Windsor Academy Trust

Manor Way Primary Academy

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Paragraph strengthened to include 'school's taking a cautious approach'	5.29.2
Paragraph strengthened to include the importance of a trusted adult	5.29.3
Update in title to include 'use of AI'	5.23
Added reference to the Prevent risk assessment	5.23.2
Reference to DfE filtering and monitoring standards	5.23.3
Guidance added on use of generative AI in schools.	5.23.4
Update in title to include 'Alternative provision'	6
Added link to working together to improve school attendance	6.3
updated guidance on Alternative provision and safeguarding responsibilities	6.4
Updated to include 'embed a culture of openness, trust and transparency'	8.9.3

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1.Key contacts:

The Head Teacher	Miss L Buffery	lbuffery@manor.windsoracademytrust.org.uk
The Designated Safeguarding Lead	Miss L Buffery	lbuffery@manor.windsoracademytrust.org.uk
The Deputy Designated Safeguarding Lead (s)	Mrs L Brettle	lbrettle@manor.windsoracademytrust.org.uk
The Designated Lead for Looked after Children is:	Mrs L Brettle	lbrettle@manor.windsoracademytrust.org.uk
Board Safeguarding governor:	Julie Houlder	jhoulder@windsoracademytrust.org.uk
The Special Educational Needs Coordinator is	Mrs L Brettle	lbrettle@manor.windsoracademytrust.org.uk
The WAT Education Director	Helena Brothwell	hbrothwell@windsoracademytrust.org.uk
WAT Head of Safeguarding	Genna Griffiths	ggriffiths@windsoracademytrust.org.uk

2.Introduction and Context

2.1. Our responsibilities

Windsor Academy Trust is committed to safeguarding children, and we expect everyone who works in our academy to share this commitment. This policy sets out how Manor Way Primary Academy will deliver these responsibilities.

2.1.1.This policy must be read in conjunction with the statutory guidance documents 'Keeping children safe in education' (September 2025), 'Working together to safeguard children' (2024), a guide to inter-agency working to safeguard and promote the welfare of Children.

2.1.2. Furthermore, we will follow the procedures set out by the Dudley Safeguarding People Partnership (DSPP); Police and Clinical Commissioning Group.

2.2. Our principles

2.2.1. We believe that our academy should provide a child-centred, caring, positive,

safe and stimulating environment that promotes the emotional, social, physical and moral development of the individual child.

2.2.2. We recognise the importance of providing an environment within our academy that will help children feel safe and respected.

2.2.3. We recognise the importance of enabling children to talk openly about anything that worries them and to feel confident that they will be listened to, kept safe and never be made to feel that they are creating a problem for reporting abuse, sexual violence or sexual harassment.

2.2.4. We recognise that children may not feel ready or know how to tell someone they are being abused, exploited or neglected and may not recognise their experiences as harmful.

2.2.5. We recognise that children with additional needs or vulnerabilities including disability and/or sexual orientation or language barriers may require additional support to enable them to tell someone they are being abused.

2.2.6. We ensure that children are taught about safeguarding, including online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum in line with the DfE's 'Teaching online safety in school (June 2019) and UKCIS 'Education for a connected world' June 2020.

2.2.7.We will work with parents to build an understanding of the academy's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situations.

2.2.8.Safeguarding arrangements in our academy are underpinned by two key principles:
▪ safeguarding is everyone's responsibility: all staff, governors and volunteers should play their full part in keeping children safe; and maintain and attitude of 'it could happen here' and
▪ a child-centred and coordinated approach: a clear understanding of the needs and views of Children.

2.3. Scope

2.3.1.In line with the law, this policy defines a child as anyone under the age of 18 years or any child on roll at this academy.

2.3.2.This policy applies to all members of staff in our academy, including all permanent, temporary and support staff, supply staff, governors, volunteers, contractors and external service or activity providers.

2.4. Our Policy

2.4.1.There are 6 main elements to our policy, which are described in the following sections:

- The types of abuse that are covered by the policy
- The signs of abuse that staff and volunteers should look out for
- Roles and responsibilities for safeguarding
- Expectations of staff and volunteers with regard to safeguarding, and the

procedures and processes that should be followed, include the support provided to children.
● How the academy will ensure that all staff and volunteers are appropriately trained, and checked for their suitability to work within the academy
● How the policy will be managed and have its delivery overseen

2.4.2.Through implementation of this policy, we will ensure that our academy provides a safe environment for children to learn and develop.

2.4.3.The academy will ensure that we facilitate a whole school approach to safeguarding which means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

3.Safeguarding Roles and Responsibilities

3.1. All staff, volunteers and governors have responsibility for the following:

● to provide a safe environment in which children can learn
● identify children who may be in need of extra help or who are suffering, or are likely to suffer significant harm.
● to take appropriate action, working with other services as needed.
● to keep themselves updated with the systems within the academy which support safeguarding that were explained to them as part of their induction (including the staff Code of Conduct). This includes knowing the role, and working with, the academy's Designated Safeguarding Lead.
● to ensure they receive appropriate safeguarding and child protection training (including digital safeguarding/online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) which is regularly updated.
● In addition to working with the Designated Safeguarding Lead or deputy, staff members should be aware that they may be asked to support social workers to make decisions about individual children.

