THE PREMIER ACADEMY

CHILD PROTECTION POLICY – SEPTEMBER 2026

Effective: 1 September 2026

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Introduction

The Premier Academy is committed to safeguarding and promoting the physical, mental and emotional welfare of every child both inside and outside of the Academy premises. The Academy implements a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of children is at the forefront of all action taken.

This Policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the Governing Body, the CEO and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL.
- Teaching children how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any child that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Understanding the importance of considering the wider environmental factors in a child's life that may be a threat to their safety.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that the CEO and any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

This policy explicitly incorporates the statutory requirements of Keeping Children Safe in Education, ensuring robust governance around filtering and monitoring systems, clear procedures for addressing AI-generated indecent imagery and digital risks, and the explicit integration of school attendance tracking into local safeguarding responses.

Key Contacts

Designated Safeguarding Lead (DSL)	Liz McGrath
Deputy DSL (DDSL)	Amy Taylor
Assistant Deputy DSL (DDSL)	Tanya Mcalister
Senior Leaders for Safeguarding (SLS)	Olivia Cain and Collette Butler
Governor for Safeguarding	Gosia Zubrzycka
CEO	Warren Harrison
Chair of Governors	Paul Ayres

In the absence of the DSL, child protection matters will be dealt with by the Deputy DSL or by the SLS.

Children's Social Care Services (CSCS) 01908 253169/253170 / children@milton-keynes.gov.uk
Multi-Agency Hub (MASH).

1. Definition

In-line with the statutory definition of safeguarding (Source: Working Together to Safeguarding Children 2023), The Premier Academy will define **"safeguarding and promoting the welfare of children"** as:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether 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.
- Taking action to enable all children to have the best outcomes in line with the outcomes.

2. Legal Framework

This Policy has consideration for, and is compliant with, the following legislation and statutory guidance:

Legislation
- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Anti-social Behaviour, Crime and Policing Act 2014
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Domestic Abuse Act 2021
- Education Act 2002
- The Education (Health Standards) (England) Regulations 2003
- School Staffing (England) Regulations 2009 (as amended)
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- School Attendance (Pupil Registration) (England) Regulations 2024
- Children's Wellbeing and Schools Act 2026

Statutory Guidance
- DfE (2023) 'Working together to safeguard children'
- DfE (2015) 'The Prevent duty'
- DfE (2026) 'Keeping children safe in education'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2021) 'Sexual violence and sexual harassment between children in schools and colleges'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory Guidance
- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Information sharing'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2024) 'Recruit teachers from overseas'
- DfE (2024) 'Working together to improve school attendance'
- DfE (2024) 'Meeting digital and technology standards in schools and colleges'

- Department of Health and Social Care (2024) 'Virginity testing and hymenoplasty: multi-agency guidance'
- DfE (2025) 'Filtering and monitoring standards for schools and colleges'
- DfE (2025) 'Meeting digital and technology standards in schools and colleges'

Other relevant Academy policies and documents, which staff must read and digest:
- Keeping Children Safe in Education (Part 1)
- Children Missing Education Policy
- Child-on-Child Abuse Policy
- Reporting Low-Level Concerns Safeguarding Policy
- Allegations Against Staff of Abuse Policy and Procedure
- Safer Recruitment Policy
- Behaviour Policy
- Whistleblowing Policy
- Anti-Bullying Policy
- Online Safety Policy
- Staff Acceptable Use of ICT Agreement
- Suspension and Exclusion Policy
- Staff Code of Conduct
- Parent-Academy Agreement
- Freedom of Information Policy
- Data Protection Policy & Privacy Notices
- Academy Enrolment Information and Policies Booklet

3. Roles and Responsibilities

All staff have a responsibility to:
- Consider, at all times, what is in the best interests of the child.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which children can learn.
- Be prepared to identify children who may benefit from early help.
- Be aware of the Academy's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to CSC, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSC and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Be aware that a child may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put children at risk of harm.

- Be aware of behaviours that could potentially be a sign that a child may be at risk of harm.
- Act in accordance with Academy procedures with the aim of eliminating unlawful discrimination, harassment and victimisation, including that in relation to child-on-child abuse.
- Inform the Academy where they are in a position where their relationships and associations outside of Academy (including online) may have an implication for the safeguarding of children in Academy.

Teachers, including the headteacher, have a responsibility to:
- Safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.
- Comply with the statutory mandatory reporting duty under the Crime and Policing Act 2026 by reporting directly to the police without delay whenever a child under the age of 18 discloses that they have suffered sexual abuse.
    - When receiving a disclosure during school hours, please refer directly to the DSL and follow standard safeguarding procedures. You may be required to be present should the DSL need to report this disclosure to the police.
    - If receiving a disclosure or second-hand information of a disclosure out of school hours, contact MASH for advice and explicitly ask "Do I need to report this directly to the police?". Upon receiving their advice, act accordingly and inform the DSL of the disclosure and action taken.

The Governing Body has a duty to:
- Take strategic leadership responsibility for the Academy's safeguarding arrangements.
- Ensure that the Academy complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the Academy are effective and comply with the law at all times.
- Guarantee that the Academy contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirm that the Academy's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the Academy's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place, children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the Governing Body is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the CEO or another governor.
- Guarantee that there are effective and appropriate policies and procedures in place.

- Ensure all relevant persons are aware of the Academy's local safeguarding arrangements, including the Governing Body itself, the SLT and DSL.
- Make sure that children are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support children to be themselves at school, e.g. if they are LGBTQ+.
- Ensure the Academy has clear systems and processes in place for identifying possible mental health problems in children, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Have overall strategic responsibility for filtering and monitoring and seek assurance that the filtering and monitoring standards for schools are being met
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle allegations against other children by children.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of children and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Guarantee that there are systems in place for children to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the VSH to discuss how the pupil premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the children's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for children who become absent from education, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the Governing Body have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements.
- Ensure that appropriate arrangements are in place to keep children safe where school facilities or premises are hired or rented out to organisations or individuals and, where services or activities are provided separately by another body, seek assurance that the body has appropriate safeguarding and child protection policies and procedures in place and that individuals working with children have appropriate DBS checks.
- Ensure that safeguarding requirements are included in any transfer of control agreement, i.e. lease or hire agreement, as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement.

- Establish robust health and safety and emergency evacuation procedures.

The CEO has a duty to:

- Ensure that the policies and procedures adopted by the Governing Body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff with the appropriate policies and information upon induction.
- Ensure that staff implement appropriate filters and monitoring of online material.
- Ensure that the Academy practises safe recruitment in checking the suitability of staff and volunteers to work with children in accordance with the guidance in Keeping Children Safe in Education and the Education (Independent School Standards) (England) Regulations 2014 as amended.
- Ensure that the Academy carries out all necessary checks on the suitability of people who serve as members and/or on the governing board.
- Ensure that, where the Academy ceases to use the services of any person because that person was considered unsuitable to work with children, a prompt and detailed report is made to the DBS within one month.

The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understand the filtering and monitoring systems and processes in place.
- Provide advice and support to staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns. **NB:** Individual schools, working with the DSL, define what "available" means and whether, in exceptional circumstances, availability via phone, videocall, or other media is an acceptable substitution for in-person availability.
- Arrange, alongside the Academy, adequate and appropriate cover for any activities outside of school hours or terms.
- Refer cases to:
    - CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
    - Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
    - DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
    - Police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a point of contact with the safeguarding partners.
- Liaise with the CEO to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the CEO and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
    - Ensuring that the Academy knows which children have or had a social worker.
    - Understanding the academic progress and attainment of these children.
    - Maintaining a culture of high aspirations for these children.

