

St Ralph Sherwin
Catholic Multi Academy Trust

Safeguarding and Child Protection Policy

Version 5
September 2026

One of three Catholic Multi Academy Trusts in the Diocese of Nottingham

Document Provenance

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Version 5	September 2027	Fully revised policy to meet annual review of KCSIE and all legislation issued for the new academic year. All academies – updated policy to meet local safeguarding procedures for 2026-27

'Let the wise hear and increase in learning, and the one who understands obtain guidance.' Proverbs 1:5

This policy reflects Keeping Children Safe in Education (KCSIE) September 2026 as well as other relevant national guidance and local safeguarding children policies and procedures.

The template policy has been developed to support St Ralph Sherwin Catholic Multi Academy Trust (SRSCMAT) academies in their safeguarding practice and must be tailored to reflect the individual education setting and its own internal provisions, vision, ethos and mission. Additional information should also be included to reflect the needs of learners, their parents/carers and the community in which the academy is located. Reference should also be made to the individual academy's networks with other education establishments, local and community organisations and businesses.

Note: Schools with early years provision should also ensure that relevant references to the statutory Early years foundation stage (EYFS) statutory framework are included in their safeguarding/child protection policy.

Name of Academy: St. Mary's Catholic Voluntary Academy

The policy will be reviewed annually as a minimum, unless lessons learnt or new legislation, national or local guidance suggests the need for an earlier date of review.

Mission Statement

"By working together at St Mary's School, we aim, through Jesus Christ, to share God's love, helping our community to learn, grow and make a difference."

ST RALPH SHERWIN CMAT SAFEGUARDING STATEMENT

St Ralph Sherwin Catholic Multi Academy Trust's first priority is the welfare of our children. We are committed to the highest standards in protecting and safeguarding the children entrusted to our care at all times.

In September 2026, the DfE published the revised Keeping Children Safe in Education – statutory guidance for academies and colleges. This statutory guidance contains information on what academies, including academies, should do and sets out the legal duties with which they must comply.

In law, individual academies are deemed to be 'relevant partners' of their local authority and as such are under a duty to co-operate in that local authority's Local Safeguarding Partnership arrangements. St Ralph Sherwin Catholic Multi Academy Trust ensures not only compliance at the local level but also assumes a strategic responsibility to ensure that safeguarding practice is of high quality.

The Trust has established a Leader of Safeguarding within the Central Leadership Team and a Safeguarding Lead Trust Board Director from the Trust Board to share good practice and to develop the strategic Safeguarding policies and procedures of the Trust.

We have comprehensive Safeguarding Procedures in place at each of our academies which are available to download from the websites and from the individual academies on request.

We know that some children may be the victims of neglect or physical, sexual or emotional abuse, and all our staff and volunteers receive regular training on how to recognise the signs of abuse and, by virtue of their day-to-day contact and knowledge of the children, are well placed to identify such abuse and offer support to those children.

In order to protect our children, we:

- create an atmosphere where all our children can feel secure, valued and listened to
- are able to recognise signs and symptoms of abuse
- are able to respond quickly and effectively to cases of suspected abuse
- monitor and support children at risk
- use the curriculum to raise children's awareness, build confidence and skills
- work closely with parent/carers and support external agencies
- ensure that all adults within our academies who have access to children have been checked as to their suitability via an Enhanced DBS check and other pre-employment vetting checks
- provide regular training and updates to our staff on a range of safeguarding issues.

We will endeavour to support each child by:

- encouraging self-esteem and self-assertiveness whilst not condoning aggression or bullying
- promoting a caring, safe and positive environment within our academies liaising and working together with all other support services and those agencies involved in the safeguarding of children
- notifying Children's Services via the approved mechanisms as soon as there is a significant concern
- providing continuing support to a child about whom there have been concerns and who leaves a academy by ensuring that appropriate information is forwarded under confidential cover to the child's new academy.

Anyone who is concerned about the safety or well-being of any child within the St Ralph Sherwin Catholic Multi Academy Trust should in the first instance contact the relevant Academy and ask to speak to the Designated Senior Person for Safeguarding.

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1. Introduction

1.1 This Safeguarding and Child Protection Policy outlines how the academy will safeguard and promote the welfare of children and keep learners safe from abuse, neglect and exploitation.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. All staff will adopt a child-centred approach and will consider, at all times, what is in the best interests of the child.

1.2 The policy applies to all adults working in or on behalf of the academy, including employees, volunteers, governors, Trustees, supply and agency staff, contractors, trainee teachers, peripatetic staff and visitors.

For the purposes of this policy, **a child means everyone under the age of 18**.

1.3 In accordance with Keeping Children Safe in Education 2026, safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing 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.

The academy recognises that no single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

1.4 Child protection is part of safeguarding and promoting the welfare of children. It refers to activity undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. Harm may occur inside or outside the home, including online.

1.5 We help to keep children safe by:

- providing safe environments, with secure access, where children can learn and develop;
- acting in the best interests of children and protecting them from harm both online and offline, including when receiving remote education;
- providing a robust programme of preventative education through a whole-academy approach;
- creating a culture in which children feel safe, listened to, valued and able to raise concerns;
- identifying, at the earliest opportunity, children who may benefit from **Family Help**, additional or community-based support, intensive services or specialist services;
- identifying children who may be suffering, or are likely to suffer, significant harm;
- taking timely and appropriate safeguarding action, including making referrals to those with the expertise to help where required;
- working effectively with parents, carers and partner agencies, unless doing so would place a child at increased risk;
- using robust safer recruitment processes;
- managing allegations against adults who work with children, including allegations that may meet the harm threshold and concerns which do not meet the harm threshold, known as low-level concerns;
- responding appropriately to unexplained and/or persistent absence from education;
- protecting children from risks associated with technology, including online abuse, exploitation, artificial intelligence, inappropriate content and harmful communications; and maintaining appropriate filtering and monitoring systems and processes.

1.6 We will ensure that parents/carers and partner agencies are aware of this Safeguarding and Child Protection Policy. The policy will be published on the Trust and academy websites and made available on request.

Each academy will also ensure that parents, carers, children and partner agencies know how to contact the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead(s). St. Mary's CVA will further raise awareness through the newsletter, display board in reception and at meetings with parents and carers of new pupils and at parent teacher meetings.

1.7 The academy website will also have information about how parents/children/other agencies can contact the designated safeguarding lead and their deputy/ies and include their availability during out of school hours and school holidays. The academy website will identify the Designated Safeguarding Lead and appropriate safeguarding contact arrangements.

1.8 Safeguarding and child protection policy statement

St. Mary's CVA operates a whole-academy approach and ethos to safeguarding and protecting children.

Where safeguarding is concerned, we maintain an attitude of:
"It could happen here."

We recognise that everyone in the academy has a role to play in keeping children safe. This includes:

- ensuring that children feel heard and understood;
- identifying concerns;
- exercising professional curiosity;
- sharing information appropriately;
- taking prompt action; and
- working effectively with children, families and other agencies.

Safeguarding and child protection are incorporated into all relevant aspects of academy processes, policies, curriculum development and decision-making.
All systems, processes and policies will operate with the **best interests of the child at their centre**.

Staff recognise that children may not feel ready, or know how, to tell someone that they are being abused, exploited or neglected. A child may not recognise their experience as harmful and may be embarrassed, humiliated, threatened or otherwise unable to disclose what is happening.

This must not prevent staff from exercising professional curiosity and speaking to the DSL where they have concerns about a child.

1.9 The academy will safeguard children while they are on or off academy premises and will be proactive in identifying and managing risks children may face within the wider community and online.
Each academy will consider its **local safeguarding context** and assess the risks that are particularly relevant to its children, families and community.
This will take account of information including:

- academy safeguarding records and trends;
- attendance information;
- local authority and police intelligence;
- local safeguarding partnership priorities;
- contextual safeguarding information;
- Prevent risks;
- child-on-child abuse;
- online safety risks;
- pupil voice;

- learning from local and national child safeguarding practice reviews; and
- information received from partner agencies.

Academies will identify their particular contextual safeguarding risks and the action taken to mitigate them within relevant academy risk assessments.

Due to the context of our academy, our children may be at greater risk of domestic abuse, neglect, on-line safety and radicalisation.

1.10 To protect learners, every academy will maintain an appropriate **Prevent risk assessment/action plan** in accordance with the Prevent Duty Guidance.
Academies will also participate in **Operation Encompass**, or the relevant police-led domestic abuse notification arrangements operating within their locality.
Staff will understand that domestic abuse can have a significant impact on children, including where children see, hear or experience the effects of domestic abuse.
Academies will provide appropriate preventative education through the curriculum and wider academy life to help children understand how to keep themselves and others safe, including online.
Academy-specific safeguarding initiatives and programmes may be identified within the Local Safeguarding Appendix.

1.11 The academy recognises the important role education providers play within multi-agency safeguarding arrangements and will contribute to multi-agency working in accordance with Working Together to Safeguard Children 2026.
As a relevant agency, each academy will understand and fulfil its responsibilities within the safeguarding arrangements applicable to the local authority in which it is situated.
St Ralph Sherwin Catholic Multi Academy Trust operates academies across **Derby City, Derbyshire, Nottinghamshire and Staffordshire**.
Each academy will therefore operate in accordance with the current:

- local safeguarding partnership arrangements;
- multi-agency safeguarding procedures;
- threshold or criteria-for-action guidance;
- Family Help/Early Help pathways;
- referral procedures;
- assessment protocols;
- information-sharing arrangements; and
- professional disagreement and escalation procedures applicable to its locality.

The relevant safeguarding partnership and procedures are:

- **Derby City and Derbyshire:** Derby and Derbyshire Safeguarding Children Partnership and its Policies and Procedures
- **Nottinghamshire:** Nottinghamshire Safeguarding Children Partnership and its Policy and Guidance

- **Staffordshire:** Staffordshire Safeguarding Children Partnership and its Procedures and Guidance
  Academies must ensure that they use the current local threshold, referral and assessment arrangements and must not rely upon historic versions saved locally.

1.12 To support key multi-agency safeguarding communications we have a dedicated secure safeguarding email address safeguarding@mde.srscmat.co.uk, which is accessible by at least two members of our safeguarding staff. During the academy term and in academy hours, this is checked daily. An 'out of office' message is operational during other times and in academy holidays to advise partner agencies if and how often messages will be checked/responded to and when the academy will reopen. Contact details to report safeguarding concerns will be included in the Sway e-newsletter at the end of each half term.

1.13 The academy will be aware of and implement relevant learning arising from:

- local child safeguarding practice reviews;
- national child safeguarding practice reviews;
- safeguarding partnership briefings;
- multi-agency audits;
- safeguarding quality-assurance activity;
- local thematic reviews; and
- relevant Trust safeguarding reviews and audits.

Academies should access local learning through the safeguarding partnership applicable to their locality:

- Derby and Derbyshire Safeguarding Children Partnership – Policies and Procedures
- Nottinghamshire Safeguarding Children Partnership
- Staffordshire Safeguarding Children Partnership

The academy will work collaboratively with other agencies supporting vulnerable children and families. This may include health services, school nursing, mental-health services, police, children's social care, Family Help/Early Help services, voluntary and community organisations, faith organisations and other education providers.

Context

1.14 This policy enables [name of academy] to carry out our functions to safeguard and promote the welfare of children and must be read alongside key guidance:

- Department for Education statutory guidance for schools;
- Keeping Children Safe in Education 2026;
- Working Together to Safeguard Children 2026;
- Designated teacher for looked-after and previously looked-after children;
- the Human Rights Act 1998;
- the Equality Act 2010, including the Public Sector Equality Duty;

- the Data Protection Act 2018;
- the UK General Data Protection Regulation;
- the Data (Use and Access) Act 2025;
- Department for Education Data Protection in Schools;
- Prevent Duty Guidance: England and Wales 2023;
- statutory guidance and standards relating to online safety, filtering and monitoring;
- statutory school attendance guidance;
- statutory Relationships Education, Relationships and Sex Education and Health Education guidance;
- the current Early Years Foundation Stage statutory framework, where applicable; and
- the multi-agency safeguarding procedures applicable within Derby City, Derbyshire, Nottinghamshire and Staffordshire.

The academy will have regard to changes in legislation, statutory guidance and local safeguarding arrangements and will not wait until the next annual policy review to amend practice where a change is required to safeguard children.

1.15 Safeguarding is not just about protecting children from deliberate harm, neglect, or failure to act, it relates to broader aspects of care and education. This policy therefore complements and supports a range of other academy policies, such as:

- children's health, safety and wellbeing, including mental health;
- behaviour, including bullying, cyberbullying, prejudice-based and discriminatory bullying and child-on-child abuse;
- attendance, including unexplained and/or persistent absence from education and children missing education;
- suspension and permanent exclusion;
- part-time/reduced timetables and children not receiving full-time education;
- use of reasonable force and restrictive intervention;
- special educational needs and disabilities;
- supporting pupils with medical conditions, including allergy management;
- first aid;
- educational visits;
- intimate care;
- emotional wellbeing and mental health;
- online safety;
- use of mobile phones, smart devices and technology;
- artificial intelligence and emerging technologies;
- making or sharing nudes and semi-nudes, including imagery altered or generated through artificial intelligence;
- filtering and monitoring;
- cyber security;
- safer recruitment and selection;

- the Single Central Record;
- staff behaviour/code of conduct;
- allegations against staff;
- low-level concerns;
- whistleblowing;
- acceptable use of technology and social media;
- academy security and visitors;
- visiting speakers;
- SEND;
- Relationships Education, Relationships and Sex Education and Health Education;
- Prevent;
- data protection, record keeping and retention;
- information sharing;
- communications; and
- complaints.

Where an academy has Early Years provision, it must also comply with the safeguarding and welfare requirements of the current statutory Early Years Foundation Stage framework.

