Pool Academy

Part of Athena Learning Trust

Pool Academy

Child protection and safeguarding policy

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POOL ACADEMY
ASPIRATION | BELONGING | RESPECT

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1 Our strong safeguarding culture

Why it is important

1.1 Safeguarding is everyone's responsibility and it is the duty of the whole organisation to safeguard and promote the welfare of children. 'Children' includes everyone under the age of 18. This is our core safeguarding principle.

To ensure robust oversight of this principle, the board of trustees retains ultimate responsibility for safeguarding across the Trust and appoints a named safeguarding trustee to maintain strategic oversight. The board delegates local oversight and responsibility for safeguarding at school level to each local governing body (LGB). Consequently, each LGB is required to appoint a named safeguarding governor who is responsible for regularly reviewing localised safeguarding data, ensuring the Single Central Record (SCR) is compliant, and holding the Headteacher and the senior leaders to account for local safeguarding arrangements.

1.1.2 In adhering to these principles, we focus on providing a safe and welcoming environment for all our children regardless of age, ability, culture, race, language, religion, gender identity, or sexual identity. All our children have equal rights to support and protection.

1.1.3 One of the cornerstones of our safeguarding culture is this policy and the procedures contained within it. This policy applies to all staff, volunteers, and governors, all of whom are trained upon its contents and on their safeguarding duties. We update this policy at least annually to reflect changes to law, guidance, and best practice. Clear, immediate referral routes for raising safeguarding concerns—including internal reporting to the DSL, external escalations to Children's Social Care, and procedures for allegations against staff—are detailed explicitly in Sections 22, 23, 27, 28, and 29 of this policy.

1.1.4 This policy should be read alongside our other safeguarding policies, which are set out in Appendix Two.

1.1 What it means for our pupils

1.1.1 We work with our local safeguarding partners to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified, and contributing to inter-agency plans, which provide additional support to the child. It also includes contributing to broader, multi-agency strategic discussions about safeguarding children.

1.1.2 All our staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a child is at risk of harm. Any pupils or staff involved in child protection or safeguarding issue will receive appropriate support.

1.1.3 Our strong safeguarding culture ensures that we treat all pupils with respect and involve them in decisions that affect them. We encourage positive, respectful, and safe behaviour among pupils and we set a good example by conducting ourselves appropriately.

1.1.4 Identifying safeguarding and child protection concerns often begin with recognising changes in pupils' attendance and/or behaviour and knowing that these changes may be signs of abuse, neglect, or exploitation. Challenging behaviour may be an indicator of abuse.

1.1.5 All our staff will reassure children that their concerns and disclosures will be taken seriously, and that they will be supported and kept safe.

2 Safeguarding legislation and guidance

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

- Information Sharing Duty (2026)
- Keeping Children Safe in Education (2026)
- Working Together to Safeguarding Children (2026)
- What to do if you're worried a child is being abused (2015)
- Prevent Duty guidance: Guidance for specified authorities in England and Wales (2023)
- The Teacher Standards 2012
- Section 16LA of the Children Act 2004
- The Safeguarding Vulnerable Groups Act 2006
- Section 157 of the Education Act 2002
- The Education (Independent School Standards) Regulations 2014
- The Domestic Abuse Act 2021
- PACE Code C 2019
- Crime and Policing Act 2026

3 Roles and responsibilities

The designated safeguarding lead (DSL) is:

Miss Lynsey White

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Tel: 01209 712220

The Deputy DSL is:

Mr Steven Connor-Hemming
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Tel: 01209 712220

The safeguarding governor is:

Mr Richard Schofield
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The principal is:

Mrs Tegen Thompson
Email: tthompson@poolacademy.uk

Tel: 01209 712220

3.1 **The designated safeguarding lead (DSL):**

3.1.1 The designated safeguarding lead takes **lead responsibility** for safeguarding and child protection (including online safety) in the school. The DSL duties include:

- Ensuring child protection policies are known, understood, and used appropriately by staff.
- Working with the local governing body to ensure that the Trust's child protection policies are reviewed annually and that the procedures are reviewed regularly.
- Acting as a source of support, advice, and expertise for all staff on child protection and safeguarding matters.
- Liaising with the headteacher regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations and being aware of the requirement for Children to have an Appropriate Adult in relevant circumstances.
- Acting as a point of contact with the safeguarding partners.
- Making and managing referrals to children's social care, the police, or other agencies.
- Keeping detailed, accurate, secure written records of concerns, discussions, and decisions made including the rationale for those decisions (including where referrals were or were not made).
- Taking part in strategy discussions, and inter-agency meetings.
- Liaising with the 'case manager' and the designated officer(s) at the local authority if allegations are made against staff.
- Making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements.
- Transferring the child protection file and any other relevant welfare or safeguarding information to a child's new school.

3.2 **The deputy designated safeguarding lead(s):**

3.2.1 Our deputy DSL(s) is/are trained to the same level as the DSL and support(s) the DSL with safeguarding matters on a day-to-day basis. The ultimate lead responsibility for child protection remains with the DSL.

3.3 **The safeguarding governor/trustee**

3.3.1 The role of the safeguarding governor/trustee is to provide support and challenge to the DSL and the leadership of the school on how they manage safeguarding so that the safety and wellbeing of the children can continuously improve. The role includes:

- Understanding the requirements of the Governance Handbook and Keeping Children Safe in Education 2026.
- Supporting and challenging the DSL on the standards of safeguarding at the school.
- Confirming that consistent and compliant safeguarding practice takes place across the school.
- Reporting to the board of trustees about the standard of safeguarding in the school

3.3.2 The DSL and the safeguarding governor/trustee meet on a regular basis to discuss safeguarding issues and to agree steps to continuously improve safeguarding practices in the school.

4 Children who may be particularly vulnerable

4.1 Some children are at greater risk of abuse, neglect, and exploitation. This increased risk can be caused by many factors including social exclusion, isolation, discrimination, and prejudice. To ensure that all our pupils receive equal protection, we give special consideration to children who:

- Are vulnerable because of their race, ethnicity, religion, special educational needs, disability, gender identity or sexuality.
- Are young carers.
- Are pregnant or are parents themselves.
- Are involved in the court system or have a family member in prison.
- Are vulnerable to being bullied or engaging in bullying.
- Are at risk of sexual exploitation, forced marriage, female genital mutilation, or being drawn into extremism.
- Live in chaotic or unsupportive home situations.
- Live transient lifestyles or live away from home or in temporary accommodation.
- Are affected by parental substance abuse, domestic abuse, or parental mental health needs.
- Do not have English as a first language.
- Experience or have experienced bereavement or mental health difficulties.
- Are in care or privately fostered or have returned home to their family from care.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded.

