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# THE NETHERHALL SCHOOL AND OAKES COLLEGE

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## SAFEGUARDING AND CHILD PROTECTION POLICY

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THIS POLICY WAS APPROVED:	AUTUMN 2025 (WITH MINOR AMENDMENTS)
THIS POLICY WILL BE REVIEWED:	AUTUMN 2026
MEMBER OF STAFF WITH RESPONSIBILITY FOR LEADING REVIEW:	KARIM MARSAOUI DESIGNATED SAFEGUARDING LEAD

<b>Section</b>	<b>Significant Changes</b>
Throughout	Where appropriate, language has been refined to make the policy more succinct.
Throughout	References are made to latest KCSIE 2025
Throughout	Use of the word must rather than will to indicate the safeguarding duties placed on academies
1.24	Reference to filtering and monitoring being appropriate but not overly restrictive
1.2.13	Reference to prolonged absence being a safeguarding concern
1.2.22	Reference to the awareness and use of Early Help for pupils attending alternative provision
2.1.10	Strengthening of the wording around the requirements for all staff to be aware of the role of Early Help and reporting thresholds and procedures
3.3.	Strengthening of the wording around safeguarding responsibilities for pupils attending alternative provision
4.5	Rewording of paragraph to incorporate relational values and belonging
4.6	Requirement of staff to take immediate action where mental health concerns may indicate abuse
4.8	Reference to prolonged absence being a safeguarding concern and the need for vigilance over attendance and safeguarding
4.16	Addition that someone who has witnessed domestic violence is also a victim
4.21	Addition of a paragraph around definition of terrorism
4.31 & 4.32	Clarification around the processes for allegations and LADO referrals

### **Safeguarding Team Contacts at**

### **THE NETHERHALL SCHOOL AND OAKES COLLEGE**

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<b>Trust Safeguarding Lead</b>	Camilla Saunders
<b>School online safety Lead</b>	Chris Woods
<b>School Prevent Lead</b>	Karim Marsaoui
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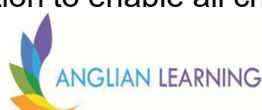
## Safeguarding statement

Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interest of the child.

(Keeping Children Safe in Education 2025)

## Introduction

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 Netherhall School and Oakes College fully recognises the responsibility it has under Section 157 (Academies) of the Education Act 2002 (as amended), and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended) to have arrangements in place to safeguard and promote the welfare of children.

This responsibility is more fully explained in the statutory guidance for schools and colleges 'Keeping Children Safe in Education' (September 2025). **All staff** must be made aware of their duties and responsibilities under part one of this document.

Staff should read the above document together with Annex B of Keeping Children Safe in Education (September 2025) and 'What to do if you are worried a child is being abused: Advice for practitioners' (March 2015) if they are working directly with children. For those staff who do not work directly with children or where English is a second language, Annex A can be issued instead but this is a matter for the academy to decide.

The Netherhall School and Oakes College fully recognises the responsibility it has under the Equality Act 2010 to provide protection from direct/ indirect discrimination or harassment for people with a 'protected characteristic' that relate to:

- Disability
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion belief or non-belief
- Sex
- Sexual orientation
- Age

In accordance with statutory guidance, Working Together to Safeguard Children 2023 ([publishing.service.gov.uk](https://www.publishing.service.gov.uk)), local safeguarding arrangements must be established for every local authority area by the three safeguarding partners (Local Authority, Police and Integrated Care Boards). All three partners have joint and equal duty for a range of roles and statutory functions including developing local safeguarding policy and procedures and scrutinising local arrangements.

This policy sets out how the academy's Local Governing Body (LGB) and the Anglian Learning trust board discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are pupils at the academy. Our policy applies to all staff, paid and unpaid, including, supply staff, contractors, community education staff, and governors. Teaching Assistants, office staff, and Early Help Team employees as well as teachers can be the first point of disclosure for a child. Concerned parents may also contact the academy and the academy's governors.

It forms part of the child protection and safeguarding arrangements for our school and is one of a suite of policies and procedures which encompass the safeguarding responsibilities of the school. In particular, this policy should be read in conjunction with the school's Code of Conduct/Staff Behaviour Policy (including Acceptable Use

of ICT), Safer Recruitment Policy, Online Safety Policy, Behaviour and Anti-Bullying Policy, and Low-Level Concern Policy.

This policy is fully consistent with the Safeguarding Children Partnership Board procedures.

## **1. Roles and Responsibilities**

### **1.1 LGB and Anglian Learning Trust Board Safeguarding Responsibilities**

The Anglian Learning trust board and LGBs fully recognise their responsibilities with regard to child protection and to safeguarding and promoting the welfare of children. They aim to ensure that the policies, procedures, and training in academies are effective and comply with the law and statutory guidance at all times:

They must:

- Facilitate a whole school approach to safeguarding. This means involving everyone in the school and ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. They will ensure that all systems, processes and policies are transparent, clear and easy to understand and comply with the law and statutory guidance at all times, whilst having the best interests of the child at their heart.
- Designate a governor for safeguarding and child protection who will oversee the implementation of the academy's child protection policy and practice and champion child protection issues, undertaking monitoring as required in the LGB Handbook and the Anglian Learning safeguarding framework; All governors and trustees must receive safeguarding training, including online safety, at induction and through regular updates, to enable effective strategic oversight. (Appendix A)
- Ensure governors and trustees are aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010, the Public Sector Equality Duty, and the local multi-agency safeguarding arrangements;
- Monitor the academy's compliance with statutory requirements and ensure that any weaknesses identified through Anglian Learning audits or peer reviews are rectified without delay.
- Ensure an annual report is made to the Governing Body and Anglian Learning trust and copied to the Education Child Protection Service.
- Ensure that this policy is annually reviewed, updated, and copied to the Education Child Protection Service. That the policy is shared with staff and published on the academy's website.
- Ensure that children's exposure to potential risks while using the internet is limited by having in place age-appropriate filtering and monitoring systems.
- Ensure children's wishes and feelings are taken into account where there are safeguarding concerns;
- Ensure that they have due regard to their public sector equality duty to cover the 'protective characteristics.' Equality Act 2010.

## 1.2 The Local Governing Body and Anglian Learning trust board will monitor and ensure:

- 1.2.1 That the role of DSL and DDSL is explicit in the role holders job description. (As outlined in Keeping Children Safe in Education, 2025 Annex C. A copy of which is held in the AL safeguarding framework).
- 1.2.2 The training for both DSL and DDSL is updated every two years in accordance with government guidance. This will be Local Authority Safeguarding Partnership approved training. In addition, the DSL and DDSLs refresh their knowledge and skills e.g., via bulletins, meetings, or additional training **at least annually**.(Appendix A)
- 1.2.3 The DSL has lead responsibility for overseeing the academy's filtering and monitoring systems. Named staff manage these systems day-to-day. The DSL ensures all staff receive annual training and know how to report and escalate online safety concerns. Filters must be appropriate, effective, and not overly restrictive.
- 1.2.4 The DSL must have the status, time, and training to carry out their duties effectively, including advising staff on child welfare and protection, attending inter-agency meetings, and contributing to assessments, in line with KCSIE 2025 Annex C
- 1.2.5 All staff receive annual training, including for new staff arriving mid-year as part of induction processes to ensure that they know the procedures for safeguarding. (Appendix A)
- 1.2.6 That the DSL or DDSL are always available (during academy hours, during term-time) to discuss any safeguarding concerns and that all staff are clear upon the course of action they must take. In exceptional circumstances it may be that no DSP are available therefore a member of the senior team will be contacted and/or advice will be sought from social care.

If you are not able to contact either the DSL or DDSL please contact either of the following (a) a member of the safeguarding team, (b) a member of SLT or (c) the PA to the Principal and Senior Leadership team. The DSL and DDSL will liaise with the three safeguarding partners (Local Authority, Integrated Care Board, and police) as appropriate and work with other agencies in line with Working Together to Safeguard Children 2023.

- 1.2.7 That the DSL and DDSL liaise with the three safeguarding partners (Local Authority, Integrated Care Board, and police) as appropriate and work with other agencies in line with Working Together to Safeguard Children 2023.

1.2.8 All new staff receive safeguarding training at induction, covering the school's policies, online safety, code of conduct, low-level concerns, behaviour policy, the safeguarding response to absence, and the role of the DSL. Staff are given relevant policies and Part One of KCSIE (or Annex A if appropriate).

Supply staff receive a quick reference guide detailing referral processes and DSL contacts. Safeguarding information and DSL details are also shared with all visitors on arrival.

1.2.9 Every member of staff, paid or unpaid, and the Local Governing Body (LGB) knows what the contingency arrangements are for when the designated members of staff are not available; in the first instance this is the headteacher/principal. Should no designated personnel be available, Year Leads or the class teacher will act on behalf of the designated person.

1.2.10 All staff and LGB members are informed at induction of who the DSLs are and how to report concerns. Paid staff use MyConcern with personal login details to log concerns. Unpaid staff and governors use school concern forms, which must be handed directly to the DSL or DDSL. If a child is at immediate risk, the DSL or DDSL must be contacted without delay

1.2.11 That the designated member of staff will take advice from a child protection specialist when managing complex cases. The Designated Safeguarding Personnel have access to professional consultations with staff working in the Multi-agency Safeguarding Hub (MASH). The emergency duty team (out of hours) is also available, see Appendix C.

1.2.12 The nominated governor for safeguarding and child protection (insert name) has undertaken appropriate training.

1.2.13 That every member of staff and every governor knows:

- that all staff have a responsibility to provide a safe environment in which children can learn;
- the name of the designated safeguarding personnel and her/his role;
- how to identify signs of abuse or neglect, understanding that children can be at risk of harm inside and outside of the academy, inside and outside of home, and online;
- how to pass on and record concerns about a pupil;
- 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;
- that they have an individual responsibility to be alert to the signs and indicators of abuse and exploitation and for referring safeguarding concerns to the designated safeguarding personnel using the academy's procedures for referral;
- what is meant by, and the importance of, showing professional curiosity;

- where to find the Multi-Agency procedures on the Safeguarding Children Partnership Board website
- their role and responsibilities in the early help process; Further guidance on effective assessment of the need for early help can be found in Working Together to Safeguard Children 2023 and in Appendix F.
- the process for making referrals to children’s social care;
- Prolonged or repeated absence is treated as a potential safeguarding issue, triggering appropriate action.
- Named individuals are responsible for day-to-day filtering and monitoring. Filters must be appropriate, effective, and not overly restrictive. Staff must know how to report and escalate online safety concerns.