  - Supporting teachers to provide additional academic support or reasonable adjustments to help these children reach their potential.
  - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these children are experiencing with the teaching team and SLT.
  - Promoting the educational outcomes of children in need by identifying, monitoring and supporting children who have or have previously had a social worker, ensuring that safeguarding concerns and academic progress are managed holistically in line with KCSIE requirements.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a child's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.
- Ensure each member of staff has access to and understands the Academy's Child Protection Policy and procedures – this will be discussed during the staff induction process.
- Work with the Governing Body to ensure the Academy's Child Protection Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the Academy's Child Protection Policy is available publicly, and parents are aware that the Academy may make referrals for suspected cases of abuse or neglect, as well as the role the Academy plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training, and update this training at least every two years.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties children may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.
- Keep cases of early help under constant review and refer them to the CSCS if the situation does not appear to be improving.
- Have a working knowledge of how LAs conduct a child protection case conference and a child protection review conference, and be able to attend and contribute to these effectively when required to do so.

The Designated Teacher has a responsibility for promoting the educational achievement of LAC and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

4. Inter-agency Working

The Premier Academy contributes to inter-agency working as part of its statutory duty.

The Academy will work with CSCS, the police, health services and other services to protect the welfare of its children, through the early help process and by contributing to inter-agency plans to provide additional support.

Where a need for early help is identified, the Academy will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The Academy also recognises the particular importance of inter-agency working in identifying and preventing Child Sexual Exploitation (CSE).

The Academy recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet children's needs and identify any need for early help.
Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the child being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of children. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

Under the Children's Wellbeing and Schools Act 2026, education and childcare agencies are now automatically classified as relevant agencies within multi-agency safeguarding arrangements. The Academy has a statutory duty to share information with these safeguarding partners.

5. Early Help

Early help means providing support as soon as a problem emerges, at any point in a child's life. Any child may benefit from early help, but in particular, staff will be alert to the potential need for early help for children who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in custody, prison, or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse drugs or alcohol.
- Have returned home to their family from care.
- Are at risk of Honour Based Abuse (HBA), such as Female Genital Mutilation (FGM) or forced marriage.
- Are privately fostered.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded from school, alternative provision or a PRU.
- Show early signs of abuse and/or neglect in other ways.

The Academy will not limit its support to children affected by the above and will be mindful of a variety of additional circumstances in which children may benefit from early help, for example, if they are:

- Bereaved.
- Viewing problematic or inappropriate online content or developing inappropriate relationships online.
- Missing education, or are persistently absent from school, or not in receipt of full-time education.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the child's situation is not improving or is worsening.

6. Abuse, Neglect and Exploitation

For the purposes of this Policy, **"abuse"** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this Policy, **"physical abuse"** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

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

For the purposes of this Policy, **"sexual abuse"** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

Under the Crime and Policing Act 2026, all staff engaged in regulated activity have a direct legal duty to report to the police or CSC immediately if a child discloses that they are experiencing or have experienced child sexual abuse. This statutory obligation applies alongside internal reporting to the DSL and staff must ensure that a report to the police is made without delay when receiving a disclosure out of school hours.

For the purposes of this Policy, **"neglect"** is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or

shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

For the purpose of this Policy **"child exploitation"** is defined as a form of abuse where an individual or group takes advantage of a power imbalance to coerce, manipulate, or deceive a child for their own gain. This gain can be financial, sexual, or for increased status.

Indicators

All staff will be aware of the indicators of abuse, neglect and exploitation and will understand that children can be at risk of harm inside and outside of the school, inside and outside of home, in an institutional or community setting by those known to them or by others, and online. Staff will also be aware that children can be affected by seeing, hearing or experiencing the effects of abuse.

The Academy will recognise that abuse or neglect of a child may occur through the infliction of harm or through the failure to act to prevent harm. The Academy will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others. The Academy will pay particular attention to the effects of domestic abuse on children, recognising that harm may arise not only when children are directly involved, but also when they see, hear, or otherwise experience its consequences. All necessary steps will be taken to identify and respond appropriately to such concerns in order to safeguard and promote the welfare of all children.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

When identifying children at risk of potential harm, staff members will look out for a number of indicators including, but not limited to, the following:

- Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
- Poor concentration and acting withdrawn
- Knowledge ahead of their age, e.g. sexual knowledge.
- Use of explicit language
- Fear of abandonment
- Depression and low self-esteem

All staff will be aware of the behaviours linked to drug taking, alcohol abuse, truancy and image based sexual abuse, and will understand that these put children in danger.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. 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.

Staff members will be aware of the effects of a child witnessing an incident of abuse at home, such as witnessing act/s of violence or threatening behaviour, emotional, psychological, controlling or coercive behaviour, sexual and/or economic abuse. Children witnessing this are classified as victims of domestic violence in their own right.

7. Specific Safeguarding Issues

There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.

Appendix C of this Policy sets out details about specific safeguarding issues that children may experience and outlines specific actions that would be taken in relation to individual issues.

8. Child-on-Child Abuse

For the purposes of this Policy, **"child-on-child abuse"** is defined as abuse between children.
The Academy has a zero-tolerance approach to abuse, including child-on-child abuse.

All staff will be aware that child-on-child abuse can occur between children of any age and gender, both inside and outside of school, as well as online. We also recognise that girls are more likely to be victims and boys perpetrators but that all child-on-child abuse is unacceptable and will be taken seriously.

All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenging inappropriate behaviour between peers, and will not tolerate abuse as "banter" or "part of growing up".

Child-on-child abuse can be manifested in many different ways, which aims to cause physical, emotional or psychological harm including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Emotional abuse
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- Youth produced sexual imagery including the consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

All staff will be clear as to the Academy's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Children will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Children will also be reassured that they will be taken seriously, be supported, and kept safe.

The Academy's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the Academy's Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

9. Online Safety

The Academy adheres to the Online Safety Policy.

As part of a broad and balanced curriculum, all children will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Attitudes and behaviours which may indicate children are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a child's online activity.

Staff training in online safety will cover the four categories of risk as outlined in KCSIE:

- Content - Staff will be trained to understand the risks associated with being exposed to illegal, inappropriate, or harmful material. This will include, but not be limited to, content relating to pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation, and conspiracy theories.
- Contact - Training will address the risks of harmful online interaction with other users. This will include peer-to-peer pressure, exposure to commercial advertising, and the threat posed by adults impersonating children or young people with the intention of grooming or exploiting them for sexual, criminal, financial, or other purposes.
- Conduct - Staff will be made aware of how certain online behaviours may increase the likelihood of harm or result in actual harm. This will encompass activities such as creating, sending, or receiving explicit images, the distribution of other explicit material, and instances of online bullying.
- Commerce - The programme will also cover risks related to online commerce. These will include dangers such as online gambling, exposure to inappropriate advertising, phishing attempts, and other types of financial scams. Any concerns that children or staff may be at risk will be reported promptly to the Anti-Phishing Working Group or through appropriate safeguarding channels.

The Academy will ensure that appropriate filtering systems are in place on ICT equipment/school devices to prevent children accessing inappropriate material. The Academy will, however, ensure that the use of filtering and monitoring systems does not cause “over blocking”, which may lead to unreasonable restrictions as to what children can be taught online. The Academy will also ensure that it meets the filtering and monitoring standards published by the DfE.