3.2. All academy staff are responsible for:

● knowing who the academy's Designated Safeguarding Lead (DSL) and deputy are
● raising any concerns with the Designated Safeguarding Lead and deputy immediately
● completing a written safeguarding concern when making a referral. Staff should be clear that this should be done immediately, always on the same day
● ensuring that their safeguarding and child protection training including digital safeguarding is up to date.
● being alert to the signs of abuse, including child on child abuse and their need to refer any concerns to the designated staff member.
● maintaining an attitude of 'it could happen here'. When concerned about the welfare of a child, staff members should always act in the interests of the child.
● knowing the academy's procedures for dealing with children who go missing from education, particularly on repeat occasions, and reporting any such concerns to the designated lead.
● listening to, and seeking out, the views, wishes and feelings of children.
● sharing information and working together to provide children with the help they

need.
● referring to the Head Teacher any concerns about another member of staff immediately, or if the concerns are about the Head Teacher, refer them to the member of the Executive Team who is nominated to be responsible for liaising with the local authority and other partner agencies.
● raising concerns about poor or unsafe practice and potential failures in the academy's safeguarding regime through the academy's Whistleblowing Policy.
● being aware of your safeguarding partnerships Dudley Metropolitan Borough Council & Dudley Safeguarding People Partnership safeguarding procedures, https://dudleysafeguarding.org.uk/children/professionals-working-with-children/safeguarding-children-procedures/ and ensuring these procedures are followed.
● seeking early help where a child and family would benefit from coordinated support from more than one agency via your Multi Agency Safeguarding Hub (MASH)
● knowing the academy's procedures for dealing with child-on-child abuse, including sexual harassment and sexual violence between children
● reading KCSIE 2025 part 1

3.3. Local Advisory Body (LAB) and Academy leadership are responsible for:

3.3.1.reading, understanding and applying KCSIE 2025.
● ensuring that there is an effective Child Protection and Safeguarding Policy in place together with a Staff Code of Conduct, which are provided to all staff.
● ensuring all staff are given a mandatory induction, which includes clear guidance on their safeguarding and child protection responsibilities, including online safety, and procedures to follow if anyone has any concerns about a child's safety or welfare.
● ensuring that policies and procedures adopted by the Board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
● ensuring that the academy has an appropriate senior member of staff from the academy leadership team, with appropriate status and authority, funding, resources and support to take the lead in responsibility for safeguarding and child protection- the Designated Safeguarding Lead (including online safety and understanding the filtering and monitoring systems and processes in place); and that they receive DSL /level 3 training which is updated every two years.
● ensuring that they are aware of and follow local procedures related to safeguarding.
● ensuring that they are doing all they reasonably can to limit children's exposure to online harms from the academy's IT system, but that 'over-blocking' does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.
● ensuring that the academy has in place filtering and monitoring, the efficacy of which is regularly monitored and reported on, and which complies with current filtering and monitoring standards.
● ensuring that all staff and volunteers undergo safeguarding and child protection training (including online safety, which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring)
● ensuring governors receive appropriate safeguarding and child protection (including online safety which includes an understanding of filtering, monitoring systems and cyber security) training at induction which is updated regularly and

at least annually to keep pace with KCSIE updates. This training should equip them with the knowledge to provide strategic challenges to test and assure themselves that the safeguarding policies and procedures in place in the academy are effective and support the delivery of a robust whole school approach to safeguarding and child protection.

- ensuring that they are aware of their obligations under the Human Rights Act 1998, The Equality Act 2010 including The Public Sector Equality Duty, and their local multi agency safeguarding arrangements (see KCSIE 2025 Part 2 The management of safeguarding)
- ensuring they have appropriate levels of security protection procedures in place in order to safeguard children, staff and systems which meet the standards in 'Cyber security standards for schools and colleges' guidance.

3.4. Designated Safeguarding Leads are responsible for:

- Taking lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).
- managing referrals from academy staff or any others from outside the academy
- working with external agencies and professionals on matters of safety and safeguarding
- undertaking relevant training and attending update sessions
- liaising with the Head Teacher to inform them of issues – especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations This should include being aware of the requirement for children to have an Appropriate Adult (PACE code C 2019)
- raising awareness of safeguarding and child protection amongst the staff and parents; and ensuring that child protection information is transferred to the child's new school/academy.
- ensuring that the academy has a robust process in the event of allegations of abuse made against the Head Teacher.
- ensuring all staff receive the appropriate training, and keep it up to date, in line with advice from the Dudley Safeguarding People Partnership (DSPP); Police and Clinical Commissioning Group.
- notifying the Children's Social Care department if there are concerns over unexplainable and/or persistent absences from education of a child.
- informing the local authority when a private fostering arrangement is in place.
- managing security within the academy and reviewing it annually
- ensuring that important policies, such as those for behaviour and anti-bullying, are kept up to date.
- keeping all child protection records up to date on CPOMS; including a clear summary of the concern, decisions reached and the rationale behind the decision, details of how the concern was resolved/outcomes.
- having an overview of the numbers of safeguarding and child protection referrals made, and provide an anonymised report to the Head Teacher.
- having in place effective ways to identify emerging problems and potential unmet needs for individual children and families.
- ensuring that there is a planned programme of evidence based, inclusive, age and stage appropriate, RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.
- ensuring through the safeguarding curriculum that children know the process of raising a concern (about themselves or a friend/other), that they know the

academy's Designated Safeguarding Lead (and deputy), and are aware of other support mechanisms such as ChildLine etc.