1.2.14 Ensure staff receive appropriate safeguarding and child protection training (including online safety) to continue to provide them with relevant skills and knowledge to safeguard children effectively. This should be regularly updated, at least annually so that they know:

- the academy’s legislative responsibility;
- their personal responsibility;
- the academy’s policies and procedures;
- the need to be alert and vigilant to the signs and indicators of possible abuse;
- the need to record concerns;
- how to support and how to respond to a child who tells of abuse, neglect and or exploitation;
- the academy’s response to children who are absent from education and that prolonged or repeated absence is treated as a potential safeguarding issue, triggering appropriate action.
- the expectations, applicable roles, and responsibilities in relation to filtering and monitoring as part of the overarching safeguarding approach of the academy.

1.2.15 That all staff and every governor recognises the need to ensure that those with ‘protected characteristics’ are treated fairly and that they are protected from all forms of discrimination and harassment.

1.2.16 All staff, paid and unpaid, must understand their duty to report concerns about unsafe or inappropriate practice involving children. Concerns must be handled promptly, sensitively, and in line with the Whistleblowing and Low-Level Concern policies. Staff should report issues to the Designated Person, and concerns may be addressed through other procedures where appropriate. All staff must know how to report low-level concerns, including those involving contractors or supply staff.

1.2.17 That parents are informed of the responsibility placed on the academy’s and staff in relation to child protection by setting out these duties on the academy’s website and in the prospectus.

- 1.2.18 Provide for parents, if requested, a copy of the academy's or Trust Safeguarding and Child Protection Policy, or refer them to the policy that is available on the academy's website at [www.netherhall.org/www.oakescc.org](http://www.netherhall.org/www.oakescc.org)
- 1.2.19 The Anglian Learning Trust Board and The Netherhall School and Oakes College Local Governing Body will ensure that all staff members undergo safeguarding and child protection training at induction. The training should be regularly updated. In addition, all staff members will receive regular safeguarding and child protection updates as required **but at least annually**.
- 1.2.20 The Anglian Learning trust board and The Netherhall School and Oakes College LGB will ensure that there are appropriate filtering and monitoring systems in place and that they recognise which children are potentially at greater risk of harm and how often they access the IT system. There are named individuals who are responsible for day-to-day filtering and monitoring, and the escalation of concerns.
- 1.2.21 Promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children (including children who have or have had a social worker) are experiencing/have experienced with teachers and academy and leadership staff.
- 1.2.22 Where pupils attend alternative provision, the academy and provider must have clear safeguarding procedures in place. The academy will obtain the provider's current safeguarding policy and written confirmation that all staff have passed the required checks. Regular quality assurance visits will verify that safeguarding processes are followed. Providers must report daily attendance and notify the academy immediately of any absences. Both parties will recognise the potential Early Help needs of these pupils and their families.

**The Headteacher has a responsibility to:**

Ensure that the policies and procedures adopted by the governing body are fully implemented and that sufficient resources, time and training are provided to enable staff members to discharge their safeguarding responsibilities and contribute effectively to a whole school approach to safeguarding.

The headteacher will be responsible for ensuring a culture of safety and ongoing vigilance that fosters the belief that 'it could happen here'.

**1.4 All staff in the academy have a responsibility to:**

- 1.4.1 Read and ensure they understand at Part One of KCSiE 2025
- 1.4.2 Ensure they are familiar with the systems within school which support safeguarding
- 1.4.3 Identify concerns early to prevent them from escalating

- 1.4.4 Provide help and support to meet the needs of pupils as soon as problems emerge
- 1.4.5 Provide a safe environment in which children can learn
- 1.4.6 All staff should be able to reassure children that they are being taken seriously and that they will be supported and kept safe. A child should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a child ever be made to feel ashamed for making a report.
- 1.4.7 Identify children who may benefit from early help (Appendix F)
- 1.4.8 Know what to do if a child tells them he/she is being abused or neglected
- 1.4.9 Follow the referral process if they have a concern
- 1.4.10 Through their day-to-day contact with pupils and direct work with families, staff at the College have a crucial role to play in noticing indicators of possible abuse or neglect and referring them to Social Care via the Customer Service Centre (0345 045 5203). Designated Person for Child Protection to refer.

**There are four main elements to our policy:**

**PREVENTION** through the teaching and pastoral support offered to pupils and the creation and maintenance of a whole academy protective ethos;

**PROCEDURES** for identifying and referring or suspected cases, of abuse or exploitation. The definitions of the four categories are included in Appendix B;

**SUPPORTING CHILDREN** particularly those who may have experienced abuse, neglect and exploitation or witnessed violence;

**PREVENTING UNSUITABLE PEOPLE WORKING WITH CHILDREN**

**2. PREVENTION**

**2.1** The academy must:

2.1.1 Ensure there is a whole school approach to safeguarding.

2.1.2 Ensure children know that there are trusted adults in the academy whom they can approach if they are worried or in difficulty and that the child's wishes and feelings are considered when determining what action to take and what services to provide. Systems will be in place that are well promoted, easily understood and easily accessible for children to confidently report any form of abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback

- 2.1.3 Establish and maintain an ethos and environment where children feel safe in both the real and digital world and are encouraged to talk about their concerns and problems
- 2.1.4 Include in the curriculum activities and opportunities which equip children with the skills they need to stay safe from abuse in both the real and virtual world and information about who to turn to for help.
- 2.1.5 Tailor our curriculum to be age and stage appropriate so that it meets the specific needs and vulnerabilities of individual children, including those who have experienced abuse, and children with special educational needs or disabilities
- 2.1.6 Incorporate into the curriculum, activities and opportunities that enable children to develop their understanding of stereotyping, prejudice, and equality.
- 2.1.7 Ensure that all staff challenge instances of prejudice related behaviour, including but not limited to, instances of racism, sexism, misogyny/misandry, homophobia, gender questioning and sexual violence/harassment. Any prejudice related incidents will be responded to in accordance with local and national policies and procedures
- 2.1.8 Highlight through the curriculum potential online risks and what to do and where to get support to report material or manage online issues such as sexting or bullying.
- 2.1.9 Include in the curriculum material which will help children develop realistic attitudes to the responsibilities of adult life, particularly with regard to childcare and parenting skills
- 2.1.10 Make full use of various agencies and independent speakers to support in providing a high quality PSHE curriculum, to review topics of safeguarding, healthy and safer lifestyles through the College's PSHE curriculum.

All staff must understand their role in the Early Help process at both the school and local authority level. Staff are expected to identify children who may benefit from Early Help and take timely action to support them. Where appropriate, staff should refer concerns through the academy's internal processes to the Early Help Team. All staff receive training to ensure they understand Early Help thresholds and know how to follow referral pathways, in line with KCSIE 2025

- 2.1.11 The updated DfE Relationships, Sex and Health Education (RSE) statutory guidance will take effect from September 2026, and this policy confirms that it will be fully adopted and implemented across The Netherhall School and Oakes College in accordance with statutory requirements.

Academies will use the curriculum to equip pupils with the knowledge and skills to stay safe from abuse and exploitation in all contexts. This includes teaching children:

- How to recognise unhealthy or unsafe family and peer relationships.
- How to identify trusted adults and seek help when needed.
- The importance of consent in all relationships.
- That people online may not be who they claim to be.
- How to stay safe online, including recognising and reporting harmful content and contact.
- How to critically assess online information and relationships, including with people they haven't met.
- The concept of privacy and when it's right to break secrecy for safety.
- That their body belongs to them and how to distinguish safe from unsafe contact.
- How to respond safely to unknown adults, including online.
- How to recognise and report feeling unsafe or uncomfortable.
- How to ask for help—and keep asking until heard.
- How to report concerns confidently, using appropriate vocabulary.
- Where to get advice—through family, school, or external sources.

(Content reflects statutory Relationships, Sex, and Health Education – DfE, 2021.)

2.1.12 Academies will incorporate into the curriculum, activities and opportunities which equip children with the skills they need to stay safer from abuse and exploitation in all contexts, including:

- How to: determine whether other children, adults or sources of information are trustworthy: judge when a family, friend, intimate or other relationship is unsafe (and to recognise this in others' relationships); and, how to seek help or advice, including reporting concerns about others, if needed.
- The characteristics of positive and healthy friendships.
- That some types of behaviour within relationships are criminal, including violent behaviour and coercive control.
- What constitutes sexual harassment and sexual violence and why these are always unacceptable.
- About online risks, including that any material someone provides has the potential to be shared online and the difficulty of removed potentially compromising material placed online.
- What to do and where to get support to report material or manage issues online.
- The impact of viewing harmful content.
- That specifically explicit material e.g., pornography presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners.

- That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including prison.
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, control, harassment, rape, domestic abuse, forced marriage, honour-based abuse and FGM and how they can affect current and future relationships.
- How people can actively communicate and recognise consent from others, including sexual consent and how and when that can be withdrawn (in all contexts including online).

(Relationships Education, Relationships and Sex Education (RSE) & Health Education, DfE, 2021)

### 2.1.13

We use the Safer Corridors Toolkit developed by the Cambridgeshire PHSE Service which supports academies and colleges in preventing and reducing sexual violence and harassment and responding to incidents.