Staff will be aware of the filtering systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Further information regarding the Academy’s approach to online safety can be found in the Online Safety Policy.

To protect both children and staff, staff must always maintain clear professional boundaries.

Personal Devices & Smartwatches: Personal devices, smartwatches and fitness trackers are prohibited during contact time, except for urgent internal communication (e.g. requesting immediate operational or medical support) or accessing official school communications when the main classroom computer is in use. Personal notifications must be muted on smartwatches and taking photos, videos or voice recordings on personal equipment is strictly forbidden. Any unauthorised use during contact time will lead to disciplinary action.

Social Media Controls: Staff must keep personal social media profiles on the highest security settings and avoid bringing the Academy into disrepute. Staff must not send, accept or maintain social media connections with any current children on roll or former pupils under 18. Furthermore, connecting with current or former parents/carers is prohibited unless a pre-existing relationship was formally declared to the CEO prior to employment or you are a parent of a current child on roll. Staff operating under the parental exception must never discuss Academy business or children. Explicitly referencing or identifying the Academy on personal social media profiles is strictly prohibited.

Photography, Images & Recording: All images and recordings must be taken on Academy-owned devices. Using personal devices for routine activities or trips is prohibited. Personal devices may only be used in exceptional, time-critical safety emergencies, after which the incident must be reported immediately to the DSL/SLT and the files transferred and deleted under leader supervision.

Reporting Low-Level Concerns: If you have concerns regarding an adult's conduct in school - even if it seems minor - report it directly to the CEO. Concerns regarding the CEO must be reported directly to the Chair of Governors.

Child-on-Child Abuse: We maintain a zero-tolerance approach to child-on-child abuse. It must never be dismissed as "banter" or typical behaviour and must be reported immediately.

10. Context of Safeguarding Incidents

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents.

Assessment of children's behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The Academy will provide as much contextual information as possible when making referrals to CSCS.

11. Children Potentially at Greater Risk of Harm

The Academy recognises that some groups of children can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse and neglect in these groups of children. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

Children with Social Workers
Children may need social workers due to safeguarding or welfare needs. These needs can leave children vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a child has a social worker in order to make decisions in the best interests of the child's safety, welfare, and educational outcomes.

Where a child needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Home-educated Children
Parents/carers may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

The Children's Wellbeing and Schools Act 2026 requires that local authorities maintain Children Not in School registers. Parents/carers who wish to withdraw children with special educational needs or children who are subject to child protection processes must obtain formal consent from the local authority before removing the child from the school roll.

In line with the School Attendance (Pupil Registration) (England) Regulations 2024, the Academy will notify the local authority whenever a child's name is added to or deleted from the admission register, and will formally notify the local authority if a child has 10 consecutive school days of unauthorised absence.

Where a parent/carer has expressed their intention to remove a child from school for EHE, the Academy, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the child has SEND, is vulnerable, and/or has a social worker.

LAC and PLAC
Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.
The Governing Body will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the child.

The DSL will be provided with the necessary details of social workers and the VSH, and, for PLAC, personal advisers.

Further details of safeguarding procedures for LAC and PLAC are outlined in the Academy's LAC Policy.

Children with SEND
When managing safeguarding in relation to children with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the child's disability without further exploration; however, it should never be assumed that a child's indicators relate only to their disability
- Children with SEND can be disproportionally impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers
- Risk of peer isolation.

When reporting concerns or making referrals for children with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a child with SEND, the DSL will liaise with the Academy's SENDCo, as well as the child's parents where appropriate, to ensure that the child's needs are met effectively.

Staff will ensure that the safeguarding and welfare concerns are taken into account when restraint techniques are used on children with SEND.
The Academy will create Individual Risk Assessments and Support Plans for children with SEND who display unsafe behaviours to minimise the likelihood of challenging behaviour.

LGBTQ+ Children
The fact that a child may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ persons can be targeted by other individuals. Staff will also be aware that, in some cases, a child who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as those who identify as LGBTQ+.

Staff will also be aware that the risks to these individuals can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these children and provide a safe space for them to speak out and share any concerns they have.

Children requiring mental health support
All staff will be made aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation.

12. Use of Academy Premises for Non-school Activities

Where the Governing Body hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep children safe. The Academy will refer to the DfE's guidance on keeping children safe in out-of-school settings in these circumstances.

Where the Governing Body provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the Governing Body will seek assurance that the body concerned has

appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The Governing Body will also ensure that there are arrangements in place to liaise with the Academy on these matters where appropriate. The Governing Body will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

Extracurricular activities and clubs

External bodies that host extracurricular activities and clubs at the Academy, e.g. charities or companies, will work in collaboration with the Academy to effectively safeguard children and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of children. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSC or the police, if necessary.
All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

13. Alternative Provision

The Academy will remain responsible for a child's welfare during their time at an alternative provider. When placing a child with an alternative provider, the Academy will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and will satisfy itself that the placement is meeting the child's needs.

Those responsible for the commissioning of alternative provision will be aware that children in alternative provision will often have complex needs – they will be mindful of the additional risk of harm that these children may be vulnerable to.

The Academy carry out, as a minimum, monthly site visits to see the child and staff as well as regular "safeguarding check-ins" with the provider.

14. Private Fostering

A private fostering arrangement is essentially one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. The period for which the child is cared for and accommodated by the private foster carer should be continuous, but that continuity is not broken by the occasional short break.

Private fostering arrangements can be a positive response from within the community to difficulties experienced by families. Nonetheless, privately fostered children remain a diverse and potentially vulnerable group.

The private foster carer becomes responsible for providing the day to day care of the child in a way which will promote and safeguard the child's welfare. Overarching responsibility for safeguarding and promoting the welfare of the privately fostered child remains with the parent or other person with parental responsibility.

In light of the above the Academy understands that they have a mandatory duty to inform the local authority of children in such arrangements and staff know to inform the DSL of any child whom they are aware of living in such circumstances.

15. Concerns About a Child

When identifying concerns, staff members will use their professional judgement and decisions will be made on a case-by-case basis.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in this Policy.

If a staff member has any concerns about a child, they will raise them with the DSL as soon as possible or, if necessary, refer the case to specialist or early help services. Staff understand that a child may not tell them about their abuse and that it may be that this is overheard, or the child's behaviour changes which raises the concern.

Staff will 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. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a child.

Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSL with the matter.

All staff members are aware that all verbal conversations causing concern must be promptly recorded in writing and passed to the DSL.

If a referral is made about a child by anyone other than the DSL, the DSL will be informed as soon as possible.

The CSCS will make a decision regarding what action is required within one working day of the referral being made, and will notify the referrer.
Staff are required to monitor a referral if they do not receive information from the CSCS regarding what action is necessary for the child.

If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the child.

If early help is appropriate, the case will be kept under constant review. If the child's situation does not improve, a referral will be considered.

All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded by the DSL on the Inclusion Contact Sheet, stored electronically and any physical safeguarding files will be kept securely in a locked cabinet in the DSL's office.

If a child is in immediate danger, a referral will be made to CSCS and/or the police immediately.

If a child has committed a crime, the police will be notified without delay.

Where there are safeguarding concerns, the Academy will ensure that the child's wishes are always taken into account, and that there are systems available for children to provide feedback and express their views.

When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the child feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

16. Managing Referrals

The reporting and referral process outlined in Appendix A will be followed accordingly.