- ensuring at least one person on any appointment panel has undertaken safer recruitment training which is renewed every two years.
- ensuring the adherence to statutory responsibilities to check staff working with children, taking proportionate decisions on whether to ask for checks beyond what is required; and ensuring volunteers are appropriately supervised.
- ensuring procedures are in place to handle allegations against members of staff and Volunteers.
- ensuring there are procedures in place to handle allegations against other children
- ensuring that there is support available for staff involved in difficult child protection cases/incidents both at the academy and externally through counselling and/or other services.
- creating a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and in the academy's development
- taking lead responsibility for promoting the educational outcomes for children who have or have had a social worker.
- making this policy available to parents and carers as appropriate
- ensuring that our staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role.
- ensuring all staff have regular reviews of their own practice to ensure they improve over time.
- ensuring any paper records are secure and kept separately from the child's main file in a locked location.
- fulfilling their duties in line with KCSIE 2025 Annex C

4.Safeguarding Processes and Procedures

The academy will deliver its responsibilities for identifying and acting on early help needs, safeguarding and child protection in line with the policies and procedures identified in the Dudley Metropolitan Borough Council safeguarding partners policies and procedure guidance, available at: Safeguarding Children Procedures –

4.1. How to report any concerns

4.1.1.Clear procedures on the reporting of any concerns are given to all staff/volunteers in the academy. This is done as part of the staff induction training and staff are given a reminder of this annually in refresher training. These procedures can be found in the Staff Room and in every room within school.

4.1.2. All concerns should be reported in writing, using the academy's safeguarding concern process (whether online or paper based). Concerns should always be completed as soon as possible, on the same day. Staff should never wait until the next day to complete a safeguarding concern report. Concerns about a member of staff should be reported immediately.

4.1.3. All child protection and/or safeguarding concerns should be reported to Lisa Buffery. (Designated Safeguarding Lead). See Appendix 1 for a flow diagram which explains how all disclosures are dealt with at the academy.

4.1.4.The academy takes its responsibility to safeguard children seriously. Failure to follow these reporting procedures may result in disciplinary action.

4.2. Taking Action

4.2.1.If at any time it is considered that a child has suffered significant harm or is likely to do so, a referral should be made to Dudley Metropolitan Borough Council's Emergency Duty Team 0300 555 5874, or call 999 if you are concerned a child needs immediate protection.

4.2.2.If the child has an injury that requires medical attention, the child protection process will not delay the administration of first aid or emergency medical assistance.

4.2.3.The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NPCC- 'When to call the police' should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

4.3. Children's disclosure of abuse

4.3.1. At Manor Way Primary Academy we have a clear procedure for reporting concerns. If a child talks to a member of staff about any risks to their safety or wellbeing, the staff member will let the child know that the staff member must pass the information on to the safeguarding team (DSL) in order to offer the proper support that the child requires. Staff members will allow them to speak freely and will not ask investigative questions.

4.3.2.Staff will be aware that children may not feel ready or know how to tell someone they are being abused, exploited or neglected, and /or they may not recognise their experiences as harmful. Staff will be aware this could be due to their vulnerability, disability and or sexual orientation or language barriers.

4.3.3.The staff member will tell the child what will happen next. It is the duty of the member of staff to inform the Designated Safeguarding Lead of what has been discussed. The staff member will write up details of their conversation with the child as soon as possible and certainly on the same day, on CPOMS. If CPOMs is temporarily unavailable the academy 'back up' paper procedures should be followed

4.3.4. Information will be shared on a need-to-know basis only. Issues or concerns will not be discussed with colleagues, friends or family unless necessary for the welfare of the child.

4.4. Suspecting that a child is at risk of harm

4.4.1.There will be occasions when staff may suspect that a child may be at risk but have no 'real' evidence. In these circumstances, staff will try to give the child the opportunity to talk. All staff should be aware that children can abuse other children

(child on child abuse) and that it can happen both inside and outside of school and online.

4.4.2.Staff should use CPOMS to record these early concerns. Following an initial conversation with the child, if the member of staff remains concerned, they should discuss their concerns with the Designated Safeguarding Lead Lisa Buffery.

