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PADDINGTON ACADEMY

Safeguarding Policy

2026 - 27

Date of last review	01/10/2026	Review period	1 year
Date of next review	01/10/2027	Owner	DRI
Type of policy	Statutory	Approval	LGB
SLT member in charge	DRI		

KEY EXTERNAL CONTACT DETAILS

Local Authority Designated Officer	**Local Authority Designated Officer** **Westminster LADO** Telephone: **020 7641 7668** Email: lado@westminster.gov.uk **Senior LADO (RBKC & Westminster)** Aqualma Daniel Telephone: **07870 481712** Email: Aqualma.Daniel@rbkc.gov.uk
Local Authority Children's Social Services	Telephone: **020 7641 4000** Email: AccesstoChildrensServices@westminster.gov.uk Out of Hours Emergency Duty Team: **020 7641 2388**
Multi-Agency Safeguarding Hub	Telephone: **020 7641 4000** Email: AccesstoChildrensServices@westminster.gov.uk
Support and Advice about Extremism	**Police** Non-Emergency Police: **101** Emergency: **999** **Mark Chalmers** Head of Community Safety & Specialist Services Email: mchalmers@westminster.gov.uk **Additional Prevent Referral Contact** Email: prevent@westminster.gov.uk Telephone: **07817 050469** **Department for Education** Non-Emergency Number: **020 7340 7264** Email: **counter.extremism@education.gov.uk** Website: https://report-extremism.education.gov.uk/ Anti-Terrorist Hotline: **0800 789 321**
NSPCC's what you can do to report abuse dedicated helpline	Telephone: 0808 800 5000 Email : help@nspcc.org.uk

Disclosure and Barring Service	**Disclosure Service** Address: DBS Customer Services, PO Box 3961, Royal Wootton Bassett, SN4 4HF, United Kingdom Telephone: **03000 200 190** Email: customerservices@dbs.gov.uk
	Barring Service Address: DBS Customer Services, PO Box 3961, Royal Wootton Bassett, SN4 4HF, United Kingdom Telephone: **03000 200 190**
Teaching Regulation Agency	Telephone: **0207 593 5393** Email: **misconduct.teacher@education.gov.uk**
OFSTED (Concerns)	Telephone: **0300 123 4666** Email: **CIE@ofsted.gov.uk**

KEY SCHOOL CONTACT DETAILS

United Learning Trust (ULT)	**Chair of ULT** Dame Reena Keeble Email: company.secretary@unitedlearning.org.uk **Director of Trust Safeguarding** Ben Antell Email: Benjamin.Antell@unitedlearning.org.uk **Regional Director (United Learning)** Ben Antell Email: Benjamin.Antell@unitedlearning.org.uk **Head of Safeguarding** Frazer Smith Telephone: **07826934336** Email: frazer.smith@unitedlearning.org.uk **United Learning Safeguarding Officer** Sara Bryson Email: sara.bryson@unitedlearning.org.uk Telephone: **07767222437**
Local Governing Body (LGB)	**Chair of LGB** Catherine Barker Telephone: **02074793973** Email : Catherine.barker@unitedlearning.org.uk **Nominated Safeguarding Governor of LGB** Catherine Barker Telephone: 02074793973 Email : Catherine.barker@unitedlearning.org.uk
Designated Safeguarding Lead (DSL) and Deputy Designed Safeguarding Leads (DDSLs)	**Designated Safeguarding Lead (DSL)** Daniel Riley-Furse, Vice Principal Telephone: 020 7479 3900 ext. 3922 or 07525 801878 Email: Daniel.Riley-Furse@paddington-academy.org **Deputy Designated Safeguarding Leads (DDSLs)** Nathaniel Wegbe, Vice Principal (KS4) Telephone: 020 7479 3900 ext. 3988 or 07590 884453 Email: Nathaniel.Wegbe@paddington-academy.org George Sutton, Vice Principal (KS5) Telephone: 020 7479 3900 ext. 3969 or 07415295011 Email: George.Sutton@paddington-academy.org Claire Newport, Child Protection Officer Telephone: 020 7479 3900 ext. 1004

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	Telephone: Email: kathryn.moss@paddington-academy.org Claire Newport (Child Protection Officer) Telephone: 020 7479 3900 ext. 1004 Email: Claire.Newport@paddington-academy.org Ms Honeini (Child Protection Officer) Telephone: 07716 093348 Email: Rana.Honeini@paddington-academy.org **Designated E-Safety Lead** Mr Riley-Furse Telephone: 07525801878 Email:Daniel.riley-furse@paddington-academy.org Details of the full safeguarding and pastoral teams can be found in Appendix 2
Designated Teachers for Looked After Children	**Designated Safeguarding Lead (DSL)** Daniel Riley-Furse, Vice Principal Telephone: 020 7479 3900 ext. 3922 or 07525 801878 Email: Daniel.Riley-Furse@paddington-academy.org Rana Honeini, Child Protection Officer Telephone: 020 7479 3900 ext. 3917 or 07716 093348 Email: Rana.Honeini@paddington-academy.org
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This policy applies to Paddington Academy ("the school"). United Learning Trust requires the School's Local Governing Body to review and update this policy annually (as a minimum). This policy is available on the school website. This policy is ratified annually by the United Learning Group Board.

This policy has regard to the following guidance and advice, as amended from time to time (and any supplemental guidance/advice referred to therein):

- Keeping Children Safe in Education (DfE, current edition/publication)
- Disqualification under the Childcare Act 2006 (DfE, August 2018)
- What to do if you're worried a child is being abused: advice for practitioners (HM Government, 2015)
- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (Updated 2024)
- Mental Health and Behaviour in Schools (DfE, November 2018)
- Preventing and Tackling Bullying (DfE, July 2017)
- Working Together to Safeguard Children (DfE, Current edition/publication)
- Information Sharing Duty (DfE, 2026) - s16LA of the Children Act 2004
- Revised Prevent Duty Guidance: for England and Wales (Home Office, April 2023)
- The Prevent duty: safeguarding learners vulnerable to radicalisation (DfE, updated September 2023)
- Relationships education, relationships and sex education (RSE) and health education (DfE, 2025)
- Equality Act (2010) – Including Public Sector Equality Duty
- The Human Rights Act (1998)
- Data (Use and Access) Act 2025 (effective from January 2026)
- Crime and Policing Act 2026

This policy also takes into account the procedures and practice of Westminster local authority and the published safeguarding arrangements set out by the Westminster safeguarding partners which can be found on this website: Welcome to lscp | lscp. The Local Governing body, and their senior leadership teams, especially their designated safeguarding leads, will:

- make themselves aware of and follow their local arrangements (including the local criteria for action and the local protocol for assessment)
- ensure this is reflected in their own policies and procedures
- supply information as requested by the three safeguarding partners
- work with social care, the police, health services and other services to promote the welfare of children and protect them from harm

POLICY STATEMENT

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. 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 interests of the child. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

The school will ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Staff working with children should have an attitude of 'it could happen here' and no reports in their school it does not mean it is not happening. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. Where there is a safeguarding concern the school will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback.

CONCERNS ABOUT A CHILD

The school always has a duty to consider the best interests of the student and take action to enable all students to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone has a role to play in identifying concerns, sharing information and taking prompt action in accordance with this policy.

The school has arrangements for listening to children, providing support before statutory intervention, including Family Help where appropriate, and processes for children to raise concerns about themselves or their peers. Details of these arrangements are shared with students at regular opportunities and can be seen below.

At Paddington Academy every student is listened to, taken seriously, cared for and supported. Students can report concerns about themselves or their peers by speaking directly with a member of the Child Protection Team, Pastoral Team or any trusted member of staff. Staff can also raise concerns through the same channels. Details of these teams are shared on posters around the Academy, displayed on TV screens and communicated regularly through assemblies and other opportunities to ensure that reporting concerns is easy and accessible for all students.

The Academy ensures that students have regular opportunities to express their views, seek support and report concerns in a safe and supportive environment.

Staff should expect to support social workers and other agencies following any referral.

Definitions of safeguarding, abuse, neglect and exploitation

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.

Abuse is a form of maltreatment of a child. Somebody may abuse, exploit, or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them, by other children, or, more rarely, by others (e.g. via the internet).

Technology is a significant component in many safeguarding and wellbeing issues. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. In many cases abuse will take place concurrently via online channels and in daily life. They may be abused by an adult or adults or by another child or children. Abuse and exploitation can be:

- Physical abuse
- Emotional abuse
- Sexual abuse; and/or
- Neglect

All staff should be aware of indicators of abuse, neglect and exploitation. Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse. Staff should always be vigilant and raise any concerns with the DSL or DDSL.

All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm. The following behaviours and indicators can be signs that children are at risk:

- drug taking and/or alcohol misuse;
- unexplainable and/or persistent absences from education;

- serious violence, criminal exploitation (including that linked to county lines), radicalisation; and
- consensual and non-consensual sharing of self-generated intimate images, including those generated using artificial intelligence (AI), such as deepfakes and manipulated images or videos.

PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

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

If staff suspect or hear an allegation or concern of abuse, neglect or exploitation from a child or any third party, they must follow the relevant procedure below. All staff should:

- listen carefully;
- avoid asking leading questions;
- reassure the individual that the allegation/complaint will be taken seriously;
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain to the child that staff will only share the information with those who need to know to help the child. All staff should explain next steps and who the information will be passed to;
- a victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

All staff should record any concerns on CPOMS. All staff in the academy have access to CPOMS and receive training on how to use it. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. Where a report includes online elements or the sharing of images, staff are reminded not to view or forward any illegal images of a child but note what has been reported. Further guidance can be found in the Sharing nudes and semi-nudes: advice for education settings working with children and young people.

Where there is a safeguarding concern, the school will ensure the student's wishes and feelings are taken into account wherever possible and will work with them (and their families where appropriate) when determining what action to take and what services to provide. This is particularly important in the context of harmful sexual behaviours, such as sexual harassment and violence. The school manages this by ensuring that there are systems in place for children to express their views and give feedback to staff which also supports dialogue with students with communications difficulties or vulnerabilities. This is managed through out child protection, pastoral and inclusion teams.

Information sharing:

Safeguarding information will often be special category personal data and the school will comply with data protection law and have due regard to the Department for Education's statutory guidance Information Sharing Duty (DfE, 2026) - s16LA of the Children Act 2004 and the relevant provisions of KCSIE when sharing such data. Personal information may be shared by the school with a third party (such as the police or local authority) without consent if there is a lawful basis to do so, such as where doing so is in order to promote a child's welfare or where their safety may be at risk. This is because the Data Protection Act 2018 includes 'safeguarding children and individuals at risk' as a condition that allows information to be shared without consent in certain circumstances. Any decision to share or withhold information will be recorded together with the reasons for it and who the information has been given to. The school operates its processes with the best interests of the student at its heart.

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. The school will ensure relevant staff comply with the relevant data protection principles when processing and sharing personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. As part of this, the school will ensure that members of staff:

- are confident of the processing conditions which allow them to process and share information for safeguarding purposes, including information which is 'special category personal data';
- understand that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data without consent in certain circumstances; and
- do not provide pupils' personal data where the sharing does not comply with data protection law.

When sharing information, staff will ensure they comply with group data protection policies and keep records of disclosures as required by these policies. These are available to staff via the United Learning Policies Portal. For further information about how the school processes pupil personal data, please see the privacy notice on the website.

What staff should do if they have concerns about a child

If staff (including governors, agency staff and volunteers) have any concerns about a child's welfare, they should act immediately and should speak with the School's DSL or DDSL. If, in exceptional circumstances, the DSL or DDSL is not available, this should not delay appropriate action being taken and staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as is practically possible.

The DSL or DDSL will consider the appropriate action to take in accordance with the threshold document published by the school's local safeguarding partners. Options will include:

- managing any support for the child internally via the school's own pastoral support processes;
- undertaking a Family Help assessment; or
- making a referral for statutory services and/or
- making a referral to the police.

If a child's situation does not appear to be improving, the DSL or DDSL (or the person who made the referral) should consider following local escalation procedures to ensure their concerns have been addressed and to ensure that the child's situation improves.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision, whether this is when problems are first emerging and support is being provided through Family Help processes, or where a child is already known to local authority children's social care (such as on a Child in Need or Child Protection Plan). Staff should

challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing (in line with this policy).

Support Before Statutory Intervention

Any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help.

All staff should be particularly alert to the potential need for support 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 pregnant and/or is a parent themselves;
- has exhibited early signs of abusive, violent and/or harmful behaviours;
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing or goes missing from education, home or care;
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from school, or is educated through Alternative Provision or a Pupil Referral Unit;
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation;
- is at risk of being radicalised into terrorism;
- 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 or drugs themselves;
- is at risk of honour or faith-based abuse such as Female Genital Mutilation (FGM) or Forced Marriage; or
- is a privately fostered child.

Children can be at risk of harm inside and outside of school, inside and outside of the home and online. Exercising professional curiosity and knowing what to look for is vital in the early identification of abuse, neglect and exploitation so that staff are able to identify children who may need help or protection.

Safeguarding issues are rarely standalone events and cannot be covered by one definition or label. In many cases, multiple safeguarding concerns will overlap.

The following behaviours and indicators can be signs that children are at risk:

- drug taking and/or alcohol misuse;
- unexplainable and/or persistent absences from education;
- serious violence, criminal exploitation (including that linked to county lines), radicalisation; and
- consensual and non-consensual sharing of self-generated intimate images, including those generated using artificial intelligence (AI), such as deepfakes and manipulated images or videos.

In the first instance, staff who consider that a student may benefit from support should discuss this with the School's DSL or DDSL. If Family Help is appropriate, the DSL or DDSL will generally lead on liaising with relevant agencies and coordinating support.

Staff may be required to support other agencies and professionals in assessments and interventions and, in some cases, may act as the lead professional.
The DSL or DDSL will support staff in liaising with external agencies and professionals as appropriate. If support is provided, the matter will be kept under constant review and consideration given to a referral to Children's Social Care if the student's situation does not appear to be improving or is getting worse.

What staff should do if a child is suffering, or is likely to suffer from harm

If staff (including governors, agency staff and volunteers) believe that a child is suffering, or is likely to suffer from harm, or is in immediate danger, it is important that an immediate referral to Westminster Children's Social Care (and the Police if appropriate) is made in accordance with the local authority referral process. Anyone can make a referral. If anyone other than the DSL or DDSL makes a referral, they should inform the DSL or DDSL as soon as possible that a referral has been made. Children's Social Care assessments should consider where children are being harmed in contexts outside the home, so it is important to provide as much information as possible as part of the referral process to enable a contextual safeguarding approach (see further below regarding Contextual Safeguarding).

The school's local safeguarding partners are Kensington, Chelsea and Westminster and the locally agreed safeguarding arrangements can be found here: https://www.rbkc.gov.uk/lscp/. Printed copies can also be accessed within the Academy by speaking with the DSL or DDSL.

What staff should do if a child is seen as at risk of radicalisation

Staff should follow the school's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or Children's Social Care depending on the level of risk. However, if staff have concerns that there is an immediate or significant risk of a child being drawn into terrorism, they must call 999 and inform the DSL or DDSL so that an appropriate referral can be made to MASH and/or Children's Social Care. Advice and support can also be sought from Children's Social Care.

The school, in recognition that students may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL or DDSL and governors responsible for safeguarding to ensure the school's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly reviewed and updated.

See further below for more information on radicalisation. Further guidance can be found in the Revised Prevent Duty Guidance: for England and Wales (Home Office, April 2023).

What staff should do if they discover an act of Female Genital Mutilation ('FGM')

All staff should speak to the DSL or DDSL about any concerns regarding FGM. Teaching staff have a separate duty to report to the Police cases where they discover that an act of FGM appears to have been carried out on a girl under the age of 18. All staff are referred to **Appendix 1** of this policy for the procedure to be followed where they suspect or discover that a student may be at risk of FGM.

What Staff Should Do If a Child Goes Missing from Education / Children Absent from Education

Children missing or absent from education, particularly repeatedly and/or for prolonged periods, and children missing education (unexplainable and/or persistent absences from education) can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation, including involvement in county lines. It may indicate

mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of Female Genital Mutilation (FGM), so-called honour-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of the Academy's unauthorised absence procedures and children missing education procedures. The Academy's procedures for unauthorised absence and for dealing with children who are missing or absent from education are set out in the Attendance Policy, which is available on the Academy website. Further detail can also be found in Appendix 1 of this policy.

The Academy will report to the Local Authority any student who fails to attend school regularly or has been absent from school without permission for a continuous period of 10 school days or more.

Elective Home Education

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, it is recommended in statutory guidance that schools and other key professionals work together to coordinate a meeting with parents/carers where possible. This would ideally take place before a final decision has been made, to ensure that parents/carers have fully considered what is in the best interests of their child.

This is particularly important where a child has special educational needs or a disability, has a social worker and/or is otherwise vulnerable. Where a child has an Education, Health and Care Plan (EHCP), the Local Authority will need to review the plan, working closely with parents and carers.

The Academy will inform the Local Authority of all deletions from the admissions register when a child is taken off roll.

Risk Assessments and Safety Plans

Assessing and managing safeguarding risks to and for children involves identifying vulnerabilities and risks, evaluating the likelihood and impact of harm, and implementing proportionate measures through written risk assessments or safety plans.

The Academy will ensure that a written risk assessment and/or safety plan is established promptly where there is a risk of significant harm, or where a student's needs escalate beyond what can be safely managed without a coordinated approach.

Such situations may be identified through:

- disclosures or evidence of harm;
- escalating patterns of concern relating to attendance, behaviour, safeguarding or wellbeing;
- complex or cumulative vulnerabilities;
- periods of transition or reintegration following a crisis; or
- multi-agency involvement requiring coordinated risk management.

Examples may include:

- self-harm;
- suicidal thoughts or ideation;
- incidents of harmful sexual behaviour;
- child-on-child abuse;
- serious behavioural incidents;
- concerns regarding exploitation;
- serious bullying concerns; or
- reintegration following a serious safeguarding incident.

Where risks are identified, the Academy will:

- work with the child and family where appropriate;
- create a written risk assessment and/or safety plan;
- identify risk factors, protective factors and agreed actions;
- ensure the child's voice is considered;
- share information on a need-to-know basis;
- review plans regularly; and
- update plans as circumstances change.