All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed.

When making a referral to CSCS or other external agencies, information will be shared in line with this Policy and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the children involved.

The DSL will work closely with the police to ensure the Academy does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

The Academy will not wait for the start, or outcome, of an investigation before protecting the victim and other children; this applies to criminal investigations as well as those made by CSCS.

Where CSCS decides that a statutory investigation is not appropriate, the Academy will give consideration to referring the incident again if it is believed that the child is at risk of harm.

Where CSCS decides that a statutory investigation is not appropriate and the Academy agrees with this decision, the Academy will give consideration to the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the child will be informed of the decisions made, actions taken and reasons for doing so in an age-appropriate manner.

Discussions of concerns with parents will only take place where this would not put the child or others at potential risk of harm.

The Academy will work closely with parents to ensure that the child, as well as their family, understands that the arrangements in place, such as in-school interventions, are effectively supported and know where they can access additional support.

17. Communication and Confidentiality

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with data protection policies. Staff members are aware that The Data Protection Act 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent where failure to do so would result in the child being placed at risk of harm.

Where there is an allegation or incident of sexual abuse or violence, the victim is entitled to anonymity by law; therefore, the Academy will consult its policy and agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the Academy will do all it can to protect the anonymity of the child/ren involved in the case.

Concerns will only be reported to those necessary for its progression (e.g. the child's teacher), and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During disclosure of a concern by a child, staff members will not promise the child confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects children from harm, information can be lawfully shared without the victim's consent, e.g. If doing so would prejudice the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the child involved. Where discussion with the parents could potentially put a child at risk of harm, this will not be

done. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the Academy will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a child is leaving the Academy, the DSL will consider whether it is appropriate to share any information with the child's new provider, in addition to the child protection file, that will allow the new provider to support the child and arrange appropriate support for their arrival.

18. Allegations Against Staff and Safeguarding Practices

Reporting Concerns About Staff

Report any inappropriate contact or safeguarding concern about staff immediately to the CEO.

For low-level concerns, the CEO will assess the matter internally under the Academy's Child Protection Policy, Staff Code of Conduct and disciplinary procedures. The CEO will also engage the Designated Safeguarding Lead (DSL).

If a concern or allegation indicates that a staff member has met the harm threshold, the CEO will contact the Local Authority Designated Officer (LADO) within 1 working day to comply with statutory guidance and before the school conducts any internal formal investigation.

If the allegation involves the CEO, it must be reported directly to the Chair of Governors.

Ofsted must be notified as soon as is reasonably practicable, but no later than 14 days, regarding any allegations of serious harm or abuse by any person working on the premises.

Whistleblowing

Any concerns regarding general safeguarding practices at The Premier Academy should be raised with the CEO. These will be handled under the Whistleblowing Policy.

If a staff member feels unable to raise a concern internally, or feels their concern has not been addressed, they should use external whistleblowing channels:

- NSPCC Whistleblowing Helpline: 0800 028 0285
- Ofsted Whistleblowing: 0300 123 3155

19. Staff Conduct and Low Level Concerns

The Academy promotes an open and transparent "culture of vigilance." We ensure that all concerns regarding adults (including supply staff, volunteers, and contractors) are shared responsibly, recorded, and dealt with promptly.

Definition

A "low-level concern" is any concern - no matter how small, and even if it is no more than a "nagging doubt" - that an adult may have acted in a way that is inconsistent with the Staff Code of Conduct. This includes inappropriate conduct outside of work that does not meet the "harm threshold" for a LADO referral.

Examples of Low-Level Concerns:

- Behaviours that may warrant a low-level concern report include, but are not limited to:

- Being over-friendly with children or "having favourites."
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Using inappropriate, sexualised, intimidating, or offensive language.

Management of Low-Level Concerns

All low-level concerns are recorded (even if they do not meet the 'harm threshold') and handled in accordance with the Academy's Reporting Low-Level Safeguarding Concerns Policy. These records will be kept confidential and reviewed periodically by the CEO for patterns.

Private Tutoring, Coaching, Mentoring, Childcare and Babysitting
Staff must not provide private tutoring, coaching, mentoring, childcare or babysitting services to any child currently registered at the Academy, or to the children of current Academy parents/carers or colleagues, without prior written authorisation from the CEO.

Any proposed arrangement must be submitted to the CEO in writing before the arrangement commences and must include details of the proposed arrangement, the relationship between the staff member and the child/family, the proposed frequency and location, and any potential conflict of interest.

The CEO must consult the DSL before approving any arrangement involving a child currently registered at the Academy. Any approval must be recorded in writing by the Academy.
Approval will only be granted where the arrangement does not compromise safeguarding, professional boundaries or the staff member's duties to the Academy.

Staff must not commence or continue any such arrangement without explicit written approval. Unauthorised arrangements will be managed in accordance with the Staff Code of Conduct and the Academy's Disciplinary Policy and Procedure.

Transporting Children
Any transport of children by staff must comply with the Staff Code of Conduct, the Academy's relevant transport procedures and risk assessments. Staff must not transport children unless the required approvals, parental/carer consent, safeguarding requirements and insurance arrangements set out in the Staff Code of Conduct have been met.

Any emergency transport arrangement must be recorded and reported in accordance with the Staff Code of Conduct.

Former Pupils
Staff must maintain appropriate professional boundaries with former pupils. Staff must follow the requirements relating to contact with former pupils, including social media contact and personal relationships, set out in the Staff Code of Conduct.

Any concern regarding an inappropriate relationship or contact between a member of staff and a former pupil must be reported in accordance with the Staff Code of Conduct and the Academy's safeguarding procedures. Where appropriate, the Academy will seek advice from the Local Authority Designated Officer (LADO).

20. LADO

In Milton Keynes, the Local Authority Designated Officer (LADO) is the statutory lead for managing allegations against people who work or volunteer with children. For a school, the LADO is the essential partner whenever a staff member's conduct toward a child reaches a specific "harm threshold."

The LADO for Milton Keynes City Council (MKCC) does not investigate the school staff themselves; instead, they oversee and coordinate the multi-agency response.
When the School Must Contact the LADO

The MKCC LADO must be informed within one working day if a member of staff or volunteer has:

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

Key Responsibilities of the MKC LADO

- Providing advice, information and guidance to employers and voluntary organisations around allegations and concerns regarding paid and unpaid workers.
- Managing and overseeing individual cases from all partner agencies.
- Ensuring the child's voice is heard and that they are safeguarded.
- Ensuring there is a consistent, fair and thorough process for all adults working with children and young people against whom an allegation is made.
- Monitoring the progress of cases to ensure they are dealt with as quickly as possible.
- Recommending a referral and chairing the strategy meeting in cases where the allegation requires investigation by police and/or social care.

There may be up to three strands in the consideration of an allegation:

- a police investigation of a possible criminal offence;
- enquiries and assessment by children's social care about whether a child is in need of protection or in need of services;
- consideration by an employer of disciplinary action in respect of the individual.

The LADO is involved from the initial phase of the allegation through to the conclusion of the case. The LADO is available to discuss any concerns and to assist in deciding whether to make a referral and/or take any immediate management action to protect a child.