4.4.3.Staff will be aware of the harm caused by child-on-child abuse including sexual violence or harassment and recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

4.4.4. Staff will use the academy's Anti-Bullying Policy where necessary https://www.manorwayprimary.org.uk/assets/downloads/policies-and-procedures/MW-Anti-Bullying-Policy-2024_2025.docx.pdf. However, there will be occasions when a child's behaviour warrants a response under child protection rather than anti-bullying procedures.

4.4.5.The academy acknowledges that some children can be particularly vulnerable or may have an increased risk of abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare. To ensure that all of our children receive equal protection, we will give special consideration to children that are considered to be Vulnerable.

4.5. Notifying parents

4.5.1.The academy will normally seek to discuss any concerns about a child with their parents. The Designated Safeguarding Lead Lisa Buffery, or a member of the safeguarding team, will make contact with the parent in the event of a concern, suspicion or disclosure.

4.5.2.However, if the academy believes that notifying parents could increase the risk to the child, exacerbate the problem or compromise the safety of a staff member, advice will first be sought from Children's Social Care.

4.6. Referral to Children's Social Care

4.6.1.The Designated Safeguarding Lead or deputy Laura Brettle will make a referral to Children's Social Care if it is believed that a child is suffering or is at risk of suffering significant harm.

4.6.2.Contacts at Dudley Metropolitan Borough Council are Yvonne Nelson-Brown (01384 813110) and Sukhchandan Kaur (01384 813066)

4.6.3.The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

4.7. Private Fostering

4.7.1.A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent, person with parental responsibility or close relative, in their own home, with the intention that it should last

for 28 days or more.

4.7.2. Comprehensive guidance on private fostering can be found here in the DfEs publication ‘Children’s Act 1989 Guidance on Private Fostering’.

4.7.3.Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or are involved in trafficking, child sexual exploitation or modern-day slavery.

4.7.4.We have a duty to notify the local authority where we are aware or suspect that a child is subject to a private fostering arrangement. Although academies have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the academy. However, it should be clear to the academy who has parental responsibility.

4.7.5.We have a mandatory duty to notify the local authority if we are involved directly or indirectly in arranging for a child to be fostered privately. Notifications must contain the information specified in Schedule 1 of The Children (private Arrangements for Fostering Regulations 2005 and must be made in writing

4.7.6.Academy staff should notify the designated safeguarding lead or deputy when they become aware of private fostering arrangements.

4.7.7.On admission to the academy, we will take steps to verify the relationship of the adults to the child who is being registered.

4.8. Reporting directly to child protection agencies

4.8.1.Staff will follow the reporting procedures outlined in this policy. However, they may also share information directly with Children’s Social Care, police, or the NSPCC if:

- The situation is an emergency and the Designated Safeguarding Lead Lisa Buffery, their deputy Laura Brettle are all unavailable

- They are convinced that a direct report is the only way to ensure the child’s safety.

4.9. Early help

4.9.1.At Manor Way Primary Academy, we also liaise with a wide variety of outside agencies, many of which are able to see children weekly. Examples of the wider agencies we liaise with include; multi-agency team/s, careers services, academy nurse, Child and Adolescent Mental Health Services (CAMHs), Educational Welfare Officer/s (EWO’s), our local Police Community Support Officers (PCSO’s), the Police and other services. We encourage families, children, and parents to work with these partner agencies also. The provision of early help services should form part of a continuum of help and support to respond to the different levels of need of individual children and families.

4.9.2.Staff and volunteers working within the academy should be alert to the potential need for early help for children. Staff and volunteers should be alert to

children with additional vulnerabilities who may benefit from Early Help.

5.Types of Abuse

5.1 Child abuse and types of abuse

5.1.1.Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults, or another child or children.

5.1.2.Further information and resources can be found in annexes A, B and part 5 of KCSIE 2025 of this policy.

5.1.3.All staff must maintain an attitude of 'it could happen here' and ensure any concern, no matter how small is reported. It could be the vital missing piece of the jigsaw that indicates a child is at risk of harm

5.1.4.All staff will receive ongoing training regarding types of abuse including local and national context.

5.1.5.The DSL and/or deputy will respond to all concerns, following local authority procedures and where there is an immediate risk of serious harm to a child will inform the police.

5.1.6.There are four types of child abuse as defined in 'Keeping Children Safe in Education'
September 2024

- physical abuse
- emotional abuse
- sexual abuse
- neglect

5.1.11. All staff must know what these are and be alert to the signs. The indicators of abuse and neglect now include a specific mention of the impact on children seeing, hearing or experiencing the effects of domestic abuse and the link that exploitation has to abuse and neglect.

5.2 Safeguarding Issues

5.2.1 All staff must have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

5.3 Child Sexual Exploitation and Child Criminal Exploitation – CSE and CCE (see KCSIE Annex B)

5.3.1 Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity in exchange for something the victim

needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

5.3.2 Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines (see below), working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

5.3.3 Children can become trapped by this type of exploitation as perpetrators can threaten victims and their families. Staff must recognise that children involved in CCE are vulnerable and are victims themselves and that they may still have been criminally exploited even if the activity appears to have been something they have agreed or consented to

5.3.4 Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength,status, and access to economic or other resources.