## 2.2 Prevention of Child-on-Child Abuse

We recognise that child on child abuse can manifest itself in many ways. This can include but is not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- 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 stand-alone or 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 to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi nude images and or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission (part of the Voyeurism (Offences) Act, April 2019) with the intention of viewing their genitals or buttocks

to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

The academy must:

- 2.2.1 Create a whole academy protective ethos in which child on child abuse, including sexual violence and sexual harassment will not be tolerated. Refer to the Sexual Harassment and Sexual Violence addendum 2021. Appendix E
- 2.2.2 Provide training for staff about recognising and responding to child-on-child abuse, including raising awareness of the gendered nature of peer abuse, with girls more likely to be victims and boys' perpetrators.
- 2.2.3 Ensure that staff members follow the procedures in this policy and those in the Sexual Harassment and Sexual Violence addendum 2025 Appendix E. It is important that when staff have any concerns of child-on-child abuse, they should report these to the Designated Safeguarding Lead (or deputy) in line with safeguarding reporting procedures. The DSL will respond to concerns related to child-on-child abuse in line with guidance outlined in Part 5 of 'Keeping Children Safe in Education'
- 2.2.4 Ensure that staff do not dismiss instances of child-on-child abuse, including sexual violence, sexual harassment, sexual taunting or 'banter' and the use of derogatory and misogynistic language as an inevitable part of growing up or banter.
- 2.2.5 Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk. Academies will ensure that these children have a trusted adult in the academy to talk to.
- 2.2.6 Recognise the risk of intra familial harms and provide support to siblings following incidents where necessary
- 2.2.7 Include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online.
- 2.2.8 Provide high quality Relationship and Sex Education (RSE) and/or enrichment programmes to allow children to take ownership of their own safety in ensuring that they are given information that empowers them to make informed and positive choices by:
  - Recognising whether other children, adults or sources of information are trustworthy, how to judge when a friendship is making them feel

unhappy or uncomfortable and how to seek help or advice from others, if needed;

- Understanding characteristics of what makes positive and healthy friendships and other relationships;
- Acknowledging that some types of behaviour within relationships are criminal, including violent behaviour and coercive control;
- Understanding what constitutes sexual harassment and sexual violence and why these are always unacceptable;
- About online risks, including that any material someone provides has the potential to be shared online and the difficulty of removed potentially compromising material placed online;
- What to do and where to get support to report material or manage issues online;
- Acknowledging the impact of viewing harmful content and specifically explicit material e.g., pornography and how this presents a distorted picture of sexual behaviour and relationships;
- Having an understanding of the law concerning the sharing and viewing of indecent images of children (including those created by children) and that it is a criminal offence which carries severe penalties including jail;
- Being able to understand what sexual exploitation, abuse, grooming, coercion, control, harassment, rape, domestic abuse, forced marriage, honour-based abuse and FGM are and how they can affect current and future relationships;
- Understanding that consent can be actively communicated and how to recognise consent from others, including sexual consent and how and when that can be withdrawn (in all contexts including online)

2.2.9 In the case of an allegation, staff are to refer to the Sexual Harassment and Sexual Violence addendum to the safeguarding policy 2025 for details on prevention and procedure. Appendix E.

The Designated Safeguarding Lead will refer to the Cambridgeshire Safeguarding Children Partnership Board's Child Sexual Abuse Assessment Tool if there is a concern that a young person may be displaying sexually harmful behaviours, may have experienced sexual violence or sexual harassment or other forms of sexual abuse.

### **3. PROCEDURES**

**3.1** We will follow the procedures set out in the Cambridgeshire and Peterborough Safeguarding Children Board 'Multi-Agency Procedures.' A copy of these procedures can be found on their website:

Multi-Agency Policies and Procedures | Cambridgeshire and Peterborough Safeguarding Partnership Board ([safeguardingcambspeterborough.org.uk](http://safeguardingcambspeterborough.org.uk))

**3.2** Where pupils attend alternative provision, the academy and provider must have clear safeguarding procedures in place. The academy will obtain written confirmation of the provider's safeguarding policy and assurance that all required checks on staff have been completed. Daily attendance updates are

mandatory, and any absence must be reported immediately. Regular quality assurance visits will verify that safeguarding procedures are being followed.

### **3.3 Liaison with Other Agencies**

The academy must:

3.3.1 Work to develop effective links with relevant services and agencies to promote the safety and welfare of all pupils.

3.3.2 Co-operate as required, in line with Working Together to Safeguard Children (July 2018), with key agencies in their enquiries regarding child protection matters including attendance and providing written reports at child protection conferences and core groups.

3.3.3 Notify the relevant Social Care team immediately if:

- it should have to exclude a pupil who is subject to a Child Protection Plan (whether fixed term or permanently);
- there is an unexplained absence of a pupil who is subject to a Child Protection Plan;
- there is any change in circumstance to a pupil who is subject to a Child Protection Plan.

3.3.4 When a pupil who is subject to a child protection plan leaves, information will be transferred to the new academy immediately. The Child Protection Chair and Social Care Work Team will also be informed.

### **3.4 Record Keeping**

The academy must:

3.4.1 Ensure all concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing and dated. Ensure that all electronic records are stored on My Concern (the academy's choice of an identified, purpose built, and secure platform).

Ensure that logs on My Concern are clear, detailed, and accurate (Keep clear, detailed, accurate, written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to Children's Social Care immediately). Ensure that all paper records received are kept securely; separate from the main pupil file and in a locked location. Paper files should be signed for on removal from and return to storage

3.4.2 Records must include:

- A clear and comprehensive summary of the concern and the date and time it occurred.
- The child's wishes and feelings;
- Names of all parties written in full, with role where appropriate
- Details of how the concern was followed up and resolved;

- A note of any action taken, decisions reached and the outcome;
  - A record and details of any discussion/ communication with parents or other agencies.
- 3.4.3 Ensure all relevant child protection records are sent to the receiving academy or establishment when a pupil moves academy, within five days, in accordance with 'Keeping Children Safe in Education', 2025, and the Education Safeguarding Team's Guidance on Keeping and Managing Child Safeguarding Records. The DSL will consider whether it would be appropriate to share information with the new school or college in advance of the child leaving.
- 3.4.4 Make parents aware that such records exist except when to do so would place the child at risk of harm.
- 3.4.5 All actions and decisions will be led by what is considered to be in the best interests of the child following discussions between professionals working with the individual child.

### **3.5 Confidentiality and Information Sharing**

The Data Protection Act 2018 does not prevent academy staff from sharing information with relevant agencies, where that information may help to protect a child. Information about children and their families is defined as 'special category data,' i.e., information that identifies a living individual. Collection, storage and sharing of personal data is governed by the UK General Data Protection Regulations (UK GDPR).

The academy must:

- 3.5.1 Ensure staff and volunteers adhere to confidentiality protocols and that information is shared appropriately; ensure they are also aware that they have a professional responsibility to share information with other agencies in order to safeguard children, (as set out in ['Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, May 2025](#)).
- 3.5.2 Ensure that if a member of staff receives a Subject Access Request (under the Data Protection Act 2018) from a pupil or parent they will refer the request to the DSL or Principal.
- 3.5.3 Ensure staff are clear with children that they cannot promise to keep secrets.

The Designated Safeguarding Lead/Deputy must:

- 3.5.4 Disclose information about a pupil to other members of staff on a 'need to know' basis considering what is necessary, proportionate, and relevant. Parental consent may be required.
- 3.5.5 Aim to gain consent to share information and be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent if a person believes that there is good

reason to do so, and that the sharing of information will enhance the safeguarding of a child and where to not do so might place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime.

- 3.5.6 Record when decisions are made to share or withhold information, who information has been shared with and why. (See 'Working Together to Safeguard Children,' July 2023)

In cases where the 'serious harm test' is met, academies must withhold providing the data in compliance with the obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt academies should seek independent legal advice.

- 3.5.7 Seek advice about confidentiality from outside agencies if required. (See 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, May 2025).
- 3.5.8 Ensure that all pupils' files are requested on admission to the academy be that from primary school or where a pupil joins the academy from another school throughout the year. Primary records will be collected where possible by either DSL or DDSL
- 3.5.9 Ensure that all Post 16 records are forwarded on request via recorded delivery and that acknowledgement of receipt of records is logged via written confirmation.

### 3.6 Communication with Parents

The academy must:

- Ensure that parents/carers have an understanding of the responsibility placed on the academy and staff for ensuring child protection is adhered to by publishing its Child Protection policy on the academy's website.
- Discuss with Children's Social Care if the academy believes that notifying parents could place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime. *[Further guidance on this can be found in the Effective Support for Children and Families in Cambridgeshire and Peterborough].*
- Particular circumstances where parents **may not** be informed include any disclosure of sexual abuse or physical abuse where the child has an injury, where it would place the child at immediate risk of harm, or where it may lead to the loss of evidence or prejudice the prevention or detection of crime. Rationales for these decisions must be recorded.
- All discussions that have taken place with parents regarding the child's welfare to be recorded on My Concern or if the decision has been made not to discuss it with parents, record the reasons why.
- Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence.
- Record what discussions have taken place with parents or if a decision has been made not to discuss it with parents, record the reasons why.

Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence.

### **3.7 Procedures for managing Sexual Violence and Sexual Harassment between children**

- Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into college/post-16. It can also occur wholly online, concurrently online, and offline, or technology may be used to facilitate offline abuse. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same academy. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.
- Sexual violence may include rape, assault by penetration or sexual assault. Sexual harassment refers to 'unwanted conduct of a sexual nature,' such as sexual comments, sexual taunting, or physical behaviour such as deliberately brushing against someone.
- Online sexual harassment may include non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages, and sexual exploitation, coercion, and threats.

The academy must:

- 3.7.1 Be clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated.
- 3.7.2 Provide training for staff on how to manage a report of sexual violence or sexual harassment.
- 3.7.3 Make decisions on a case-by-case basis.
- 3.7.4 Reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when decision making.
- 3.7.5 Implement measures to keep the victim, alleged perpetrator and if necessary other children and staff members, safe. Record any risk assessments and keep them under review.
- 3.7.6 Give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations.
- 3.7.7 Liaise closely with external agencies, including police and social care, when required.

3.7.8 Academies are to follow the procedures outlined in:

- Sexual Harassment and Sexual Violence addendum to the safeguarding policy 2025 Appendix E.
- 'Keeping Children Safe in Education – Part Five' 2025, Sexual violence and sexual harassment between children in schools and colleges,' (DfE, September 2021).
- Academies should also refer to Sharing nudes and semi – nudes: advice for education settings working with children and young people' (UKCIS, December 2020) Appendix G.