5 Children with special educational needs, disabilities or health issues

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

- Assumptions that indicators of possible abuse such as behaviour, mood, and injury relate to the child's disability without further exploration.
- Being more prone to peer group isolation that other children.
- The potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in overcoming these barriers
- The need for intimate care or that these children are isolated from others.
- That these children are more likely to be dependent on adults for care, and
- These children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

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

6 Children who are absent from education

6.1 Children being absent from education for prolonged periods, on an increasing basis and/or on repeat occasions, and children with unexplainable and/or persistent absences from education, can be an indicator of abuse, neglect and exploitation, including sexual abuse or exploitation, trafficking, modern slavery, child criminal exploitation, mental health problems, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Our staff are alert to these risks.

6.2 We closely monitor attendance, absence, and exclusions and our DSL will take appropriate and proactive action including notifying the local authority, particularly where children go missing on repeated occasions, on an increasing basis and/or are missing for periods during the school day.

7 Alternative provision

7.1 Where a pupil is placed with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil and will ensure we are satisfied that the placement meets the pupil's needs.

8 Mental health

8.1 Schools have an important role to play in supporting the mental health and wellbeing of their pupils.

8.2 All staff are aware that mental health problems can be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation, and that in some cases they can develop into safeguarding concerns. Staff are also aware that where children have suffered adverse childhood experiences those experiences can impact on their mental health, behaviour, and education.

8.3 All staff are aware that there are potential warning signs when a child is struggling with their mental health. These include:

8.3.1 Significant changes in behaviour.

8.3.2 Ongoing difficulty sleeping.

8.3.3 Withdrawing from social situations.

8.3.4 Not wanting to do things they usually like; and

8.3.5 Physical signs of self-harm or neglecting themselves.

8.4 Where staff are concerned that a child's mental health is also a safeguarding concern, they will discuss it with the DSL or a deputy who will alert other relevant agencies as necessary.

9 Children who are lesbian, gay or bisexual

9.1 The fact that a child or a young person may be lesbian, gay, or bisexual is not in itself an inherent risk factor for harm. Unfortunately, children who are lesbian, gay, or bisexual, or are simply perceived to be lesbian, gay, or bisexual, can be vulnerable to discriminatory bullying by other children. The risk to these children can be compounded where children who are lesbian, gay, or bisexual lack a trusted adult with whom they can be open.

9.2 Our staff endeavour to reduce the barriers and provide a safe space for those children to speak out or share their concerns with them.

10 Children who are questioning their gender

10.1 The school will take a sensitive, child-centred approach to pupils who are questioning their gender identity or who have the protected characteristic of gender reassignment, having regard at all times to the welfare of the individual pupil and the welfare of other pupils.

10.2 The school will respect both gender-critical and gender-affirming beliefs held within the school community and will not tolerate bullying, harassment, or discrimination in connection with any such beliefs.

10.3 The school will not initiate any social transition actions. Where a child, parent, or carer requests support in relation to gender identity, including any form of social transition (such as changes to name, pronouns, or presentation), the school will only implement any changes following a school-level decision made in accordance with the following process:

10.3.1 **DSL involvement**: The designated safeguarding lead ("DSL") will be informed and involved in the decision-making process from the outset, as gender-related requests may intersect with safeguarding considerations.

10.3.2 **Parental engagement**: Parents and carers will be engaged as a matter of priority and their views treated with importance. The school will not implement any social transition arrangements without parental knowledge and engagement, save in the exceptional circumstances described in paragraph 10.3.3 below.

10.3.3 **Exception to parental engagement**: Where staff have reasonable grounds to conclude that involving parents or carers would create a greater risk of harm to the child, the DSL will determine what safeguarding action is appropriate before parents are contacted and before

any decision is taken. Any decision to proceed without parental engagement will be documented with clear reasons.

10.3.4 **Professional advice**: Where appropriate, the school will seek advice from relevant professionals, which may include the school's special educational needs coordinator ("SENCO"), relevant health professionals, or the local authority designated officer ("LADO") where applicable. The school will be alert to the possibility that gender-questioning presentations may co-occur with, or be influenced by, other factors including neuro-developmental conditions, mental health difficulties, or other needs.

10.3.5 **Cautious approach**: The Trust will take a careful and considered approach, recognising that social transition is an active intervention with potentially significant consequences. In primary schools, support for full social transition will be agreed only in very rare circumstances.

10.3.6 **Record-keeping**: All discussions, decisions, and the reasons for those decisions will be recorded in writing and stored securely and confidentially. Records will be kept under review and revisited if circumstances change.

10.3.7 **Review**: Any agreed arrangements will be subject to periodic review. Where circumstances change, the DSL will be informed immediately and arrangements will be reassessed.

10.4 The school will ensure that its facilities arrangements comply with its legal obligations in relation to biological sex and with its safeguarding duties.

10.4.1 **Toilets**: The school will not permit a child to use toilet facilities designated for the opposite biological sex. Where a pupil does not wish to use toilet facilities designated for their biological sex, the school will consider whether an alternative arrangement, such as a self-contained individual toilet, can be provided without compromising single-sex provision or the safety, comfort, privacy, or dignity of the pupil or other pupils. Any such arrangement will be recorded and reviewed regularly.

10.4.2 **Changing rooms and showers**: The school will not permit a pupil aged 11 or over to undress in the presence of a pupil of the opposite biological sex and will not permit access to changing rooms or shower facilities designated for the opposite biological sex as part of any social transition arrangements. Where a pupil does not wish to use facilities designated for their biological sex, the school will consider alternative arrangements that do not compromise single-sex provision, and will keep clear records, communicate appropriately, and review regularly.