5.3.5 The abuse can be perpetrated by individuals or groups, males or females, and children or adults. It can take place as a one off or over a period of time and may occur online.

5.3.6 It is important that staff recognise that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however, staff should be aware that girls are at risk of criminal exploitation too.

5.3.7 Staff must also be aware that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

5.3.8 Staff should be aware that CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children believe they are in a genuine romantic relationship.

5.3.9 As a result, many children who are victims of sexual exploitation do not recognise themselves as such which can be an additional barrier to disclosure.

5.3.10 Staff will receive training and updates on CSE and CCE to ensure awareness of and mitigate these additional difficulties to ensure children receive appropriate intervention and support at the earliest opportunity.

5.3.11 CSE is a form of child sexual abuse and 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.

5.3.12 The local response and support for CSE and CCE can be found at: https://dudleysafeguarding.org.uk/children/professionals-working-with-children/child-exploitation/

5.4 Serious Violence

5.4.1 All staff should be aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, as significant decline in performance, signs of self-harm or significant changes in wellbeing, signs of assault or unexplained injuries.

5.4.2 Unexplained gifts or new possessions are also potential indicators that children have been approached by or are involved with criminal networks or gangs and may be at risk of CCE.

5.4.3 All staff should be aware of the range of risk factors which increases the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced maltreatment and having been involved in offending such as theft or robbery.

5.4.4 Staff will receive training and updates on serious violence and have access to information and resources to support development of their knowledge, skills and understanding.

5.4.5 Any concerns, no matter how small, must be reported using the academy's usual procedures. The DSL or deputy will follow the local authority safeguarding procedures. Where there is a risk of imminent harm an immediate referral to the police should be made.

5.5 County Lines

5.5.1 County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or "deal lines". It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as 'cuckooing'. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations. County line activity and the associated violence, drug dealing, and exploitation has a devastating impact on children, vulnerable adults and local communities.

5.5.2 Signs to look out for:

- Persistently going missing from school or home and / or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones

- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons

- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

5.5.3 Where staff have a concern around county lines, they should inform the DSL immediately who will follow the local authority safeguarding procedures. Where there is a risk of imminent harm, an immediate referral to the police should be made.

5.5.4
https://www.catch-22.org.uk/find-services/county-lines-support-and-rescue/

https://dudleysafeguarding.org.uk/children/professionals-working-with-children/child-exploitation/

5.6 Honour-Based Abuse (HBA)

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

5.6.2 Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead (or deputy). Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

5.6.3 Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency. Where FGM has taken place please refer to section 5.7 of this policy. (see below)

5.7 Female Genital Mutilation

5.7.1 Female Genital Mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

5.7.2 All staff should speak to the DSL or deputy with regard to any concerns about FGM

5.7.3 Teachers should be aware that there is a mandatory legal duty upon them that, if in the course of their work, they discover that an act of FGM appears to have been carried out on a girl under 18 years, they must report this to the police (see annex B of KCSIE for further details)

5.7.4 Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out and discuss any such cases with the Designated Safeguarding Lead and children's social care. The duty does not apply in relation to at risk or suspected cases though staff will always refer to

the DSL to take the next appropriate steps

5.8 Forced Marriage

5.8.1 A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to marriage and pressure or abuse is used. A marriage must be entered into with the free and full consent of both parties, there must be a choice.

5.8.2 Forced marriage is recognised as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

5.8.3 An arranged marriage is not the same as a forced marriage. In an arranged marriage, the families take a leading role in choosing the marriage partner, but both parties are free to choose whether to enter into the marriage or not.

5.8.4 Where staff or volunteers have any reason to suspect that someone is experiencing pressure or being forced into marriage, they must report this to the DSL through the academy process.

5.8.5 For more information on forced marriage see Annex B in KCSIE

5.9 Breast Ironing/Flattening

5.9.1 Breast ironing or flattening is the process during which pubescent girls' breasts are ironed, massaged, flattened and/or pounded down over a period of time (sometimes years) in order for the breasts to disappear or delay the development of the breasts entirely.

5.9.2 Staff or volunteers worried about the risk of breast ironing in the academy should refer through the appropriate channels to the Designated Safeguarding Lead as soon as possible who will make a referral to children's services. If staff or volunteers are concerned that the girl is in immediate danger, contact the police by calling 999.

5.9.3 The DSL will need to contact the Foreign and Commonwealth Office if the girl has been taken abroad:

5.9.4 For more information on breast ironing/ flattening see KCSIE, Annex B.

5.10 Preventing Radicalisation

5.10.1 The Counter-Terrorism and Security Act, 2015, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism "the Prevent duty".

5.10.2 Where staff are concerned that children are developing extremist views or show signs of becoming radicalised they should discuss this with the Designated Safeguarding Lead and be recorded on CPOMS.

5.10.3 The Designated Safeguarding Lead has received training about the Prevent

Duty and tackling extremism and is able to support staff with any concerns they may
have.

5.11 Channel

5.11.1 We understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

5.11.2 We use the curriculum to ensure that children understand how people with extreme views share these with others to radicalise others, especially using the internet.