## 4. SUPPORTING CHILDREN

### 4.1 Children showing signs of Abuse, Neglect and Exploitation

The academy recognises that **any** child may be subjected to abuse, neglect or exploitation, and that safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

The academy recognises that experiencing abuse, neglect or exploitation may have an adverse impact on those children which may last into adulthood without appropriate intervention and support.

The academy must

- Provide a stable, secure, and predictable environment for pupils at risk. Children affected by abuse, neglect, or exploitation may display challenging, defiant, passive, or withdrawn behaviours.
- Identify and support young people who may display abusive behaviour, referring them for appropriate intervention.
- Ensure all staff are trained to recognise and report suspected abuse, neglect, and exploitation, following this policy. (See Appendix B for definitions of abuse.)
- DSLs and all staff must consider Risks Outside The Home (ROTH), including extra-familial harm such as sexual or criminal exploitation and serious youth violence.
- Recognise that safeguarding risks may occur between children and outside the academy environment.
- Understand that technology plays a major role in many safeguarding issues. Risks may occur online, offline, or both. Online abuse may include harassment, non-consensual image sharing, and exposure to harmful content via chat groups and messaging platforms.

**4.2** We recognise that the impact on children who are abused, or witness violence may last into adulthood without appropriate intervention and support.

**4.3** The academy may be the only stable, secure, and predictable element in the lives of children at risk. Nevertheless, when at school/college their behaviour may be challenging and defiant or they may be withdrawn.

**4.4** We recognise that some children actually adopt abusive behaviours and that these children must be referred on for appropriate support and intervention.

**4.5** The academy will support all pupils through:

- Building self-esteem and self-motivation through cross-curricular opportunities.
- Promote an academy ethos that fosters a positive, supportive, and secure environment where pupils feel they belong.
- Apply the behaviour policy consistently. Staff must address behaviour without damaging a pupil's sense of worth, ensuring children know they are valued, that they belong and are not to blame for any abuse they have experienced.
- Liaise with the Senior Mental Health Lead where safeguarding concerns involve mental health. If concerns suggest possible abuse or exploitation, staff must act immediately.
- Work closely with external agencies such as Social Care, CAMHS, Cambridgeshire Sexual Behaviours Service, Educational Psychology, and Early Help teams to support pupils.
- Engage supportively with parents and carers, including those facing challenging circumstances, to promote pupil welfare.
- Consider wider environmental risks (safeguarding vulnerabilities). Staff must be alert to Risks Outside the Home (ROTH) (see Appendix F).

The list includes:

#### **4.6 Children with Disabilities, Certain Health Conditions, Additional Needs or Special Educational Needs**

The academy recognises that, statistically, children with additional needs, special educational needs, emotional and behavioural difficulties, and disabilities are most vulnerable to abuse. Academy staff who deal with children with complex and multiple disabilities and/or social, emotional and mental health needs should be particularly sensitive to indicators of abuse. Staff must take immediate safeguarding action where mental health concerns suggest abuse or exploitation.

Under the Equality Act, there is a duty to make reasonable adjustments for disabled children and young people.

The academy will:

4.6.1 Support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self-esteem as part of an overall support plan agreed with parents/carers.

4.6.2 Promote through a differentiated curriculum and adult support how pupils with additional needs can recognise if they are feeling unsafe including within family relationships and friendships; how to ask for help; the difference between safe and unsafe secrets; the difference between safe and unsafe physical contact; and how to recognise and manage risk including in a digital context. The content of lessons will be shared with parents/carers so that they can be supported at home.

- 4.6.3 Will be aware of pupils who may have communication difficulties and are aware that they are vulnerable to abuse because they are unable to express themselves to others. Instead, such children will often exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the child.
- 4.6.4 Where necessary, the academy will provide additional training to staff in the use of Widget, Makaton, PECS, or other communication systems. Supervision by senior managers will be vigilant to create a protective ethos around the child.
- 4.6.5 Promote high standards of practice, including ensuring that children with additional needs know how to raise concerns, and have access to a range of adults with whom they can communicate.

## **4.7 Young Carers**

The academy recognises that children who are living in a home environment which requires them to act as a young carer for a family member or a friend, who is ill, disabled or misuses drugs or alcohol can increase their vulnerability and that they may need additional support and protection.

The academy will:

- Seek to identify young carers;
- Offer additional support internally; Jordan Speller, the Young Carers Champion;
- Signpost to external agencies; C33 Young Carers support the pupils in the academy;
- Be particularly vigilant to the welfare of young carers and follow the procedures outlined in this policy, referring to Early Help or Social Care as required if concerns arise.

## **4.8 Children Absent from Education**

Prolonged or repeated absence is treated as a potential safeguarding issue, triggering appropriate action.

The academy recognises that children who are absent or repeatedly missing from education may be at risk of abuse, neglect, exploitation, mental health issues, substance misuse, radicalisation, FGM, or forced marriage. Staff must take immediate safeguarding action if mental health concerns suggest abuse or exploitation.

Children with persistent or erratic attendance are more vulnerable and therefore the academy will:

- Ensure that all staff are aware of their responsibilities as outlined in the academy attendance policy.
- Ensure that the attendance champion Chris Woods regularly liaises with the Designated Safeguarding Lead to discuss all persistently absent

pupils and those who go missing to identify the risk of abuse and neglect, including sexual abuse or exploitation and to ensure that appropriate safeguarding responses have been put in place to reduce the risk of future harm;

- Closely monitor attendance of individual pupils who are absent from education and analyse patterns of absence to aid early identification of concerning patterns of absence; Prolonged or repeated absence is treated as a potential safeguarding issue, triggering appropriate action.
- Endeavour to hold more than one emergency contact for each pupil to provide additional options to make contact with a responsible adult when a child who is absent from education is identified as a welfare and/or safeguarding concern;
- When a child is absent from education, the academy follows the procedure as set out in Cambridgeshire's Children Missing Education guidance. The academy will inform the Local Authority Attendance officer and Social Care if a child who is absent from education is subject to a Child Protection Plan or there have been ongoing concerns
- Train staff in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

#### **4.9 Pupils with Mental Health Needs**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff must take immediate safeguarding action where mental health concerns suggest abuse or exploitation.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the school's policy, and speaking to the DSL or a deputy.

The school and college have access to two school counsellors and this service is to support student mental health concerns where appropriate. The school and college will also make Early Help referrals to support mental health. The school and college share external agencies such as Kooth to support students in reaching out for their own support. Please see the school/college's website for further information for mental health.

#### **4.10 Children who are lesbian, gay, bi, or gender questioning**

**N.B. This section remains under review, pending the outcome of the DfE guidance consultation, and final gender questioning guidance documents being published.**

The academy acknowledge that the fact that a child or young person may be lesbian, gay or bisexual is not in itself an inherent risk factor for harm. However, children who are lesbian, gay or bisexual can be targeted by other children. In

some cases, a child who is perceived to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

Risks can be compounded where children who are lesbian, gay or bisexual lack a trusted adult with whom they can be open. Staff should therefore endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

#### **4.11 Substance Misuse and Child Protection**

The discovery that a young person is using legal or illegal substances or reported evidence of their substance use is not necessarily sufficient in itself to initiate child protection proceedings but the academy will consider such action in the following situations:

When there is evidence or reasonable cause:

- To believe the young person's substance misuse may cause him or her to be vulnerable to other abuse such as sexual abuse;
- To believe the pupil's substance related behaviour is a result of abuse or because of pressure or incentives from others, particularly adults;
- Where the misuse is suspected of being linked to parent/carer substance misuse;
- Where the misuse indicates an urgent health or safeguarding concern;
- Where the child is perceived to be at risk of harm through any substance associated criminality;
- Where a young person has been caught bringing substances into the academy they will be dealt with as per the academy's Behaviour Policy.

#### **4.12 Children Living with Substance Misusing Parents/Carers**

4.12.1 Misuse of substances in parents/carers is strongly associated with significant harm to children, especially when combined with other features such as domestic violence.

4.12.2 When the academy receives information about substance abuse by a child's parents/carers they will follow appropriate procedures.

4.12.3 This is particularly important if the following factors are present:

- Use of the family resources to finance the parent's dependency, characterised by inadequate food, heat and clothing for the children;
- Children exposed to unsuitable caregivers or visitors e.g., customers or dealers;
- The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviour;
- The parental misuse is regarded as problematic including unsafe storage of drugs and injecting equipment;
- A chaotic and unpredictable home environment exists which can be attributed to drug or alcohol misuse leading to emotional unavailability, irrational behaviour and reduced parental vigilance;

- Children are not being provided with acceptable or consistent levels of social and health care;
- Disturbed moods as a result of withdrawal or dependency;
- Drugs and/or alcohol having an adverse impact on the growth and development of the unborn child.

#### **4.13 Privately Fostered Children**

Private fostering is when a child under the age of 16, (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or relative in their own home for 28 days or more.

The academy will:

- Follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements and refer to the Specialist Fostering Team.

#### **4.14 Children who have returned home to their family from care**

The academy recognises that a previously looked after child potentially remains vulnerable and staff will vigilantly monitor the welfare of previously looked after children, keep records, and notify Social Care as soon as there is a recurrence of a concern in accordance with the Cambridgeshire and Peterborough Safeguarding Partnership 'Inter - Agency Procedures.' The academy's Designated Teacher for Previously and Currently Looked after children is **Anjuli Riley**.

#### **4.15 Children who have Family Members in Prison**

The academy is committed to supporting children and young people who have a parent or close relative in prison and will work with the family to find the best ways of supporting the child.

It recognises that children with family members in prison are at risk of poor outcomes including:

- Poverty;
- Stigma;
- Isolation;
- Poor mental health;
- Poor attendance.

The academy will work with the family, specialist organisations and the child, to support minimise the risk of the child not achieving their full potential. They will treat information shared by them in confidence and on a need-to-know basis.

## 4.16 Children living with Domestic Abuse

The academy's Designated Lead on Domestic Abuse is **Sue White**.