The following expressions, where they appear, shall have the following meanings:

i. 'CMAT' means the Catholic Multi Academy Trust, that is the company responsible for the management of the Central Team and the Academies and, for all purposes, means the employer of staff within the Central Team and the Academies.

ii. 'Board' means the board of Directors of the CMAT who are responsible for carrying out the employment functions of the CMAT.

iii. 'Central Team' means all staff employed in the Central Office functions of the CMAT.

iv. 'Chair' means the Chair of the Board of the CMAT as appointed from time to time.

v. 'Companion' means a willing work colleague not involved in the subject matter under which the policy in being invoked, a trade union official, an accredited representative of a trade union or other professional association of which the employee is a member.

vi. 'Diocesan Education Service' means the education service provided by the diocese in which the CMAT is situated, which may also be known, or referred to, as the Diocesan School Commission.

vii. 'Directors' means directors appointed to the Board of the CMAT from time to time.

viii. 'Governor' means a member of the Local Governing Body of the School

ix. 'Headteacher' means the most senior teacher in the School who is responsible for its management and administration. Such teacher may also be referred to as the Head of School or Executive Headteacher.

x. 'Local Governing Body' means the Governors appointed from time to time to carry out specified functions in relation to the School as delegated by the CMAT.

xi. 'School' means the Academy named at the beginning of this Policy and Procedure and includes all sites upon which the Academy undertaking is, from time to time, being carried out.

xii. 'Working Day' means any day on which you would ordinarily work if you were a full-time employee. In other words, 'Working Day' will apply differently to teaching and non-teaching staff. However, part-time and full-time staff will not be treated differently for the purposes of implementing this Policy and Procedure.

2. What is abuse?

2.1 Abuse, neglect and exploitation

All staff must be aware of the **indicators of abuse, neglect, exploitation and modern slavery** and understand that children can be at risk of harm inside and outside the academy, inside and outside the home, within the community and online.

Exercising **professional curiosity** and knowing what to look for are vital to the early identification of abuse, neglect and exploitation so that children who may need help or protection can be identified at the earliest opportunity.

Abuse is a form of maltreatment of a child. A child may be abused or neglected through the infliction of harm or through a failure to act to prevent harm. Harm can include ill-treatment that is not physical, as well as the impact of seeing, hearing or experiencing the effects of the ill-treatment of others. This is particularly relevant to children who experience the effects of domestic abuse.

Children may be abused:

- within their family;
- within an institutional, academy or community setting;
- by people known to them;
- more rarely, by people unknown to them;
- by an adult or adults;
- by another child or children; and
- wholly online, or through the use of technology to facilitate offline abuse.

Children may also cause harm to parents, carers or other family members. This may be referred to as **child-to-parent or child-to-caregiver abuse** and should be considered within an appropriate safeguarding response.

The four broad categories of abuse are:

Physical abuse – a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical

harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse – the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Emotional abuse may include persistent criticism, belittling or name-calling; conveying to a child that they are worthless, unloved or inadequate; silencing them or preventing them from expressing their views; imposing inappropriate expectations; overprotection; serious bullying, including cyberbullying; causing a child frequently to feel frightened or in danger; or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment, although it may occur alone.

Sexual abuse – forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening and whether or not physical violence is involved. Sexual abuse may involve physical contact or non-contact activities, including involving children in looking at or producing sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse. Sexual abuse can take place online and technology may be used to facilitate offline abuse. Sexual abuse may be perpetrated by adults of any gender and by other children.

Neglect – the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. Neglect may include failing to provide adequate food, clothing or shelter; failing to protect a child from physical or emotional harm or danger; inadequate supervision; failing to ensure access to appropriate medical care or treatment; or being unresponsive to a child's basic emotional needs. Neglect may also occur during pregnancy, for example as a result of substance misuse.

2.2 **Recognising safeguarding concerns**

All staff must understand that **abuse, neglect, exploitation and safeguarding concerns are rarely standalone events** and cannot always be covered by a single definition or label. In many cases, different forms of harm will overlap.

The following behaviours and indicators may be signs that a child is at risk of harm:

- drug taking and/or alcohol misuse;
- unexplained and/or persistent absence from education;
- serious violence;
- criminal exploitation, including exploitation associated with county lines;
- sexual exploitation;
- modern slavery and trafficking;
- radicalisation into terrorism; and
- consensual or non-consensual making or sharing of nudes or semi-nudes.

Staff must remain alert to changes in a child's behaviour, presentation, emotional wellbeing, relationships, attendance or engagement with education and should consider the possibility that these may indicate an underlying safeguarding concern.

A child does not need to make a disclosure before safeguarding action is taken. Staff must exercise professional curiosity and discuss any concerns with the Designated Safeguarding Lead (DSL) or a Deputy DSL.

2.3 **Extra-familial harm**

All staff, and particularly the DSL and Deputy DSLs, must consider whether a child is at risk of abuse or exploitation in situations **outside their family**.

Extra-familial harm can take many forms and children may experience several forms of harm at the same time. These may include:

- sexual abuse, sexual harassment and sexual exploitation;
- child criminal exploitation, including **financial exploitation**;
- county lines;
- modern slavery and trafficking;
- serious youth violence;
- gang-related activity;
- radicalisation into terrorism;
- abuse within children's own intimate relationships, sometimes referred to as teenage relationship abuse, including physical, sexual and emotional abuse, coercive or controlling behaviour and stalking; and
- harm facilitated or amplified through technology and social media.

The academy recognises that the individuals or groups who exploit children may be outside the home and that safeguarding responses must therefore consider the wider contexts and relationships in which children live their lives.

2.4 **Safeguarding issues and specific forms of harm**

Safeguarding action may be required to protect children from a wide range of risks. These include abuse perpetrated by adults and abuse or harmful behaviour perpetrated by other children.

Staff must be alert to, but not limited to:

- physical abuse;
- emotional abuse;
- sexual abuse;
- neglect;

- child-on-child abuse, including harassment and violence;
- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- racist, disablist, homophobic, biphobic or transphobic abuse and other discriminatory harm;
- misogynistic and misandrist behaviour and abuse;
- gender-based violence and violence against women and girls;
- harmful sexual behaviour;
- sexual violence and sexual harassment between children;
- online sexual harassment and online sexual abuse;
- consensual and non-consensual making or sharing of nudes and semi-nudes;
- coercing or pressuring another child to create or share sexual images;
- sharing abusive sexual images or pornography with children who do not wish to receive it;
- **upskirting**;
- abuse within intimate personal relationships between children;
- domestic abuse, including the impact on children who see, hear or experience its effects;
- child sexual exploitation;
- child criminal exploitation, including county lines and financial exploitation;
- modern slavery and trafficking;
- gang-related activity and serious youth violence;
- radicalisation into terrorism;
- substance misuse, including drugs and alcohol;
- risks associated with technology and social media, including grooming, exploitation, harmful or inappropriate content and abuse occurring concurrently online and offline;
- female genital mutilation (FGM);
- forced marriage;
- marriage or civil partnership involving a person under the age of 18;
- virginity testing and hymenoplasty;
- so-called **honour or faith-based abuse**;
- illness fabricated or induced in a child, including concerns arising from perplexing presentations;
- homelessness;
- private fostering;
- child-to-parent or child-to-caregiver abuse; and
- any other circumstance or behaviour which may place a child at risk of harm.

This list is not exhaustive. Staff must consider the individual child, their circumstances and lived experience and must not dismiss a concern simply because it does not fit neatly within a particular category of abuse.

2.5 Child-on-child and online abuse

All staff must recognise that **children can abuse other children** and that this can happen inside or outside the academy and online.

Technology is a significant component of many safeguarding and wellbeing issues. Abuse may take place face-to-face, wholly online, or concurrently online and offline.

Online child-on-child abuse can include:

- abusive, threatening or harassing communications;
- misogynistic or misandrist messages;
- online sexual harassment;
- non-consensual making or sharing of nudes or semi-nudes;
- sharing abusive images or pornography with another child who does not wish to receive them;
- sexualised bullying;
- coercion or exploitation;
- abuse facilitated through social media, messaging services, online games or other digital platforms; and
- the manipulation, generation or sharing of sexual or abusive imagery using artificial intelligence or other technologies.

All staff must understand the academy's procedures for preventing and responding to child-on-child abuse. Concerns must never be dismissed as "banter", "having a laugh", "part of growing up" or simply children falling out.

Child-on-child abuse, including sexual violence, sexual harassment and harmful sexual behaviour, is addressed in greater detail in **Section 7 of this policy**.

2.6 Upskirting

Upskirting is a criminal offence. It typically involves taking an image under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or to cause humiliation, distress or alarm.

Any concern regarding upskirting must be treated as a safeguarding concern and reported immediately in accordance with the academy's safeguarding procedures.

2.7 Responding to concerns

Staff do not need to determine what type of abuse may have occurred before raising a concern.

Where a member of staff:

- has a safeguarding concern about a child;
- observes an indicator of abuse, neglect or exploitation;
- receives information that causes concern;
- notices a pattern or change which may indicate harm; or
- is unsure whether something constitutes a safeguarding concern,

they must speak to the **Designated Safeguarding Lead or a Deputy DSL without delay** and follow the academy's safeguarding procedures.

Where a child makes a disclosure, staff must listen carefully, take the child seriously, reassure them that they have done the right thing by speaking out and explain what will happen next. Staff must never promise confidentiality.

2.8 Further guidance

Further information about the indicators of abuse, neglect and exploitation and specific safeguarding issues is contained within:

- Keeping Children Safe in Education 2026; and
- Working Together to Safeguard Children 2026.

All staff are expected to understand the safeguarding information relevant to their role and to undertake safeguarding training and updates in accordance with this policy.

If staff are unsure about the welfare or safety of a child, **they should always speak to the DSL or a Deputy DSL**.

3. What is a Low Level Concern?

Staff induction

3.1 All staff, governors and Trustees will receive an induction appropriate to their role. This will include the Trust and academy's Catholic mission, vision and ethos, safeguarding culture, expectations of professional conduct and clear information about behaviour which is considered acceptable and unacceptable.

New staff will receive information about the systems within the academy which support safeguarding, including online safety, and will be provided with or given access to relevant policies and procedures. This will include:

- this Safeguarding and Child Protection Policy, including the academy's approach to child-on-child abuse;
- the academy Behaviour Policy, including measures to prevent and respond to bullying, cyberbullying and prejudice-based and discriminatory bullying;
- the Staff Behaviour/Code of Conduct Policy, including:
    - acceptable use of technology, mobile and smart devices;
    - staff use of social media and electronic communication;
    - appropriate staff/child relationships and professional boundaries;
    - filtering and monitoring arrangements and staff responsibilities in relation to these;
    - artificial intelligence and emerging technologies;
    - low-level concerns;
    - allegations against staff; and
    - whistleblowing;

- the academy Attendance Policy and the safeguarding response to children who are absent from education, particularly where absence is unexplained and/or persistent;
- the academy's safeguarding response to child-on-child abuse;
- the role and identity of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead(s);
- the identity of the Designated Teacher for looked-after and previously looked-after children;
- the academy's safeguarding governor;
- relevant information about the Senior Mental Health Lead and other staff with specific safeguarding responsibilities; and
- the academy's arrangements for reporting safeguarding concerns, including how concerns are recorded.

3.2 **Keeping Children Safe in Education**

All staff will receive a paper or electronic copy of, or have ready access to, **Part One of** Keeping Children Safe in Education 2026.

All staff must read and understand Part One.

The Trust and its academies will have appropriate mechanisms in place to confirm that staff have read and understood the guidance.

The Department for Education's *Part One: overview for all staff* may be used as an additional quick-reference resource but does **not** replace the requirement to read Part One in full.

Academy leaders, including Headteachers, relevant senior leaders, DSLs and Deputy DSLs, governors and Trustees, will read those sections of KCSIE 2026 necessary to understand and discharge their safeguarding responsibilities. DSLs and Deputy DSLs must have appropriate knowledge of the guidance as a whole and, in particular, the responsibilities set out for the DSL.

Staff will be supported to understand KCSIE and this policy in a way appropriate to their role, including where staff require reasonable adjustments, additional explanation or alternative formats.

3.3 **Responsibilities of all staff**

All staff will be aware of:

- the academy's systems which support safeguarding;
- the role and identity of the DSL and Deputy DSL(s);

- the safeguarding response to children who are absent from education, particularly where absence is unexplained and/or persistent;
- the academy's approach to child-on-child abuse;
- **Operation Encompass**, or the equivalent police-led domestic abuse notification arrangements applicable within the academy's locality;
- the **Family Help** process and the role they may be expected to play in identifying emerging need and supporting children and families;
- the process for making referrals to local authority children's social care;
- the statutory assessments that may follow a referral and the role education professionals may play in those assessments;
- the importance of early and appropriate information sharing;
- the academy's procedures for reporting concerns about adults who work with children; and
- the academy's whistleblowing procedures.

All staff will:

- know what to do if a child tells them that they are being abused, neglected or exploited;
- know how to respond in a way which reassures the child that they are being taken seriously, will be supported and will be kept safe;
- never promise a child confidentiality where a safeguarding concern has been disclosed;
- know what to do if a child makes, shares or receives a nude or semi-nude image or other sexual communication, including imagery created or manipulated using artificial intelligence;
- know what to do if a parent, carer or other person raises concerns about a child;
- exercise professional curiosity and remain alert to indicators of abuse, neglect, exploitation and modern slavery;
- understand that children can be at risk of harm inside and outside the home, inside and outside the academy, within the community and online;
- understand that children may experience extra-familial harm;
- recognise that children can abuse other children and understand the academy's procedures for preventing and responding to child-on-child abuse;
- understand that abuse, neglect and exploitation are rarely standalone events and that multiple safeguarding issues may overlap;
- report safeguarding concerns promptly in accordance with academy procedures; and
- speak to the DSL or a Deputy DSL whenever they are unsure about the safety or welfare of a child.

Staff must understand that children may not feel ready, or know how, to tell someone that they are being abused, neglected or exploited. A child may not recognise their experiences as harmful and may be embarrassed, humiliated, threatened or otherwise unable to disclose what is happening.

This must not prevent staff from exercising professional curiosity and speaking to the DSL where they have concerns.

3.4 Children who may benefit from Family Help or require additional safeguarding support

All staff should be prepared to identify children who may benefit from **Family Help**.

Staff should be particularly alert to the potential need for help and support for a child who:

- is disabled or has particular additional needs;
- has special educational needs, whether or not they have a statutory Education, Health and Care Plan;
- has a mental health need;
- is a young carer;
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing or going missing from education, home or care;
- has experienced multiple suspensions, is at risk of permanent exclusion or is accessing alternative provision;
- is at risk of modern slavery, trafficking, sexual exploitation or criminal exploitation;
- is at risk of being radicalised into terrorism;
- has a parent or carer in custody or is affected by parental offending;
- is in circumstances presenting challenges for the child, including substance misuse, adult mental-health problems or domestic abuse;
- is at risk of so-called honour-based abuse, including FGM or forced marriage;
- is privately fostered;
- is persistently absent from education;
- is experiencing homelessness or insecure housing; or
- has other circumstances which may increase vulnerability or create barriers to accessing help.