Oversight of high-risk plans sits with the DSL and DDSLs.

What Staff Should Do If They Have Concerns About Another Staff Member (Including Supply Staff, Trainee Teachers, Volunteers and Contractors)

If staff have safeguarding concerns, or an allegation is made about another staff member posing a risk of harm to children, then this should be referred to the Head and/or the Executive Head, where applicable. Where there are concerns or allegations about the Head or the Executive Head, where applicable, this should be referred to the Chair of the LGB and Head of Safeguarding. In the event of concerns or allegations of abuse being made, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, trainee teachers, volunteers and contractors).

What Staff Should Do If They Have Concerns About Safeguarding Practices in the School

Where staff have concerns about poor or unsafe practices and potential failures in the school's safeguarding regimes, these should be raised in accordance with the school's whistleblowing procedures which can be found on the school website. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the school, feel that their genuine concerns are not being (or have not been) addressed or are concerned about the way a concern is being handled, they may use other whistleblowing channels, such as the NSPCC whistleblowing helpline. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

CHILD-ON-CHILD ABUSE (INCLUDING SEXUAL VIOLENCE AND SEXUAL HARASSMENT)

Safeguarding issues can manifest themselves through child-on-child abuse. Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between two or more children and within children's relationships (both intimate and non-intimate). All staff working with children are advised to maintain an attitude of "it could happen here." Staff should recognise that even if there are no reports, it does not mean that child-on-child abuse is not happening; it may simply not be being reported.

This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between children (also known as teenage relationship abuse);
- Physical abuse, including hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
- Physical assault and harm, or the threat of harm with a weapon;
- Harmful sexual behaviour, sexual violence and sexual harassment, including misogyny and misandry;
- Consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using artificial intelligence (AI);

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party;
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause humiliation, distress or alarm;
- Initiation or hazing type violence and rituals; and
- Discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents.

Child-on-child abuse is a safeguarding issue for both the child who has experienced the behaviour and the child who has displayed the behaviour.

It is recognised that for some, but not all, forms of child-on-child abuse it is more likely that girls will be victims and boys perpetrators. However, all forms of child-on-child abuse are unacceptable and will be taken seriously. As such, if staff have any concerns regarding child-on-child abuse, they should speak to their designated safeguarding lead (or deputy).

Child-on-child abuse can be associated with factors outside the school and can occur online and face-to-face between two or more children of any age or gender. The Academy therefore takes a contextual safeguarding approach to managing child-on-child abuse.

Child-on-child abuse is abuse and is never acceptable. The Academy takes a zero-tolerance approach. It should never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys", as this can lead to a culture of unacceptable behaviour, misogyny, discrimination and an unsafe environment for children.

The Academy takes the following steps to minimise the risk of child-on-child abuse:

- PSHE content delivered across the year which focuses on gender equality, racial discrimination and diversity;
- PSHE and assembly content which promotes equality, diversity, inclusion, anti-racism and challenges discriminatory behaviour;
- Relationships and Sex Education delivered in Year 9, with a particular focus on consent, respectful relationships and harassment;
- A strong Behaviour Policy linked to clear values which are consistently reinforced;
- Very clear expectations regarding acceptable language and conduct;
- Fully staffed duty points around the Academy to ensure high levels of supervision;
- Silent transitions around the Academy which minimise opportunities for sexual harassment and inappropriate behaviour;
- A dedicated Child Protection and Pastoral Team, with every student having access to a Head of Year and a non-teaching Student Support Mentor;
- Opportunities for students to report concerns anonymously online; and
- Regular safeguarding education delivered through assemblies, tutor time and the wider curriculum.

All incidents involving the sharing of nude or semi-nude images require a safeguarding response, whether consensual or non-consensual, with a proportionate approach that considers the age, development, circumstances and vulnerability of the children involved, as well as any elements of coercion, exploitation or abuse. This includes images generated or manipulated using artificial intelligence (AI).

The Academy's approach to pupils sharing nudes and semi-nudes images and/or videos (also known as sexting or youth-produced sexual imagery) begins with education through assemblies, PSHE and Relationships and Sex Education. Staff are trained to be vigilant and report concerns to the Child Protection Team. Incidents are investigated in accordance with DfE and UKCIS guidance and, where appropriate, advice is sought from the Police. Staff are also referred to the United Learning Online Safety Policy. Further guidance can be found in the UKCIS *Sharing nudes and semi-nudes: advice for education settings working with children and young people*.

Where an issue of student behaviour or bullying gives reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, staff should follow the safeguarding procedures outlined in this policy rather than the Academy's Behaviour Policy or Anti-Bullying Policy in the first instance.

What to Do if Staff Suspect that a Child May Be at Risk or Hears a Report of Child-on-Child Abuse

For detailed information on what sexual violence and sexual harassment constitutes, the definition of consent, important context to be aware of, related legal responsibilities for schools and colleges, advice on a whole-school approach to preventing child-on-child sexual violence and sexual harassment and further advice on responding to reports, see the Department for Education's statutory guidance: Keeping Children Safe in Education (2026), Part 5 – Child-on-Child Sexual Violence and Sexual Harassment.

The procedures set out below have been developed following consultation with students, staff and parents and will be reviewed, at least annually, in light of an assessment of the impact and effectiveness of the policy.

The Academy's initial response to a report from a child is important. How the Academy responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report concerns or come forward.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online should never be downplayed and should be treated as seriously as abuse occurring face-to-face. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in a way that avoids causing alarm or distress.

It is important to recognise that children may not always find it easy to disclose abuse verbally. Children can show signs or act in ways that they hope adults will notice and respond to. In some circumstances, the child may not make a direct report. A friend may make a report, a member of staff may overhear a conversation, or a child's behaviour may indicate that something is wrong. If staff have any concerns regarding a child's welfare, they should act immediately rather than waiting to be told.

All staff are trained to manage reports appropriately. Effective safeguarding practice includes:

- where possible, managing reports with two members of staff present, ideally one of whom is the DSL or DDSL;
- careful handling of reports that contain an online element, including awareness of guidance relating to searching, screening and confiscation and the UKCIS guidance on sharing nudes and semi-nudes;
- staff not viewing or forwarding illegal images of a child;
- not promising confidentiality at the initial stage, as information may need to be shared with relevant safeguarding professionals;
- ensuring that the child understands what will happen next and who the information will be shared with;
- recognising that a child may choose to disclose to any trusted member of staff;
- recognising that an initial disclosure may not reflect the full extent of the abuse experienced and that trauma can affect memory and recall;
- recognising that some children face additional barriers to disclosure due to disability, SEND, ethnicity, language barriers, sex, gender identity or sexual orientation;
- listening carefully, reflecting back, using the child's language, avoiding judgement and asking only open questions where necessary;

- ensuring a written record is made as soon as possible after the disclosure;
- recording only the facts as presented by the child and avoiding personal opinion or interpretation;
- considering the best method of recording the disclosure whilst maintaining engagement with the child throughout the conversation; and
- informing the DSL or DDSL as soon as practically possible if they were not involved in receiving the initial report.

If a staff member has concerns that a child may be at risk of, or experiencing, abuse by another child, or that a child may be at risk of abusing or may be abusing other children, they should discuss their concerns with the DSL or DDSL without delay so that an appropriate course of action can be agreed.

The Academy recognises that a child is likely to disclose concerns to someone they trust, and this may be any member of staff. By making such a disclosure, the child is likely to feel that the member of staff is in a position of trust and confidence.

All concerns and allegations of child-on-child abuse will be handled sensitively, appropriately and promptly. Investigations will consider the wider context in which the behaviour may have occurred where appropriate. The Academy treats all children involved as potentially vulnerable and ensures that a safeguarding response is in place for both the child who has experienced the abuse and the child who has displayed the behaviour. Immediate consideration will be given to how best to support and protect all children involved or affected.

The Academy will take into account the views of the child or children involved. Unless it is considered unsafe to do so, the DSL will discuss proposed actions with the child or children and their parents or carers following appropriate liaison with Children's Social Care. The Academy will manage expectations regarding information sharing and keep children and parents informed of developments where appropriate and safe to do so.

All children affected by child-on-child abuse will be supported by the Child Protection Team, Pastoral Team and Inclusion Team as appropriate, and support from external agencies will be sought where necessary. Children who have experienced abuse will be reassured that they are being taken seriously and will be supported and kept safe. The Academy recognises that children with SEND or certain health conditions can be more vulnerable to child-on-child abuse and peer-group isolation than other children and will consider enhanced pastoral, inclusion or external support where necessary.

Where necessary, and following advice from relevant safeguarding agencies, consideration may be given to alternative arrangements for a child who has been alleged to have caused harm whilst investigations are ongoing. The Academy will take advice from Children's Social Care, the Police and other safeguarding partners as appropriate and will take all necessary actions to ensure the safety and welfare of all children involved. If it is necessary for a student to be interviewed by the Police, parents will be informed as soon as possible, subject to safeguarding advice, and appropriate support will be provided throughout the process. Confidentiality will remain an important consideration throughout, and advice will be sought from safeguarding partners as required.