10.4.3 **Overnight accommodation**: The school will not permit a pupil to share overnight accommodation with a pupil of the opposite biological sex. Where a pupil does not wish to share accommodation with a pupil of the same biological sex, the school will seek to identify alternative arrangements where possible without compromising safety, comfort, privacy, or dignity, and will document those arrangements.

10.5 For safeguarding purposes, relevant staff will be made aware of a pupil's biological sex in all cases, and a pupil's biological sex will be recorded accurately wherever it is recorded by the school.

11 Child-on-child abuse

11.1 Child-on-child abuse – children harming other children - is unacceptable and will be taken seriously; it will not be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. The school takes a zero-tolerance approach to sexual harassment and sexual violence; it is never acceptable, and it will not be tolerated.

11.2 It is more likely that boys will be perpetrators of child-on-child abuse and girls' victims, but allegations will be dealt with in the same manner, regardless of whether they are made by boys or girls.

11.3 All staff are aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator, and they are clear about the school's policy and procedures for addressing child-on-child abuse and maintain an attitude of 'it could happen here'.

11.4 Child-on-child abuse can take many forms, including:

- **Physical abuse** such as shaking, hitting, biting, kicking or hair pulling.
- **Bullying,** including cyberbullying, prejudice-based and discriminatory bullying.
- **Sexual violence** such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- **Sexual harassment** such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse and which may include misogyny/misandry.
- Serious physical assault and harm, or the threat of harm with a weapon.
- **Causing someone to engage in sexual activity without consent**, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- **Up skirting**, which involves taking a picture under a person's clothing without their permission for the purposes of sexual gratification or to cause humiliation, distress or alarm.
- **Consensual and non-consensual making or sharing of nude and semi-nude images and/or videos** (including those generated by AI), and including pressuring others to share sexual content.
- **Abuse in intimate personal relationships between children (also known as teenage relationship abuse)** - such as a pattern of actual or threatened acts of physical, sexual or emotional abuse.
- **Initiation/hazing** – used to induct newcomers into sports teams or school groups by subjecting them to potentially humiliating or abusing trials with the aim of creating a bond.

11.5 Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

11.6 All staff recognise that that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but is not being reported.

11.7 **Minimising risk**

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

- Promoting an open and honest environment where children feel safe and confident to share their concerns and worries.
- Using assemblies to outline acceptable and unacceptable behaviour.
- Using RSE and PSHE to educate and reinforce our messages through stories, role play, current affairs, and other suitable activities.
- Ensuring that the school is well supervised, especially in areas where children might be vulnerable.

11.8 **Investigating allegations**

11.8.1 All allegations of child-on-child abuse should be passed to the DSL immediately who will investigate and manage the allegation as follows:

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

11.8.2 Where allegations of a sexual nature are made, the school will follow the statutory guidance set out in Part 5 of Keeping Children Safe in Education 2026. The DSL will decide on a case-by-case basis whether to carry out an immediate risk and needs assessment.

11.8.3 Reports of rape or assault by penetration are especially serious. While the school establishes the facts and liaises with children's social care and the police, the alleged perpetrator(s) may be removed from any shared classes with the victim. The school will also consider how to maintain a reasonable physical separation between the victim and alleged perpetrator(s)

across school, including before or after school-based activities, and on transport to and from the school.

11.8.4 Children can report allegations or concerns of child-on-child abuse to any staff member and that staff member will pass on the allegation to the DSL in accordance with this policy. To ensure children can report their concerns easily, the school has a range of systems in place for children to confidently report abuse - see page 28 of this policy.

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

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

11.8.7 The support required for the pupil who has been harmed will depend on their particular circumstance, and the nature of the abuse. The support we provide could include counselling and mentoring or restorative justice work.

11.8.8 Support may also be required for the pupil who caused harm. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil, and/or change behaviours. The consequences for the harm caused or intended will be addressed.

12 Serious violence

12.1 Serious violence is a continuing safeguarding concern which may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and criminal exploitation. All staff are aware of the signs that a child may be at risk of or involved in serious violence, including:

12.1.1 An increased absence from school or college or a significant decline in educational performance.

12.1.2 A change in friendships or relationships with older individuals or groups.

12.1.3 Signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries, and

12.1.4 Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

13 Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

13.1 Both CCE and CSE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through

violence or the threat of violence. This power imbalance can be due to a range of factors, including:

13.1.1 Age.

13.1.2 Gender.

13.1.3 Sexual identity.

13.1.4 Cognitive ability.

13.1.5 Physical strength.

13.1.6 Status.

13.1.7 Access to economic or other resources.

13.2 The abuse can be perpetrated by individuals or groups, males or females, and children or adults. It can also be perpetrated by an organised network or gang, and the victim may identify as being part of this group. They can be one-off occurrences or a series of incidents over time and may or may not involve force or violence. Exploitation can be physical and take place online.

13.3 CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery.

13.4 **Child Criminal Exploitation (CCE)**

13.4.1 CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, being forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

13.4.2 Children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.

13.4.3 Children involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

13.4.4 It is important to note that the experience of girls who are criminally exploited can be very different to that of boys, and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

13.5 **CCE indicators**

13.5.1 **CCE** indicators can include children who:

(a) Appear with unexplained gifts or new possessions.

(b) Associate with other young people involved in exploitation.

(c) Suffer from changes in emotional well-being.

(d) Misuse drugs or alcohol.

(e) Go missing for periods of time or regularly return home late.

(f) Regularly or increasingly miss school or education or do not take part in education.

13.6 **Child Sexual Exploitation (CSE)**

13.6.1 CSE is a form of child sexual abuse which may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

13.6.2 CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, e.g. through others sharing videos or images of them on social media.

13.6.3 CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. CSE can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

13.6.4 Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

13.7 **CSE indicators**

13.7.1 The above indicators can also be indicators of **CSE**, as can children who:

(a) Have older boyfriends.

(b) Suffer sexually transmitted infections or become pregnant.

13.8 We include the risks of criminal and sexual exploitation in our RSE and health education curriculum. It is often the case that the child does not recognise the coercive nature of the exploitative relationship and does not recognise themselves as a victim.

13.9 Victims of criminal and sexual exploitation can be boys or girls, and it can have an adverse impact on a child's physical and emotional health.

13.10 All staff are aware of the indicators that children are at risk of or are experiencing CCE or CSE. All concerns are reported immediately to the DSL. Staff must always act on any concerns that a child is suffering from or is at risk of criminal or sexual exploitation.