Contact Details for Milton Keynes LADO

Service	Contact Information
LADO Direct Line	01908 254307
LADO Email	LADO@milton-keynes.gov.uk
MASH (Urgent Harm)	01908 253169 or 253170
Out of Hours	01908 265545 (Emergency Social Work Team)

21. Safer Recruitment

The Academy's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

Safer recruitment is a stringent, multi-layered process designed to deter, identify, and reject individuals who may pose a risk to children. Following the statutory KCSIE 2026 (Keeping Children Safe in Education) and EYFS frameworks, the process begins long before an interview, starting with a safeguarding-focused job description and a mandatory requirement for applicants to provide a full, chronological employment history on a standardised form.

The Academy's Single Central Record (SCR) serves as the legal evidence base for these checks, documenting that every adult has undergone an Enhanced DBS check with Barred List information (as relevant), identity verification, and right-to-work checks.

Under the Crime and Policing Act, the supervision exemption for volunteers engaged in regulated activity has been removed. Any individual carrying out teaching, training, instructing or supervising children on a regular basis (more than three days in a 30-day period or overnight) is classified as engaging in regulated

activity, regardless of whether they are directly supervised by another staff member. An Enhanced DBS check with Children's Barred List information is mandatory for all individuals undertaking these roles prior to commencement.

Regulations mandate that at least one member of the interview panel must have current Safer Recruitment Training, and those independent professional references - which specifically address safeguarding suitability - must be obtained and scrutinised before any appointment is confirmed.

Key Statutory Checks

Stage	Legal Requirement
Shortlisting	**Online Searches:** Conducted on all shortlisted candidates to identify any public incidents that suggest unsuitability.
Vetting	**Section 128 Check:** Mandatory for Trustees and all Senior Leadership Team (SLT) members to ensure they are not prohibited from managing a school. **DBS Certificate Retention and Data Protection:** Copies of DBS certificates will be retained securely in accordance with data protection legislation and DBS guidance. Certificates will be kept for no longer than six months following the recruitment decision. Once this period elapses, the copy will be securely destroyed. The Academy will retain a record on the Single Central Record confirming the date the check was completed, the unique certificate reference number and the outcome of the check.
Early Years	**EYFS PFA:** For staff in nursery ratios, a valid Paediatric First Aid (PFA) certificate is now a statutory requirement for the candidate to count in the headcount.
Overseas	**Certificate of Good Conduct:** Required for any candidate who has lived or worked abroad for a significant period (typically 3+ months).
Induction	**KCSIE Part 1**: New staff must provide signed, dated evidence that they have read and understood Part One in full.

22. Single Central Record (SCR)

The Academy keeps an SCR which records all staff, including supply staff and teacher trainees on salaried routes, who work at the Academy.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check, alongside checks for qualified teacher status (QTS) and induction completion, conducted directly via the DfE "Check a teacher's record" portal prior to appointment.
- A check of professional qualifications
- A check to determine the individual’s right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A signed statement confirming that the individual has read and understood Part One in full of Keeping Children Safe in Education.

For supply staff, the Academy will also record whether written confirmation from the employment business supplying the member of staff has been received, which indicates that all of the necessary checks have been conducted and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR.

23. Staff Suitability

All staff members are required to sign the staff disqualification declaration confirming that they are not disqualified from working in a schooling environment.

A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

A disqualified person will not be permitted to continue working at the Academy, unless they apply for and are granted a waiver from Ofsted. The Academy will provide support with this process.

All staff are expected to inform the Academy if their circumstances change which may have implications for the safeguarding of children in the Academy.

The Premier Academy is required to inform all existing and new staff that the Disqualification under the Childcare Act 2006 applies to them should they work with children above reception age during Academy hours and / or children under 8 in supervised activities during out of Academy hours and as such are required to complete a self-declaration to ensure their suitability to work in the Academy.

24. Training

All new staff, regardless of whether their role involves direct contact with children (including administrative, premises and catering personnel), are required to read Part One of Keeping Children Safe in Education in full during their induction, as the condensed summary (formerly Annex A) has been removed from statutory guidance. Signed and dated confirmation of this reading will be retained on the Single Central Record.

All staff will receive formal safeguarding training at induction and at least every two years. Safeguarding updates and refresher training will be provided at least annually, with additional briefings provided when required.

The DSL and deputies have additional Level 3 training that includes building a safe culture, safer recruitment, and managing allegations against adults.

Our training specifically details how staff are supported to put their knowledge into practice, ensuring they can confidently identify early indicators of harm, manage disclosures, and understand their duty regarding the Prevent Duty and Whistleblowing.

Training will include online safety and digital risks relevant to primary-aged children, specifically addressing evolving threats such as AI-generated indecent imagery and the risks posed by AI chatbots or manipulation tools. Staff will be trained to identify the signs that a child may be a victim of, or engaging with, harmful AI-generated content.

Records of all training, including the delivery method and date of completion, are maintained in a central tracker to ensure 100% compliance across the team.

<u>In-House Training:</u>

- Safeguarding Induction: Tailoring the Academy’s specific policies, the Staff Code of Conduct, and local referral pathways for new starters.
- Refresher Sessions: Weekly / Monthly "safeguarding bites" during staff meetings (e.g. discussing a new "Low-Level Concerns" policy or a case study).
- Policy Briefings: When legislation changes, the DSL briefs the team on the new requirements.
- Scenario-Based Learning: Testing staff knowledge with "What would you do if...?" scenarios to ensure they can put theory into practice.

- Online safety and digital risks relevant to primary aged children under-5s, including exposure to inappropriate content and the Academy's specific filtering and monitoring systems.

External Training:
- Level 3 DSL Training
- Certified Qualifications
- Paediatric First Aid (PFA)
- Prevent Duty
- Positive Handling
- Safer Recruitment
- Harmful Sexual Behaviour

25. Monitoring and Review

This Policy is reviewed at least annually by the DSL and the CEO. This Policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt. Any changes made to this Policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this Policy as part of their induction programme. The next scheduled review date for this policy is September 2027.

Any child protection incidents at the Academy will be followed by a review of the safeguarding procedures within the school and a prompt report to the governing board. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the Academy's procedures.

If any concerns are raised by the LADO or Ofsted about safeguarding issues, the following actions will be taken:
- The DSL carries out an investigation as a priority and comply with any deadlines given
- The Chair of the Governors reports to the LADO or Ofsted on the findings of the investigation and sets out any action to be taken
- The Academy endeavours to comply as soon as possible with any recommendations from the LADO or Ofsted.

Appendix A - Contacts and Advice

The Premier Academy Key Contacts

Designated Safeguarding Lead (DSL)	Liz McGrath
Deputy DSL (DDSL)	Amy Taylor
Assistant Deputy DSL (DDSL)	Tanya Mcalister
Senior Leaders for Safeguarding (SLS)	Olivia Cain and Collette Butler
Governor for Safeguarding	Gosia Zubrzycka
CEO	Warren Harrison
Chair of Governors	Paul Ayres

In the absence of the DSL, child protection matters will be dealt with by the Deputy DSL or by the SLS.