This list is not exhaustive. Staff must consider the individual child's circumstances and lived experience.

3.5 Children with additional vulnerabilities

All staff will recognise that some children face additional safeguarding challenges and barriers to the recognition or disclosure of abuse.

Children with special educational needs and/or disabilities, including children with neurodevelopmental conditions such as autism and children with certain medical or physical health conditions, may be particularly vulnerable to abuse, neglect and exploitation both online and offline.

Additional barriers can include:

- assumptions that indicators of possible abuse relate to the child's disability or additional need;
- communication barriers or difficulties;
- children being disproportionately affected by bullying without outwardly showing signs;
- difficulties in recognising, understanding or reporting abuse; and
- cognitive understanding, including difficulties understanding the difference between fact and fiction in online content.

The DSL and SENCO will work closely together where there are safeguarding concerns involving a child with SEND.

Staff will also recognise the potential additional vulnerabilities of:

- children who have or have had a social worker;
- looked-after and previously looked-after children;
- children in kinship care arrangements;
- children who are absent or missing from education;
- children who are electively home educated;
- children accessing alternative provision;
- children requiring mental-health support;
- children affected by domestic abuse;
- young carers;
- children experiencing exploitation;
- children at risk of serious violence;
- children who may be susceptible to radicalisation into terrorism; and
- children who may face bullying, discrimination or additional barriers because of their individual characteristics or circumstances.

Mental-health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff should also recognise that behaviour which is challenging, distressed or significantly different from a child's usual presentation may be an indication that the child is experiencing harm or trauma.

3.6 Specific safeguarding responsibilities of staff

All staff will:

- have the skills, knowledge and understanding appropriate to their role to safeguard looked-after and previously looked-after children;
- understand the importance of the **"one chance" rule** in relation to forced marriage and so-called honour-based abuse;
- be alert to indicators that a child may be susceptible to radicalisation into terrorism;
- be alert to indicators which may signal that a child is at risk from, or involved in, serious violence;
- discuss and report concerns about a child to the DSL or Deputy DSL without delay;
- work with the DSL and support children's social care and other safeguarding partners in carrying out assessments where required; and
- understand that early information sharing is vital to identifying and tackling abuse, neglect and exploitation and promoting children's welfare, including their educational outcomes.

Staff must speak to the DSL or Deputy DSL regarding concerns about so-called honour-based abuse, including female genital mutilation (FGM), forced marriage, breast ironing, virginity testing or hymenoplasty.

Teachers must understand their **specific legal duty to report to the police known cases of FGM in girls under 18**, in accordance with statutory requirements.

Virginity testing and hymenoplasty are illegal in the United Kingdom.

Governors, Trustees and the management of safeguarding

3.7

In accordance with Keeping Children Safe in Education 2026, the Trust Board has strategic leadership responsibility for safeguarding arrangements across the Trust and must ensure that the Trust and its academies comply with their duties under legislation and statutory guidance.

The Trust Board will ensure that safeguarding policies, procedures and training are effective and comply with the law at all times.

A **senior board-level lead** will take leadership responsibility for the Trust's safeguarding arrangements.

The Trust Board will ensure that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of Trust and academy process and policy development.

3.8 Trust safeguarding governance and assurance

The Trust Board will assure itself that safeguarding arrangements across the Trust are effective through a proportionate programme of oversight, challenge and quality assurance.

This will include:

- regular safeguarding reporting to Trustees;
- academy safeguarding self-evaluation and audit;
- scrutiny of statutory safeguarding compliance;
- Trust safeguarding reviews and visits;
- review of safeguarding themes, trends and risks;
- oversight of safer recruitment and Single Central Record compliance;
- oversight of online safety, filtering and monitoring;
- consideration of safeguarding training and DSL capacity;
- learning from serious incidents and local or national child safeguarding practice reviews; and
- appropriate challenge where safeguarding standards require improvement.

Safeguarding will be considered regularly by Local Governing Bodies and relevant Trust committees, with appropriate evidence of oversight and challenge recorded.

Each academy will complete the safeguarding audit/self-evaluation required by the Trust and any relevant statutory or local safeguarding arrangements. Findings will inform academy and Trust safeguarding improvement activity.

3.9 Multi-agency and local safeguarding arrangements

The Trust Board, Central Team, Local Governing Bodies, Headteachers and DSLs will understand and have regard to the safeguarding arrangements applicable to the locality in which each academy operates.

St Ralph Sherwin Catholic Multi Academy Trust operates academies across **Derby City, Derbyshire, Nottinghamshire and Staffordshire**.

Each academy must therefore understand and apply the current:

- safeguarding partnership arrangements;
- threshold or criteria-for-action guidance;
- Family Help/Early Help pathways;
- local referral arrangements;
- assessment protocols;
- information-sharing procedures;
- professional disagreement and escalation procedures; and
- child protection procedures applicable within its local authority area.

The academy will cooperate with local authority children's social care, safeguarding partners and other relevant agencies and will supply information reasonably requested to enable those agencies to discharge their safeguarding functions, including activity relating to local and national child safeguarding practice reviews.

Academy-specific arrangements and relevant local links will be contained within the **Local Safeguarding Appendix**.

Headteacher

3.10

The Headteacher/Executive Headteacher is responsible for ensuring that the safeguarding policies and procedures adopted by the Trust Board are fully implemented and followed by all staff.

The Headteacher will work closely with the DSL, Deputy DSL(s), senior leaders and the Local Governing Body to ensure the effectiveness of safeguarding arrangements within the academy.

The Headteacher will ensure that:

- safeguarding is embedded within the culture and day-to-day operation of the academy;
- sufficient time, funding, training, resources and support are available to enable the DSL and Deputy DSL(s) to fulfil their responsibilities effectively;
- staff understand their safeguarding responsibilities;
- appropriate safeguarding training and induction take place;
- safeguarding concerns are responded to appropriately;
- safer recruitment requirements are followed;
- appropriate filtering and monitoring arrangements are in place;
- attendance is understood as a safeguarding matter;

- the educational outcomes of children who have or have had a social worker are promoted; and
- the academy engages appropriately with the Trust's safeguarding quality-assurance arrangements.

Designated Safeguarding Lead and Deputy Designated Safeguarding Lead

3.11

Each academy will appoint an appropriate senior member of the academy leadership team as its **Designated Safeguarding Lead (DSL)**.

The DSL has lead responsibility for safeguarding and child protection, including:

- online safety;
- understanding the filtering and monitoring systems and processes in place;
- safeguarding information management;
- referrals and multi-agency working;
- supporting staff with safeguarding concerns;
- promoting the educational outcomes of children who have or have had a social worker; and
- ensuring that safeguarding practice reflects KCSIE and relevant local multi-agency procedures.

The DSL's responsibilities will be explicit within their job description.

3.12

The DSL will coordinate the academy's safeguarding and child protection arrangements and provide advice, support and expertise to staff on child welfare, safeguarding and child protection matters.

The DSL will:

- take lead responsibility for safeguarding and child protection;
- support staff in deciding whether and how to make safeguarding referrals;
- make or oversee referrals to children's social care, the police, Prevent/Channel and other agencies where appropriate;
- participate in strategy discussions and inter-agency meetings, or support other staff to do so;
- contribute to assessments of children;
- oversee appropriate responses to Operation Encompass notifications;
- maintain effective safeguarding records;

- ensure safeguarding information is transferred appropriately when children move education settings;
- work closely with the SENCO, Designated Teacher, attendance leads, pastoral staff, Senior Mental Health Lead and IT/digital leads; and
- maintain appropriate liaison with children's social care and other safeguarding partners.

3.13

Each academy will appoint one or more appropriately trained **Deputy Designated Safeguarding Leads**.

Deputy DSLs will be trained to the same standard as the DSL and may carry out delegated activities of the DSL.

The **ultimate lead responsibility for safeguarding and child protection remains with the DSL and must not be delegated**.

3.14

During academy hours, the DSL or a Deputy DSL will always be available for staff to discuss safeguarding concerns.

Ordinarily, this availability will be in person. In exceptional circumstances, availability by telephone or other secure communication may be appropriate.

Each academy will establish appropriate safeguarding arrangements for:

- educational visits;
- residential visits;
- before- and after-school provision;
- academy-organised activities outside normal academy hours; and
- periods of academy closure where safeguarding communication arrangements are required.

These arrangements will be identified within the academy's Local Safeguarding Appendix where appropriate.

3.15

The DSL and Deputy DSL(s) will be provided with sufficient:

- time;
- funding;
- training;
- resources; and
- support

to fulfil their safeguarding responsibilities effectively.

The DSL's role and responsibilities are set out in Keeping Children Safe in Education 2026.

The Trust expects DSLs and Deputy DSLs to work collaboratively through the Trust's safeguarding structures and to participate in Trust safeguarding training, networks, quality assurance and professional development.

Safeguarding training

3.16

All staff will receive safeguarding and child protection training, including online safety, at induction.

Training will be regularly updated and will be appropriate to staff members' roles and responsibilities.

All staff will also receive safeguarding and child protection updates, including online safety, **at least annually**, and more frequently where required, to provide them with relevant skills and knowledge to safeguard children effectively.

Training and updates will include, as appropriate:

- abuse, neglect, exploitation and modern slavery;
- professional curiosity;
- Family Help;
- child-on-child abuse;
- sexual violence and sexual harassment;
- sharing nudes and semi-nudes, including imagery created or manipulated using AI;
- domestic abuse and Operation Encompass;
- Prevent and radicalisation into terrorism;
- attendance and children absent from education;
- online safety;
- artificial intelligence and emerging technology;
- filtering and monitoring;
- information sharing;
- local safeguarding procedures; and
- emerging local and national safeguarding risks.

Relevant staff will understand the Department for Education's guidance on sharing nudes and semi-nudes.

3.17 Attendance training

All staff will receive appropriate training and information about the relationship between attendance and safeguarding.

Staff with a specified attendance function, including relevant administrative, pastoral, family-support and senior leadership staff, will receive dedicated attendance training appropriate to their responsibilities.

Staff will understand the safeguarding significance of unexplained and/or persistent absence and the importance of identifying and responding to patterns of absence at the earliest opportunity.

3.18 Data protection and cyber security training

All staff will receive appropriate training in data protection, safeguarding record keeping and cyber security.

DSLs will receive **in-depth data protection training appropriate to their safeguarding responsibilities**, including the lawful sharing, storage, retention and transfer of safeguarding information.

Staff will understand that data protection law does not prevent the sharing of information for the purposes of keeping children safe.

3.19 Governor and Trustee safeguarding training

Governors and Trustees will receive safeguarding and child protection training at induction.

Training will be regularly updated and will equip governors and Trustees with the knowledge necessary to provide appropriate strategic challenge and assure themselves that safeguarding policies, processes and procedures across the Trust and its academies are effective and robust.

Training will support governors and Trustees to understand:

- their strategic safeguarding responsibilities;
- KCSIE requirements;
- safer recruitment;
- child-on-child abuse;
- online safety;
- filtering and monitoring;
- Prevent;
- attendance as a safeguarding matter;
- local safeguarding arrangements; and
- how to test and assure themselves that a whole-academy approach to safeguarding is operating effectively.

3.20 Safer recruitment training

Those involved in the recruitment and selection of staff to work with children will receive appropriate safer recruitment training.

The Trust will ensure that recruitment panels include appropriately trained individuals in accordance with statutory requirements and Trust safer recruitment procedures.

4. Key Safeguarding Concerns

Key Local Safeguarding Contacts

Each academy must ensure that it uses the safeguarding arrangements and referral pathways applicable to the local authority in which it is situated. Local procedures and contact details should be reviewed at least annually and whenever the relevant local authority or safeguarding partnership publishes revised arrangements.

In an emergency where a child is at immediate risk of serious harm, contact the **Police on 999**.

Local Safeguarding Contacts

Safeguarding Service	Derby City	Derbyshire
Family Help / Early Help advice	Refer to current Derby City Family Help/Early Help and locality arrangements.	**Starting Point Consultation and Advice Service for Professionals:** 01629 535353.
Children's Social Care – safeguarding referral	**First Contact Team:** 01332 641172. Non-urgent concerns may also be submitted through Derby City Council's online reporting system.	**Starting Point / Call Derbyshire:** 01629 533190 where there is a child protection concern or risk of significant harm.
Professional consultation / threshold advice	Contact Derby City First Contact Team on **01332 641172** for safeguarding advice where required.	**Starting Point professional consultation:** 01629 535353, Monday–Friday, 10am–4pm.
Out-of-hours Children's Social Care	**Derby City Careline:** 01332 956607 for professionals; 01332 956606 for members of the public.	**Call Derbyshire / Starting Point:** 01629 533190. This number provides access to relevant out-of-

Safeguarding Service	Derby City	Derbyshire
		hours social care arrangements.
Local Authority Designated Officer (LADO)	Follow the current Derby City / Derby and Derbyshire Safeguarding Children Partnership allegations-management procedure and LADO referral route.	Follow the current Derbyshire / Derby and Derbyshire Safeguarding Children Partnership LADO referral procedure.
Police	**Emergency:** 999. **Non-emergency:** 101.	**Emergency:** 999. **Non-emergency:** 101.
Prevent / concerns about radicalisation	Contact Derby Prevent Team through the current Derby City Prevent arrangements. **Prevent email:** Prevent@derby.gov.uk. Immediate risk: 999.	Follow the current Derbyshire Prevent / Channel referral pathway. Advice may also be sought through Police on 101 where appropriate.
Female Genital Mutilation – mandatory reporting by teachers	Known cases of FGM in girls under 18 must be reported directly to the Police on **101**.	Known cases of FGM in girls under 18 must be reported directly to the Police on **101**.
Children Missing Education (CME)	Refer through Derby City Council's current Children Missing Education arrangements and CME referral process.	Refer through Derbyshire County Council's current Children Missing Education arrangements.
Virtual School	Refer to the current Derby City Virtual School contact arrangements.	Refer to the current Derbyshire Virtual School contact arrangements.
Domestic Abuse / Operation Encompass	The academy will participate in **Operation Encompass** and use current Derby City domestic-abuse support arrangements.	The academy will participate in **Operation Encompass** and use current Derbyshire domestic-abuse support arrangements.
Mental health and emotional wellbeing	Refer to the current Derby City/Derby and Derbyshire children and young people's emotional-health and mental-	Refer to the current Derbyshire children and young people's emotional-health and mental-health

Safeguarding Service	Derby City	Derbyshire
	health pathway and academy MHST arrangements.	pathway and academy MHST arrangements.
Homelessness / housing insecurity	Contact Derby City Council Housing Options where appropriate. Where homelessness creates a safeguarding concern, follow Children's Social Care/Family Help procedures.	Contact the relevant district or borough housing authority for the child's home address. Where homelessness creates a safeguarding concern, follow Children's Social Care/Family Help procedures.