14 **County lines**

14.1 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store, and sell drugs and money, with offenders often using coercion, intimidation, violence and weapons to ensure compliance of victims.

14.2 County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child. This power imbalance can be due to the same range of factors set out at paragraph 10.1 of this policy.

14.3 Children can be targeted and recruited into county lines in a number of locations, including schools and colleges. Indicators of county lines include those indicators set out at 10.3 of this policy, with the main indicator being missing episodes from home and/or school.

14.4 Additional specific indicators that may be present where a child is criminally exploited include children who:

- Go missing and are subsequently found in areas away from home.
- Have been the victim or perpetrator of serious violence (e.g. knife crime).
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs.
- Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Are found in accommodation with which they have no connection or in a hotel room where there is drug activity.
- Owe a 'debt bond' to their exploiters.
- Have their bank accounts used to facilitate drug dealing.

14.5 All staff are aware of indicators that children are at risk from or are experiencing criminal exploitation. The main indicator is increased absence during which time the child may have been trafficked for the purpose of transporting drugs or money.

15 Sharing nudes and semi-nudes

15.1 Sharing photos, videos, and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the creation, sending, or posting online of nude or semi-nude images, videos, or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps, or forums, or carried out offline between devices via services like Apple's AirDrop.

15.2 Images may be taken or created by the child themselves or by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

15.3 The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. Other terms used in education include 'sexting', youth produced sexual imagery' and 'youth involved sexual imagery'.

15.4 The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also

possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- Children and young people find nudes and semi-nudes online and share them claiming to be from a peer.
- Children and young people digitally manipulate an image of a young person into an existing nude online.
- Images created or shared are used to abuse peers, e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

15.5 The school takes a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual. All such incidents require a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation, or vulnerability. All incidents involving nude or semi-nude images will be managed as follows:

- The incident will be referred to the DSL immediately and the DSL will discuss it with the appropriate staff. If necessary, the DSL may also interview the children involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put a child at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm, we will refer the matter to the police and/or children's social care.

15.6 The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes in February 2024 - UKCIS advice 2024 . The school will have regard to this advice when managing these issues.

16 Online safety

16.1 It is essential that children are safeguarded from potentially harmful and inappropriate online material. As well as educating children about online risks, we have appropriate and effective filtering and monitoring systems in place to limit the risk of children being exposed to inappropriate content, subjected to harmful online interaction with other users and to ensure their own personal online behaviour does not put them at risk. Our filtering and monitoring systems also prevent access to harmful and inappropriate content accessed through generative AI tools and products.

16.2 These filtering and monitoring systems block harmful and inappropriate content, and we take care to ensure that they do not unreasonably impact on teaching and learning. The systems are reviewed regularly (at least every academic year) to ensure their effectiveness, and staff have been identified and assigned suitable roles and responsibilities to manage these systems. We also have effective monitoring strategies in place to meet the safeguarding needs of our pupils.

16.3 We tell parents and carers what filtering and monitoring systems we use, so they can understand how we work to keep children safe.

16.4 We will also inform parents and carers of what we are asking children to do online, including the sites they need to access, and with whom they will be interacting online.

16.5 Online safety risks can be categorised into four areas of risk:

- **Content**: Being exposed to illegal, inappropriate, or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact**: Being subjected to harmful online interaction with other users or generative AI applications that simulate this, such as peer-to-peer pressure and adults posing as children or young adults to groom or exploit children.
- **Conduct**: Personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images, including those generated using AI and online bullying.
- **Commerce**: Risks such as online gambling, inappropriate advertising, phishing or financial scams.

16.6 All staff are aware of these risk areas and should report any concerns to the DSL.

17 Domestic abuse

17.1 The Domestic Abuse Act 2021 introduced a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear, or experience the effects of abuse.

17.2 Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse, between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial, and emotional abuse.

17.3 Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality, or background and domestic abuse can take place inside or outside of the home. This means children can also be victims of domestic abuse.

17.4 Children can witness and be adversely affected by domestic violence in their home life. Experiencing domestic abuse and exposure to it can have a serious emotional and psychological impact on children, and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

17.5 Where police have been called to a domestic violence incident where children are in the household and experienced that incident, the police will inform the DSL. The police will also notify us if they have reasonable grounds to believe a child may be a victim of domestic abuse. This ensures that the school has up to date safeguarding information about the child.

17.6 All staff are aware of the impact domestic violence can have on a child. If any of our staff are concerned that a child has witnessed domestic abuse, they will report their concerns immediately to the DSL.

18 Honour or faith-based abuse

18.1 Honour or faith-based abuse (HBA) encompasses actions taken to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

18.2 Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. Our staff are aware of this dynamic and additional risk factors and we take them into consideration when deciding what safeguarding action to take.

18.3 If staff are concerned that a child may be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead.

18.4 Female genital mutilation

18.4.1 FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal and a form of child abuse with long-lasting harmful consequences.

18.4.2 FGM is carried out on females of any age, from babies to teenagers to women. Our staff are trained to be aware of risk indicators, including concerns expressed by girls about going on a long holiday during the summer break. If staff are concerned that a child may be at risk of FGM or who has suffered FGM, they should speak to the designated safeguarding lead. Teachers are also under legal duty to report to the police where they discover that FGM has been carried out on a child under 18. In such circumstances, teachers will personally report the matter to the police as well as informing the designated safeguarding lead.

18.5 Forced marriage

18.5.1 A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Coercion may include physical, psychological, financial, sexual, and emotional pressure or abuse.

18.5.2 Forced marriage is illegal. It is also illegal to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

18.5.3 Our staff are trained to be aware of risk indicators, which may include being taken abroad and not being allowed to return to the UK.

18.5.4 Forced marriage is not the same as arranged marriage, which is common in many cultures.

18.5.5 If staff are concerned that a child may be at risk of forced marriage, they should speak to the designated safeguarding lead.

19 Radicalisation and extremism

19.1 Extremism is defined as vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different

faiths and beliefs. Radicalisation refers to the process of a person legitimising support for, or use of terrorist violence.