SCSC: Milton Keynes Local Authority (MKLSP)

If you are concerned about the safety or wellbeing of a child contact:

Multi Agency Safeguarding Hub (MASH)
Daytime during the week - Phone: 01908 253169 and 01908 253170
Email: children@milton-keynes.gov.uk
Out of hours evenings, weekends and bank holidays -Phone: 01908 265545 (Emergency Social Work Team)

If you are concerned about allegations against a member of staff contact:

Local Authority Designated Officer (LADO)
Phone: 01908 254307
Email: lado@Milton-keynes.gov.uk
Staff: Debbie Newman and Kay Young

If you are concerned about safeguarding and welfare of children and vulnerable adults contact:

MK Together
Phone: 01908 254373
Email: mktogether@milton-keynes.gov.uk
MK Together website

If you are concerned and require additional information on prevention of child abuse or want to report a concern contact:

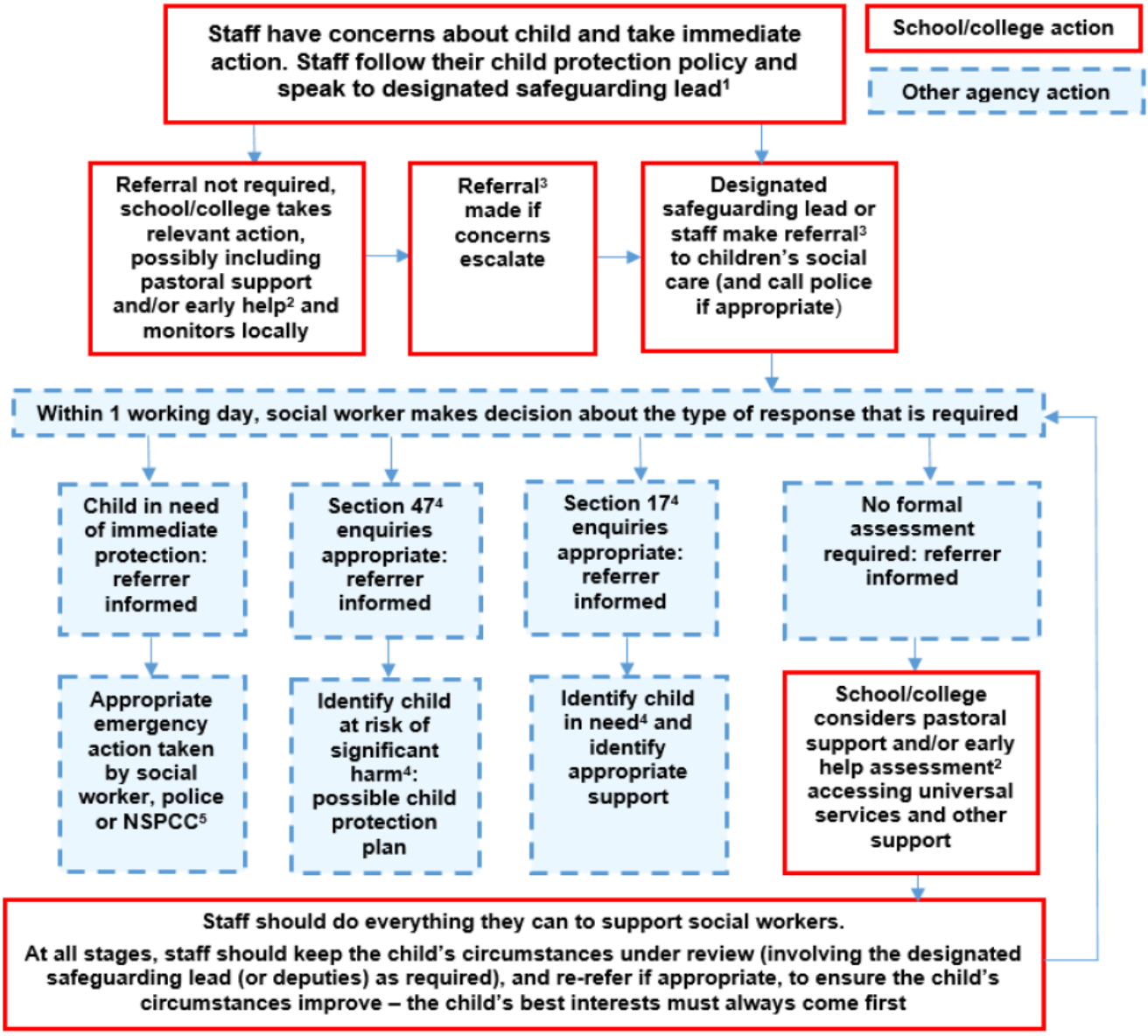
National Society Prevention of Cruelty to Children (NSPCC)
Phone: 0808 800 5000
NSPCC website

If you are concerned about terrorism or want to report a concern contact:

Prevent Duty Referrals
Prevent Help Line 0800 011 3764
Report online

Appendix B – Safeguarding Reporting Process – Keeping Children Safe In Education 2026

Figure 1: Flowchart setting out the actions taken where there are concerns about a child



[1] In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

[2] Family Help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated Family Help, a family help inter-agency assessment should be arranged. Working Together to Safeguard Children provides detailed guidance on the Family Help process.

[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. See Working Together to Safeguard Children.

[4] Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Working Together to Safeguard Children.

[5] This could include applying for an Emergency Protection Order (EPO).

Appendix C – Specific Safeguarding Issues

This appendix sets out details about specific safeguarding issues that children may experience and outlines specific actions that would be taken in relation to individual issues.

Here are the issues covered:
- Domestic abuse
- Homelessness
- Children absent from education
- Child abduction and community safety incidents
- Child criminal exploitation (CCE)
- Cyber-crime
- Child sexual exploitation (CSE)
- Modern slavery
- FGM
- Virginity testing and hymenoplasty
- Forced marriage
- Radicalisation
- Children with family members in prison
- Children required to give evidence in court
- Mental health
- Serious violence

Domestic Abuse

For the purposes of this Policy, and in line with the Domestic Abuse Act 2021, "domestic abuse" is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. "Abusive behaviour" includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse.

"Personally connected" includes people who:
- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The Academy will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:
- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because "they have to".

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm.

Children Absent from Education

A child who is absent from school can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. The Academy will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of children becoming absent from education in the future. Staff will monitor children that are absent from school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Absent from Education Policy. In accordance with statutory duty, the Academy will notify the local authority whenever a child is added to or removed from the school roll, and will immediately report any child who fails to attend regularly or has accrued 10 consecutive school days of unauthorised absence. As and when the need arises, the Academy will complete a Child Missing in Education form and submit it to the LA alongside submission of the CTF.

The Academy will follow the DfE's guidance on improving attendance where there is a need to work with children's services due to school absences indicating safeguarding concerns.

Admissions register
Children are placed on the admissions register at the beginning of the first day that is agreed by the Academy, or when the Academy has been notified that the child will first be attending. When specifically requested, the Academy will notify the LA when a child's name is added to the admissions register.

The Academy will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents/carers when any changes occur. Two emergency contacts will be held for each child where possible. Staff will monitor children who do not attend the Academy on the agreed date and will notify the LA at the earliest opportunity.

If a parent/carer notifies the Academy that their child will live at a different address, the Academy will record the following information on the admissions register:
- The full name of the parent with whom the child will live
- The new address
- The date from when the child will live at that address

If a parent/carer notifies the Academy that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:
- The name of the new school
- The date on which the child first attended, or is due to attend, that school

Where a child moves to a new school, the Academy will use a secure internet system to securely transfer children's data.

To ensure accurate data is collected to allow effective safeguarding, the Academy will inform the LA of any child who is going to be deleted from the admission register, in accordance with the School Attendance (Pupil Registration) (England) Regulations 2024, where they:
- Have been taken out of the school by their parents/carers, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the Academy, and no longer live within a reasonable distance of the premises.
- Have been certified by the Academy's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent/carer has not indicated the intention to the child continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the Academy does not reasonably believe they will be returning to the school at the end of that period.

- Have been permanently excluded.
- Have died.