Key National Safeguarding Contacts

Organisation / Service	Contact Details / Purpose
NSPCC Helpline	**0808 800 5000.** Advice for adults who are concerned about the safety or welfare of a child.
NSPCC Report Abuse in Education Helpline	**0800 136 663.** Support for children and young people who have experienced abuse in an education setting and for concerned adults and professionals.
NSPCC Whistleblowing Advice Line	**0800 028 0285.** Advice for professionals concerned about how safeguarding or child-protection matters are being handled within their organisation.
Childline	**0800 1111.** Free confidential support for children and young people.
UK Safer Internet Centre – Professionals Online Safety Helpline	helpline@saferinternet.org.uk. Advice for professionals working with children and young people on online-safety issues.
CEOP	National reporting route for concerns about online sexual abuse, exploitation or inappropriate sexual communication with a child.
Report Harmful Content	UK Safer Internet Centre service supporting the reporting of harmful online content where platform reporting routes have not resolved the concern.
Anti-Terrorist Hotline	**0800 789 321.** For concerns relating to possible terrorist activity. In an emergency call **999**.
ACT Early	**0800 011 3764.** Advice where there are concerns that someone may be vulnerable to radicalisation.

Organisation / Service	Contact Details / Purpose
National Domestic Abuse Helpline	**0808 2000 247.** National domestic-abuse support service delivered by Refuge.
Operation Encompass	National police and education partnership enabling schools to receive timely information when a child has experienced a domestic-abuse incident.
Stop It Now!	**0808 1000 900.** Advice where there are concerns about a child or adult's sexual behaviour.

Academy-specific contacts

Each academy's **Local Safeguarding Appendix** should additionally identify:

Role / Service	Academy-specific information
Designated Safeguarding Lead	Gill Novak-Lemmings gnovaklemmings@mde.srscmat.co.uk
Deputy Designated Safeguarding Lead(s)	Denise Andrews dandrews@mde.srscmat.co.uk Philippa Brentnall Pbrentnall@mde.srscmat.co.uk
Safeguarding Governor	[Insert name and academy contact details]
Attendance Lead	Denise Andrews dandrews@mde.srscmat.co.uk
SENCO	Philippa Brentnall Pbrentnall@mde.srscmat.co.uk
Designated Teacher for Looked-After and Previously Looked-After Children	Gill Novak-Lemmings gnovaklemmings@mde.srscmat.co.uk
Senior Mental Health Lead	Philippa Brentnall Pbrentnall@mde.srscmat.co.uk
Local Family Help / Early Help contact	Early Help Advisors **Locality 1 & 5** • Areas: Derwent, Chaddesden, Spondon, Oakwood, Mackworth, Allestree, Darley • Email: *vcm1and5@derby.gov.uk* **Phone:** 01332 208175
Local Virtual School contact	Virtual School Head - 07812 301044 or graeme.ferguson@derby.gov.uk **Specialist Education Support Officer for LAC** Kate Harm – Specialist Education Officer kate.harm@derby.gov.uk 01332 641439

Role / Service	Academy-specific information
	Catherine Ward catherine.ward@derby.gov.uk 01332 640346 Nina McNelis nina.mcnelis@derby.gov.uk 01332 956459 Sarah Parkman – sarah.parkman@derby.gov.uk 01332 640347 Susannah Beadle susannah.beadle@derby.gov.uk 01332 642385 Genevieve McCaskill – genevieve.mccaskill@derby.gov.uk 07741 091375
Mental Health Support Team / local emotional-wellbeing service	Compass, Bridge the Gap, Build Sound Minds, CAMHS Specialist Community Advisors, Derby and Derbyshire Mental Health Pathway Guidance
School nurse / public-health nursing service	Nursing Team Support 0300 1234586 (Option 1)
Local police / Safer Neighbourhood Team	999 for emergencies or 101 for non-emergencies Mandatory reporting of Female Genital Mutilation (FGM) via 101 Academy Police Safer neighbourhood team
Academy safeguarding email address	safeguarding@mde.srscmat.co.uk

5. Ensuring a safe environment for all children

5.1 Our academy provides a safe, secure and supportive environment in which children can learn, develop and flourish. This forms an essential part of our whole-academy approach to safeguarding.

We maintain a culture of vigilance in which:

- safeguarding and promoting children's welfare is everyone's responsibility;
- children are listened to and taken seriously;
- staff exercise professional curiosity;
- emerging needs are identified at the earliest opportunity;
- timely and appropriate action is taken where children may need Family Help or other support;
- concerns about abuse, neglect or exploitation are acted upon without delay; and
- safeguarding arrangements operate with the best interests of the child at their centre.

The academy maintains an attitude of **"it could happen here"**.

5.2 The academy will provide an environment which protects children from harm and reduces opportunities for abuse, neglect and exploitation.
Positive, respectful behaviour and healthy relationships will be consistently promoted. Abusive, discriminatory, sexualised, intimidating or otherwise harmful behaviour will be challenged and responded to appropriately.

The academy will seek to create an environment in which every child feels:

- safe and protected;
- valued and respected;
- listened to and understood;
- able to identify trusted adults;
- confident to raise concerns; and
- confident that concerns will be taken seriously and acted upon.

5.3 Children who may be particularly vulnerable

The academy recognises that some children may face additional safeguarding challenges and that some circumstances can create additional barriers to recognising or disclosing abuse, neglect or exploitation.

The academy will give particular consideration to the needs of the following children.

Children who have or have had a social worker

When a child has or has had a social worker, the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

The academy recognises that adversity and trauma can have a lasting impact on children's attendance, learning, behaviour and mental health.

The academy will work with children's social care, the Virtual School Head and other relevant professionals as appropriate to promote the educational outcomes of children who have or have had a social worker.

Children who are absent from education

The academy recognises that attendance is a safeguarding matter and that children being absent from education, particularly where absence is unexplained and/or persistent, can be an important warning sign of safeguarding concerns.

Absence may be associated with abuse, neglect or exploitation, including:

- sexual exploitation;
- criminal exploitation;
- county lines;
- modern slavery and trafficking;

- serious violence;
- mental-health difficulties;
- domestic abuse;
- neglect;
- harmful family circumstances; and
- the risk of travelling to conflict zones, FGM or forced marriage.

The academy will take a **support-first approach** to attendance and will seek to identify and understand barriers to attendance at the earliest opportunity.

We will:

- build strong and trusting relationships with children and families;
- listen to and understand barriers to attendance;
- analyse attendance and absence patterns;
- respond promptly to unexplained absence;
- provide appropriate support to improve attendance;
- consider whether absence indicates a safeguarding concern;
- share information appropriately; and
- work collaboratively with the relevant local authority, children's social care and other agencies.

The academy will comply with current statutory school attendance guidance and the Children Missing Education requirements applicable to its locality.

Children not receiving full-time education

The academy recognises that children who are not attending school full time may be particularly vulnerable because they have reduced access to the protective environment and opportunities provided by education.

This includes children:

- on temporary part-time/reduced timetables;
- who have been suspended;
- who are at risk of permanent exclusion;
- who have been permanently excluded;
- accessing alternative provision; or
- otherwise not receiving their full educational entitlement.

Any decision affecting a child's access to education will have regard to the child's best interests and safeguarding needs.

The academy will pay particular attention to children who have a social worker, looked-after and previously looked-after children, children with SEND and other children known to be vulnerable.

Part-time/reduced timetables will only be used in exceptional circumstances and in accordance with current statutory and relevant local authority guidance.

Elective Home Education

Where a parent or carer expresses an intention to remove a child from the academy with a view to educating them at home, the academy will work with the family and relevant local authority in accordance with statutory requirements.

Where possible and appropriate, the academy will seek to coordinate a meeting with parents/carers and relevant professionals before the child is removed from roll.

This is particularly important where a child:

- has SEND;
- has an Education, Health and Care Plan;
- has or has had a social worker;
- is looked after;
- has significant attendance concerns; or
- is otherwise considered vulnerable.

The academy will inform the relevant local authority when a child is removed from the admission register in accordance with statutory requirements.

Children who require mental-health support

The academy recognises the important role education plays in supporting children's mental health and emotional wellbeing.

Mental-health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should diagnose mental-health conditions. However, academy staff are well placed to observe children and identify behaviour or presentation that may suggest a child is experiencing a mental-health difficulty or may require additional support.

The academy will maintain appropriate systems for:

- promoting emotional wellbeing and resilience;
- identifying emerging concerns;
- providing pastoral support;
- making appropriate referrals;
- working with parents/carers; and
- seeking support from specialist services where required.

Where a mental-health concern is also a safeguarding concern, immediate action will be taken in accordance with this policy and the DSL will be informed.

Looked-after and previously looked-after children

The academy recognises that looked-after and previously looked-after children may be particularly vulnerable.

Appropriate staff will have access to information necessary to safeguard and support a looked-after child, including, as relevant:

- their legal status;

- care arrangements;
- contact arrangements;
- the level of authority delegated to carers;
- the identity of the child's social worker;
- relevant Virtual School contact details; and
- where applicable, details of the child's Personal Adviser.

The academy will appoint a **Designated Teacher for Looked-After and Previously Looked-After Children** who has appropriate training and the necessary knowledge and experience to fulfil the role.

The Designated Teacher will work with the relevant Virtual School Head to promote the educational achievement of looked-after and previously looked-after children.

Children with SEND or health conditions

Children with special educational needs and/or disabilities, neurodevelopmental conditions such as autism, and certain medical or physical health conditions can face additional safeguarding challenges both online and offline.

These may include:

- assumptions that indicators of possible abuse relate to the child's disability or condition;
- communication barriers;
- difficulties recognising or reporting abuse;
- being disproportionately affected by bullying or child-on-child abuse;
- cognitive difficulties affecting understanding of online content or relationships; and
- additional dependency on adults for care or support.

The DSL and SENCO will work closely together where there are safeguarding concerns about a child with SEND.

The academy will consider whether additional pastoral support, communication support or reasonable adjustments are required.

Children who are lesbian, gay, bisexual or gender questioning

The fact that a child may be lesbian, gay, bisexual or gender questioning is **not in itself an inherent safeguarding risk**.

However, these children can sometimes be targeted by other children or adults and may experience bullying, discrimination or abuse.

The academy will seek to reduce additional barriers these children may face and ensure that they have access to safe, trusted adults with whom they can raise concerns.

Staff will respond to safeguarding concerns in accordance with the child's individual circumstances, this policy, statutory guidance and the academy's duties under equality legislation.

Children in private fostering arrangements

The academy recognises the additional safeguarding considerations associated with private fostering.

A private fostering arrangement is generally one made privately for the care of a child under 16, or under 18 where the child is disabled, by someone who is not their parent or close relative, where the arrangement is intended to last for 28 days or more.

Where a private fostering arrangement comes to the academy's attention, the academy will notify the relevant local authority in accordance with statutory requirements.

Children in kinship care arrangements

The academy recognises the importance of family networks and kinship care and will consider the particular circumstances and support needs of children living in kinship arrangements.

Where safeguarding concerns arise, these will be responded to in the same child-centred manner as concerns involving any other child.

Other factors affecting vulnerability

The academy recognises that vulnerability is individual and can change over time.

Additional consideration may be required where a child:

- is affected by parental substance misuse;
- is affected by parental mental ill-health;
- is experiencing domestic abuse;
- is themselves misusing drugs or alcohol;
- is an asylum seeker or refugee;
- has experienced displacement or significant trauma;
- is living away from home;
- has recently returned home from care;
- is homeless or living in temporary or insecure accommodation;
- is living in circumstances characterised by neglect, instability or lack of support;
- experiences discrimination or prejudice;
- is a young carer;
- experiences communication or language barriers;
- is involved in family or criminal court proceedings;
- has a parent or carer in custody;
- is affected by parental offending;
- is at risk of exploitation, trafficking or modern slavery; or
- has any other circumstances which may increase their vulnerability to harm.

Staff must avoid assumptions or stereotyping and consider each child's individual circumstances and lived experience.

5.4 Teaching safeguarding

The academy is committed to providing high-quality **preventative education** as part of its whole-academy approach to safeguarding.

Children will be taught, at an age and developmentally appropriate level, about safeguarding risks and how to seek help.

This will include teaching children about:

- healthy and respectful relationships;
- consent and personal boundaries;
- sexual harassment and sexual violence;
- child-on-child abuse;
- online relationships and online safety;
- sharing nudes and semi-nudes;
- harmful and inappropriate online content;
- misinformation and disinformation;
- artificial intelligence and emerging technologies;
- exploitation and grooming;
- domestic abuse;
- equality and respect;
- mental health and emotional wellbeing; and
- how and where to obtain help.

Preventative education will be tailored where appropriate to the specific needs and vulnerabilities of individual children, including children with SEND and children who have experienced abuse.

5.5

Preventative education forms part of the academy's wider work to prepare children for life in modern Britain.

The academy will promote a culture in which sexism, misogyny, misandry, racism, disablism, homophobia, biphobia, sexual violence, sexual harassment and other forms of discrimination or abuse are not tolerated.

The curriculum will be responsive to:

- the academy's safeguarding context;
- pupil voice;
- safeguarding trends and intelligence;
- local safeguarding partnership priorities;
- national safeguarding developments; and
- emerging risks affecting children.

5.6

The academy's Catholic mission, values and standards, together with the fundamental British values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those of different faiths and beliefs, will be promoted throughout academy life.

Preventative education will be supported through the academy's:

- Relationships Education/Relationships and Sex Education and Health Education curriculum;
- wider curriculum;
- behaviour curriculum and policy;
- pastoral provision;
- assemblies and collective worship;
- online safety education; and
- wider personal development provision.