- 4.16.1 Under the Domestic Abuse Act 2021, children are recognised as victims in their own right if they see, hear, or experience the effects of domestic abuse. All children can be affected by abuse within the home, which may lead to long-term emotional and psychological harm. Some may blame themselves or be forced to leave their home as a result.

Young people can also experience abuse in their own relationships, sometimes called 'teenage relationship abuse'. While this may not meet the legal definition of domestic abuse if either party is under 16, it must still be treated as a safeguarding concern.

Domestic abuse includes any controlling, coercive, threatening behaviour, violence, or abuse between those aged 16+ who are personally connected. It may be psychological, physical, sexual, financial, or emotional

- 4.16.2 Where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which may carry with them into their adult life and relationships. Domestic Abuse can also affect children in their personal relationships as well as in the context of home life
- 4.16.3 Schools are ideally placed to offer appropriate support, alongside other agencies, whether families are in crisis, or whether there are early signs of potential abuse. The academy will vigilantly monitor the welfare and attendance of children living in domestic abuse households. Contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plans as required.
- 4.16.4 The Netherhall School and Oakes College will work in partnership with Cambridgeshire Police and Cambridgeshire County Council to identify and provide appropriate support to pupils who have experienced domestic abuse in their home. This partnership is called Operation Encompass.
- 4.16.5 Cambridgeshire's Education Safeguarding team will share information of all domestic incidents where police have been called with the Designated Safeguarding Lead (DSL)/Domestic Abuse Lead (DAL) where one of the academy's pupils has been present (having either witnessed or heard the incident)
- 4.16.6 On receipt of any information, the DSL/DDSL will take appropriate action to ensure the safety of the child and if necessary, share the information with key staff such as Year Leads.
- 4.16.7 All notifications and information are stored confidentially in line with the academy's safeguarding record keeping as outlined in 2.4.
- 4.16.8 The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information All information

sharing and resulting actions will be undertaken in accordance with the 'Cambridgeshire and Peterborough Joint Agency Protocol for Domestic Abuse – Notifications to Schools and Early Years settings'.

#### **4.17 Children at risk of 'Honour-Based' abuse including Female Genital Mutilation (FGM)**

4.17.1 So called 'honour based' abuse (HBA) encompasses incidents which are committed to protect or defend the honour of the family and/or the community including breast ironing, female genital mutilation (FGM) and forced marriage.

4.17.2 "FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways." (Multi-agency statutory guidance on female genital mutilation, April 2016).

4.17.3 In accordance with the Female Genital Mutilation Act, it is a statutory duty for teachers in England and Wales to report 'known' cases of FGM in under-18s which they identify in the course of their professional work to the police.

4.17.4 The academy takes these concerns seriously and staff will be made aware of the possible signs and indicators that may alert them to the possibility of FGM. Any indication that FGM is a risk, is imminent, or has already taken place will be dealt with under the child protection procedures outlined in this policy.

4.17.5 The Designated Safeguarding Lead will make appropriate and timely referrals to Social Care if FGM is suspected. In these cases, parents will not be informed before seeking advice. The case will still be referred to Social Care even if it is against the pupil's wishes.

#### **4.18 Forced Marriage**

A forced marriage is one entered into without the full and free consent of one or both parties where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. The new Marriage and Civil Partnership (Minimum Age) Act 2023 bans marriage for 16 and 17-year-olds, who no longer will be allowed to marry or enter a civil partnership, even if they have parental consent, as the legal age of marriage rises to 18, even if violence, threats, or another form of coercion are not used. The Forced Marriage Unit has [statutory guidance](#) and [Multi-agency guidelines](#) and can be contacted for advice or more information.

#### **4.19 Children at risk of Child Sexual Exploitation (CSE)**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) may involve an exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or

facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

4.19.1 Sexual exploitation can take many forms from a seemingly 'consensual' relationship to serious organised crime involving gangs and groups.

4.19.2 Exploitation is marked out by an imbalance of power in the relationship and involves varying degrees of coercion, intimidation and sexual bullying including cyber-bullying and grooming.

4.19.3 Potential indicators of sexual exploitation will be addressed within staff training, including raising awareness with staff that some young people being sexually exploited do not show any external signs of this abuse and may not recognise that they are being abused.

4.19.4 Young people who go missing can be at increased risk of sexual exploitation and so procedures are in place to ensure the appropriate response to children and young people who go missing, particularly on repeat occasions. At the academy this involves working with the family, referring to social care, involving police action and referring to the locality.

4.19.5 The Designated Safeguarding Lead will complete the Safeguarding Children Partnership Board's Exploitation (CSE/Criminal/Gangs) Contextual Risk Screening Tool and refer to Social Care if there is a concern that a young person may be at risk of CSE.

4.19.6 At The Netherhall School and Oakes College, we are working in partnership with Cambridgeshire Police and Cambridgeshire County Council to identify and provide appropriate support to pupils who have gone missing through the Operation Encompass scheme. Cambridgeshire's Education Safeguarding Team will share police information of missing child episodes with the Designated Safeguarding Lead(s) (DSL). On receipt of any information, the DSL will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.

#### **4.20 Children at risk of Child Criminal Exploitation (CCE)**

As with CSE, CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity. Drug networks or gangs exploit children and young people to

carry drugs and money from urban areas to suburban and rural areas. Exploitation can occur even if activity appears to be consensual.

4.20.1 As with CSE children are coerced to participate in illegal activities in exchange for something the victim needs or wants and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The academy's Prevent Lead is **Karim Marsaoui** in addition, the governing body will ensure that the DSL has undertaken Prevent awareness training and that all staff receive training about the Prevent duty.

4.20.2 CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines see 3.22). forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation.
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late, and children who regularly miss academy or education or do not take part in education;
- The academy recognises that young people who go missing can be at increased risk of child criminal exploitation, modern slavery and/or trafficking and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

4.20.3 The Designated Safeguarding Lead will complete the Safeguarding Children Partnership Board's Exploitation (CSE/Criminal Gangs) Risk Assessment and Management Tool and refer to Social Care if there is a concern that a young person may be at risk of CSE.

## 4.21 Children at Risk of Extremism and Radicalisation

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause (KCSIE 2025)

Children may be susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a academy's safeguarding approach.

The process of radicalisation may involve:

- Being groomed online or in person
- Exploitation, including sexual exploitation
- Psychological manipulation
- Exposure to violent material and other inappropriate material
- The risk of physical harm or death through extremist acts

Staff are required to be alert to changes in children's behaviour which could indicate they need help or protection. Concerns that a child is at risk of extremism or radicalisation are referred to the DSL in the usual way. The academy's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

- All new staff are required to undertake online accredited Prevent training as part of the academy's safeguarding induction;
- See also "The Prevent Duty, Departmental advice for schools and childcare providers," June 2015, Department for Education and "Revised Prevent Duty Guidance: for England and Wales", July 2015, HM Government.

## **4.22 County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line"

4.22.1 Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money.

4.22.2 Children can be targeted and recruited into county lines in a number of locations including academies.

4.22.3 Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

4.22.4 The Designated Safeguarding Lead will complete the Safeguarding Children Partnership Board's Exploitation (CSE/Criminal/Gangs) Risk Assessment and Management Tool and refer to Social Care if there is a concern that a young person may be involved in County Lines.

## **4.23 Modern slavery**

Encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. We refer to the DfE guidance [Modern slavery: how to identify and support victims](#) for concerns of this nature.

## 5. PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN

- 5.1 The academy will operate safe recruitment practices including ensuring appropriate DBS and reference checks are undertaken according to Part Three of 'Keeping Children Safe in Education 2025 and The Netherhall School and Oakes College Central Record of Recruitment and Vetting Checks policy.
- 5.2 The Principal will undertake 'random' checks of the Single Central Record (SCR) to ensure all requirements have been seen and logged and that any discrepancies can be explained.
- 5.3 The LGB will ensure that at least one of the persons who conducts interviews has completed safer recruitment training. The following members of staff have completed the Safer Recruitment training: The Principal and all members of the Senior Leadership team. The following governors have also completed Safer Recruitment Training: **Paul Bullen-Smith**

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

- 5.3.1 Any allegation against a member of staff, supply staff, contractor, or volunteer must be reported immediately to the Headteacher or Principal. Allegations involving the Anglian Learning Executive Leadership team must be reported to the CEO. If the Headteacher or Principal is the subject, the matter must be reported to the CEO and Chair of the Trust, following the process in Appendix D. The academy will follow the procedures in Part Four, Section One of *Keeping Children Safe in Education (2025)*
- 5.3.2 The academy will follow the procedures in Part Four of *Keeping Children Safe in Education (2025)* when managing allegations against staff, volunteers, or agency/supply staff. The Anglian Learning HR team or Director of Inclusion will first be consulted and then the Local Authority Designated Officer (LADO). If the allegation concerns the Headteacher or Principal, it must be reported to the Trust CEO/Director of People and then to the Chair of Trustees
- 5.3.3 The Anglian Learning HR team, Director of Inclusion, Headteacher or Chair of Trustees in discussion, will ensure that all allegations are reported to the LADO within one working day. The LADO will advise on all further action to be taken.
- 5.3.4 Before contacting the CEO and the LADO, academies should conduct basic safeguarding enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

Academies will use the guidance chart found at Appendix D to support their decision-making.

5.3.5 Where the academy identifies a child has been harmed and that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact children's social care and as appropriate the police immediately.

5.3.6 Academies will consider:

- **Looking after the welfare of the child** - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
- **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content, and context of the allegation, and agree a course of action.

5.3.7 The academy will ensure that any disciplinary proceedings against staff, volunteers or contractors relating to child protection matters are concluded in full even when the member of staff or volunteer is no longer employed at the academy and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

5.3.8 Staff, volunteers or contractors who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

5.3.9 Consideration must be given to the needs of the child and recognition that a child may make an allegation against an innocent party because they are too afraid to name the real perpetrator. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

#### **5.4 Concerns that do not meet the harms threshold (Part Four, Section Two)**

5.4.1 Low level concerns that do not meet the harms threshold should be reported to the Headteacher/Principal, using the Low Level Concerns reporting form which can be found on the Anglian Learning Connect platform. NB: The term low level does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms test.