The Academy will also remove a child from the admissions register where the Academy and LA has been unable to establish the child's whereabouts after making reasonable enquiries into their attendance.

If a child is to be removed from the admissions register, the Academy will process the CTF with the following information:

- The full name of the child
- The full name and address of any parent/carer with whom the child lives
- At least one telephone number of the parent/carer with whom the child lives
- The full name and address of the parent/carer with whom the child is going to live, and the date that the child will start living there, if applicable
- The name of the child's new school and the expected start date there, if applicable
- The grounds for removal from the admissions register under the School Attendance (Pupil Registration) (England) Regulations 2024)

The Academy will work with the LA to establish methods of making returns for children back into the school. The Academy will highlight to the LA where they have been unable to obtain necessary information from parents/carers, e.g. where an address is unknown. The Academy will also highlight any other necessary contextual information, including safeguarding concerns.

Child Abduction and Community Safety Incidents

For the purposes of this Policy, "child abduction" is defined as the unauthorised removal or retention of a child from a parent/carer or anyone with legal responsibility for the child. Child abduction can be committed by parents/carers and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the Academy that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with children.

Children will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

Child Criminal Exploitation (CCE)

For the purposes of this Policy, "child criminal exploitation" is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The Academy will recognise that children involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The Academy will also recognise that children of any gender are at risk of CCE.

School staff will be aware of the indicators that a child is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.

- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.

County Lines

For the purposes of this Policy, "county lines" refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK. As well as the general indicators for CCE, school staff will be aware of the specific indicators that a child may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of children with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a child may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Cyber-crime

For the purposes of this Policy, "cyber-crime" is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.
- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring children to the National Crime Agency's Cyber Choices programme.

Child Sexual Exploitation (CSE)

For the purposes of this Policy, "child sexual exploitation" is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The Academy will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge, e.g. through others sharing videos or images of them on social media. The Academy will recognise that CSE can affect any child who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes children aged 16 and above who can legally consent to sexual activity. The Academy will also recognise that children may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a child is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The Academy will cooperate as needed.

Modern Slavery

For the purposes of this Policy, "modern slavery" encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a child may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

Female Genital Mutilation (FGM)

For the purposes of this Policy, "FGM" is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a child being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The Academy's procedures relating to managing cases of FGM and protecting children will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a child under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine children, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. *NB: This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.*

All staff will be aware of the indicators that children may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the child. It is

important to note that the child may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a child may be at heightened risk of undergoing FGM include:
- The socio-economic position of the family and their level of integration into UK society.
- The child coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:
- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the child:
- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of so-called "'honour-based' abuse (HBA)", which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Virginity Testing and Hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out.
Children aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status.

All staff will be aware of the following indicators that a child is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A child is known to have requested either procedure or asks for help.
- Family members disclose that the child has already undergone the practices.
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously.
- Concern from family members that the child is in a relationship, or plans for them to be married.
- A close relative has been threatened with either procedure or has already been subjected to one.
- A child has already experienced or is at risk of other forms of HBA.
- A child is already known to social services in relation to other safeguarding issues.
- A child discloses other concerns that could be an indication of abuse, e.g they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling.
- A child displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour.
- A child appears fearful of their family or a particular family member.
- Unexplained absence from school, potentially to go abroad.
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment.

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

The Academy will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the child, including expediting arrangements for the procedure.

Forced Marriage

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.
All staff will be alert to the indicators that a child is at risk of, or has undergone, forced marriage, including, but not limited to, the child:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents/carers.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL will ensure the child is spoken to privately about these concerns and further action taken as appropriate. Children will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the child's family or those with influence in the community, without the express consent of the child, as this will alert them to the concerns and may place the child in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among children.

If a child is being forced to marry, or is fearful of being forced to, the Academy will be especially vigilant for signs of mental health disorders and self-harm. The child will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the Academy will use existing national and local protocols for multi-agency liaison with police and children's social care.

The Academy will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The Academy will establish where possible whether those at risk of forced marriage have a dual nationality or two passports.

The Academy will aim to create an open environment where children feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The Academy will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted.

Teachers and other staff members will be educated about the issues surrounding forced marriage and the signs to look out for.

Radicalisation

For the purposes of this Policy, "radicalisation" refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this Policy, "extremism" refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this Policy, "terrorism" refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting children from the risk of radicalisation is part of the Academy's wider safeguarding duties. The Academy will actively assess the risk of children being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify children who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The Academy will work with local safeguarding arrangements as appropriate.

The Academy will ensure that they engage with parents/carers and families, as they are in a key position to spot signs of radicalisation. In doing so, the Academy will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the child's parents/carers, unless the Academy has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect children against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

The Prevent Duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as "the Prevent duty". The Prevent duty will form part of the Academy's wider safeguarding obligations.

The Academy's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outlined in the Prevent Duty Policy.

Children with Family Members in Prison

Children with a family member in prison will be offered pastoral support as necessary. A referral to CHAS may be advised and arranged if appropriate.

Children Required to Give Evidence in Court

Children required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Children will be provided with the booklet 'Going to Court' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Mental Health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – the Academy will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify children whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how children's experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a child that is also a safeguarding concern will act in line with this Policy and speak to the DSL or deputy DSLs.

The Academy will access a range of advice to help them identify children in need of additional mental health support, including working with external agencies.

In all cases of mental health difficulties, the Academy's Social, Emotional and Mental Health (SEMH) Policy will be consulted and adhered to at all times.

Serious Violence

Through training, all staff will be made aware of the indicators which may signal a child is at risk from, or is involved with, serious violent crime.

These indicators include, but are not limited to:
- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a child's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:
- Being male.
- Having been frequently absent from school.
- Having been permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a child may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

Appendix D – Safeguarding Induction Sheet

Safeguarding Induction Sheet

Our Statutory Duty

We all have a statutory duty to safeguard and promote the welfare of children. This means:

- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best life chances.

Safeguarding Key Contacts

Role	Name
Designated Safeguarding Lead (DSL)	Liz McGrath
Deputy DSL (DDSL)	Amy Taylor
Assistant DDSL	Tanya Mcalister
Senior Leaders for Safeguarding	Olivia Cain & Collette Butler
Nominated Safeguarding Governor	Gosia Zubrzycka

External Contacts:

- **Milton Keynes MASH (Multi-Agency Safeguarding Hub):** 01908 253169
- **Local Authority Designated Officer (LADO):** 01908 254307
- **NSPCC Whistleblowing Helpline:** 0800 028 0285

How to Report a Concern About a Child

If you have any concern about a child's wellbeing, safety or behaviour, you must log it on the same day. Never assume someone else will act.

- **Primary Method:** Log all day-to-day safeguarding concerns immediately via email to Liz McGrath and Amy Taylor. Report urgent concerns in person to Liz immediately without delay, following up with a detailed email. If Liz McGrath is absent, report directly to Amy Taylor or another member of the safeguarding team. If email access is unavailable, complete a physical Safeguarding Report Form from the main office and hand it directly to a DSL.
- **Immediate Danger:** If a child is in immediate danger, inform a DSL verbally right away or call 999.

Handling a Disclosure from a Child

If a child talks to you about abuse or harm:

DO:

- **Listen carefully** and remain calm.
- **Reassure them** that they were right to tell you.
- **Explain clearly** that you cannot keep secrets and must share this with the DSL to help keep them safe.
- **Record exact words** used by the child, along with the date, time and location, as soon as possible.