5.11.3 We are committed to ensuring that our children are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the academy's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

5.12 Child on Child Abuse

5.12.1 All staff should be aware that children can abuse other children at any age and that it can happen both inside and outside of school and online.

5.12.2 All staff must know the indicators and signs of child-on-child abuse, know how to identify it and respond to reports of it. This includes sexual violence and sexual Harassment.

5.12.3 All staff must be aware that even if there are no reports it does not mean child on child abuse is not happening. It may be the case that it is just not being reported.

5.12.4 Staff must be vigilant and if they have any concerns they should speak to the DSL or deputy.

5.12.5 We will minimise the risk of all types of child-on-child abuse by making sure our staff are clear as to the school's policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

They will be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. Our staff are aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Our staff are aware of the increased vulnerabilities of children with SEND and those students who are LGBTQ+.

5.12.6 All staff must challenge inappropriate behaviours between children including, but not limited to:

- Bullying (including cyberbullying, prejudiced based and discriminatory bullying, inappropriate touching).
- Abuse in intimate personal relationships between peers.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault which may also include an online element.
- Sexual harassment such as sexual comments, remarks, jokes and online harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- Consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery).
- Up skirting – taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals.

5.12.7 All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

5.13 Child on child sexual violence and sexual harassment

5.13.1 This section of the policy must be read in conjunction with KCSIE.

5.13.2 Sexual violence and sexual harassment can happen anywhere, Staff should be aware that it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely that it will be perpetrated by boys.

5.13.3 All staff should be aware of and respond appropriately to all reports and concerns.

5.13.4 The academy has a zero-tolerance approach to sexual violence and sexual assault. It is never acceptable, will not be tolerated and will never be passed off as 'banter' 'just having a laugh' 'part of growing up' or 'boys being boys'.

5.13.5 We recognise that sexual violence and sexual harassment exists on a continuum, may overlap and can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

5.13.6 We also recognise that sexual violence and sexual harassment can occur online and face to face (both physically and verbally) and is never acceptable. All staff and volunteers will maintain an attitude of 'it could happen here'.

5.13.7 We will ensure that all children are taught, in an age-appropriate way,

about sex and relationships and understand that the law is in place to protect children rather than criminalise them.

5.13.8 We recognise that some children will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the academy's Behaviour Policy.

5.14 Responding to reports of sexual violence and sexual harassment.

5.14.1 Allegations may be made against children by other children in the academy, which are of a safeguarding nature.

5.14.2 Safeguarding issues raised in this way may include sexual violence, sexual harassment, sexual exploitation, physical abuse, emotional abuse.

5.14.3 We will support and reassure the victims that they are being taken seriously and that they will be supported and kept safe. We will ensure that victims are never given the impression that they are creating a problem or made to feel ashamed by reporting sexual violence or sexual harassment.

5.14.4 We will ensure that we are aware of intra-familial harms and support is provided for siblings following incidents.

5.14.5 Abuse that occurs online or outside of the academy will not be downplayed and will be treated equally seriously.

5.14.6 All staff will be trained in how to manage a report.

5.14.7 The academy recognises that certain children may face additional barriers to disclosure because of their vulnerability, disability, sex, ethnicity and/or sexual orientation and that procedures will ensure that all children are able to report easily.

5.15 Risk Assessment

5.15.1 Where there has been a report of sexual violence the DSL or deputy will make an immediate written risk and needs assessment which will be kept under review and will work to engage with children's social care and specialist services as required.

5.15.2 Action will be taken immediately to protect the victim, alleged perpetrator(s) and other children in the academy. The academy will not wait for the outcome or even the start of any police investigation before taking action to protect the children involved.

5.15.3 Any relevant action under the academy behaviour policy will be considered.

5.15.4 Where there has been a report of sexual harassment the need for a risk assessment will be considered on a case-by-case basis.

5.15.5 The risk and needs assessment will consider:-

- The victim, especially their protection and support.
- Whether there may have been other victims.

- The alleged perpetrator(s).
- All the other children (and, if appropriate adults and staff) at the academy, especially any actions that are appropriate to protect them from the alleged perpetrator(s) or from future Harms.

5.16 Action following a report of sexual violence and/or sexual harassment.

5.16.1 When a report has been received the DSL or deputy will consider the following:

- The wishes of the victim.
- The nature of the alleged incident (s) including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed.
- The ages of the children involved.
- The developmental stages of the children involved.
- Any power imbalance between the children.
- If the alleged incident is a one off or a sustained pattern of abuse.
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers.
- If there are any ongoing risks to the victim, other children, or staff.
- Intra familial harms.
- Support for siblings.
- Other related issues and the wider context including links to CSE and CCE.

5.16.2 Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator(s) and any other children involved or impacted.

5.16.3 The DSL will consider 4 options when managing a report.

- Manage the report internally.
- Provide support through the local Early Help process.
- Make a referral to Children's Social Care
- Report to the police

5.16.4 All concerns, discussions, decisions and reasons for decisions, including rationale for not escalating will be recorded on CPOMS.