5.4.2 In cases where the Headteacher or Principal is the subject of an allegation, it will be reported to the Director of People, CEO and the Chair of Trustees. The academy will follow the procedures set out in Part Four of 'Keeping Children Safe in Education' 2025.

5.4.3 The academy will deal with any such concern, no matter how small, where an adult working in or on behalf of the academy may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

5.4.4 All low-level concerns should be recorded on the Low Level Concern form, which is found on Connect. All staff should be aware of the processes for reporting a concern. The written record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

5.4.5 Academies can decide where these records are kept, but they must be kept confidential, held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Hard copies are held in a separate folder and locked in a secure filing cabinet with an online record also being held by the PA to the Principal and Senior Leadership Team.

**5.5** The academy will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the academy or academies in the Trust (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately. This will enable the academy and Trust to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the academy/Trust are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

5.5.1 The academy will ensure that all staff, including supply staff, volunteers and contractors are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents as advised within the Local Authority's Code of Conduct: 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2022). As part of their induction process, all staff including supply staff, volunteers and contractors will receive guidance about how to create appropriate professional boundaries with children (both on and offline) especially those with a disability or deemed vulnerable. Staff are encouraged to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

5.5.2 All staff will have read and signed a copy of the Anglian Learning Staff Code of Conduct and Guidance for Safer Working Practice for Adults

who work with Children and Young People in Educational Settings' (February 2022).

5.5.3 The academy will ensure that staff and volunteers are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings being taken against them under the Sexual Offences Act 2003 (Abuse of position of trust).

5.5.4 Staff who work within an academy have a duty of care to model appropriate social behaviours and to ensure that the professional role of trust is not abused.

5.5.5 The academy will ensure that communication between pupils and adults, by whatever method, is transparent and takes place within clear professional boundaries and is open to scrutiny.

## 6. OTHER RELATED POLICIES THAT SUPPORT SAFEGUARDING

- Anti-bullying policy
- Attendance policy (including children missing education)
- Behaviour policy
- Complaints policy
- Critical Incident plan
- Equality policy
- First Aid policy
- Health and Safety policy
- Lone Working policy
- Online Safety and Acceptable Use policy
- Physical Intervention and/or Use of Reasonable Force policy
- Safer Recruitment policy
- Staff Code of Conduct/Safer Working Practice
- Staff Discipline and Grievance procedures
- SEND
- Whistleblowing policy
- Staff can contact the NSPCC Whistleblowing Advice Line (0800 028 0285 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)) for confidential safeguarding advice.

## 7. USE OF ACADEMY PREMISES FOR NON-ACADEMY ACTIVITIES

7.1 If the LGB and Anglian Learning trust provides extended school facilities or before or after school activities directly under the supervision or management of academy's staff, the academy's arrangements for safeguarding as written in this policy shall apply. Reference will be made to the DfE guidance Keeping children safe in out-of-school settings.

7.2 If an allegation is made relating to an incident that happened when an individual or organisation was using academy premises for non-school activities, we will follow the safeguarding policies and procedure as written in this policy.

7.3 Where services or activities are provided separately by another body the LGB/Anglian Learning trust will seek assurance that the body concerned has appropriate policies and procedures in place for safeguarding children and child

protection and there are adequate arrangements to liaise with the academy on these matters where appropriate.

***Policy adopted by the Local Governing Body on INSERT DATE***

***Review: Summer 2025***

Signed by the Principal



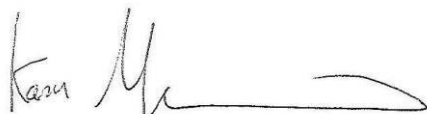
CEO Anglian Learning

.....

Chair of Governors

.....

Designated Safeguarding Lead



## Appendix A: Training

The academy provides an ongoing safeguarding training programme to all staff. This includes the **compulsory annual refresher course for all adults employed at the academy**. Staff training will include annual updates to KCSIE, prevent awareness, lessons learned from Child Safeguarding Practice Reviews, and opportunities to consider scenarios that support practical understanding of safeguarding concerns.

**Adults not employed by the academy** but who have access to the children, including all academy Governors, peripatetic music teachers, or regular contractors are required to attend training provided by the academy. Supply teachers are provided with a Quick Reference guide that informs about academy's procedures for reporting concerns, including the named persons who are designated to manage disclosures and referrals.

New staff receive training from a specified person in personnel as soon as is reasonably possible; this is part of new staff induction so that staff know:

- i) Their personal responsibility;
- ii) The child protection procedures;
- iii) The need to be vigilant in identifying cases of abuse;
- iv) How to support and to respond to a child who tells of abuse.

The training of staff ensures that the procedures set out in this policy and in the child protection guidance to staff are fully understood.

The following are part of staff training:

- Staff should never arrange meetings with individual pupils off the academy premises without the prior approval of the Headteacher/Principal;
- Staff should not transport individual children in private cars unless approved by the Headteacher/Principal or Designated Safeguarding Lead (or Deputy). In these cases, a second adult must accompany the member of staff and where possible the parent informed;
- Staff should not arrange private tuition of any of the academy's pupils, in the academy or beyond, during term time or holiday time, without the prior approval of the Headteacher/Principal. Intervention and tuition that is planned as part of academy based catch up programme should take place in an 'open classroom;'
- Staff should never give pupils their personal email address, mobile phone number or have any contact with pupils on social networking sites. If a young person makes a 'friend' request or comments on a staff member's private site this must be reported to the Designated Safeguarding Lead or Principal as soon as possible;

- Staff should never use mobile phones in the classroom or when in direct contact with the children either to make or take calls or to take photographs of the children. A mobile phone may be necessary on a trip, but in this case, the academy's mobile should be used;

Staff should never photograph pupils using their own cameras unless using a memory card provided by the academy. All photographs taken of the children should be uploaded on academy's computers only.

## Appendix B: Four Categories of Abuse

**Abuse** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

### 1. Physical Abuse

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

### 2. Neglect

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.

It may occur during pregnancy as a result of maternal substance misuse.

It may involve the neglect of or lack of responsiveness to a child's basic emotional needs.

It also includes parents or carers failing to:

- Provide adequate food, clothing and shelter including exclusion from home or abandonment;
- Protect a child from physical or emotional harm or danger;
- Ensure adequate supervision including the use of inadequate caregivers;
- Ensure access to appropriate medical care or treatment;

### 3. Emotional Abuse

Is the persistent emotional maltreatment so as to cause severe and adverse effects on a child's emotional development.

It may involve conveying to the child that they are:

- Worthless;
- Unloved;
- Inadequate;
- Valued only in so far as they meet the other persons needs

It may include:

- Not giving the child opportunities to express their views;
- Deliberately silencing them;
- 'Making fun' of what they say and how they communicate;

It may also feature age or developmentally inappropriate expectations being imposed on children including:

- Interactions that are beyond the child's developmental capability;
- Overprotection and limitation of exploration and learning;
- Preventing participation in normal social interaction.

It may involve:

- Seeing or hearing the ill-treatment of another;
- Serious bullying (including cyber bullying) causing children frequently to feel frightened or in danger;
- The exploitation or corruption of children;

Some level of emotional abuse is involved in all types of maltreatment although it may occur alone.

#### 4. Sexual Abuse

Involves forcing or enticing a young person to take part in sexual activities, not necessarily involving high level violence, whether or not the child is aware of what is happening.

This may involve:

- Physical contact including assault by penetration (e.g., rape or oral sex);
- Non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing;
- Non-contact activities involving:
  - Children looking at, or the production of, sexual images;
  - Children in watching sexual activities;
  - Or encouraging children to behave in sexual inappropriate ways;
  - Grooming a child in preparation for abuse, including via the internet;

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of abuse, as can other children.

**Child Criminal Exploitation** - Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, this may involve an 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. CSE and CCE 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.

#### **Standards for Effective Safeguarding Practice in Academies**

Child protection matters are receiving an increased priority in Ofsted inspections. The following standards may assist academies in evaluating their practice.

In best practice, academies:

1. Have an ethos in which children feel secure, their viewpoints are valued, and they are encouraged to talk and are listened to;
2. Provide suitable support and guidance so that pupils have a range of appropriate adults to whom they can turn if they are worried or in difficulties;
3. Work with parents/carers to build an understanding of the academy's responsibility to ensure the welfare of all children and a recognition that this may occasionally require children to be referred to other agencies as a constructive and helpful measure;
4. Are vigilant in cases of suspected child abuse, recognising the signs and indicators, have clear procedures whereby all staff report such cases to the designated person and are aware of local procedures so that information is passed on to the relevant professionals;
5. Monitor children who have been identified as at risk, keeping, *in a secure place*, clear records of pupils' progress, maintaining sound policies on confidentiality, providing information to other professionals, submitting reports to case conferences, and attending case conferences;
6. Provide and support child protection training regularly to the academy's staff every three years and to designated teachers every two years to ensure their skills and expertise are up to date, and ensure that targeted funding for this work is used solely for this purpose;
7. Contribute to an inter-agency approach to child protection by developing effective and supportive liaison with other agencies;
8. Use the curriculum to raise pupils' awareness and build confidence so that pupils have a range of contacts and strategies to ensure their own safety and understand the importance of helping others to stay safe;
9. Provide clear policy statements for parents/carers, staff and children and young people on this and on both positive behaviour policies and the academy's approach to bullying;
10. Have a clear understanding of the various types of bullying - physical, verbal, indirect, and cyber-bullying, - act promptly and firmly to combat it, making sure that pupils are aware of the academy's position on this issue and who they can contact for support;
11. Take particular care that pupils with SEND in mainstream and special schools, who may be especially vulnerable to abuse, are supported effectively. Particular attention should be paid to ensuring that those with communication difficulties are enabled to express themselves to a member of staff with appropriate communicative skills, e.g., Makaton or PECS;

12. Have clear guidance about the handling of allegations of abuse by members of staff, ensuring that all staff are fully aware of the procedures and that they are followed correctly at all times, using the guidance set out in the DfES (now DfE) document Safeguarding Children and Safer Recruitment in Education;
13. Have a whole academy Safeguarding and Child Protection policy, which is regularly reviewed and made available to all academy staff;
14. Ensure that specified information requested in the Annual Child Protection Monitoring Report to Governors is passed on to the LA for monitoring purposes.