19.2 Children are vulnerable to extremist ideology and radicalisation. Whilst Islamic fundamentalism is the most widely publicised, extremism and radicalisation can occur in other cultures, religions, and beliefs, including the far right and white supremacy. Our staff are trained to identify those at risk of being radicalised or drawn into extremism.

19.3 If staff are concerned that a child may be at risk of radicalisation or being drawn into extremism, they should speak to the designated safeguarding lead.

20 Staff/pupil relationships

20.1 Staff are aware that inappropriate behaviour towards pupils is unacceptable and that it is a criminal offence for them to engage in any sexual activity with a pupil under the age of 18.

20.2 We provide our staff with advice regarding their personal online activity, and we have clear rules regarding electronic communications and online contact with pupils. It is considered a serious disciplinary issue if staff breach these rules.

20.3 Our Staff Code of Conduct sets out our expectations of staff and is signed by all staff members.

21 Safeguarding concerns and allegations made about staff, including supply teachers, volunteers, and contractors

21.1 If a safeguarding concern or allegation is made about a member of staff, supply teacher, volunteer, or contractor, or relates to incidents that happened when an individual or organisation was using the school premises for the purposes of running activities for children our set procedures must be followed. Our safeguarding concerns and allegations made about staff, supply teachers, volunteers, and contractors and procedure can be accessed by contacting the school and the full procedure for managing such allegations or concerns are set out in Part Four of Keeping Children Safe in Education 2026.

21.2 Safeguarding concerns or allegations made about staff who no longer work at the school will be reported to the police.

22 Whistle blowing if you have concerns about a colleague

22.1 It is important that all staff and volunteers feel able to raise concerns about a colleague's practice. All such concerns should be reported to the headteacher, unless the complaint is about the headteacher, in which case concern should be reported to the chair of governors.

22.2 Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

22.3 The school's whistleblowing policy allows staff to raise concerns or make allegations and for an appropriate enquiry to take place. This can be found on the Athena Learning Trust website.

23 Staff and governor/trustee training

23.1 Our staff receive appropriate safeguarding and child protection training (including online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) which is regularly updated. In addition, all staff receive

safeguarding and child protection updates on a regular basis to ensure they are up to date and empowered to provide exceptional safeguarding to our pupils.

23.2 New staff and volunteers receive a briefing during their induction which covers this Child Protection and Safeguarding policy and our staff behaviour policy, how to report and record concerns and information about our designated safeguarding lead and deputy DSLs.

23.3 Our governors/trustees receive appropriate safeguarding and child protection (including online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction which equips them with the knowledge to provide strategic challenge to test and assure themselves that there is an effective whole trust approach to safeguarding. This training is updated at least annually.

23.4 Our safeguarding governor/trustee receives additional training to empower them to support and challenge the designated safeguarding lead and support the delivery of high-quality safeguarding across the trust.

24 Safer recruitment

24.1 The governing body and our senior leadership team are responsible for ensuring that we follow recruitment procedures which help to deter, reject, or identify people who might harm children. When doing so we check and verify the applicant's identity, qualifications, and work history in accordance with Keeping Children Safe in Education 2026 and the local safeguarding partner arrangements.

24.2 All relevant staff (involved in early years settings and/or before or after school care for children under eight) are made aware of the disqualification from childcare guidance and their obligations to disclose to us relevant information that could lead to disqualification.

24.3 We ensure that our volunteers are appropriately checked and supervised when in school. We check the identity of all contractors working on site and requests DBS checks where required by Keeping Children Safe in Education 2026. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

24.4 When using supply staff, we will obtain written confirmation from supply agencies or third-party organisations that staff they provide have been appropriately checked and are suitable to work with children. Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

24.5 The trust maintains the single central record of recruitment checks undertaken in each of our academies. Our recruitment policy and procedures can be accessed by contacting the school.

25 Site security

25.1 Visitors are asked to sign in at the school reception and are given a badge, which confirms they have permission to be on site. If visitors have undergone the appropriate checks, they can be provided with unescorted access to the school site. Visitors who have not undergone the required checks will be escorted at all times.

26 Child protection procedures

26.1 Recognising abuse

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

26.1.2 Keeping Children Safe in Education 2026 refers to four categories of abuse. These are set out at Appendix One along with indicators of abuse and neglect.

26.2 **Taking action**

26.2.1 Any child could become a victim of abuse. Key points for staff to remember for taking action are:

- In an emergency take the action necessary to help the child, if necessary, call 999.
- Complete a record of concern form and report your concern to the DSL as soon as possible.
- Share information on a need-to-know basis only and do not discuss the issue with colleagues, friends or family.

26.3 **If you are concerned about a pupil's welfare**

26.3.1 Staff may suspect that a pupil may be at risk. This may be because the pupil's behaviour has changed, their appearance has changed, or physical signs are noticed. In these circumstances, staff will give the pupil the opportunity to talk and ask if they are OK.

26.3.2 If the pupil does reveal that they are being harmed, staff should follow the advice below.

26.3.3 Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or are being threatened, which could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to our DSL if they have concerns about a child.

26.4 **If a pupil discloses to you**

26.4.1 If a pupil tells a member of staff about a risk to their safety or wellbeing, the staff member will:

- Remain calm and not overreact.
- Allow them to speak freely.
- Not be afraid of silences.
- Not ask investigative questions
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'.
- Not automatically offer physical touch as comfort.
- Let the pupil know that in order to help them they must pass the information on to the DSL.

- Tell the pupil what will happen next and give them an opportunity to ask questions about what will happen next.
- Complete the **concern form** and pass it to the DSL as soon as possible.
- Report verbally to the DSL even if the child has promised to do it by themselves.
- Let the pupil know when they can expect to be updated or receive more information, emphasising that the pupil can talk to them or the DSL at any time.

26.5 **Notifying parents**

26.5.1 The school will normally seek to discuss any concerns about a pupil with their parents. If the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are notified.

27 **Referral to children's social care**

27.1 The DSL will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

28 **Reporting directly to child protection agencies**

28.1 Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care or the police if they are convinced that a direct report is required or if the designated safeguarding lead, the deputies, the head teacher or the chair of governors are not available, and a referral is required immediately.

29 **Confidentiality and sharing information**

29.1 Child protection issues necessitate a high level of confidentiality. Staff should only discuss concerns with the designated safeguarding lead, headteacher, or chair of governors.