5.7 Online safety

Online safety is an integral part of safeguarding and the academy's whole-academy approach.

The breadth of issues classified within online safety is considerable and constantly evolving. The academy recognises four broad areas of online risk:

Content – being exposed to illegal, inappropriate or harmful content, including pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism.

Contact – being subjected to harmful online interaction with other users, including peer pressure, commercial advertising and adults posing as children or young adults with the intention of grooming or exploiting children.

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, including making, sending or receiving explicit images and online bullying.

Commerce – risks such as online gambling, inappropriate advertising, phishing and financial scams.

The academy will also remain alert to emerging risks arising from **generative artificial intelligence and other rapidly developing technologies**, including the creation, alteration or sharing of harmful, sexual or otherwise inappropriate content.

5.8 Filtering and monitoring

The academy will have appropriate filtering and monitoring systems in place on academy devices and academy networks.

Arrangements will meet the Department for Education's current Filtering and Monitoring Standards for Schools and Colleges.

The academy will:

- identify and assign roles and responsibilities for filtering and monitoring;
- review filtering and monitoring provision **at least annually**;
- block harmful and inappropriate content without unreasonably impacting teaching and learning;

- maintain effective monitoring strategies which meet the academy's safeguarding needs;
- ensure staff understand their responsibilities in relation to filtering and monitoring; and
- consider the age range of children, number of children, SEND, risk profile and proportionality when determining appropriate arrangements.

The DSL will take lead responsibility for safeguarding and online safety, including understanding the filtering and monitoring systems and processes in place.

5.9

The academy will protect and educate children and staff in their use of technology and will have mechanisms to identify, intervene in and escalate online-safety concerns where required.

This includes risks arising through:

- academy devices and networks;
- personally owned devices;
- mobile and smart technology;
- social media;
- messaging and communication platforms;
- gaming;
- remote education;
- artificial intelligence tools; and
- emerging technologies.

5.10

The academy's Online Safety/Acceptable Use arrangements will set out how children and staff are expected to use technology safely and appropriately.

Cyber-security arrangements will have regard to the Department for Education's current Cyber Security Standards for Schools and Colleges.

The academy will communicate regularly with parents and carers about online safety and will provide information to help families understand and respond to emerging online risks.

5.11

Online safety arrangements, including filtering and monitoring, will be reviewed at least annually and more frequently where:

- new technology is introduced;
- safeguarding concerns identify a weakness;
- the academy's risk profile changes;
- significant changes are made to systems or infrastructure; or
- new statutory guidance or standards require action.

5.12 Systems for children to report concerns and abuse

The academy recognises the importance of ensuring that **all children feel heard and understood**.

We will maintain a culture of listening to children and taking account of their wishes and feelings when determining what action is required to protect them.
The child's wishes and feelings will be considered, but the safety and welfare of the child will remain paramount.

5.13

The academy recognises that children may face barriers to reporting abuse.

Children may:

- not feel ready to tell someone;
- not know how to tell someone;
- not recognise their experience as abusive;
- fear that they will not be believed;
- fear consequences for themselves or others;
- feel embarrassed, ashamed or humiliated;
- have communication difficulties; or
- communicate distress indirectly through behaviour, attendance or changes in presentation.

The absence of a disclosure must never be taken to mean that abuse, neglect or exploitation is not occurring.

5.14

The academy will foster trusted relationships between children and adults and ensure children know which adults they can approach if they are worried about themselves or someone else.
Children, parents/carers and staff should see the academy as a safe place in which safeguarding concerns can be raised.
Staff will remain alert to children who communicate concerns indirectly, including through:

- behaviour;
- changes in presentation;
- attendance;
- comments to friends;
- written or online communication; or
- conversations which staff may observe or overhear.

5.15

The academy will maintain **well-promoted, easily understood and accessible systems** through which children can confidently report abuse, neglect, exploitation or other concerns.

Children will be taught:

- how to report a concern;
- who they can speak to;
- that concerns will be taken seriously;
- that they can safely express their views and give feedback; and
- that staff cannot promise to keep safeguarding concerns secret.

Academy-specific reporting mechanisms will be identified within the academy's Local Safeguarding Appendix and communicated clearly to children.

5.16 Working with parents and carers

The academy recognises that effective safeguarding is strengthened through positive, respectful and constructive relationships with parents and carers.

We will work with parents and carers openly and honestly wherever it is safe and appropriate to do so.

5.17

The academy will ensure that:

- parents and carers are encouraged to raise concerns about their child's safety, welfare, emotional wellbeing or mental health and know that these concerns will be taken seriously;
- parents and carers understand the academy's whole-academy approach to safeguarding;
- parents and carers are provided with appropriate information about safeguarding risks and sources of support;
- the academy participates in **Operation Encompass**, or the equivalent police-led domestic abuse notification arrangements applicable within its locality;
- parents and carers receive appropriate information about online safety, child-on-child abuse, exploitation, harmful sexual behaviour, sharing nudes and semi-nudes, radicalisation and other relevant safeguarding issues;
- parents and carers understand that the academy has statutory responsibilities to share safeguarding information where necessary to protect children; and
- parents and carers understand that safeguarding records will be maintained securely.

5.18 Pupil information and emergency contacts

The academy will maintain accurate and up-to-date information about children, including:

- the names and contact details of those with whom the child normally lives;
- details of those with parental responsibility;
- **at least two emergency contacts for every child where reasonably possible**;
- details of adults authorised to collect the child where applicable;
- relevant medical information and GP details where required;
- relevant court orders or restrictions known to the academy; and
- other information necessary to safeguard and promote the welfare of the child.

Parents and carers are responsible for informing the academy promptly of relevant changes.

5.19 Confidentiality, information sharing and safeguarding records

Information about children and families will be handled sensitively and securely.
Safeguarding information will be shared on a **need-to-know basis**, but staff must understand that data protection law does not prevent the sharing of information where this is necessary to safeguard a child.
The academy will:

- maintain accurate safeguarding records;
- record decisions and the rationale for those decisions;
- store safeguarding information securely;
- restrict access appropriately;
- retain records in accordance with Trust requirements and applicable law; and
- transfer safeguarding records securely when a child moves to another education setting.

When safeguarding records are transferred, the academy will obtain confirmation that they have been received.

5.20
Where there is a safeguarding concern, the academy will normally seek to work openly with parents and carers.
However, staff **must not automatically inform parents or carers before taking safeguarding action**.
Where discussing a concern with a parent or carer could:

- place the child at increased risk of harm;
- place another person at risk;
- compromise a police or children's social care investigation;
- lead to evidence being destroyed;
- increase the risk of coercion, intimidation or flight; or
- otherwise not be in the child's best interests,

the academy will seek advice from the DSL and, where appropriate, children's social care or the police before contacting the parent or carer.
The safety and best interests of the child will determine the academy's response.

6. Responding to Concerns About a Child's Welfare

6.1 What all staff must do

Any member of staff, including volunteers, supply staff and contractors, who has a concern about a child's welfare must act promptly.
Staff must:

- **in an emergency, take immediate action to protect the child**, including calling 999 where necessary;
- never assume that somebody else will take action or share information which may be critical to keeping a child safe;
- report any safeguarding concern to the **Designated Safeguarding Lead (DSL) or a Deputy DSL without delay**;
- speak to the DSL or Deputy DSL if unsure whether something constitutes a safeguarding concern;

- make an accurate written record of the concern as soon as possible, normally on the same working day, using the academy's agreed safeguarding recording system;
- record what they have seen, heard or been told factually and distinguish clearly between fact, professional opinion and information provided by others;
- share safeguarding information only with those who need it for safeguarding purposes; and
- seek appropriate support if they are distressed by a safeguarding matter.

Concerns must **not be left until the end of the day** where earlier action is required.

Where the DSL or a Deputy DSL is unavailable, staff must not delay appropriate safeguarding action. The concern should be raised with the most senior appropriate member of staff available and/or advice sought directly from local authority children's social care where necessary.

Any member of staff may make a referral directly to children's social care where circumstances require it.

All concerns, discussions, decisions and the reasons for decisions must be recorded.

6.2 Concerns requiring an immediate safeguarding response

Staff must immediately inform the DSL or a Deputy DSL where they:

- suspect that a child is experiencing or is at risk of abuse, neglect or exploitation;
- observe injuries, marks or bruising which cause concern;
- identify significant changes in behaviour, presentation, emotional wellbeing or attendance;
- receive a disclosure, allegation, hint or indication of abuse;
- become concerned that a person who may pose a risk to children has access to a child;
- identify a safeguarding concern following a search or confiscation;
- become concerned about online abuse, grooming, exploitation or harmful online behaviour;
- become aware of the making, receiving or sharing of nudes or semi-nudes;
- become aware of sexual or abusive imagery which has been generated or manipulated using artificial intelligence or other technology;
- have concerns about sexual violence, sexual harassment or other child-on-child abuse;
- become aware of a possible private fostering arrangement;
- have concerns about domestic abuse;
- have concerns about so-called honour-based abuse, FGM or forced marriage;
- have concerns about child sexual exploitation or child criminal exploitation, including county lines or financial exploitation;
- suspect modern slavery or trafficking;
- have concerns about serious violence;
- have concerns that a child may be susceptible to radicalisation into terrorism; or
- otherwise believe that a child may require safeguarding help or protection.

This list is not exhaustive.

6.3 Where there is no disclosure or clear evidence

Staff do not need proof that abuse, neglect or exploitation has occurred before raising a safeguarding concern.

There may be occasions when a member of staff notices changes in a child's:

- behaviour;
- appearance;
- attendance;
- emotional wellbeing;
- relationships;
- engagement;
- concentration; or
- educational performance

without knowing the reason.

Staff should exercise **professional curiosity**.

Where appropriate, staff may provide the child with an opportunity to talk, for example by asking sensitively whether they are alright or whether there is anything they would like help with.

Staff must not investigate the concern themselves.

Any safeguarding concern arising from the conversation or observations must be reported and recorded in accordance with this policy.

If you are unsure, always speak to the DSL or a Deputy DSL.

6.4 Responsibility for investigating concerns

It is **not the responsibility of academy staff to investigate abuse or determine whether an allegation or disclosure is true**.

The role of staff is to:

- recognise concerns;
- listen;
- respond appropriately;
- record;
- report;
- share relevant information; and
- support the child.

Investigations and statutory assessments are the responsibility of children's social care, the police and other relevant statutory agencies.

6.5 If a Child Tells a Member of Staff About Abuse or a Safeguarding Concern

Children may find it extremely difficult to disclose abuse, neglect or exploitation.

A child may feel frightened, ashamed, embarrassed or responsible for what has happened. They may have been threatened, may fear that they will not be believed or may not recognise their experiences as abusive.

Staff must ensure that a child making a report is:

- taken seriously;
- listened to carefully;
- reassured that they have done the right thing by speaking;
- told that they are not to blame;
- supported; and
- kept safe.

Children must never be made to feel that they are creating a problem by making a report or be made to feel ashamed.

6.6 Responding to a disclosure

When a child talks about a safeguarding concern, staff should:

- listen carefully and allow the child to speak freely;
- remain calm;
- take the child seriously;
- use the child's own words;
- avoid expressing shock, disbelief or judgement;
- avoid interrupting unnecessarily;
- ask only the minimum questions necessary to clarify what the child is saying;
- use open prompts where necessary, such as **"tell me", "explain" or "describe"**;
- never ask leading, investigative or repetitive questions;
- never ask the child to repeat their account unnecessarily;
- acknowledge how difficult it may have been for the child to speak;
- reassure the child that they have done the right thing;
- never promise confidentiality or secrecy;
- explain, in an age-appropriate way, that information will need to be shared with people who can help;
- explain what is likely to happen next;
- avoid automatically initiating physical contact;
- report the concern to the DSL or Deputy DSL without delay; and
- make an accurate written record as soon as possible.

Staff should record the child's words **verbatim where significant**, particularly where the child has used specific words to describe abuse.

Children must **not** be asked to write or sign a statement about abuse.

6.7 Sharing nudes and semi-nudes

Where a concern involves nudes or semi-nudes, staff must **not intentionally view, copy, print, save, forward or share the imagery**.

The matter must be reported immediately to the DSL or Deputy DSL and managed in accordance with current Department for Education guidance on sharing nudes and semi-nudes.
This includes sexual imagery created, altered or manipulated using artificial intelligence or other digital technologies.

6.8 Role of the DSL Following Identification of a Concern

When the DSL or Deputy DSL receives a safeguarding concern, they will consider the information available and determine what action is required in the best interests of the child.

This will include consideration of:

- whether the child is in immediate danger;
- whether urgent medical attention is required;
- what is already known about the child and family;
- previous safeguarding concerns and chronology;
- attendance and any unexplained or persistent absence;
- the child's presentation and behaviour;
- whether the child has or has had a social worker;
- whether siblings or other children may also be at risk;
- SEND, communication or health needs;
- online and extra-familial risks;
- contextual or place-based risks;
- information from police domestic-abuse notifications, including Operation Encompass;
- whether the child may benefit from Family Help;
- whether statutory children's social care intervention may be required; and
- the child's wishes and feelings.
-

The DSL will ensure that information is shared with relevant academy staff on a need-to-know basis where this is necessary to safeguard or support the child.

6.9 Assessment and decision-making

The DSL may use appropriate academy, local and national safeguarding tools and guidance to support professional judgement.
The DSL will follow the **current safeguarding partnership procedures, threshold/criteria-for-action guidance and referral pathways applicable to the academy's local authority area**.
For Trust academies, this will be the relevant arrangements for:

- Derby City;
- Derbyshire;
- Nottinghamshire; or
- Staffordshire.

Current local procedures and contacts will be identified within the academy's Local Safeguarding Appendix.

The DSL will not rely solely on a numerical score, checklist or assessment tool where professional judgement indicates that a child may be at risk.

6.10 Possible safeguarding responses

Depending upon the child's circumstances, action may include:

- continued monitoring and pastoral support within the academy;
- additional academy-based support;
- Family Help;
- multi-agency support;
- consultation with children's social care;
- referral to children's social care;
- referral to the police;
- referral through Prevent/Channel arrangements;
- referral to specialist health or mental-health services;
- sharing information regarding exploitation or extra-familial harm through the relevant local multi-agency process; or
- another appropriate safeguarding response.

The response must be proportionate to the child's needs and level of risk and must not delay statutory intervention where this is required.