## Appendix C: Useful Contacts

### Useful Contacts - Cambridgeshire

### Useful Contacts - Cambridgeshire

Cambridgeshire and Peterborough Safeguarding Children Partnership Board – Safeguarding  
Multi-Agency Procedures

Education Safeguarding Team [ecps.general@cambridgeshire.gov.uk](mailto:ecps.general@cambridgeshire.gov.uk)

Police Child Abuse Investigation Unit Tel: 101

### Useful Contacts - Cambridgeshire

Education Safeguarding Manager – Sara Rogers [sara.rogers@cambridgeshire.gov.uk](mailto:sara.rogers@cambridgeshire.gov.uk)

Early Help Hub (EHH)- Targeted Support Service Tel: 01480 376666

Customer Service Centre – social care referrals Tel: 0345 045 5203

Emergency Duty Team (out of hours) Tel: 01733 234724

Local Authority Designated Officer (LADO) [lado@cambridgeshire.gov.uk](mailto:lado@cambridgeshire.gov.uk)  
Tel: 01223 727967

Senior Leadership Adviser – Phil Nash Tel: 01223 699448

Prevent Officers [prevent@cambs.police.uk](mailto:prevent@cambs.police.uk)  
Tel: 01480 422596

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## Relevant Documents

“Keeping Children Safe in Education: Statutory guidance for school and colleges” (September 2025)

“Keeping children safe during community activities, after academy clubs and tuition: non – statutory guidance for providers running out of school settings” April 2022

“Guidance for Safer Working Practice for those working with children and young people in education settings” (February 2022)

“Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers” (July 2018)

“Meeting digital and technology standards in schools and colleges, filtering and monitoring standards for schools and colleges” March 2023

“The Prevent Duty, Departmental advice for schools and childcare providers” (June 2015)

“The Prevent Duty: safeguarding learners vulnerable to radicalisation (October 2022)

“Sharing nudes and semi-nudes: advice for education settings working with children and young people” (UKCIS, December 2020)

“Sexting in schools and colleges: Responding to incidents and safeguarding young people” published by the UK Council for Child Internet Safety (UKCCIS) – (December 2020)

“Sexual violence and sexual harassment between children in schools and colleges” (September 2021)

“What to do if you’re worried a child is being abused: Advice for practitioners” (March 2015)

“When to Call the Police: guidance for schools and colleges,” (National Police Chief Council)

“Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children” (2023)

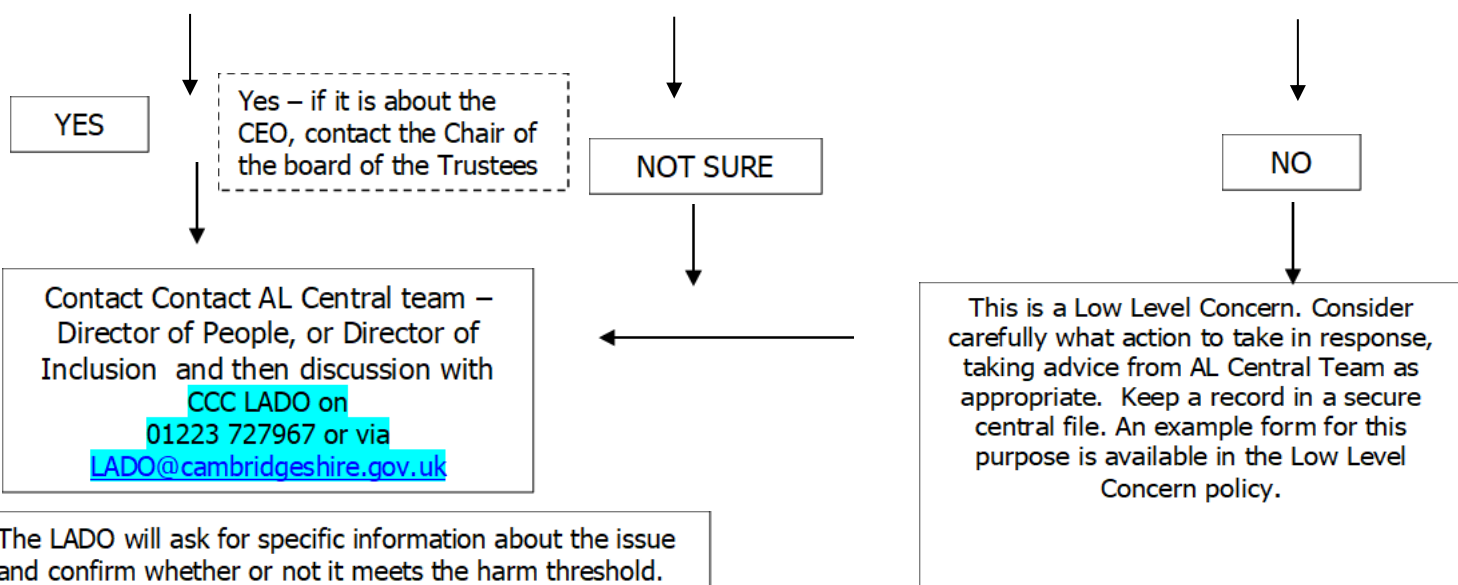
## Dealing with Allegations or Concerns about an Adult Working with Children Appendix D

Allegation or concern raised with Head Teacher about a member of staff or adult

Does it meet the harm threshold? The harm threshold is met where it is alleged that an adult working (or volunteering) in the academy has:

- *behaved in a way that has harmed a child, or may have harmed a child and/or*
- *possibly committed a criminal offence against or related to a child and/or*
- *behaved towards a child or children in a way that indicates he or she 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 (see KCSIE Part 4)*

You may wish to consider the questions in Box A below to help you decide the answer to this question.



The LADO will ask for specific information about the issue and confirm whether or not it meets the harm threshold. If it does, they will begin a formal process to manage the allegation. If it doesn't meet the threshold then they will record the information and advise you to treat the issue as a Low Level Concern. You will need to inform the staff member that LADO hold information on them.

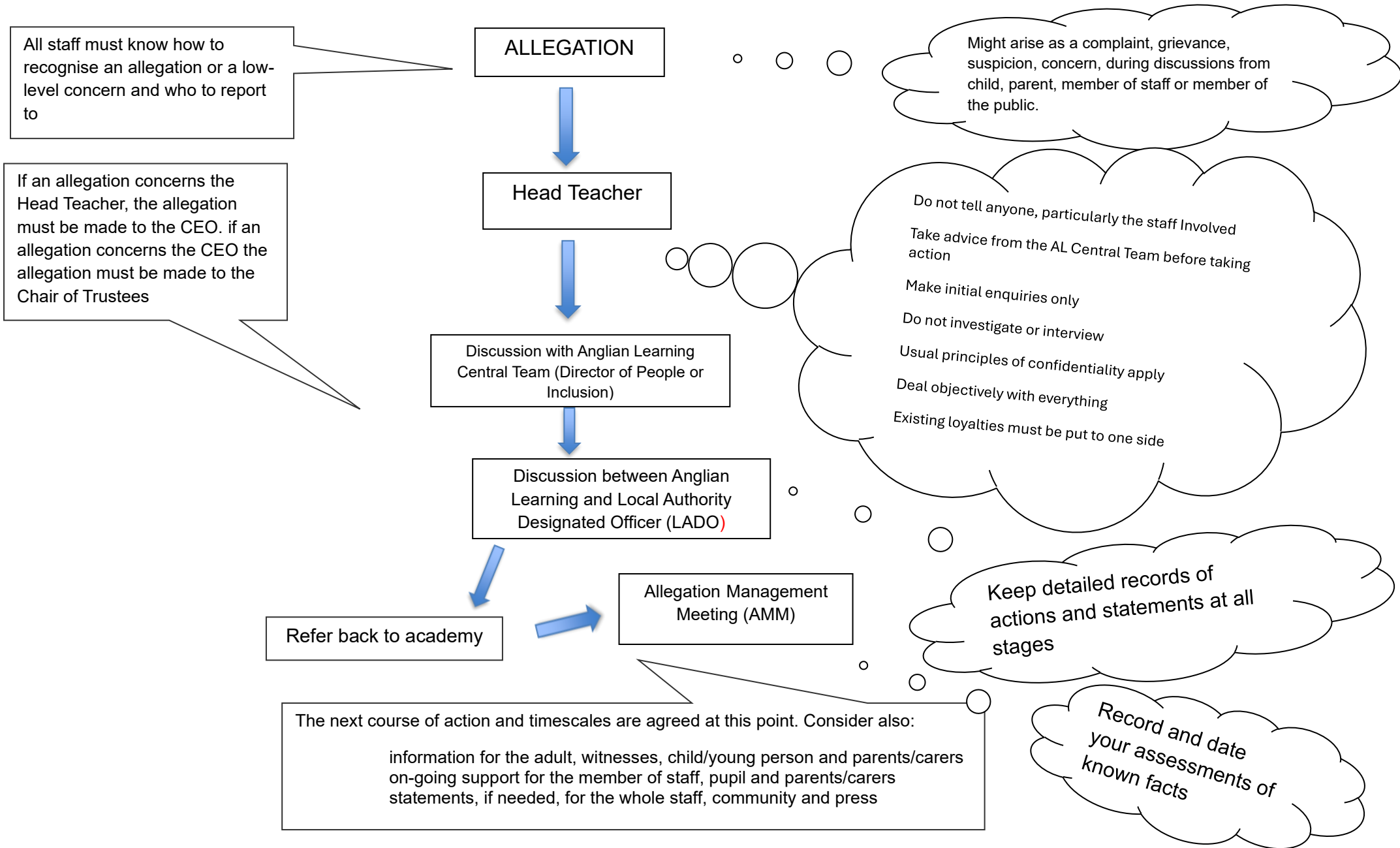
If you need **further advice** on any aspect of this then please contact either:

Caroline Newman or Camilla Saunders – Anglian Learning

### Box A:

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

**Managing an Allegation Against a Member of Staff in your Establishment..... Appendix D**



## **Addition to the Safeguarding Policy**

### **Appendix E: Addendum. Child on child abuse and Sexual Violence and Harassment 2025**

#### **1. Aims**

All Anglian Learning academies will adopt a whole academy or college approach to safeguarding and child protection and will promote the principle within all settings that child on child abuse, sexual harassment and sexual violence is not acceptable and will not be tolerated.