29.2 The school has a statutory duty to share information where the DSL considers that the information is relevant to safeguarding or promoting the welfare of a child and that sharing it may assist the recipient organisation to exercise its safeguarding functions. The duty extends to information about any adult or other individual connected to the child where that information is relevant to the child's safety or welfareThe DSL will normally obtain consent from the pupil and/or parents to share child protection information. Where there is good reason to do so, the DSL may share information without consent, and will record the reason for deciding to do so.

29.3 The DSL will inform the child and/or their parents or carers about what information has been shared and why, unless there is good reason not to. Consent from the child, parent or carer is not required before sharing. This is a transparency obligation, not a requirement to obtain consent before sharingInformation sharing will take place in a timely and secure manner and only when it is necessary and proportionate to do so and the information to be shared is relevant, adequate and accurate.

29.4 Data protection law provides the framework for sharing information lawfully and proportionately; it is not a barrier to sharing. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Data Protection OfficerInformation sharing decisions will be recorded, whether or not the decision is taken to share.

29.5 Where the DSL determines through their professional judgement that sharing relevant information would be more detrimental to the child than not sharing, they will withhold the information. All decisions, whether to share or not to share, will be recorded with clear reasonsThe UK GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Data Protection Officer.

29.6 **Storing information**

29.7 Child protection information will be stored separately from the pupil's school file, and the school file will be 'tagged' to indicate that separate information is held. It will be stored and handled in line with our retention and destruction policy.

29.8 Where a child transfers to a new school, the DSL will transfer the child protection file and any other relevant welfare or safeguarding information to the child's new school.

29.9 Our confidentiality and information sharing policy and our retention and destruction policy are available to parents and pupils on request.

30 **Special circumstances**

30.1 **Looked after children**

30.1.1 The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

30.2 **Children who have a social worker**

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

30.3 **Work experience**

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

30.4 **Children staying with host families**

30.4.1 The school may make arrangements for pupils to stay with host families, for example during a foreign exchange trip or sports tour. When we do, we follow the guidance set out in the

Keeping Children Safe in Education 2026 to ensure hosting arrangements are as safe as possible.

30.4.2 Schools cannot obtain criminal record information from the Disclosure and Barring Service about adults abroad. Where pupils stay with host families abroad, we will agree with the partner schools a shared understanding of the safeguarding arrangements. Our designated safeguarding lead will ensure the arrangements are sufficient to safeguard our pupils and will include ensuring pupils understand who to contact should an emergency occur, or a situation arise, which makes them feel uncomfortable. We will also make parents aware of these arrangements.

30.4.3 Some overseas pupils may reside with host families during school terms, and we will work with the local authority to check that such arrangements are safe and suitable.

30.5 **Private fostering arrangements**

30.5.1 A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

30.5.2 Where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will tell the DSL, and the school will notify the local authority of the circumstances.

Appendix One - Four categories of abuse

It is vital that staff are also aware of the range of behavioural indicators of abuse and neglect and report any concerns to the designated safeguarding lead. It is the responsibility of staff to report their concerns.

All staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. All staff are also aware of the indicators of abuse, neglect, exploitation and modern slavery, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online.

1 Physical abuse

Physical abuse is 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.

1.1 Indicators of physical abuse

The following may be indicators of physical abuse:

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

2 Emotional abuse

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

children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

2.1 Indicators of emotional abuse

The following may be indicators of emotional abuse:

- The child consistently describes him/herself in negative ways.
- Over-reaction to mistakes.
- Delayed physical, mental, or emotional development.
- Inappropriate emotional responses, fantasies.
- Self-harm.
- Drug or solvent abuse.
- Running away.
- Appetite disorders – anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

3 Sexual abuse

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

3.1 Indicators of sexual abuse

The following may be indicators of sexual abuse:

- Sexually explicit play or behaviour or age-inappropriate knowledge.
- Aggressive behaviour including sexual harassment or molestation.
- Reluctance to undress for PE or swimming.
- Anal or vaginal discharge, soreness, or scratching.
- Bruises or scratches in the genital area.
- Reluctance to go home.
- Refusal to communicate.

- Depression or withdrawal.
- Isolation from peer group.
- Eating disorders, for example anorexia nervosa and bulimia.
- Self-harm.
- Substance abuse.
- Acquiring gifts such as money or a mobile phone from new 'friends'.

4 Neglect

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

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

4.1 Indicators of neglect

The following may be indicators of neglect:

- Constant hunger or stealing, scavenging and/or hoarding food.
- Frequent tiredness.
- Frequently dirty or unkempt.
- Poor attendance or often late.
- Poor concentration.
- Illnesses or injuries that are left untreated.
- Failure to achieve developmental milestones or to develop intellectually or socially.
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings.
- The child is left at home alone or with inappropriate carers.

Appendix Two - Related safeguarding policies

The below policies, and a range of others, can be found on the Pool Academy website, or on the Athena Learning Trust website. These lists are not exhaustive:

- Behaviour
- Personal and intimate care
- Complaints procedure
- Bullying
- Whistleblowing
- SEND
- Data Protection
- Online safety
- RSE
- Anti-radicalisation policy

The below policies are internal policies and are available upon request - please contact the school directly:

- Staff behaviour/code of conduct
- Recruitment and selection
- Safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers
- Grievance and disciplinary

Pool Community Academy

School-Specific Safeguarding Practice

Appendix to the Athena Learning Trust Safeguarding & Child Protection Policy

1. Safeguarding Culture and Ethos

While Pool Community Academy operates within the Athena Learning Trust safeguarding framework, our school-specific practice is underpinned by a **culture of vigilance**, where safeguarding is **everyone's responsibility**.

We move beyond procedural compliance to a **proactive, child-centred approach**, ensuring that the **best interests of the child** are prioritised at every decision point. Safeguarding is embedded in daily practice, relationships, curriculum delivery, staff training, and leadership oversight.

2. Reporting Safeguarding Concerns – Students

Pool Academy empowers students to report concerns through a **multi-channel approach**, ensuring that no child's voice is unheard.