6.11 Domestic abuse notifications

Where the academy receives an **Operation Encompass or equivalent police domestic-abuse notification**, the DSL will consider the child's welfare and any support or safeguarding action required.

Staff should not directly question a child about the specific incident solely because a notification has been received.

Instead, appropriate opportunities should be provided for the child to speak with a trusted adult.

If the child chooses to discuss the incident, staff will respond in accordance with the disclosure procedures set out in this policy.

6.12 Working with Parents and Carers Following a Concern

The academy will seek to work openly and constructively with parents and carers wherever it is safe and appropriate to do so.

Where a child may benefit from Family Help or other support, parents/carers will normally be involved in planning that support.

However, parents or carers **must not automatically be informed before safeguarding action is taken**.

The DSL will consider whether informing a parent or carer could:

- place the child at increased risk;
- place another person at risk;
- compromise a police or children's social care investigation;

- lead to evidence being destroyed;
- lead to intimidation, coercion or pressure being placed on the child; or
- otherwise not be in the child's best interests.

Where there is uncertainty, advice will be sought from children's social care or the police before contacting parents or carers.

Levels of Support and Intervention

6.13 Academy-based and universal support

The academy will consider what support can appropriately be provided through its own pastoral, educational, attendance, SEND, wellbeing and family-support arrangements.

Support will be reviewed to determine whether it is improving outcomes for the child.

Where needs increase, persist or cannot appropriately be met by the academy alone, additional support or referral will be considered.

6.14 Family Help

The academy recognises the importance of providing children and families with the **right help at the right time**.

Where a child and family require coordinated support from more than one service, the academy will engage with the **Family Help arrangements applicable within its local authority area**.

The academy will work collaboratively with children, parents/carers, family networks and relevant agencies.

Where appropriate, academy staff may:

- contribute to or undertake assessments;
- participate in multi-disciplinary meetings;
- contribute to plans;
- act as a lead professional where appropriate; and
- contribute to family group decision-making.

Family Help arrangements will be kept under review.

Where the child's situation does not improve, needs escalate or there are concerns that the child is suffering or likely to suffer significant harm, the DSL will consider referral to children's social care.

Referral to Local Authority Children's Social Care

6.15

Where there are concerns that a child may be in need, is suffering or is likely to suffer significant harm, a referral will be made to the children's social care service for the local authority responsible for the child, in accordance with current local procedures.

If at any point there is a risk of immediate serious harm to a child, a referral must be made immediately to children's social care and/or the police.

Anybody can make a referral.

Normally, the DSL or Deputy DSL will make the referral. However, this must never prevent another member of staff making a referral directly where necessary.
If a member of staff makes a direct referral, they should inform the DSL as soon as practicable.

6.16
Referrals will be made using the **current referral process prescribed by the relevant local authority**.
The academy will not rely upon a single Trust-wide requirement for telephone, online or written referral because arrangements differ between Derby City, Derbyshire, Nottinghamshire and Staffordshire and may change during the lifetime of this policy.
The academy's Local Safeguarding Appendix will identify the current:

- children's social care/MASH/front-door contact;
- emergency and out-of-hours contact;
- professional consultation route; and
- referral process.

6.17 Female Genital Mutilation
All staff must report concerns that a girl may be at risk of FGM to the DSL in accordance with normal safeguarding procedures.
In addition, teachers have a **personal statutory duty** to report to the police where, in the course of their professional duties, they discover that FGM appears to have been carried out on a girl under the age of 18.
A report under the mandatory reporting duty must be made to the police on **101** as soon as possible and, unless there are exceptional circumstances, by the end of the **next working day**.
The teacher's mandatory reporting duty is **in addition to**, not instead of, the academy's wider safeguarding response.
Mandatory reporting of female genital mutilation: procedural information

Action Following a Referral
6.18
Following a referral, the DSL, Deputy DSL or other appropriate member of staff will:

- follow the referral process required by the relevant local authority;
- provide relevant safeguarding information, including information about extra-familial or contextual risks;
- maintain appropriate contact with the allocated social worker or other professional;
- contribute to assessments;
- participate in strategy discussions where requested;
- contribute to Section 47 enquiries and other statutory assessments;
- provide reports for and attend Child Protection Conferences where required;
- contribute to Child in Need meetings;
- attend and contribute to core groups;

- share reports with parents/carers and, where appropriate, the child in accordance with local procedures and safeguarding considerations;
- inform the relevant social worker promptly of significant safeguarding developments, including unexplained absence or a change of education setting; and
- continue to support the child's education, welfare and safety.

6.19 Escalation and professional challenge

The academy recognises that safeguarding professionals may sometimes disagree about:

- the level of risk;
- whether statutory intervention is required;
- the response to a referral; or
- whether sufficient action is being taken to protect a child.

If, after a referral or consultation, the child's situation does not appear to be improving, or the DSL remains concerned that appropriate action has not been taken, the DSL will **follow up and escalate the concern**.

Each academy will use the professional disagreement/escalation procedure applicable to its local safeguarding partnership.

Professional disagreement must never prevent immediate action being taken where a child is at risk.

6.20 Confidentiality and Information Sharing

Effective information sharing is essential for identifying and responding to abuse, neglect and exploitation.

The academy will have regard to current statutory and national guidance, including Information Sharing: Advice for Practitioners Providing Safeguarding Services.

Staff must understand that:

- information sharing is vital to safeguarding;
- information should be shared early where this is necessary to protect a child;
- information sharing must be necessary, proportionate, relevant, adequate, accurate, timely and secure;
- information should be shared with those who need it for safeguarding purposes;
- the rationale for significant information-sharing decisions should be recorded; and
- **data protection law does not prevent the sharing of information for the purposes of keeping children safe**.

The academy will comply with the Data Protection Act 2018, UK GDPR and other applicable data-protection legislation, including the Data (Use and Access) Act 2025.

Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

6.21 Consent and information sharing

Consent is **not always required** to share personal information for safeguarding purposes.

Where it is safe and appropriate, the academy will be transparent with children and parents/carers about how information will be used and shared.

However, safeguarding information may be shared without consent where there is a lawful basis to do so and where seeking consent could:

- place a child or another person at increased risk;
- prejudice the prevention, detection or prosecution of a crime;
- lead to unjustified delay in safeguarding action; or
- otherwise undermine the purpose for which the information needs to be shared.

If staff are unsure whether information should be shared, they should seek advice from the DSL or Deputy DSL. **A lack of certainty must not result in necessary safeguarding information being withheld.**

Record Keeping

6.22

All safeguarding concerns, discussions, decisions and the reasons for those decisions will be recorded in writing using the academy's agreed safeguarding recording system.

Records should be:

- factual;
- accurate;
- contemporaneous;
- sufficiently detailed;
- written in clear professional language; and
- completed as soon as practicable.

6.23

Safeguarding records will include, where appropriate:

- a clear and comprehensive summary of the concern;
- the child's own words where relevant;
- the names of those involved;
- the source of the information;
- actions taken;
- referrals made;
- advice sought or received;
- decisions reached and the reasons for those decisions;
- outcomes;
- relevant communication with parents/carers and agencies;
- follow-up and review;
- professional disagreement and escalation; and
- consideration of the child's wishes and feelings.

Safeguarding records will be held securely with access restricted to those who require the information.

6.24 Transfer of safeguarding records

When a child transfers to another school or college, the DSL will ensure that the child's safeguarding/child-protection file is transferred **as soon as possible and within five days for an in-year transfer, or within the first five days of the start of a new term**.

The safeguarding file will be transferred separately from the main pupil file, securely and with confirmation of receipt obtained.

The DSL will consider whether information should be shared with the receiving setting **in advance of the child arriving**, particularly where this is necessary to ensure appropriate support or protection is immediately available.

This may be particularly relevant for children:

- who have or have had a social worker;
- subject to a Child Protection or Child in Need Plan;
- who are looked after;
- receiving support through Channel;
- at risk of exploitation; or
- with other significant safeguarding needs.

The receiving academy DSL will ensure that transferred safeguarding information is reviewed promptly and that appropriate action and support are put in place.

6.25 Support for Those Involved in Safeguarding Matters

Abuse, neglect and exploitation can have a significant emotional impact upon children, families and staff.

The academy will provide appropriate support by:

- taking all safeguarding concerns and disclosures seriously;
- maintaining appropriate communication with those involved;
- providing children with access to trusted adults and appropriate pastoral support;
- responding sensitively where a child or member of staff experiences distress or anxiety;
- maintaining confidentiality and sharing information only where appropriate;
- maintaining secure records;
- signposting to appropriate internal or external support;
- providing appropriate support and supervision to safeguarding staff;
- following relevant complaints, whistleblowing, disciplinary and allegations-management procedures; and
- cooperating fully with statutory agencies.

Where a member of staff is the subject of an allegation, the academy will appoint an appropriate **case manager** and follow the allegations-management procedures set out elsewhere in this policy.

7. Child-on-child abuse, including sexual violence and harassment

7.1 Our approach

All staff working in or on behalf of the academy will maintain an attitude of **"it could happen here"** when considering child-on-child abuse.

The academy recognises that children can abuse other children and that this can happen:

- inside or outside the academy;
- online or offline;
- within intimate personal relationships;
- between children of any age or sex;
- between two children; or
- through an individual or group abusing another individual or group.

The absence of reported incidents does **not** mean that child-on-child abuse is not occurring. It may mean that it has not yet been recognised or reported.

If staff have any concern about child-on-child abuse, they must report it to the DSL or a Deputy DSL without delay.

7.2

The academy adopts a **zero-tolerance approach to child-on-child abuse**.

This means that abusive behaviour will never be dismissed or normalised as:

- "banter";
- "just having a laugh";
- "boys being boys";
- "girls being girls";
- "part of growing up"; or
- an inevitable part of children's relationships.

A zero-tolerance approach does not mean that every incident will receive the same response or sanction. Responses will be **proportionate, child-centred, educative and safeguarding-led**, taking account of the nature and seriousness of the behaviour, the needs of the children involved and the academy's Behaviour Policy.

The academy recognises that dismissing or tolerating harmful behaviour can contribute to a culture in which children feel unsafe and abuse becomes normalised.

7.3

Child-on-child abuse will be treated as a **safeguarding matter**, not simply as a behaviour or disciplinary issue.

The academy will respond to concerns regardless of whether the behaviour:

- occurred on academy premises;
- occurred during academy activities;
- occurred outside the academy;
- occurred online;
- involved children from another education setting; or
- took place some time before it was reported.

The academy recognises that a child who has harmed another child may themselves have additional needs, vulnerabilities or experiences of abuse.

Safeguarding support for a child who has displayed harmful behaviour does not diminish the seriousness of the behaviour or the academy's responsibility to protect and support the child who has experienced harm.

7.4 What is Child-on-Child Abuse?

Child-on-child abuse can take many forms. In accordance with **Keeping Children Safe in Education 2026**, this includes, but is not limited to:

- **bullying**, including cyberbullying, prejudice-based and discriminatory bullying;
- **abuse in intimate personal relationships between children**;
- **physical abuse**, such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm, including online behaviour which facilitates, threatens or encourages physical abuse;
- **sexual violence**, including rape, assault by penetration and sexual assault, including where online activity facilitates, threatens or encourages sexual violence;
- **sexual harassment**, including sexual comments, remarks, jokes and online sexual harassment, whether occurring as a standalone incident or as part of a broader pattern of abuse;
- **causing someone to engage in sexual activity without consent**, such as forcing someone to strip, touch themselves sexually or engage in sexual activity with another person;
- **consensual and non-consensual sharing of nudes and semi-nudes**, including sexual imagery which has been created or manipulated using artificial intelligence or other technologies;
- **upskirting**, which typically involves taking an image under a person's clothing without their permission with the intention of viewing their genitals or buttocks to obtain sexual gratification or to cause humiliation, distress or alarm; and
- **initiation/hazing-type violence and rituals**, including activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, including where these have an online element.

The academy will also be alert to emerging forms of child-on-child abuse facilitated by technology, including the creation, manipulation or distribution of sexual or abusive material using **generative artificial intelligence**.

7.5 Understanding child-on-child abuse

Child-on-child abuse exists on a continuum. Different forms of abuse may overlap and behaviour may escalate over time.

The academy recognises that:

- any child can experience child-on-child abuse;
- children may experience multiple forms of abuse simultaneously;
- girls are more likely to experience some forms of child-on-child sexual abuse and boys are more likely to perpetrate them, but **all children can be victims or perpetrators**;
- children with SEND may face additional safeguarding barriers and are statistically more vulnerable to abuse;

- lesbian, gay and bisexual children and children who are gender questioning may be particularly vulnerable to targeted bullying, harassment or abuse;
- children affected by domestic abuse, trauma, exploitation or previous abuse may face increased vulnerability;
- power imbalances may arise through age, developmental stage, sex, gender, physical strength, popularity, social status, disability, SEND, economic circumstances, access to technology or information, or other factors;
- children who display harmful behaviour may themselves have experienced abuse, neglect, exploitation or trauma; and
- the academy must consider the **context** in which the behaviour occurred, including the child's peer group, family, community and online environment.

Staff must avoid assumptions or stereotypes about which children may experience or perpetrate abuse.

Preventing Child-on-Child Abuse

7.6

Preventing child-on-child abuse is part of the academy's **whole-academy approach to safeguarding**.

The academy will seek to create a culture in which:

- children feel safe;
- respectful relationships are the norm;
- harmful behaviour is challenged;
- children understand consent and boundaries;
- discrimination is challenged;
- children know how to report concerns;
- children believe that adults will listen and take them seriously; and
- staff respond consistently to inappropriate and abusive behaviour.

7.7 Preventative education

The academy will provide age- and developmentally appropriate preventative education through Relationships Education/RSE, Health Education, online-safety education and the wider curriculum.

This will include teaching about:

- healthy and respectful relationships;
- consent;
- personal boundaries;
- sexual harassment and sexual violence;
- bullying and discrimination;
- online relationships;
- sharing nudes and semi-nudes;
- pornography and harmful sexual content where age appropriate;
- harmful sexual behaviour;
- misogyny and other forms of discriminatory behaviour;

- grooming and exploitation;
- the safe and responsible use of artificial intelligence and emerging technologies; and
- how and where to seek help.

Preventative education will be adapted where necessary for children with SEND or other additional needs.