DO NOT:

- **Do not promise confidentiality.**

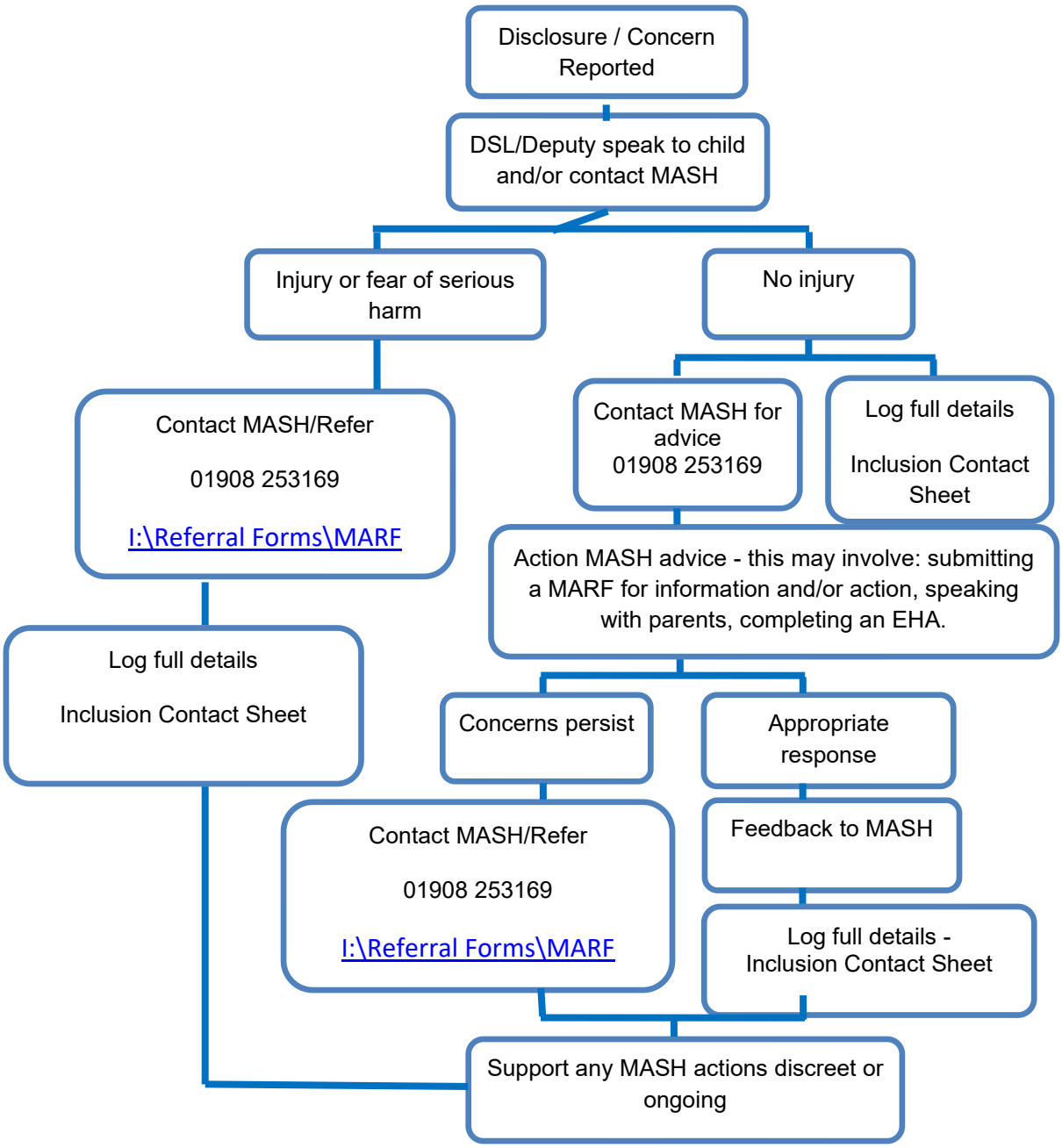
- **Do not ask leading questions** or investigate (only ask open questions to clarify, such as *"What happened next?"*).
- **Do not express judgment, shock or anger** about the people involved.
- **Do not confront** the person named in the disclosure.

Staff Conduct and Low-Level Concerns
To protect both children and staff, you must maintain clear professional boundaries at all times:

- **Staff Code of Conduct:** Ensure that you have read our Staff Code of Conduct regarding acceptable use of technology, social media and physical contact.
- **Low-Level Concerns:** If you have concerns about the conduct of an adult working in the school - even if it seems minor or a "poking-around" concern - you must report it directly to the CEO.
- **Concerns About the CEO:** Report directly to the Chair of Governors.
- **Child-on-Child Abuse:** We have a zero-tolerance approach to child-on-child abuse. It must never be dismissed as "banter" or "growing up." Report all incidents immediately.

Thank you for supporting and safeguarding the children at our school.

Appendix E – Safeguarding Concerns Reporting Flowchart



Appendix F – Milton Keynes Children Social Care Structure

In Milton Keynes City Council, Children's Social Care (CSC) operates within a structured continuum of care to triage, assess and manage support for children, young people and families.

1. **Triage and Front Door: MASH (Multi-Agency Safeguarding Hub)**

Role: The primary "front door" for all safeguarding contacts and referrals across Milton Keynes.

Structure: A co-located team consisting of Children's Social Care, Thames Valley Police, Health professionals and Adult Safeguarding representatives.

Process: When a multi-agency referral form (MARF) or contact is submitted, MASH acts as the central risk-assessment engine. They check cross-agency databases to determine the level of risk and delegate the case to the appropriate service.

2. Early Help and Family Support

Role: Targeted intervention for families whose needs fall below the statutory threshold (Section 17 / Section 47).

Structure: Works closely with schools, health visitors and family centres using the Early Help Assessment Framework (EHAF).

Process: Coordinates multi-agency "Team Around the Family" (TAF) meetings to offer early support, preventing problems from escalating into formal social work intervention.

3. Assessment and Family Support Teams (AFST)

Role: Statutory social work teams handling cases that meet the threshold for a statutory assessment.

Process:
- **Child in Need (CiN - Section 17):** Conducts Child and Family Assessments where a child needs statutory support to maintain their health or development.
- **Child Protection (CP - Section 47):** Conducts formal child protection investigations alongside police where there is reasonable cause to suspect significant harm.
- Handles continuous social work oversight until the family's situation stabilises or transitions to longer-term care.

4. Specialist and Escalated Teams

NEST: Nurture, Empower, Support, Transform operates as a specialised, targeted intervention and trauma-informed support team designed to work alongside core social work teams. NEST focuses on intensive, home-based support for children, young people and families facing complex challenges. Its primary objective is to build family resilience, prevent family breakdown and reduce the need for children to enter statutory care or move into residential placements.

Children with Disabilities (CWD) Team: Dedicated social workers and assistant social workers providing specialised assessments, care packages, direct payments, and short breaks for children with severe complex needs or SEN.

Corporate Parenting / Looked After Children (LAC) Team: Manages children subject to Care Orders, those living with foster carers, or young people in residential care.

16+ and Leaving Care Team: Coordinates the transition for young people leaving care toward independent adulthood up to age 25.

5. Emergency Social Work Team (Out of Hours)

Role: Provides duty coverage outside standard office hours (evenings, weekends and bank holidays).

Process: Deals strictly with urgent, immediate safeguarding emergencies that cannot safely wait until MASH opens the following business day.