2.1 In-Person Reporting – *"Any Adult, Any Time"*

- By "Adult" we mean a member of staff.
- Students are explicitly taught that they can speak to **any member of staff**.
- All staff are trained to receive disclosures and to **stay calm, listen, and reassure**.
- Regular, informal check-ins take place through:
    - Form tutors
    - Heads of Year
    - Pastoral staff
    - Student support teams

These low-stakes interactions are a key mechanism for **early identification of concerns**.

2.2 Pastoral Office – *Safe Haven*

- The Pastoral Office operates as a **Safe Haven** for students.
- Students can access immediate safeguarding support.

2.3 Designated Safeguarding Leads (DSLs)

- Photographs of the **DSL (Lynsey White)** and **Deputy DSL (Rebecca Neville)** are prominently displayed across the school.
- Students are taught how to identify and approach safeguarding leads quickly.

2.4 Online Reporting and Digital Safety

- The **Tootoot** platform enables 24/7 reporting.

- Robust **filtering and IT monitoring systems** are in place in line with KCSIE.
- Students are educated about:
    - The purpose of filtering and monitoring
    - How to report over-blocking or under-blocking concerns

3. Peer-on-Peer Abuse and Anti-Bullying

Pool Community Academy maintains a **clear and uncompromising stance** on peer-on-peer abuse.

- The school operates a **zero-tolerance approach** to child-on-child abuse.
- All incidents are addressed with **urgency, clarity, and care**.
- Safeguarding considerations always take precedence over behaviour management.

4. Management of Serious Peer-on-Peer Incidents

(Including Sexual Violence and Sexual Harassment – KCSIE Part 5)

All serious peer-on-peer incidents are managed through a clear, consistent and child-centred safeguarding response, aligned with recognised best practice. Detailed procedures are outlined in Appendix A.

Our approach is informed by the Child Sexual Abuse Response Pathway, which we use to guide professional decision-making when there are concerns that a child or young person may be experiencing or has experienced sexual abuse.

The guidance linked to this pathway helps us ensure that the child or young person remains at the centre of all decision-making. It provides clarity on how to respond, who to involve, and how to support the child throughout the initial stages of concern, ensuring our practice is consistent, proportionate, and safeguarding-led.

5. Anti-Bullying and Student Leadership

The student-led anti-bullying group, **“The Superhumans,”** plays an active role in safeguarding culture.

Members are trained to recognise:

- Boundary-crossing “banter”
- Online harassment
- Gender-based and sexualised behaviours

Students are encouraged to report concerns they **witness**, reinforcing a culture where speaking up is expected and normal.

6. Student Voice and Safeguarding

Students contribute to safeguarding through:

- Student Council

- Pastoral check-ins
- Surveys
- Daily conversations with staff

6.1 Lived Experience Safeguarding Model

- Students participate in learning walks with staff to identify areas of concern.
- Findings lead directly to:
    - Environmental changes
    - Supervision adjustments

Feedback is revisited so pupils can see how their voice leads to **visible action**.

7. Responsive Curriculum and RSHE

- PSHE and Character curricula are **dynamic and responsive**.
- Content is adapted swiftly to address emerging risks (e.g. vaping, online harm, social media trends).
- RSHE is:
    - Age-appropriate
    - Explicit
    - Regularly revisited

Core coverage includes consent, respectful and unhealthy relationships, sexual harassment and violence, and how to seek help.

8. Focus Weeks, Assemblies, and External Expertise

- Annual **Anti-Bullying Focus Week**
- Themed assemblies informed by student voice and safeguarding intelligence
- Partnership with **local PCSOs**, delivering messages on:
    - Online safety
    - Community safety
    - Exploitation
    - Legal consequences of harmful behaviour

9. Greeting Programme and Real-Time Safeguarding Messages

The Greeting Programme provides an additional proactive safeguarding layer by:

- Delivering targeted safeguarding messages by year group
- Responding rapidly to emerging local or national risks
- Providing clear signposting and relational support at the point of need

10. Vulnerable Groups and Inclusion

10.1 Young Carers

- Identified using a **whole-family approach**
- Supported through:
    - Relationship-based interventions
    - Safe discussion spaces
    - Links to local Carer Support services

10.2 Children in Kinship Care

- DSLs remain alert to specific safeguarding vulnerabilities
- The school works in partnership with:
    - Virtual School Heads
    - Local Authorities
    - Families

Safeguarding considerations are embedded into Early Help, attendance, and transition planning.

11. Operation Encompass – Domestic Abuse Protocol

Pool Academy is a **full participant** in Operation Encompass.

- Police notifications are received before the start of the school day
- Immediate **"silent support"** is provided on arrival at school

Full protocol, tiered support, and confidentiality arrangements are detailed in **Appendix B**.

12. Safer Recruitment and Ongoing Training

- Weekly **Safeguarding Snapshots**
- Termly **low-level concern reviews**
- Online searches conducted for shortlisted candidates as part of safer recruitment
- Safeguarding training is continuous, not annual

13. Safeguarding Disclosure – Immediate Action (All Staff)

All staff follow a clear, consistent disclosure response.
The full step-by-step flowchart is provided in **Appendix C**.

14. Safeguarding Case Management – MyConcern

Safeguarding case management at Pool Academy is underpinned by:

- Centralised recording on **MyConcern**
- Prompt DSL/DDSL review
- Named responsibility for every case
- Task allocation and monitoring
- Regular oversight and audit

Full operational detail is provided in **Appendix D**.

Appendices

Appendix A

Peer-on-Peer Abuse: Serious Incident Management Flow

(Includes immediate risk assessment, disclosure handling, evidence preservation, police thresholds, safeguarding support, behaviour responses, and review.)

Appendix B

Operation Encompass – Domestic Abuse Protocol

(Includes notification process, Key Adult role, tiered support model, confidentiality, data integrity, and inter-agency working.)

Appendix C

Safeguarding Disclosure – Immediate Action Flowchart

(All Staff)

(Step-by-step guidance from disclosure to recording and follow-up.)

Appendix D

Safeguarding Case Management and MyConcern Protocol

(Recording standards, named responsibility, task management, oversight, and audit trail.)

Appendix A

Peer-on-Peer Abuse: Serious Incident Management Flow

Applies to:
Sexual violence, sexual harassment, harmful sexual behaviour, serious physical assault, coercive behaviour, or any incident meeting safeguarding or criminal thresholds.