7.8

All staff are responsible for challenging inappropriate behaviour between children.

Staff must not downplay inappropriate sexual behaviour, harassment, discriminatory language or other harmful conduct.

The academy's response to child-on-child abuse will operate alongside its:

- Behaviour Policy;
- Online Safety Policy;
- Relationships Education/RSE Policy;
- Attendance Policy;
- Equality arrangements;
- Anti-Bullying arrangements;
- Staff Code of Conduct; and
- relevant Trust safeguarding procedures.

Systems for Children to Report Abuse

7.9

The academy recognises that children may not find it easy to report child-on-child abuse.

A child may:

- not recognise the behaviour as abusive;
- fear that they will not be believed;
- worry about being blamed;
- fear retaliation;
- feel embarrassed or ashamed;
- fear the consequences for the other child;
- have communication difficulties;
- disclose indirectly through a friend;
- communicate distress through behaviour or attendance; or
- hope that an adult will notice what is happening without them having to make a direct disclosure.

Staff must remain alert to these barriers.

The academy will maintain **well-promoted, easily understood and accessible systems** through which children can confidently report abuse, knowing that their concerns will be taken seriously.

The reporting arrangements described in Section 5 and Section 6 of this policy apply.

Responding to Child-on-Child Abuse

7.10 Initial response

The academy's initial response to a report of child-on-child abuse is extremely important. Staff will:

- take the report seriously;
- listen carefully;
- reassure the child that they have done the right thing by reporting;
- explain that they will be supported and kept safe;
- not make the child feel that they are creating a problem;
- not shame or blame the child;
- not minimise their experience;
- not promise confidentiality;
- avoid leading or investigative questions;
- report the concern to the DSL or Deputy DSL without delay; and
- make an accurate written record.

The procedures in **Section 6 – Responding to Concerns About a Child's Welfare** must be followed.

7.11

All reports will be considered **case by case**.

The DSL will take a leading role, using professional judgement and seeking advice from children's social care, the police or other agencies where appropriate.

The DSL will consider:

- the wishes and feelings of the child who has experienced the alleged abuse;
- the nature and seriousness of the alleged behaviour;
- whether the behaviour may constitute a criminal offence;
- whether sexual violence or sexual harassment is alleged;
- whether the incident occurred once or forms part of a pattern;
- the ages and developmental stages of the children;
- any SEND, communication or cognitive needs;
- the relationship between the children;
- any power imbalance;
- whether coercion, intimidation, threats, secrecy, bribery or exploitation were involved;
- whether technology or online platforms were used;
- whether artificial intelligence or manipulated imagery was involved;
- whether other children may have experienced harm;
- whether the child alleged to have caused harm presents a risk to other children;
- whether either child may themselves be experiencing abuse, neglect or exploitation;
- the location and context of the incident;
- extra-familial and contextual risks;
- the impact on the wider peer group; and
- what immediate action is necessary to protect the children involved.

The DSL will take account of the child's wishes and feelings while recognising that the academy may need to take safeguarding action even where this is not the child's preferred course.

7.12 Sexual Violence and Sexual Harassment

Reports of sexual violence and sexual harassment will be managed in accordance with **Part Five of Keeping Children Safe in Education 2026**.

Where a report includes an allegation of **rape or assault by penetration**, the child alleged to have caused the harm will be removed from any classes they share with the child who has reported the harm while the allegation is being investigated.

The academy will also carefully consider how to keep the children apart on academy premises and during:

- before- and after-school activities;
- break and lunchtime;
- extracurricular activities; and
- transport to and from the academy.

These arrangements are a **safeguarding measure and not a judgement of guilt**.

7.13

For other reports of sexual violence, sexual harassment or child-on-child abuse, the academy will immediately consider:

- the proximity of the children;
- shared lessons;
- shared social spaces;
- transport;
- before- and after-school provision;
- online contact;
- extracurricular activities; and
- any other arrangements necessary to protect and support the children involved.

The academy will seek to avoid, wherever possible, actions which create the effect of **isolating or penalising the child who has experienced the alleged abuse**.

Risk and Needs Assessment

7.14

Following a report of child-on-child abuse, the DSL will consider whether a written **risk and needs assessment** is required.

For reports of sexual violence, this will normally be required.

The assessment will consider:

The child who has experienced the alleged harm

- their safety;
- wishes and feelings;
- emotional and educational needs;
- support required; and

- risk of further harm or retaliation.

The child alleged to have caused harm

- risks they may pose to others;
- their own safeguarding and welfare needs;
- whether they may themselves have experienced abuse or exploitation;
- support or intervention required; and
- appropriate behavioural or disciplinary action.

Other children

- whether there may be other children who have experienced harm;
- whether witnesses require support;
- risks to siblings, peers or other children;
- the impact on the wider peer group and academy culture; and
- measures necessary to prevent further harm.

The environment and context

- where the behaviour occurred;
- whether particular locations require additional supervision or changes;
- online environments;
- peer-group dynamics; and
- contextual or extra-familial safeguarding concerns.

7.15

Risk and needs assessments will be **dynamic documents** and will be reviewed regularly and whenever circumstances change.

The academy will continue to consider the safety and needs of all children involved throughout any children's social care or police investigation and following its conclusion.

7.16 Deciding What Action to Take

Depending on the circumstances, a report may be managed through one or more of the following:

- academy safeguarding and pastoral support;
- the Behaviour Policy;
- Family Help;
- children's social care;
- police involvement;
- specialist harmful sexual behaviour services;
- mental-health or therapeutic support; or
- other relevant specialist services.

Safeguarding and disciplinary processes may operate **at the same time**.

The fact that police or children's social care are involved does not remove the academy's responsibility to safeguard and support children.

Where the police are involved, the academy will liaise with them regarding any investigation while continuing to take proportionate steps necessary to keep children safe.

7.17

The academy will follow the current safeguarding partnership procedures applicable to its locality.

Academies will therefore use the relevant procedures and referral pathways for:

- Derby City;
- Derbyshire;
- Nottinghamshire; or
- Staffordshire.

Current referral contacts and local procedures will be maintained within the academy's **Local Safeguarding Appendix**.

7.18 Supporting Children Who Have Experienced Child-on-Child Abuse

Support will be tailored to the individual child and may include:

- a trusted adult;
- pastoral support;
- adjustments to lessons, social times or transport;
- safety planning;
- counselling or therapeutic support;
- mental-health support;
- SEND support or reasonable adjustments;
- support around attendance;
- work with parents/carers where appropriate; and
- referral to specialist services.

The academy will remain alert to the possible impact of abuse on:

- mental health;
- attendance;
- academic progress;
- friendships;
- feelings of safety; and
- participation in academy life.

The academy will seek to ensure that the child is able to continue their education in a supportive environment.

7.19 Supporting Children Who Have Displayed Harmful Behaviour

The academy has a responsibility to safeguard and support children who display harmful behaviour while also taking appropriate action to protect others.

The academy will consider:

- the child's developmental understanding;
- whether the behaviour is harmful or abusive;
- whether the child has experienced abuse, neglect, trauma or exploitation;
- SEND or communication needs;
- family circumstances;
- contextual and peer influences;

- online influences;
- whether specialist assessment is required;
- risk to other children; and
- appropriate support and intervention.

Support does not prevent the academy from applying proportionate sanctions in accordance with its Behaviour Policy.

7.20 Sharing Nudes and Semi-Nudes

Reports involving the sharing of nudes and semi-nudes will be managed in accordance with current national guidance for education settings.

Staff must **not intentionally view, copy, save, print, forward or otherwise share sexual imagery** unless this is specifically necessary in accordance with the applicable safeguarding guidance.

The DSL will take the lead in responding to such incidents and will consider:

- the ages of the children;
- consent;
- coercion;
- exploitation;
- whether adults are involved;
- whether the imagery has been widely shared;
- whether the imagery has been created or manipulated using AI or other technologies;
- risk of further distribution; and
- whether children's social care and/or the police should be involved.

7.21 Recording

All child-on-child abuse concerns will be recorded in accordance with Section 6 of this policy.

Records will include:

- the concern or allegation;
- the child's account;
- actions taken;
- decisions made and the reasons for them;
- advice sought;
- referrals;
- risk and needs assessments;
- support plans;
- communication with parents/carers where appropriate; and
- reviews and outcomes.

Patterns and trends will be considered by the DSL and senior leaders as part of the academy's wider safeguarding evaluation.

This includes consideration of whether incidents indicate a wider issue relating to:

- academy culture;

- particular locations;
- particular groups;
- online activity;
- discriminatory attitudes;
- harmful sexual behaviour; or
- the effectiveness of preventative education.

7.22 Learning from Incidents

The academy will use safeguarding information to identify patterns and improve practice.

Following significant or repeated incidents, leaders will consider:

- whether changes to supervision are required;
- whether particular locations are unsafe;
- whether curriculum provision needs strengthening;
- whether staff require additional training;
- whether academy policies need amendment;
- what pupil voice indicates about safety and culture;
- whether particular groups are disproportionately affected; and
- whether wider contextual or community risks require action.

The academy will not assume that an incident is resolved simply because an individual case has concluded.

7.23 Transfer to Another Education Setting

Where a child involved in child-on-child abuse transfers to another education setting, the DSL will ensure that safeguarding records are transferred in accordance with Section 6.

The DSL will consider whether relevant safeguarding information should be shared **in advance** with the receiving setting to enable appropriate support and risk management to be in place from the child's arrival.

Where information relates to a child who has allegedly caused harm, the DSL will consider what information is necessary and proportionate to share to protect other children and staff.

8. Safer recruitment and selection of staff

8.1

The Trust and its academies are committed to safeguarding and promoting the welfare of children through robust safer recruitment practice.

Recruitment procedures will comply with **Part Three of** Keeping Children Safe in Education 2026 and will be designed to deter, reject or identify people who may be unsuitable to work with children.

Safer recruitment arrangements apply, as appropriate, to:

- employees;

- supply and agency staff;
- third-party staff;
- trainee and student teachers;
- volunteers;
- governors and Trustees;
- contractors; and
- others whose role gives them access to children.

Safer recruitment forms an essential part of the Trust's whole-organisation approach to safeguarding.

8.2 Safer recruitment training

Those involved in recruitment and selection will receive appropriate safer recruitment training.

At least one person involved in conducting an interview for a role involving work with children will have undertaken appropriate safer recruitment training.

The Trust will ensure that recruitment decisions are made by individuals who understand their safeguarding responsibilities.

8.3 Recruitment process

Safeguarding will be considered at every stage of the recruitment process, including:

- advertising;
- job descriptions;
- person specifications;
- application forms;
- scrutiny of employment history;
- shortlisting;
- online searches where appropriate;
- references;
- interviews;
- selection decisions;
- pre-appointment checks; and
- induction and probation.

Advertisements will include an appropriate safeguarding statement and make clear the Trust's commitment to safeguarding and promoting the welfare of children.

Application forms will require applicants to provide a complete employment history and explain any gaps or inconsistencies.

CVs will not be accepted in place of a completed application form.

8.4 Shortlisting and online searches

As part of the shortlisting process, the academy may carry out an **online search of shortlisted candidates** as part of its due diligence.

The purpose of such searches is to identify information which may be relevant to the candidate's suitability to work with children.
Any information identified will be considered proportionately and, where appropriate, discussed with the candidate at interview.
Online searches will not be used unlawfully or discriminatorily.

8.5 References

References will normally be sought directly from the referee and scrutinised before appointment.
Where possible, references should be obtained before interview so that any concerns or inconsistencies can be explored with the candidate.
References should:

- be from an appropriate senior person with authority to provide the reference;
- confirm relevant employment information;
- address the applicant's suitability to work with children;
- provide factual information about any **substantiated safeguarding concerns or allegations that met the harm threshold** where appropriate; and
- not include information about allegations which were unsubstantiated, unfounded, false or malicious.

Open references or testimonials provided directly by the applicant will not normally be relied upon.

8.6 Pre-appointment checks

Before appointment, the academy will undertake all checks required by legislation and KCSIE appropriate to the role.
These may include:

- verification of identity;
- enhanced Disclosure and Barring Service (DBS) checks;
- children's barred-list checks where the role involves regulated activity;
- prohibition from teaching checks;
- checks relating to restrictions or sanctions applicable to teachers;
- checks under section 128 of the Education and Skills Act 2008 where required;
- verification of professional qualifications;
- verification of the person's right to work in the United Kingdom;
- checks relating to individuals who have lived or worked outside the UK;
- checks under the Childcare Disqualification Regulations 2018 where applicable; and
- any other check required by law or statutory guidance.

The level of check undertaken will be appropriate and proportionate to the role.

8.7 Individuals who have lived or worked outside the UK

Individuals who have lived or worked outside the UK will undergo the same checks as other applicants.

The academy will also undertake such additional checks as are considered appropriate to establish their suitability to work with children, taking account of the countries in which they have lived or worked and the information reasonably available.

8.8 Agency and third-party staff

Where an academy uses supply staff or other workers provided by an agency or third-party organisation, the academy will obtain written confirmation that the agency has completed the checks the academy would otherwise be required to undertake.

The academy will also verify the identity of the individual on arrival.

Where an agency has obtained an enhanced DBS certificate containing information, the academy will obtain a copy of the certificate from the agency before the individual begins work.

Any safeguarding concern regarding agency or third-party staff will be managed in accordance with Section 9 of this policy and shared with their employer as appropriate.

8.9 Contractors

Academies will ensure that contractors working on academy premises are subject to appropriate safeguarding arrangements.

Contracts will specify relevant safeguarding requirements.

The academy will determine the level of checks, supervision and access appropriate to the nature of the work and whether the contractor will have opportunity for contact with children.

A contractor for whom the required checks have not been completed must not be allowed to engage in regulated activity or have unsupervised access to children.

8.10 Trainee and student teachers

Where the Trust or academy is the employer of a salaried trainee teacher, the Trust will ensure that the required safeguarding checks are completed.

Where trainee teachers are placed by an Initial Teacher Training provider and are not employed by the Trust, the academy will obtain written confirmation from the provider that the appropriate checks have been carried out and that the trainee has been judged suitable to work with children.

8.11 Volunteers

The academy will undertake a risk assessment when determining the checks and supervision required for volunteers.

Under no circumstances will a volunteer who has not undergone the necessary checks be left unsupervised or permitted to engage in regulated activity.

The academy will have regard to current statutory guidance relating to the supervision of individuals working with children.