Reports Concerning Harmful Sexual Behaviour (Including Sexual Violence and Sexual Harassment)

Consideration of safeguarding all children involved in a safeguarding report will be immediate. Following a report of sexual violence and/or sexual harassment, the DSL will consider the appropriate response. Important considerations will include:

- the victim's wishes regarding how they wish to proceed. Victims should be given as much control as reasonably possible regarding how an investigation will be progressed and what support they are offered, balanced against the Academy's duty to protect other children;
- the nature of the alleged incident, including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed;
- the ages and developmental stages of the children involved;

- any power imbalance between the children, including differences in age, maturity, confidence, social status or whether the victim has a disability or learning difficulty;
- whether the alleged incident is isolated or part of a sustained pattern of abuse. Sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not be solely sexual in nature;
- the fact that sexual violence and sexual harassment can take place within intimate personal relationships between children;
- the importance of understanding intrafamilial harm and whether siblings may also require support;
- any ongoing risks to the victim, other children, adult students or staff; and
- wider contextual concerns, including links to Child Sexual Exploitation (CSE) or Child Criminal Exploitation (CCE).

When there has been a report of sexual violence, the DSL (or DDSL) will complete an immediate risk and needs assessment in respect of each child affected by the abuse. Where there has been a report of sexual harassment, the need for a risk and needs assessment will be considered on a case-by-case basis. The assessment will consider:

- the child who has experienced the abuse;
- the child alleged to have displayed the behaviour; and
- other children and, where appropriate, staff within the Academy.

The DSL will consider, as part of the Academy's response, the context within which the incident occurred and the importance of anonymity. Risk assessments will be recorded and regularly reviewed. The DSL will consider risks posed to all children and implement appropriate measures to ensure safety. This may include consideration of shared classes, social times, Academy premises and transport arrangements. Any professional risk assessment completed by external agencies will inform the Academy's response.

The Police will be informed of any harmful sexual behaviour, sexual violence or sexual harassment that may constitute a criminal offence. This includes behaviours such as grabbing bottoms, breasts or genitalia. Allegations of rape, assault by penetration and sexual assault will be referred to the Police. A report to the Police will generally be made alongside a referral to Children's Social Care.

If the DSL decides to make a referral to Children's Social Care and/or a report to the Police against the wishes of the child who has experienced the abuse, those reasons will be explained to the child and appropriate support offered. The DSL or DDSL will work closely with Children's Social Care, the Police and other agencies to ensure that action taken by the Academy does not jeopardise any statutory investigation and to determine how information should be shared with students, staff and parents whilst protecting confidentiality and anonymity.

Regardless of the outcome of any criminal investigation or process, including where a child is subject to bail conditions, the DSL will liaise with the Police and Children's Social Care to ensure the continued welfare and safety of all children. Risk assessments will be reviewed and updated and appropriate safeguarding measures maintained.

The Academy will consider whether disciplinary action is appropriate for any child involved. Before making any decision, the Academy will consider its duty to safeguard all children, the underlying reasons for a child's behaviour, any unmet needs, any harm or abuse experienced by the child, the risk posed to others and the severity and circumstances of the behaviour.

The DSL will ensure that where a child moves to another educational setting following an incident of child-on-child abuse, the receiving school is made aware of any ongoing support needs and, where appropriate, any identified risks to other children or staff.

The Academy recognises that accurate record keeping and monitoring of reports relating to sexual violence and sexual harassment are essential and support the Academy in meeting its Public Sector Equality Duty.

Contextual Safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the Academy and/or can occur between children outside of these environments. All staff, but especially the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs), should consider whether children are at risk of abuse or exploitation in situations outside their families.

Extrafamilial harm can take a variety of different forms and children can be vulnerable to multiple harms, including, but not limited to, child sexual exploitation, child criminal exploitation, serious youth violence, child-on-child abuse and other forms of harm occurring outside the home.

SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, TRAINEE TEACHERS, VOLUNTEERS AND CONTRACTORS

The Academy's procedures for managing concerns and allegations against staff who are currently working in the Academy follow Department for Education statutory guidance and local safeguarding partners' arrangements and apply when staff (including supply staff, trainee teachers, volunteers and contractors) have, or are alleged to have:

- Behaved in a way that has harmed a student, or may have harmed a student; and/or
- Possibly committed a criminal offence against or related to a student; and/or
- Behaved towards a student in a way that indicates they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside the Academy, which could make them unsuitable to work with children ("transferable risk"). Advice can be sought from the LADO when assessing transferable risk.

Non-Recent Allegations

Allegations against an adult who is no longer working or volunteering with children should be referred to the Police. Where it is known that the adult is still working or volunteering with children, all allegations (including historical or non-recent allegations of abuse) should be referred to the Police and the LADO in the local authority in which the adult is working or volunteering.

Where an adult makes an allegation to the Academy that they were abused as a child, they should be advised to report the allegation to the Police. Non-recent allegations made by a child should be reported to the LADO in line with local authority procedures for dealing with non-recent allegations. Abuse can be reported regardless of how long ago it occurred.

If an allegation is made against anyone working with children in the Academy, the Academy should not undertake its own investigation without prior consultation with the Local Authority Designated Officer (LADO) or, in the most serious cases, the Police, so as not to jeopardise any statutory investigation. In borderline cases, the Academy may discuss concerns informally with the LADO on a no-names basis where local safeguarding procedures allow.

All allegations should be investigated as a priority to avoid any unnecessary delay.

Allegations That May Meet the Harms Threshold

1. Reporting the allegation

All allegations which appear to meet the reporting criteria must be reported immediately to the Case Manager, who will normally be the Principal(s). Where the Principal(s) are absent or are the subject of the allegation or concern, reports should be made to the Chair of the Local Governing Body and the United Learning Head of Safeguarding. Where the Principal is the subject of the allegation, they must not be informed prior to contact being made with the Chair of the Local Governing Body, Head of Safeguarding, LADO and, where appropriate, Children's Social Care and the Police.

2. Welfare of the child

Where the Case Manager believes that a child has been harmed, may have been harmed, is at immediate risk of harm or the situation is an emergency, the DSL or DDSL should contact Children's Social Care and, where appropriate, the Police immediately.

3. Investigating and supporting the individual subject to the allegation

Before contacting the LADO, the Academy should conduct basic enquiries in line with local procedures to establish the facts and determine whether there may be any foundation to the allegation, whilst taking care not to jeopardise any future investigation. This may include establishing:

- Was the individual present in the Academy at the time of the allegation?
- Could they have come into contact with the child?

The Academy should establish what information the LADO requires and, where necessary, seek advice before undertaking any preliminary enquiries.

4. Consultation with the LADO

The Case Manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation, agreeing an appropriate course of action and whether Police involvement is required. The LADO should be informed within one working day of all allegations that appear to meet the criteria, or which are made directly to the Police and/or Children's Social Care.

5. Communication and record keeping

All discussions should be recorded in writing. Any communication with the individual concerned and the parents of the child should be agreed with the LADO and/or Police. The Case Manager will ensure that the individual who is the subject of the allegation is informed as soon as possible and provided with an explanation of the likely course of action, unless Children's Social Care or the Police advise otherwise. A named representative will be appointed to keep the individual informed throughout the process and to consider any welfare support that may be required.

6. Suspension

The Case Manager should carefully consider whether the circumstances warrant suspension or whether alternative arrangements can appropriately safeguard children whilst the allegation is investigated. The views of the LADO, HR advisers, the Police and Children's Social Care will be taken into account where relevant. Where an individual is suspended, the Case Manager will ensure they have a named contact within the Academy and are provided with their details.

7. Support for the member of staff

Whilst the welfare of the child remains paramount, appropriate welfare support should also be offered to the member of staff concerned. Information should remain confidential and should not ordinarily be shared with staff, students or parents who are not directly involved. Further guidance can be found within KCSIE.

8. Parental communication

The Case Manager will ensure that parents are informed as soon as possible and kept updated regarding progress, subject to any advice from Children's Social Care or the Police.

9. Further investigation

Where further investigation is required, the LADO and Case Manager will agree how and by whom this investigation will be undertaken.

10. DBS and TRA referrals

The Case Manager will discuss with the LADO whether a referral to the Disclosure and Barring Service (DBS) and/or the Teaching Regulation Agency (TRA) is required in line with KCSIE requirements.

This includes circumstances where:

- an allegation is substantiated and the individual is dismissed, resigns or otherwise ceases to provide services;
- an individual has engaged in relevant conduct in relation to children and/or vulnerable adults;
- the harm threshold is met; or
- the individual has been cautioned or convicted of a relevant offence.

In cases involving serious professional misconduct by a teacher, the Case Manager must consider referral to the Teaching Regulation Agency.

11. No further action

Where initial discussions result in no further action, the Case Manager and LADO should record the decision and rationale and agree what information should be communicated to the individual concerned and by whom.

12. Learning lessons

At the conclusion of the case, the Case Manager should review the circumstances with the LADO to determine whether improvements can be made to safeguarding procedures or practice. Consideration should include the use of suspension, its duration, whether it was justified and how similar matters might be managed in future.

13. Unfounded, false, malicious or unsubstantiated allegations

Where an allegation is found to be unfounded, false, malicious or unsubstantiated, the Case Manager and, where involved, the LADO should review the circumstances to determine whether any lessons can be learned or improvements made.