This will involve everyone in the Trust and its academies, including Trustees, the LGB and all staff, children and young people and their parents or carers. All parties will understand that child on child abuse, sexual violence or sexual harassment will not be passed off as 'banter,' 'part of growing up' or 'having a laugh' and staff will be expected and supported to challenge and report all incidents of concern, however minor they may seem.

Safeguarding procedures with regard to child-on-child abuse, sexual violence and sexual harassment will be transparent, clear, and easy to understand for staff, pupils, parents, and carers. Academy websites and information sharing will make clear to pupils and their families the procedures they can follow if they have concerns or wish to make a disclosure follow.

All allegations and disclosures will be taken seriously and managed without judgement.

All academy leaders, when faced with a report of child-on-child abuse, sexual violence and/or sexual harassment will give immediate consideration as to how best to support and protect the victim and the alleged perpetrator through in-academy provision whilst simultaneously engaging and working with external agencies. Particular attention will be paid to the wishes and feelings of the victim.

The Relationships Education curriculum in primary academies and the Sex and Relationships curriculum in secondary academies must build a coherent understanding of the nature of healthy relationships and support all pupils to manage their relationships well. Pupils will be taught how to respond to inappropriate and unhealthy attitudes expressed towards them and will learn the sources of support they can access when any associated problems arise.

#### **2. Action following a report of child on child abuse or sexual violence and/or sexual harassment.**

All academies will carefully consider any report of child on child abuse, sexual violence and/or sexual harassment. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the academy's initial response. Where there are concerns that need support, advice, or review beyond academy level the DSL should contact the Director of Inclusion.

## 2.1. Important considerations must include:

the ages of the children / young people involved related to the following:

- the developmental stages of the children involved ([Child Sexual Behaviour Tool](#));
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour;
- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- any power imbalance between those involved. For example, is the alleged perpetrator significantly older, more mature, or more confident;
- whether the victim has a disability or learning difficulty;
- if the alleged incident is a one-off or constitutes a sustained pattern of behaviour;
- if there are ongoing risks to the victim, other children, adult students or academy or college staff;
- what support the parents, carers and families of alleged victims and perpetrators may need and are entitled to;
- any other related issues and wider context.

## 3. Responses to disclosures of child-on-child abuse, sexual violence, and sexual harassment:

- staff and governor training ensuring their academy's approach to managing child on child abuse or sexual harassment and sexual violence is fully understood as is the difference between them;
- pupils learning appropriate attitudes and behaviours through staff modelling, through the RSE curriculum and throughout various aspects of the broader curriculum;
- the academy making clear to pupils and parents the contacts and process for reporting any concerns;
- all staff being trained to manage reports of child-on-child abuse or sexual violence and harassment in accordance with each academy's safeguarding policies and procedures. This training evidenced and recorded;
- effective links between this policy guidance and any other policies that establish the foundation for a calm, considered and appropriate response to any reports of sexual harassment or sexual violence. Including the academy's behaviour, RSE and anti-bullying policies;
- ensuring that allegations will be reported to and overseen by the designated safeguarding lead (or deputy). Appropriate members of the senior leadership team being made aware of how they can best support the DSL and safeguarding team in the event of an investigation of this nature.

### **3.1 Response to any report from a child or young person will ensure:**

- that the wishes and feelings of the victim are taken into consideration
- victims are reassured that they are being taken seriously and that they will be supported and kept safe with immediate effect;
- victims will never be given the impression that they are creating a problem by reporting child on child abuse or sexual violence or sexual harassment;
- victims will never be made to feel ashamed for making a report;
- victims will be informed of all decisions about the next steps and any potential agency involvement;
- alleged perpetrators of sexual harassment and/ or sexual violence are kept separate from the victim and are not judged;
- parents and carers of victims and perpetrators are contacted and informed of any allegations in accordance with statutory guidance;
- where a crime of potential crime is disclosed, it is reported to the Police and/or other relevant body as required by law or DfE guidance.

### **4. Responsibilities - all academy staff must:**

- understand they cannot promise confidentiality at any stage of the management process, especially in the initial stage. (It is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care representative) to discuss the next steps to be taken);
- ensure that the victim understands what the next steps will be and who the information shared will be passed to;
- set clear boundaries, recognising that a child or young person is likely to disclose to someone they trust. This could be any member of the academy or college staff. Staff will always listen carefully, be supportive and respectful of the child or young person whether they are the victim of the alleged perpetrator;
- not ask leading questions and only prompt the child where necessary with open questions – *where, when, what*;
- devote their full attention to the child, recognising that it may be appropriate to make notes during the disclosure/discussion without appearing distracted. (especially if a second member of staff is present);
- only share the information and report with those people who are necessary in order to progress it.

### **5. Recording disclosures**

Staff will only record the facts as the child or young person presents them. Any records must not reflect the personal opinion of the note taker. All academy designated safeguarding leads (and deputies) must be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation and should only be factual, concise and without bias. All interview notes should be signed by all those present to ensure that they are agreed as an accurate representation of the meeting.

Staff must consider the best way to make a record of the disclosure. In immediate instances, best practice is to wait until the end of a discussion and immediately write up a thorough summary and upload to My Concern or write directly onto the pupil profile on My Concern (this should include both victim and perpetrator).

Staff must ensure that if procedures require that they formally interview a child that this is only done with another member of staff present (ideally one person will be the note taker and the other the interviewer). These two colleagues should meet before the interview to pre-plan questions to ensure that they are not leading and are sensitive. Children and young people should have the option for a parent/carer to be present.

### **5.1 Managing reports.**

Designated safeguarding leads and deputies in addition to LGBs and proprietors will be aware that they can access detailed definitions on what constitutes sexual violence and harassment and advice to support their academy in the Department of Education <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>. Annex A of this document should be signposted to staff offering links to further support and guidance.

### **6. Online sexual harassment and/or sexual violence:**

Where the disclosure and/or reporting includes an online element, all leaders will follow their individual academy policies of searching, screening, and confiscation. They will, as necessary, consult [searching, screening and confiscation at academy](#) and follow the advice of [UKCCIS sexting](#) advice for schools and colleges. Staff must not view or forward illegal images of a child.

In reporting disclosures of online sexual harassment staff must:

- wherever possible manage reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy with one taking notes of the meeting)
- inform the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report

The above will allow for all academies to make decisions on a case-by-case basis, with the designated safeguarding lead (or deputy) taking a leading role and using their professional judgement, supported by wider agencies, such as children's social care and the police as required.

### **7. Risk assessments.**

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment [EST RA for primary academies](#) and [EST RA for secondary academies](#). Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk assessment is not intended to replace any detailed assessments of expert professionals. Any such professional

assessments should be used to inform the academy's approach to supporting and protecting their pupils and students and updating their own risk assessment.

Risk assessments must be recorded using MyConcern. They must be added to the victim's and alleged perpetrator's files and should be kept under review. All updates will be uploaded to the individual's files. At all times, the academy should be actively considering the risks posed to all their pupils and students and ensure adequate measures are in place to protect them and keep them safe.

### **7.1 The risk and needs assessment must consider.**

- the victim, especially their protection, support and wishes
- the alleged perpetrator and their protection and support
- all other children and young people (and, if appropriate, adult students and staff) at the academy especially any actions that are appropriate to protect them.
- if the alleged perpetrator attends any outside clubs where they could be perceived to be a risk. DSLs should share information on a need-to-know basis with safeguarding representatives of such clubs/teams etc.

Where the victim and alleged perpetrator are in the same year group elements in the risk assessment may include:

- moving the alleged perpetrator to different classes
- informing staff without disclosing details that the children/young people are to be kept separate
- sharing with staff relevant aspects of the risk assessment that will support keeping the victim and perpetrator safe
- ensure the victim and perpetrator know who their 'go to person' in the academy is
- allocate a safe space for the victim and the perpetrator to use as necessary
- allow time and allocate a discreet place for other agencies to visit the victim and the perpetrator in the academy
- consider transitions in corridors
- consider changing facilities
- consider unstructured times such as breaks and lunchtimes
- consider times of arriving at and leaving academy or college sites (are the victim and alleged perpetrator on the same bus, using the same cycle/pedestrian route?)
- consider the potential 'ripple effect' across the year and peer groups and any potential risk in this. For example- the victim's or alleged perpetrator's peers taking actions against either the alleged victim and/or perpetrator.

These considerations are in the best interests of both the victim and alleged perpetrator.

They are not an assumption of guilt by the academy.

The designated safeguarding lead (or a deputy) must ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and / or sexual violence specialists will be required.

## Appendix F

### Early help

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific 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 in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

## Appendix G

### Sharing nudes and semi-nudes: how to respond to an incident

An overview for all staff working in education settings in England

UK Council for  
Internet Safety

This document provides a brief overview for frontline staff of how to respond to incidents where nudes and semi-nudes have been shared.

**All** such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or equivalent and managed in line with your setting's child protection policies.

The appropriate safeguarding lead person should be familiar with the full 2020 guidance from the UK Council for Internet Safety (UKCIS), *Sharing nudes and semi-nudes: advice for education settings working with children and young people* and should **not** refer to this document instead of the full guidance.

#### What do we mean by sharing nudes and semi-nudes?

In the latest advice for schools and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

#### What to do if an incident comes to your attention

**Report it to your Designated Safeguarding Lead (DSL) or equivalent immediately. Your setting's child protection policy should outline codes of practice to be followed.**

- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal.**<sup>1</sup>
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

#### For further information

Download the full guidance, *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (UKCIS, 2020) at [www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people](http://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people).

<sup>1</sup> In exceptional circumstances, it may be necessary for the DSL (or equivalent) only to view the image in order to safeguard the child or young person. That decision should be based on the professional judgement of the DSL (or equivalent).