Existing volunteers will be subject to appropriate ongoing safeguarding arrangements.

8.12 Governors and Trustees

Governors and Trustees will undergo the safeguarding checks required by KCSIE, legislation and the academy trust regulatory framework.

This will include enhanced DBS checks and section 128 checks where applicable.

8.13 Single Central Record

The Trust and each academy will maintain a **Single Central Record (SCR)** of recruitment and vetting checks in accordance with KCSIE 2026.

The SCR will include all persons required by statutory guidance and will be maintained accurately and kept under regular review.

The academy will have clear responsibility for maintaining, checking and quality-assuring the SCR.

Errors or omissions identified will be addressed without delay.

Visitors

8.14

The academy will maintain appropriate arrangements for managing visitors.

Different safeguarding arrangements may apply depending upon the nature and purpose of the visit, including:

- professional visitors;
- parents and relatives;
- contractors;
- visiting speakers;
- volunteers;
- partner-agency staff;
- members of the public; and
- individuals attending academy events.

The academy will determine appropriate identity checks, safeguarding checks, supervision and access arrangements according to the circumstances.

Visitors will be required to comply with academy safeguarding and security procedures.

8.15 Professional visitors

The academy recognises that social workers, police, health professionals and other safeguarding partners may need access to children in order to safeguard or promote their welfare.

Professional identity will be verified appropriately.

The academy will facilitate lawful professional access while maintaining appropriate safeguarding and site-security arrangements.

Trust-wide policy will not require academies to use a Derby/Derbyshire-only professional-visitors protocol. Each academy may also have regard to relevant local safeguarding partnership guidance applicable to its locality.

External Speakers and Visitors

8.16

Where external speakers or organisations are invited to work with children, the academy will consider:

- the educational purpose and value of the activity;
- the suitability of the person or organisation;
- age and developmental appropriateness;
- safeguarding considerations;
- Prevent duties;
- whether checks are required;
- appropriate supervision;
- the content and resources to be used; and
- how any safeguarding disclosure arising during the activity will be managed.

External visitors will not be permitted to promote views which undermine safeguarding, equality duties, fundamental British values or the academy's legal responsibilities.

Alternative Provision

8.17

Where an academy commissions **Alternative Provision (AP)**, responsibility for the pupil's safeguarding and welfare remains with the commissioning academy.

Children accessing alternative provision may have complex needs and can be particularly vulnerable to abuse, neglect and exploitation.

Before a placement begins, the academy will satisfy itself that the provision is safe, appropriate and suitable for the individual pupil.

This will include appropriate due diligence regarding:

- safeguarding and child-protection arrangements;
- safer recruitment and vetting;
- the physical premises;
- staffing;
- attendance arrangements;
- curriculum and educational suitability;
- SEND and medical needs;
- behaviour and risk management;
- transport where relevant;
- the registered status of the provider;
- any subcontracted, satellite or additional sites used; and
- arrangements for reporting safeguarding concerns to the commissioning academy.

8.18

The academy will obtain appropriate written assurance that required safeguarding and vetting checks have been undertaken.

The academy will maintain an accurate record of:

- the provider;

- the address at which the pupil is being educated;
- any additional or satellite sites;
- key contacts;
- the pupil's attendance;
- safeguarding information; and
- placement review arrangements.

The academy will maintain regular contact with both the pupil and provider and will review the placement at appropriate intervals.

Any unexplained absence, safeguarding concern or significant change in placement arrangements will be investigated promptly.

The Trust's Alternative Provision commissioning and quality-assurance arrangements must be followed before placement.

8.19

The academy must not assume that commissioning an external provider transfers its safeguarding responsibility.

Where concerns arise about the suitability or safety of alternative provision, the academy will take immediate action, including ending or suspending the placement where necessary to protect the pupil.

Use of Academy Premises by Other Organisations

8.20

Where activities are provided directly by the academy under the supervision or management of academy staff, the academy's Safeguarding and Child Protection Policy will apply.

Where services or activities are provided by another organisation using academy premises, the academy will seek assurance that the organisation has appropriate safeguarding and child-protection policies and procedures in place.

This applies whether or not the children attending the activity are pupils at the academy.

The academy will ensure that appropriate safeguarding expectations are incorporated within relevant:

- lease agreements;
- lettings agreements;
- hire agreements;
- contracts; and
- partnership arrangements.

The academy will have regard to the Department for Education's current Out-of-school settings safeguarding guidance.

Where the academy receives a safeguarding allegation relating to an incident which occurred while an organisation or individual was using academy premises, the

academy will follow its safeguarding procedures and inform the appropriate agencies.

9. What staff should do if they have a safeguarding concern or an allegation about another member of staff or concerns about safeguarding practices within the school/college

9.1 Safeguarding culture

The Trust and its academies are committed to maintaining a culture of **openness, trust, transparency and continuous vigilance**.

All staff must feel able to raise concerns about adults working in or on behalf of the academy.

This includes concerns arising from conduct:

- within the academy;
- outside work;
- online;
- during activities on academy premises; or
- in another setting

where that conduct may have implications for the person's suitability to work with children.

All safeguarding concerns or allegations about adults must be reported, however small they may initially appear.

This includes concerns regarding:

- employees;
- supply staff;
- trainee teachers;
- volunteers;
- contractors;
- governors;
- Trustees; and
- other adults working in or on behalf of the academy.

9.2

The academy recognises two broad categories of safeguarding concern about adults:

1. **allegations that may meet the harm threshold**; and
2. **concerns that do not meet the harm threshold**, commonly referred to as **low-level concerns**.

The fact that a concern is described as "low-level" does not mean that it is insignificant.

9.3 Allegations That May Meet the Harm Threshold

An allegation may meet the harm threshold where it is alleged that a person who works with children has:

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

The final criterion includes behaviour outside the academy and is sometimes referred to as **transferable risk**.

The academy will consider whether behaviour in a person's private life raises concerns about their suitability to work with children.

9.4 Reporting concerns about an adult

Any allegation or concern that may meet the harm threshold must be reported **without delay**.

Where the concern relates to:

- **a member of academy staff, volunteer, contractor or supply worker:** report to the Headteacher;
- **the Headteacher:** report to the Chief Executive Officer and/or Chair of the Local Governing Body in accordance with Trust procedures;
- **the Chief Executive Officer:** report to the Chair of the Trust Board;
- **a Trustee:** report to the Chair of the Trust Board;
- **the Chair of the Trust Board:** report to the appropriate Trust/Diocesan authority in accordance with Trust procedures.

Where there is a conflict of interest or the normal reporting route is inappropriate, advice should be sought directly from the **Local Authority Designated Officer (LADO)**.

No member of staff should attempt to investigate an allegation themselves.

9.5 Immediate safeguarding action

Where a child has been harmed or there is an immediate risk of harm:

- the DSL will ensure appropriate action is taken to safeguard the child;
- children's social care will be contacted where appropriate;
- the police will be contacted where a criminal offence may have been committed or there is immediate danger; and
- medical assistance will be obtained where required.

Safeguarding the child takes priority over any employment or disciplinary process.

9.6 LADO and case management

The academy will follow **Part Four of Keeping Children Safe in Education 2026** and the relevant LADO procedure for the local authority area in which the academy is situated.

The appropriate **case manager** will consider the allegation and seek LADO advice before undertaking an investigation where the harm threshold may be met.

The case manager will normally be:

- the Headteacher for allegations against staff;
- the CEO for allegations against a Headteacher; or
- another appropriate senior person as determined through Trust procedures.

The academy will cooperate fully with:

- the LADO;
- children's social care;
- the police;
- the Disclosure and Barring Service;
- Teaching Regulation Agency; and
- other relevant bodies.

9.7 Supply staff and contractors

Where an allegation relates to an individual employed by an agency or contractor, the academy will not cease safeguarding involvement merely because it is not the person's employer.

The academy will:

- take the lead in safeguarding children;
- inform the agency or employer;
- cooperate with the LADO and other agencies;
- participate appropriately in any investigation; and
- ensure relevant safeguarding information is shared.

The academy will not simply terminate the individual's placement as an alternative to following safeguarding procedures.

Low-Level Concerns

9.8 What is a low-level concern?

A low-level concern is any concern, **no matter how small and even if it causes only 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 which:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work; and
- does not meet the harm threshold or is otherwise not sufficiently serious to warrant referral to the LADO.

Examples may include, but are not limited to:

- being over-friendly with children;
- having favourites;
- taking photographs of children contrary to academy policy;
- engaging with a child one-to-one in a secluded area or behind a closed door contrary to expectations;
- humiliating children; or
- using inappropriate, sexualised, intimidating or offensive language.

A low-level concern may arise from conduct inside or outside work.

9.9 Purpose of reporting low-level concerns

A culture in which low-level concerns are reported enables the academy to:

- identify inappropriate, problematic or concerning behaviour early;
- minimise opportunities for abuse;
- identify patterns of behaviour;
- ensure adults understand professional boundaries;
- provide appropriate support or management action;
- protect staff from misunderstandings where appropriate; and
- maintain a transparent safeguarding culture.

9.10 Reporting low-level concerns

All low-level concerns must be shared promptly in accordance with Trust procedures.

Normally, concerns about a member of academy staff will be reported to the **Headteacher**.

Where the academy's agreed process allows concerns initially to be reported to the DSL or another nominated senior leader, the **Headteacher must be informed in a timely manner**.

Low-level concerns about the Headteacher must be reported to the **CEO** in accordance with Trust procedures.
Concerns relating to the CEO must be reported to the **Chair of the Trust Board**.
Staff must not determine for themselves that a concern is too insignificant to report.

9.11 Self-referral

Staff are encouraged to self-refer where they:

- have found themselves in a situation which could be misinterpreted;
- believe their behaviour may appear compromising to others;
- realise retrospectively that their conduct may have fallen below expected professional standards; or
- wish to seek advice about professional boundaries.

Self-referral supports a culture of openness and transparency.

9.12 Decision-making

The Headteacher will normally be the decision-maker in respect of low-level concerns involving academy staff, although they may consult the DSL, Trust Safeguarding Lead, HR or LADO as appropriate.
The person receiving the concern will determine:

- whether the behaviour is consistent with the Code of Conduct;
- whether the concern is a low-level concern;
- whether it may meet the harm threshold;
- whether LADO advice is required;
- whether disciplinary or capability procedures may be relevant; and
- what action, support or monitoring is appropriate.

Where there is doubt about whether the harm threshold is met, **LADO advice should be sought**.

9.13 Recording low-level concerns

All low-level concerns will be recorded in writing.
Records will include:

- details of the concern;
- the context in which it arose;
- the identity of the person raising the concern, where known;
- the decision reached;
- the rationale for the decision;
- action taken; and
- the outcome where appropriate.

Records will be kept confidential, stored securely and retained in accordance with Trust policy and KCSIE.

9.14 Reviewing patterns

Low-level concerns will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern is identified, the academy will consider whether:

- disciplinary or other employment action is required;
- the harm threshold may now be met;
- the LADO should be consulted;
- additional training or supervision is required;
- academy culture or practice requires improvement; or
- wider safeguarding action is necessary.

9.15 References

Low-level concerns will not ordinarily be included in references unless:

- they relate to matters which would normally be included in a reference, for example misconduct or poor performance; or
- a pattern of concerns has met the harm threshold and resulted in relevant substantiated safeguarding findings.

References will comply with KCSIE 2026 and provide factual, accurate and fair information.

9.16 Safeguarding Concerns About Practice Within the Academy

All staff have a responsibility to raise concerns about poor, unsafe or inappropriate safeguarding practice or potential failures within the academy's safeguarding arrangements.

Concerns may include:

- failure to act on safeguarding information;
- unsafe professional practice;
- inappropriate conduct by colleagues;
- failures in safeguarding systems;
- deliberate concealment of safeguarding concerns; or
- concerns that academy leaders are not responding appropriately.

Such concerns will be taken seriously.

9.17 Whistleblowing

Staff should normally raise concerns through the academy or Trust's internal whistleblowing procedures.

Where a member of staff:

- feels unable to raise the matter internally;
- believes their genuine concerns are not being addressed; or
- believes safeguarding practice remains unsafe,

they may use appropriate external whistleblowing arrangements.

Staff may contact the **NSPCC Whistleblowing Advice Line on 0800 028 0285** for advice.

No member of staff will be subjected to detrimental treatment for raising a genuine safeguarding concern in good faith.

9.18 Concerns arising from use of academy premises

Where an allegation relates to an incident involving an organisation or individual using academy premises for activities involving children, the academy will:

- consider the immediate safety of the child;
- follow appropriate safeguarding procedures;
- notify the provider where appropriate;
- seek LADO advice where the allegation concerns an adult working with children; and
- inform children's social care and/or police where necessary.

Safeguarding action will not be avoided solely because the individual concerned is not employed by the Trust.

APPENDIX 1

ST. MARY'S CATHOLIC VOLUNTARY ACADEMY LOW-LEVEL CONCERNS REPORTING FORM

Use this form to share any concern with the Headteacher, no matter how small or seemingly insignificant, even if causing no more than a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the Schools' Code of Conduct [including inappropriate conduct outside of work] and/or in a way that on first glance does not appear to meet the allegation, 'harm' threshold.

Continue on separate sheets as necessary.

NAME OF STAFF MEMBER FOR WHOM THE CONCERN IS BEING RAISED	
DATE(s) TIME(s) OF CONCERNING INCIDENT(s)	
BRIEF CONTEXT IN WHICH THE LOW-LEVEL CONCERN AROSE	
DETAILS OF CONCERN- CHRONOLOGICAL, PRECISE AND AS ACCURATE AS POSSIBLE	
Name of Staff member raising the concern **Signed**	**Department and Role** **Time and Date**

ACTION TAKEN BY THE HEADTEACHER
DETAILS OF INITIAL FACT FINDING CARRIED OUT
STAFF MEMBER'S RESPONSE TO THE CONCERN RAISED **OUTCOME/ACTION TAKEN**
This record form will be held securely in one central digital file in MSTEAMS, and monitored with the DSL on a monthly basis, along with other concerns received, to identify any potential patterns of problematic or inappropriate behaviour. Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.

APPENDIX 2



Taken from Keeping Children Safe in Education (September 2026), DfE,

APPENDIX 3 The seven golden rules to sharing information

1. Remember that the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the UK GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Taken from Information Sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (2018) HM Government