14. Settlement agreements

Compromise or settlement agreements must not be used where allegations indicate that an individual may pose a risk of harm to children or may be unsuitable to work with children. Such agreements will not prevent Police investigation, Academy investigation or referrals to the DBS or TRA where required. The Academy will continue its investigation if an individual resigns or otherwise ceases to provide services.

Information Sharing

Staff should be mindful of the guidance contained within KCSIE regarding information sharing between safeguarding partners during the management of allegations against staff.

The Academy will make every reasonable effort to maintain confidentiality and protect individuals from unwanted publicity while an allegation is being investigated or considered.

Allegation outcomes

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. Substantiated allegations should be included in references, provided that the information is factual and does not include opinions (KCSIE). Low level concerns (see below) should not be included in references unless they relate to issues which would normally be included in a reference such as misconduct or poor performance (KCSIE).

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager should consider whether the child and/or person who made the allegation is in need of help or may have been abused by someone else, in which case a referral to children's social care may be appropriate.

If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a student who made it in accordance with the school's behaviour policy; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a student.

Supply Teachers, Trainee Teachers and All Contracted Staff

In some circumstances, the Academy will need to consider an allegation against an individual who is not directly employed by the Academy, for example a supply teacher, trainee teacher or contracted member of staff provided through an employment agency or business. Where this applies, the Academy will share safeguarding responsibilities with the employment agency or business. The Academy remains responsible for gathering the facts and managing the safeguarding process, whilst working closely with the employment agency or business, which will usually lead on any disciplinary processes.

Whilst the Academy is not the employer of supply teachers, trainee teachers or contracted staff, it remains responsible for ensuring that allegations are dealt with appropriately. Under no circumstances will the Academy cease to use a supply teacher, trainee teacher or contracted member of staff solely because safeguarding concerns have been raised, without first establishing the facts and liaising with the LADO to determine an appropriate outcome. The Academy will work with the relevant agency or provider to determine whether suspension, redeployment or alternative arrangements are appropriate whilst enquiries are undertaken.

Employment agencies and contractors are expected to cooperate fully with enquiries conducted by the LADO, Police and/or Children's Social Care. The Academy will usually take the lead in managing allegations as agencies do not have direct access to children or Academy staff and are therefore unable to gather all relevant information required as part of the safeguarding investigation process.

When using an agency or contractor, the Academy will inform them of its procedures for managing allegations and will take account of their own safeguarding and disciplinary procedures, including their duty to make referrals to the Disclosure and Barring Service (DBS) where appropriate. This may include inviting the agency's Human Resources representative or equivalent to meetings and ensuring they are kept informed throughout the process.

Where concerns or allegations relate to a trainee teacher placed within the Academy, the expectations outlined above apply equally. Initial Teacher Training providers are expected to work with the Academy in the same way as supply agencies and contractors to ensure that safeguarding concerns are managed appropriately and consistently.

When using a supply agency, the Academy will ensure that appropriate information sharing takes place throughout the investigation and resolution process and that all relevant safeguarding outcomes are communicated to the agency in accordance with statutory guidance and data protection requirements.

Governors

If an allegation is made against a governor, the Academy will follow its local procedures for managing allegations. Where an allegation is substantiated, the Academy will follow the appropriate procedures to consider removing the governor from office.

Organisations or Individuals Using Academy Premises

The Academy may receive an allegation relating to an incident that occurred when an individual or organisation was using Academy premises for the purpose of providing activities for children, for example community groups, sports associations or providers of extra-curricular activities. As with any safeguarding allegation, the Academy will follow its safeguarding procedures, including informing the LADO where appropriate.

CONCERNS THAT DO NOT MEET THE HARM THRESHOLD / LOW-LEVEL CONCERNS POLICY

As part of its whole-school approach to safeguarding, the Academy will promote an open and transparent culture in which all concerns about adults working in or on behalf of the Academy (including supply teachers, volunteers, governors and contractors) are dealt with promptly and appropriately.

The term *low-level concern* does not mean that it is insignificant. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a "nagging doubt", that an adult working in or on behalf of the Academy may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work;
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children; and
- does not meet the allegations threshold or is otherwise not considered serious enough to warrant a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being overly friendly with children;
- having favourites;
- taking photographs of children on a personal mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating children.

It is crucial that any such concerns, including concerns that do not meet the allegations threshold, are shared responsibly with the appropriate person and are recorded and dealt with appropriately.

Sharing / Reporting a Concern

Low-level concerns about a member of staff should be reported to the Principal, DSL or DDSL. Where a low-level concern is raised about the DSL, it should be shared with the Principal. If a member of staff is unsure who they should share their concern with, they should report it to the United Learning Safeguarding Lead within the Central Office Team.

Staff do not need to determine whether a concern is a low-level concern or whether it meets the threshold for referral to the LADO. If a concern is reported to the DSL or DDSL rather than directly to the Principal, the DSL or DDSL will inform the Principal of the concern in a timely manner. The Principal remains the ultimate decision-

maker in respect of all low-level concerns, although they may choose to consult with the DSL when appropriate.

Where a low-level concern relates to a person employed by a supply agency or contractor working within the Academy, the concern should be shared with the DSL or DDSL and recorded in accordance with the Academy's Low-Level Concerns Policy and Staff Code of Conduct. The individual's employer will also be informed so that any potential patterns of behaviour can be identified.
If the person raising the concern does not wish to be identified, the Academy will respect this request wherever possible. However, there may be circumstances where their identity must be disclosed, for example where this is necessary to enable a fair disciplinary investigation. For this reason, anonymity cannot be guaranteed.

If the Academy is unsure whether information shared as a low-level concern may in fact meet the harms threshold, advice will be sought from the LADO.

Self-Reporting

Occasionally an adult may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, an adult may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

How should a low-level concern be responded to

The DSL/DDSL/Principal should:

- speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided;
- review the information and determine whether the behaviour (i) is entirely consistent with the school's Code of Conduct and the law, (ii) constitutes a low-level concern, (iii) is serious enough to consider a referral to the LADO, or (iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO/other relevant external agencies;
- where the DSL/DDSL/Principal is in any doubt whatsoever, they should seek advice from the LADO;
- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);

Any investigation of low-level concerns should be done discreetly and, on a need-to-know basis.

Advice should be sought from Human Resources and legal services (where necessary) about next steps.

There are a number of potential outcomes e.g.

- If it is decided that the low-level concern in fact amounts to behaviour which is entirely consistent with the organisation's Code of Conduct and the law it will still be important for the DSL/DDSL/Principal to inform the individual in question what was shared about their behaviour, and to give them an opportunity to respond to it; In addition, the DSL/DDSL/Principal should speak to the person who shared

the low-level concern to provide them with feedback about how and why the behaviour is consistent with the organisation's Code of Conduct and the law.

- Some will not give rise to any ongoing concern and, accordingly, will not require any further action;
- Others may be most appropriately dealt with by means of management guidance and/or training;
- A low-level concern may require a conversation with the individual about whom the concern has been raised. This should include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate;
- Some low-level concerns may also raise issues of misconduct or poor performance;
- Some concerns may trigger the organisation's disciplinary, grievance or whistleblowing procedures, which should be followed where appropriate;
- A referral to the LADO as the school believes the threshold has been met.
- The school should exercise their professional judgement and, if in any doubt, they should seek advice from other external agencies including the LADO.

The DSL/DDSL/Principal should review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews should be made.

Recording concerns

All procedures for recording and storing of records should comply with United Learning's Data Protection Policies.

All low-level concerns should be recorded in writing by the DSL/DDSL/Principal. The 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.

The name of the individual sharing the low-level concern, and their role, should be stated, as should the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised. If the latter individual has an opposing factual view of the incident, this should be fairly recorded alongside the concern. The record should include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record should be signed, timed and dated.

There should be appropriate records of:

- all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses;
- all external conversations – for example, with the LADO/other external agencies; • the rationale for decisions;
- any action taken.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting

the harms threshold, in which case it should be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

Adults about whom a low-level concern has been raised may have rights of access to such records, provided of course that this would not also unreasonably disclose information of children concerned.

The school should retain the record consistent with comply with United Learning's Data Protection policies. The school should retain all records of low-level concerns (including those which are subsequently deemed by the DSL/DDSL/Principal to relate to behaviour which is entirely consistent with the Code of Conduct) in a central low-level concerns file (either electronic or hard copy). Where multiple low-level concerns have been shared regarding the same individual these should be kept in chronological order as a running record. These records should be kept confidential and held securely, with access afforded only to a limited number of individuals such as the DSL/DDSL/Principal and the individual they report to (e.g. Regional Director); and senior HR officer, and the individual they report to (e.g. Head of HR). The DSL/DDSL/Principal may store the central low level concerns file with his/her other safeguarding and child protection records.

Some low-level concerns may also involve issues of misconduct or poor performance, or they may trigger the disciplinary, grievance or whistleblowing procedures. Where these issues would ordinarily require records to be made and retained on the staff member's personnel file, this should be done in the normal way, in addition to the records of the low-level concern(s) being retained in a central low-level concerns file.

If a low-level concern in and of itself is deemed to be serious enough to consider a referral to the LADO and, perhaps following consultation, a referral is made to them, then records relating to the low-level concern should be placed and retained on the staff member's personnel file.