Statutory Reference:
Keeping Children Safe in Education (KCSIE) – Part 5

Stage 1: Immediate Safety and Risk Assessment

- Concern received by **DSL (Lynsey White)** or **Deputy DSL (Mr Steven Connor-Hemming)**
- Immediate assessment of:
    - Safety and wellbeing of all students
    - Ongoing risk of harm
    - Need for separation, supervision, or safe spaces
- Protective actions taken without:
    - Making assumptions
    - Pre-empting outcomes

Stage 2: Disclosure Handling and Recording

- Staff:
    - Listen calmly
    - Do not investigate
    - Do not promise confidentiality
- Concern recorded on **MyConcern**, including:
    - Exact words (where possible)
    - Factual observations only
    - Date, time, and location
- Record reviewed by DSL/DDSL without delay

Stage 3: Evidence Preservation (Non-Investigative)

Where appropriate:

- CCTV footage identified and preserved where possible
- Digital or written material secured (where advised)
- Data protection requirements followed

Stage 4: External Agency Thresholds

DSL determines whether thresholds are met for:

- Police involvement
- Multi-agency safeguarding response

Parents/carers are informed unless doing so would increase risk or compromise an investigation.

Stage 5: Ongoing Safeguarding Support

Support provided to:

- Alleged victim
- Alleged perpetrator

May include:

- Pastoral support
- Regular welfare check-ins
- External agency involvement

Support is reviewed regularly and remains child-centred.

Stage 6: Behaviour and School-Based Responses

- Considered separately from criminal processes
- Proportionate and evidence-informed
- Rooted in safeguarding and risk assessment
- Risk assessments updated throughout

Stage 7: Review and Learning

- All actions recorded on **MyConcern**
- Safeguarding team reviews:
  - Patterns or themes
  - Curriculum or supervision adjustments
  - CPD needs

  Learning informs future safeguarding practice.

Appendix B

Operation Encompass – Domestic Abuse Protocol

Purpose:
To provide immediate, compassionate, and trauma-informed support for children exposed to domestic abuse.

Statutory Alignment:
KCSIE (Part 1 and Part 2) – Domestic abuse as a standalone safeguarding concern and ACE (Adverse Childhood Experiences).

Phase 1: Police Notification

- Police attend a domestic abuse incident
- Children present or resident in the household
- Incident logged as an **Operation Encompass** case

Phase 2: Secure Transmission to School

- Notification sent securely to the school's **Key Adult**:
    - DSL or Deputy DSL
- Data shared via encrypted system or secure portal
- Key Adults are trained in confidentiality and trauma-sensitive handling

Role	Responsibility
Key Adult (DSL or DDL)	Receives notification, assesses risk, and the DSL will decide which staff members need to know, emphasising the 'need-to-know' principle.
Class Teachers/Tutors	Monitor the child for behavioural changes; provide "silent support" Physical support - Providing a spare uniform or stationary if they have arrived without their belongings").
All Staff	Maintain a calm, consistent environment and report any concerns to the DSL. Maintain strict confidentiality. The details of the police report must never be discussed in communal areas or with staff who do not need to know. Emotional Support: Brief, positive check-ins like, It's good to see you today,' without probing for information

Phase 3: Critical Timing

- Notification received before the start of the school day
- Ensures support is in place **before the student arrives at school**

Implementation of Support

Upon receipt, the Key Adult will:

Triage

- Assess risk
- Check existing safeguarding records (CP, CiN, Early Help)

Information Sharing

- Share only on a **strict need-to-know basis**
- Brief staff directly responsible for the child's wellbeing

Support Delivery

- Implement silent or overt support as appropriate

Tiered Support Model

Tier 1: Silent (Trauma-Informed) Support *(Default)*

- Breakfast provision
- Uniform or equipment support
- Homework flexibility
- Warm, non-probing interactions

Tier 2: Overt Support and Disclosure

- Active listening if the child initiates conversation
- No investigation or probing
- Immediate referral to DSL
- Disclosure recorded verbatim on MyConcern

Confidentiality and Data Integrity

- All Encompass records held securely on **MyConcern**
- Safeguarding files kept separate from academic records
- Records transferred securely to new schools within 5 working days
- Breaches of confidentiality treated as conduct issues

Appendix C

Safeguarding Disclosure – Immediate Action Flowchart *(All Staff – Pool Community Academy)*

Step 1: Listen Carefully and Remain Calm

- Give full attention
- Allow the child to speak freely
- Take the disclosure seriously
- Do not interrupt or judge

Step 2: Reassure (Do Not Promise Confidentiality)

Use clear, age-appropriate language:

- "Thank you for telling me."
- "You have done the right thing."
- "I can't keep this a secret, but I will share it with the safeguarding team to help keep you safe."

Step 3: Do Not Investigate

- Do not ask leading or probing questions
- Do not gather evidence
- Use open prompts only if essential:
    - "Can you tell me what happened next?"

Step 4: Consider Immediate Risk

- If there is immediate danger:
    - Remain with the child
    - Speak to the DSL **in person immediately**
- If no immediate risk:
    - Proceed to recording

Step 5: Record and Report Promptly

- Log concern on **MyConcern** as soon as possible
  Include:
    - Exact words (where possible)
    - Observations
    - Date, time, and location
- Do not include opinions or assumptions

Step 6: Share with Safeguarding Team

- Ensure DSL or Deputy DSL is aware
- Follow any immediate guidance provided

Step 7: After the Disclosure

- Treat the child normally and sensitively
- Maintain confidentiality
- Do not discuss with others
- Do not take further action unless directed

Appendix D

Safeguarding Case Management and MyConcern Protocol

Recording and Review

- All safeguarding concerns recorded on **MyConcern**
- Reviewed promptly by DSL or Deputy DSL
- Clear, specific titles used for tracking

Named Responsibility

Each concern is allocated a named lead to ensure:

- Clear accountability
- Consistent follow-up
- Effective external communication

Task Allocation and Monitoring

- Actions recorded as time-bound tasks
- Tasks may include:
    - Student welfare check-ins
    - Parental contact
    - Referrals
    - Internal support

Oversight and Audit

- Regular safeguarding team reviews
- Monitoring of:
    - Patterns and themes
    - Escalation or de-escalation of risk
- Clear audit trail maintained

Cases remain open until actions are complete and risk has reduced.