5.16.5 The academy will ensure that if a child is convicted or receives a caution for a sexual offence the risk assessment will be updated to ensure relevant protections are in place and needs are being met.

5.16.6 If a report is assessed as being unsubstantiated, unfounded, false or malicious the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been by someone else and that this is a cry for help. In such circumstances the DSL may make a referral to children's social care. An Early Help process may be initiated.

5.16.7 If a report is deliberately invented or malicious, the academy will consider what disciplinary action is appropriate as outlined in the behaviour policy.

5.17 Ongoing response – safeguarding and supporting the victim

5.17.1 The following principles will help shape and decisions regarding safeguarding

and supporting the victim:

- The needs and wishes of the victim will be paramount.
- Consideration of the age and development stage of the victim, nature of the allegations and the potential risk of further abuse.
- The victim will never be made to feel they are the problem or made to feel ashamed.
- Proportionality of response. Support will be tailored on a case-by-case basis.
- A holistic approach with an awareness of health needs associated with sexual assault including physical, mental and sexual health problems and unwanted pregnancy.

5.18 Academy procedures

'any decisions are for the school or college to make on a case-by case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as local authority children's social care and the police as required' (KCSIE Sept 2024 section 470).

5.19 Domestic Abuse and Children

5.19.1 This form of abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

5.19.2 Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

5.19.3 Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

5.19.4 We encourage children to come forward by raising awareness of the issue and teaching the children about health relationships through SRE, the wider curriculum and modelling behaviour in the academy.

5.20 Adolescent to Parent Violent Abuse

5.20.1 APVA is a hidden form of domestic violence and abuse that is often not spoken about. By raising awareness around this issue, we can provide better protection to victims and apply an appropriate safeguarding approach.

5.20.2 What to look out for when a child is witnessing domestic abuse:

- The emotional responses of children who witness domestic violence may include fear, guilt, shame, sleep disturbances, sadness, depression, and anger (at both the abuser for the abuse and at the victim for being unable to prevent the abuse).
- Physical responses may include stomach aches and/or headaches, bedwetting, and loss of ability to concentrate. Some children may also experience physical or
  sexual abuse or neglect. Others may be injured while trying to intervene on behalf of the victim or a sibling.

- The behavioural responses of children who witness domestic abuse may include acting out, withdrawal, or anxiousness to please. The children may exhibit signs of anxiety and have a short attention span which may result in poor academic performance and attendance. They may experience developmental delays in speech, motor or cognitive skills. They may also use violence to express themselves, displaying increased aggression with peers or family. They can become self-injuring.
- If a child discloses that they have witnessed domestic abuse, or an adult linked to a child in the academy discloses that they are being abused, follow the academy safeguarding procedures and report your concern to the Designated Safeguarding Lead.

5.21 Digital Safeguarding (also known as-online safety/E-safety)

5.21.1 It is essential that children are safeguarded from potentially harmful and inappropriate online material. The breadth of issues classified within digital safeguarding is considerable but can be categorised into four areas of risk. These are content, contact, conduct, commerce.

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

5.21.2 We will ensure digital safeguarding is a running and interrelated theme when devising and implementing policies and procedures. This will include considering how digital safeguarding is reflected, as required, in all relevant policies. In addition, we will consider digital safeguarding whilst planning the curriculum, staff training, the role of the DSL and parental engagement.

5.21.3 Whilst the DSL has lead responsibility for digital safeguarding, we will ensure there is support, if required, for operational digital safeguarding and the appropriate technical and safeguarding knowledge, skills and understanding to be able to quality assure systems, policies and processes, train staff and contribute to the safeguarding curriculum is available.

5.21.4 We will keep our digital safeguarding processes and procedures under review through our digital safeguarding group using independent tools.

5.21.5 We are thoroughly committed to improving children’s online safety awareness

at Manor Way Primary Academy Our Technology Acceptable Use policy is signed by all children and staff annually.

5.21.6 If a child, parent/carer or member of staff has a concern relating to online safety children are encouraged to report it. They can report it directly to Miss Buffery at the academy.

5.21.7 Through our regular communication with parents, we will reinforce the importance of children being safe online, explain what systems we use to filter and monitor online use, explain what children are being asked to do online including sites they will be asked to access and who from the academy (if anyone) their child is going to be interacting with online.

5.22 Photography and images

5.22.1 The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

5.22.2 To protect children, we will:

- Seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications).
- Seek parental consent.
- Use only the child's first name with an image.
- Ensure children are appropriately dressed.
- Encourage children to tell us if they are worried about any photographs that are taken of them.
- Remove photographs where requested.
- Only use school equipment when taking photographs of children.
- Comply with GDPR.