If a low-level concern (or group of concerns) is reclassified as an allegation, all previous records of low-level concerns relating to the same individual should be moved from the central lowlevel concerns file to the staff member's personnel file and retained in accordance with Part 4 of KCSIE.

When a staff member leaves and/or takes up new employment, that creates a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore necessary to keep.

Low-level concerns should not be referred to in references unless they relate to issues which would ordinarily be included in a reference, for example, misconduct or consistent poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. Where a lowlevel concern (or group of concerns) has met the threshold for referral to LADO and found to be substantiated, it should be referred to in a reference. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

The school will refer to Part Four, Section Two of KCSIE for further advice and guidance.

STAFF BEHAVIOUR POLICY / CODE OF CONDUCT

The Academy's Staff Code of Conduct can be found on the Academy website.

The purpose of the Staff Code of Conduct is to provide clear guidance regarding professional behaviour, conduct and expectations, including the appropriate response to low-level concerns, in order to safeguard students, maintain professional boundaries and reduce the risk of harm to students or allegations of harm being made against staff.

The Staff Code of Conduct should be read alongside this Safeguarding and Child Protection Policy and all staff are expected to understand and comply with the expectations set out within it.

SAFER RECRUITMENT

The Academy is committed to safer recruitment processes and ongoing safer working practices. Members of the teaching and non-teaching staff, including part-time staff, temporary staff, supply staff and visiting staff, such as musicians and sports coaches, are subject to the necessary statutory safeguarding checks before commencing employment. These checks include, where appropriate, right to work checks, identity verification, reference checks, employment history checks, medical fitness checks and overseas checks.

Please refer to the Safeguarding Children – HR Procedural Guidance available on the United Learning Hub for further guidance.
Full details of the Academy's safer recruitment procedures for checking the suitability of staff, members of the Local Governing Body, Trustees and volunteers to work with children and young people are set out in:

- United Learning Recruitment and Selection Policy;
- United Learning Safeguarding Children – HR Procedural Guidance;
- United Learning LGB Handbook; and
- United Learning guidance: *Trustees - Recruitment, Appointment and Removal Process*.

These documents are available on the United Learning Hub.
The Academy's protocols for ensuring that visiting speakers, whether invited by staff or students, are suitable and appropriately supervised are set out within the Recruitment and Selection Policy

MANAGEMENT OF SAFEGUARDING

The Academy's DSL is Daniel Riley-Furse, who is a member of the Leadership Team.

Claire Newport (Child Protection), Rana Honeini (Child Protection), Nathaniel Wegbe (KS4) and George Sutton (KS5) are the DDSLs and are the individuals to whom concerns should be reported in the absence of the DSL. This ensures that there is always appropriate cover for the role.

The DSL and DDSLs' contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters within the Academy. The DSL is responsible for maintaining an overview of safeguarding within the Academy, including online safety and understanding the filtering and monitoring systems and processes in place; developing effective communication with local statutory agencies; liaising closely with safeguarding partners, including Children's Social Care and the Police; supporting staff in carrying out their safeguarding responsibilities; and monitoring the effectiveness of safeguarding policies and procedures in practice. The DSL and DDSLs are most likely to have a complete safeguarding picture and are therefore best placed to advise on safeguarding concerns and appropriate responses.

The DSL works with the Local Governing Body to review and update the Academy's safeguarding policy. Where a student leaves the Academy, the DSL will ensure that the child's safeguarding file is transferred securely to the receiving school as soon as possible and separately from the main student file. Confirmation of receipt will be obtained. The DSL will also consider whether it is appropriate to share safeguarding information with the new school before the student leaves. This may include information relating to children who have a social worker, children receiving support through the Channel programme, or children requiring ongoing safeguarding

support, so that appropriate arrangements are in place when they arrive at their new school. The Academy will ensure that key staff, including the SENCO, are aware of these arrangements where appropriate.

The DSL will maintain detailed, accurate and secure records of all safeguarding concerns, discussions and decisions, including the rationale for decisions. This includes circumstances where referrals were made, and where a decision was taken not to make a referral to another agency, such as Children's Social Care or Prevent.

The DSL will inform safeguarding partners of any incident that they believe should be considered for a Child Safeguarding Practice Review.

The DSL regularly reviews safeguarding practice within the Academy. This includes ensuring that all staff understand their professional responsibility to report safeguarding concerns and welfare issues to the DSL, DDSL, a member of the Senior Leadership Team, or directly to Children's Social Care where appropriate.

The DSL or DDSL will always be available to discuss safeguarding concerns. During term time, a DSL or DDSL will always be available during school hours. For out-of-hours and out-of-term activities, safeguarding concerns should be reported in line with local safeguarding procedures and the contact details provided at the beginning of this policy.

To ensure continuity of safeguarding responsibilities, the Academy maintains appropriate cover arrangements when the DSL is unavailable due to absence, leave or other circumstances. The DDSLs are trained to the same standard as the DSL and are able to carry out the functions of the role when required.

Full details of the DSL role can be found in Annex C of KCSIE.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility cannot be delegated.

TRAINING

Induction and training (including online safety, which amongst other things includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) are in line with advice from local safeguarding partners.

All Staff

All new staff will be provided with induction training that includes:

- Safeguarding and child protection, including online safety;
- The Child Protection and Safeguarding Policy, including information about the identity and role of the DSL and DDSLs;
- The Behaviour Policy (including measures to prevent bullying, cyberbullying, prejudice-based bullying and discriminatory bullying);
- The safeguarding response to children who are absent from education and children missing education;
- The Staff Code of Conduct, including the Academy's Whistleblowing Procedures, Acceptable Use Policy, staff-student relationships and professional use of technology and social media;
- A copy of Part One of *Keeping Children Safe in Education*;
- School leaders and staff working directly with children will also be expected to read Annex A of *Keeping Children Safe in Education*.

Induction training will normally take place within seven working days of a member of staff commencing employment. Copies of relevant safeguarding documentation will be provided during induction. On

appointment, and through the annual United Learning declaration process, all staff will receive and sign the current Staff-Student Relationship Letter and Acceptable Use Declaration. The Staff Code of Conduct is available on the Academy website and is shared with staff annually. Temporary staff and volunteers are also provided with safeguarding information appropriate to their role.

As part of the Academy's whole-school approach to safeguarding, all staff are required to:

- Read Part One of *Keeping Children Safe in Education* and confirm that they have done so;
- Understand and apply the key information contained within *Keeping Children Safe in Education*;
- Receive safeguarding and child protection training regularly, in line with local safeguarding partner guidance;
- Receive training on online safety, filtering and monitoring systems, harmful sexual behaviour, sexual violence and sexual harassment;
- Receive Prevent training to ensure they can identify and appropriately respond to concerns regarding radicalisation and extremism;
- Understand local Family Help and Children's Social Care processes and their role within them; and
- Undertake regular safeguarding updates, at least annually, through staff briefings, training sessions, emails, bulletins and other professional development opportunities.

DSLs and DDSLs

The DSL will receive updated child protection training at least every two years in order to provide the knowledge, skills and authority required to carry out the role effectively. This includes training in local safeguarding procedures, multi-agency working, child protection conferences, supporting children in need, identifying children at risk of radicalisation, supporting children with SEND, overseeing online safety, understanding filtering and monitoring systems, promoting a culture of listening to children and maintaining effective safeguarding records.

In addition to formal training, the DSL's knowledge and skills will be updated regularly and at least annually to ensure that they remain informed of developments in safeguarding practice and legislation. DDSLs will be trained to the same standard as the DSL.

To ensure continuity of safeguarding provision, the Academy maintains appropriate arrangements for DSL cover during periods of absence. DDSLs are trained and equipped to fulfil DSL responsibilities where required.

Governors

All governors receive appropriate safeguarding and child protection training, including online safety training, at induction and on an ongoing basis. This equips governors to provide effective strategic challenge and assure themselves that safeguarding arrangements and procedures are robust and effective. Governors will also maintain awareness of their responsibilities under the Human Rights Act 1998, the Equality Act 2010 and local safeguarding arrangements

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Christie Spurling is the board-level lead designated to take responsibility for safeguarding arrangements across United Learning. Catherine Barker is the Local Governing Body lead with responsibility for safeguarding arrangements at Paddington Academy.

A review of the Academy's safeguarding policies takes place at least annually, including a review of the effectiveness of procedures and their implementation. The Academy draws on the expertise of staff, including the DSL and DDSLs, in shaping safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the Academy will work with the Local Authority Designated Officer (LADO) to determine whether there are any improvements that can be made to safeguarding procedures or practice to help prevent similar events in the future.

THE ACADEMY'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Opportunities to Teach Safeguarding
The Local Governing Body and United Learning ensure that all students are taught about safeguarding, including online safety, through the curriculum, Relationships and Sex Education, Health Education and PSHE.

The Academy provides preventative education as part of a whole-school approach that prepares students for life in modern Britain and promotes a culture of zero tolerance towards sexism, racism, misogyny, misandry, homophobia, biphobia, sexual violence, sexual harassment, discriminatory behaviour and other forms of abuse.

The Academy's programme of safeguarding education includes:

- Developing the skills that form the building blocks of healthy relationships;
- Healthy and respectful relationships;
- Boundaries, consent and kindness;
- Stereotyping, prejudice and equality;
- Body confidence and self-esteem;
- Recognising abusive and controlling behaviours;
- Understanding sexual harassment, sexual violence and why these behaviours are never acceptable;
- Understanding online harms, including image sharing, pornography, deepfakes, AI-generated content and harmful online influencers;
- Knowing how and where to seek help and support.

The Academy recognises the additional risks that students with SEND may face online and works closely with the Head of IT, Inclusion Team and Safeguarding Team to ensure that additional support and protective measures are in place where required.

Online safety is an integral part of the Academy's curriculum and is delivered in an age-appropriate manner. It is also reinforced through assemblies, tutor time, PSHE and Relationships and Sex Education.

Students are taught:

- What positive, healthy and respectful online relationships look like;
- The impact of their online actions on others;
- How to recognise and demonstrate respectful behaviour online;
- How to use technology safely, responsibly and securely; and
- How and where to seek help if they have concerns.

Filtering and Monitoring

The Academy has appropriate filtering and monitoring systems in place to safeguard students from harmful and inappropriate online content.

These systems are designed to:

- Reduce the risk of children being exposed to illegal, harmful or inappropriate content;
- Reduce the risk of harmful online interactions;
- Identify safeguarding concerns linked to online activity; and
- Help manage behaviours that may increase the likelihood of harm to children.

The effectiveness of filtering and monitoring systems is reviewed at least annually by the Academy. This review is undertaken by the relevant senior leaders, DSL and IT staff to ensure systems remain effective and appropriate.

The leadership team and relevant staff maintain awareness of the filtering and monitoring systems in place and understand how concerns should be escalated. Staff who identify concerns relating to filtering, monitoring or online safety should report them to the DSL or DDSL and, where necessary, to the Principal.

The Academy will communicate with parents and carers to reinforce the importance of online safety and help them understand the systems used to filter and monitor online activity. The Academy will also ensure that parents and carers understand the online platforms, websites and technologies being used by students as part of their education.

Further information regarding the Academy's approach to online safety, mobile technology, filtering and monitoring can be found in the Behaviour Policy and relevant Online Safety policies. These policies also set out how the Academy safeguards students from extremist and terrorist material when accessing the internet through Academy systems.

Looked After Children (and Previously Looked After Children)

Looked after children (and previously looked after children) are a particularly vulnerable group. The Academy will ensure that prompt action is taken when necessary to safeguard these children and the Local Governing Body and United Learning Trust ensure that staff have the skills, knowledge and understanding necessary to safeguard children on roll who are looked after, or have previously been looked after, by a Local Authority.

Daniel Riley-Furse and Rana Honeini are the designated members of staff with responsibility for the welfare, progress and educational achievement of looked after and previously looked after children, and for ensuring that the needs identified within Personal Education Plans (PEPs) are met.

The Academy ensures that designated staff receive appropriate training and have access to the information they require regarding a child's looked after status, care arrangements, contact arrangements, social worker and Virtual School Head.

The designated members of staff also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship orders or child arrangement orders, and those adopted from state care outside England. They will work closely with Virtual School Heads and other professionals where appropriate.

The DSL will ensure that details of any Local Authority Personal Advisor supporting a care leaver are held and used appropriately and will liaise with them where necessary regarding safeguarding or welfare concerns.

Children Who Need a Social Worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may require this support as a result of abuse, neglect, exploitation, trauma or complex family circumstances. A child's experiences of adversity can leave them vulnerable to further harm and may also affect attendance, learning, behaviour, wellbeing and mental health.

Where the Local Authority has informed the Academy that a child has a social worker, the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This information will be considered routinely when making safeguarding and pastoral decisions.

Where children need a social worker, this information will inform decisions about safeguarding, for example responding to unauthorised absence or children missing education where safeguarding risks are known. It will also inform decisions about promoting welfare, including the provision of pastoral, behavioural and academic support alongside the work of statutory services.

Children Who Are Absent From Education

Children being absent from education for prolonged periods and/or on repeated occasions can act as a vital warning sign of a range of safeguarding issues including neglect, child sexual exploitation and child criminal exploitation, particularly county lines activity.

The Academy recognises that persistent absence and absence from education may increase known safeguarding risks, particularly for children who have a social worker, are subject to a Child Protection Plan, are Children in Need or are looked after children.

Attendance concerns will therefore be considered as part of the Academy's safeguarding response and information will be shared with relevant agencies where appropriate.

Young Carers

The Academy recognises that young carers may face additional challenges which can impact upon attendance, attainment, wellbeing and behaviour.

Staff will remain alert to signs that a child may have caring responsibilities and will work with families and external agencies where appropriate to ensure that young carers receive support at the earliest opportunity.

Appropriate pastoral, attendance and safeguarding support will be provided where required.

Children Requiring Mental Health Support

The Academy recognises the important role it plays in supporting student mental health and wellbeing.

All staff should be aware that mental health concerns can, in some circumstances, become safeguarding concerns. This may include:

- self-harm;
-
- eating disorders;
- suicidal thoughts or ideation; or
- indicators that a child has experienced abuse, neglect or exploitation.

Whilst Academy staff are not expected to diagnose mental health conditions, they play a key role in:

- promoting positive mental wellbeing;
- identifying concerns at an early stage;
- ensuring appropriate support is provided; and
- working alongside specialist services where necessary.

The Academy utilises a graduated approach to supporting student mental health and will work with students, parents, carers and external agencies where required.

Where mental health concerns present a safeguarding risk, safeguarding procedures outlined within this policy will be followed.

Safeguarding Children with Medical Conditions

The Academy recognises that children with medical conditions may require additional support in order to access education safely.
A medical condition does not in itself indicate that a child is at increased safeguarding risk. However, where significant concerns arise, particularly following serious incidents involving medical conditions, safeguarding considerations will form part of the Academy's response.
The Academy will work closely with healthcare professionals, families and external agencies where required to ensure that students receive safe and appropriate support.

Children Who Are Questioning Their Gender

The Academy recognises that some children may question their gender identity.
The Academy will always seek to understand and support the needs of children who are questioning their gender whilst ensuring that safeguarding remains the primary consideration.
The Academy will not initiate any process relating to social transition. Where a child or parent raises such a request, decisions will be considered carefully, in consultation with parents/carers, and in accordance with safeguarding duties, equality legislation, human rights legislation and current statutory guidance.
The Academy recognises that children who are questioning their gender may experience additional vulnerabilities, including mental health concerns, social isolation and discriminatory bullying.
Any decisions relating to support provided will be appropriately documented and reviewed.

Mobile Phone Policy

Paddington Academy operates as a mobile phone-free environment during the school day. Any exceptions to this expectation will only be made where there is a clear educational, safeguarding or medical reason to do so.
The Academy recognises that unrestricted access to mobile technology can present safeguarding risks including:

- cyberbullying;
- online abuse;
- harmful sexual behaviour;
- sharing of inappropriate images;
- access to harmful content;
- exposure to extremist material; and
- misuse of artificial intelligence technologies.

Details regarding student mobile phone expectations can be found within the Behaviour Policy.

Restrictive Interventions, Including the Use of Reasonable Force

There are times when the use of restrictive interventions will be lawful and necessary, for example, to keep individual children, staff and the wider Academy community safe.

The Academy has regard to statutory guidance issued by the Department for Education under Section 93A of the Education and Inspections Act 2006 and will ensure that significant incidents involving the use of force by staff are appropriately recorded and reported. The Academy also has regard to the Department for Education's guidance *Restrictive Interventions, Including the Use of Reasonable Force, in Schools* (current version).

The Academy recognises the additional vulnerability that may exist when restrictive interventions or reasonable force are used in response to incidents involving children with SEND, mental health needs or medical conditions. The Academy will consider its duties under the Equality Act 2010 and the Public Sector Equality Duty when making decisions in relation to the use of reasonable force.

Positive and proactive behaviour support, including the use of individual behaviour plans, risk assessments and personalised strategies developed in partnership with parents and carers, can reduce the frequency of challenging behaviour and the need for restrictive interventions or reasonable force.

The Academy's procedures regarding restrictive interventions and the use of reasonable force can be found within the Behaviour Policy, which is available on the Academy website.

Arrangements for Visiting Speakers

The Academy has clear protocols to ensure that all visiting speakers are suitable, appropriately supervised and aligned with the values and ethos of the Academy. The Academy's responsibility is to ensure that students are able to critically assess the information they receive and that visiting speakers support, rather than undermine, British Values.

The Academy will undertake an appropriate risk assessment before agreeing to a visiting speaker attending the Academy. This will take account of any vetting requirements considered necessary and may include a DBS check where appropriate.
Visiting speakers will be expected to understand that, where appropriate, their presentation should actively promote the British Values of democracy, the rule of law, individual liberty, and mutual respect and tolerance for those with different faiths and beliefs. At no point should a visiting speaker seek to undermine these values. In some circumstances, the Academy may request copies of presentations, materials or recordings in advance of the session.

Visiting speakers will always be supervised by a member of Academy staff whilst on site. On arrival, visiting speakers will be required to provide original photographic identification, such as a passport or photocard driving licence. The Academy will maintain a register of visiting speakers in accordance with its Data Protection Policy.

Use of Academy Premises for Non-School Activities

Where the Local Governing Body or United Learning permits Academy premises to be used by external organisations or individuals, including community groups, sports associations and providers of extra-curricular activities, appropriate safeguarding arrangements will be in place to ensure children are kept safe.

Where activities are provided directly under the management or supervision of Academy staff, the Academy's safeguarding arrangements will apply. However, where activities are provided independently by another organisation, the Academy will seek assurance that appropriate safeguarding and child protection policies and procedures are in place and will inspect these where necessary.

The Academy will ensure there are appropriate arrangements to liaise with external providers on safeguarding matters where necessary. This applies regardless of whether the children attending the activity are students of the Academy.

Safeguarding requirements will be incorporated into any transfer of control, hire or lease agreement relating to Academy premises. Failure to comply with safeguarding expectations may result in the termination of the agreement.

The Academy has regard to the statutory guidance *Keeping Children Safe in Out-of-School Settings* when assessing safeguarding arrangements for external providers using Academy facilities.

Alternative Provision

Where the Academy places a pupil with an Alternative Provision provider, it continues to be responsible for the safeguarding and welfare of that pupil and will ensure that it is satisfied that the placement is appropriate, safe and able to meet the pupil's individual needs.

The Academy will obtain written confirmation from the Alternative Provision provider that appropriate safeguarding checks have been carried out on all adults working within the provision, including those checks that schools would otherwise undertake on their own staff. The Academy will also seek assurance that any safeguarding concerns, staffing changes or issues that may impact the safety of the placement are communicated promptly.

The Academy will know where a pupil is placed during school hours and will maintain accurate records of the address of the Alternative Provision provider and any satellite or subcontracted provision attended by the pupil.

Alternative Provision placements will be reviewed regularly and at least half-termly to ensure:

- the pupil is attending regularly;
- the placement remains safe;
- safeguarding arrangements remain effective; and
- the placement continues to meet the pupil's educational, behavioural and welfare needs.

Where safeguarding concerns arise in relation to an Alternative Provision placement, the Academy will review the placement immediately and will take appropriate action, including terminating the placement where necessary, unless and until safeguarding concerns have been satisfactorily addressed.

Police Attendance on Academy Site (Statutory Guidance – PACE Code C 2019)

Students may only be interviewed at their place of education in exceptional circumstances and only when the Principal, or their nominee, agrees. Every effort will be made to notify the parent(s), carer(s), or other person responsible for the student's welfare, together with the appropriate adult where this is a different person, that the Police wish to interview the student. Reasonable time will be allowed to enable the appropriate adult to attend the interview.

If waiting for the appropriate adult would cause unreasonable delay, and unless the student is suspected of an offence against the Academy, the Principal or their nominee will act as the appropriate adult for the purposes of the interview.

APPENDIX 1 –FURTHER INFORMATION

All staff should be aware of indicators of abuse and neglect, as well as specific safeguarding issues such as child criminal exploitation and child sexual exploitation. Staff should always be vigilant, and if unsure, should **always** speak to the DSL or DDSL.

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. They can occur from within or outside families, in or out of school, from other children within peer groups or the wider community and/or online. In most cases, multiple issues will overlap with one another and children can therefore be vulnerable to multiple threats.

All staff should be aware that behaviours linked to drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

This appendix contains important additional information about specific forms of abuse and safeguarding issues.

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

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

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

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic abuse; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, having a physical or learning disability, or being neurodivergent, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions which could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal and sexual exploitation
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (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.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in the DfE guidance: Child sexual exploitation: guide for practitioners.

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line." This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be

worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:
• go missing (from school or home) and are subsequently found in areas away from their home
• have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime)
• are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
• are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
• are found in accommodation that they have no connection with, often called a 'trap house' or 'cuckooing' or hotel room where there is drug activity
• owe a 'debt bond' to their exploiters, and
• have their bank accounts used to facilitate drug dealing.

Children who are absent from education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, honour or faith-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school or college's unauthorised absence procedures and children missing education procedures.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).
Cyber-dependent crimes include:
• unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
• 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
• making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.
Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).
Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse.' Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass

Operation Encompass is an information-sharing scheme between the police and relevant education settings operating in all police forces across England and Wales. In November 2025, a new statutory duty was placed on the police to notify a child's education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse.1 This includes all children connected to a household where they have attended a domestic abuse incident; children who are physically present at the incident, children not physically present during the incident, and situations where a child might reside in another household temporarily or permanently.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children, and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

Modern slavery and the National Referral Mechanism

Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs.

Preventing radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

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.

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn into terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

Serious violence

There are a number of indicators, which may signal children are at risk from, or are involved in serious violence. These may include:

- increased absence from school or college
- a change in friendships or relationships with older individuals or groups
- a significant decline in educational performance
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries, and
- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male
- having been suspended, spent time in Alternative Provision or permanently excluded from school, and
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school and can concentrate in particular places.

Honour or faith-based abuse (including female genital mutilation and forced marriage)

Honour or faith-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

FGM mandatory reporting duty for teachers

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

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.157 Unless the teacher has good reason not to, they should still consider and discuss any such case with the school or college's designated safeguarding lead (or a deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher

does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

APPENDIX 2 – Meet the Child Protection/Safeguarding/Pastoral Team

The Child Protection Team 26-27

Are you worried about yourself or someone else?

Speak to a member of the Child Protection Team or any member of staff.

Every student is **listened** to.

Every student is **taken seriously**.

Every student is **cared** for and **supported**.

DSL



Mr Riley-Furse
Vice Principal (KS3)
Year 7, 8 & 9
Office: Blue 0

DDSL



Mr Wegbe
Assistant Principal (KS4)
Year 10 & 11
Office: Central 1

DDSL



Mr Sutton
Assistant Principal (KS5)
Year 12 & 13
Office: 6th Form

DDSL



Ms Newport
Child Protection Officer
Office: Purple 2

DDSL



Ms Honeini
Child Protection and Parent Engagement
Office: Purple 2

Paddington Academy
The best in everyone™
Part of United Learning

DSL - Designated Safeguarding Lead
DDSL - Deputy Designated Safeguarding Lead

APPENDIX 2 – Meet the Child Protection/Safeguarding Team/ Pastoral Team



APPENDIX 3 – Safeguarding Training Log

All staff receive safeguarding and child protection training at induction and at least annually thereafter. This is accompanied by regular safeguarding training delivered by the DSL, all of this includes:

- Child Protection and Safeguarding;
- Keeping Children Safe in Education updates;
- Online Safety, including filtering and monitoring;
- Child-on-Child Abuse;
- Sexual Violence and Sexual Harassment;
- Prevent Duty;
- Children Missing Education and Persistent Absence;
- Low-Level Concerns;
- Staff Code of Conduct.

The DSL and DDSLs undertake additional safeguarding training appropriate to their roles and receive regular updates in line with statutory guidance and United Learning expectations.

Group	Mandatory Training	Frequency
Principal	Annual Safeguarding Training, Safer Recruitment, DSL Refresher (where applicable)	Annual
DSL	DSL Training, Annual Safeguarding Training, Safer Recruitment, Prevent, Online Safety	DSL every 2 years, annual updates
DDSLs	DSL Training, Annual Safeguarding Training, Prevent, Online Safety	DSL every 2 years, annual updates
Senior Leadership Team	Safeguarding Training, Prevent, Online Safety	Annual
Pastoral Leaders	Safeguarding Training, Child Protection Training, Prevent	Annual
All Staff	Safeguarding Training, KCSIE Updates, Online Safety, Prevent	Annual
New Starters	Induction Safeguarding Training, KCSIE Part 1, Code of Conduct	On Appointment
Designated Online Safety Lead	Online Safety, Filtering & Monitoring, Safeguarding Training	Annual
PE Staff	Safeguarding Training, First Aid (where applicable)	Annual
Medical / First Aid Staff	Safeguarding Training, First Aid Certification	Annual / Renewal Cycle
Chair of Governors	Safeguarding Training, Safer Recruitment (where applicable)	Annual
Safeguarding Governor	Safeguarding Training	Annual

Local Governing Body	Safeguarding Training	Annual
Volunteers	Safeguarding Induction and Briefing	On Appointment

APPENDIX 4 – Policy Addendum

Due to the September 2026 version of 'Keeping Children Safe in Education' (DfE, 2026) having some further changes, the following addendum has been added to the Safeguarding Children and Child Protection Policies and Procedures template document (issued during the 2025-2026 summer term). All staff and volunteers should read this addendum to understand those changes and view them as part of this policy.

As Schools/Nurseries will have already shared their Safeguarding Children and Child Protection Policies and Procedures document at the start of term, the addendum should be added to the document and shared with all staff and volunteers.

Key Changes/Additions

Change/Addition	Content
Added content	All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.
Addition of term 'causing' to definition of sexual abuse.	Sexual abuse: involves forcing, causing or inciting a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening.
Added content	All staff should recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate.
Further example(s) of child-on-child abuse added.	Discriminatory behaviour, **including racism, faith-targeted abuse,** and other prejudice-based incidents.
Additional expectation places on schools/nurseries	**Schools and colleges should promote an inclusive, anti-discriminatory culture** where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of their safeguarding responsibilities.