5.22.3 Parents, carers or relatives may only take still or video photographic images of children in the academy or on academy-organised activities with the prior consent of the academy and then only in designated areas. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected.
https://www.manorwayprimary.org.uk/our-school/governance-and-policies/policies-and-procedures/

5.23 Filtering and monitoring & Use of AI

5.23.1 The academy will limit children's exposure to risks from the academy's IT system.

5.23.2 The academy has in place appropriate filtering and monitoring systems that are in line with the recommendations in the UK Internet Centre document Appropriate Filtering for Education Settings and in part, by the risk assessment required by the Prevent Duty

5.23.3 The Department for Education's filtering and monitoring standards set out that schools and colleges should:

• identify and assign roles and responsibilities to manage filtering and monitoring systems.

• review filtering and monitoring provision at least annually.

• block harmful and inappropriate content without unreasonably impacting teaching and learning.

• have effective monitoring strategies in place that meet their safeguarding needs.

• schools can use the department's 'plan technology for your school service' to self assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them

5.23.4 Schools will use the DfE published Generative AI: product safety expectations to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

5.24 Sharing of nudes and semi-nudes

5.24.1 All staff will be trained in digital safeguarding and will have a role in educating and protecting children about online harms.

5.24.2 All staff will be available and approachable for children to make disclosures which will then be referred to the DSL for further action.

5.24.3 We will seek to prevent children from online harms through educating them about the laws and potential consequences of activity online.

5.24.4 Digital safeguarding may be addressed through lessons, specialised digital safeguarding sessions, PHSE, flexi-learning weeks and assemblies.

5.24.5 Many professionals may refer to 'nudes and semi-nudes' as:

● youth produced sexual imagery or 'youth involved' sexual imagery.

● indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children under the age of 18.
● 'sexting'. Many adults may use this term, however some children interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images
● Image based sexual abuse. This term may be used when referring to the non consensual sharing of nudes and semi-nudes.

5.24.6 Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism

(Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

5.24.7 In dealing with cases of sending of nudes, semi-nudes etc the response to these incidents will be guided by the principle of proportionality and the primary concern at all times will be the welfare and protection of any children involved.

5.24.8 We will:

- Outline our expectations and explain the rules of having a mobile, tablet or smartphone;
- Ask children what they feel is acceptable to send to other people then discuss appropriate images and the dangers of inappropriate images (listed above);
- Make sure children are comfortable saying no, that they know their body is private and being asked to share explicit images is inappropriate and illegal;
- Explain to children about the importance of trust and consent in a healthy relationships;
- Tell children that it's not ok for someone to make them feel uncomfortable, to pressure them into doing things that they don't want to do, or to show them things that they're unhappy about;
- Tell children what can happen if things go wrong through real life examples such as television programs or news stories as far as possible;
- Ask children about the 'Granny rule' . Would you want your Granny to see the image you're sharing?
- Talk about whether a person who asks for an image from you might also be asking other people for images;
- Discussions about 'revenge' sending of images after relationships have broken down or a friend has done something as a joke and lost control of the image etc.
- Let children know that they can speak to us if this ever happens and that disclosures will be treated confidentially and without embarrassment and support will be given. Staff will react calmly and listen to the concerns of the child and explain that they must share the information confidentially with the DSL;
- Provide details of sources of support and coping strategies if the child finds themselves in an uncomfortable position such as the Zipit App or ChildLine

5.24.9 When a child has been affected by the sending of an explicit image staff will:

- Recognise that if the child has been sending explicit images or videos of themselves, the child may feel anxious talking about this.
- Recognise that they themselves may feel shocked, upset, angry, confused or disappointed while listening to the child.
- Give themselves time to process the information, remembering that the child will be watching their reactions.
- Reassure the child that they are not alone.
- Listen and offer support – they're probably upset and need help and advice, not criticism;
- Not shout or make them feel like it's their fault;
- Will not ask questions like "why have you done it?" as this may stop them from opening up;
- Discuss the problem and the wider pressures that they may face, to help them to understand what's happened and understand any wider safeguarding concerns;
- Assure the child that they will do all they can to help and explain that they will seek the support of the DSL
- Remind them that they can always talk to Childline or another trusted adult if

they are not comfortable talking directly to the staff member.

5.24.10 If a child has shared an explicit image, the DSL or deputy will:

- Ask them who they initially sent it to, their age, and if they know whether it's been shared with anyone else.
- Support the victim to get the images removed by contacting the Internet Watch Foundation.
- Assess the situation for wider safeguarding concerns and agree who will be contacted and when then contact parents/police/CEOP/ as appropriate to the case.
- Contact the Child Exploitation and Online Protection Centre (CEOP) if the image was requested by an adult, as this is grooming which is illegal.
- Contact the DSL at the relevant school if the image was requested by a school aged child not from this academy, to raise awareness of potential wider safeguarding issues or circulation of the image in their school.
- All actions and information to be logged on CPOMS.
- Parents to be contacted as appropriate.

5.24.11 If a child has been sent a sexually explicit image:

- The DSL or deputy should ask them if they know the person who sent it and their age.
- if the image was sent by another child, staff may want to help the child to speak to the sender in order to stop future messages. If the child agrees, staff can also help them to block the sender on social media.
- The DSL will consult the UKIS sharing nudes and semi nudes advice Sharing nudes and seminudes: how to respond to an incident (publishing.service.gov.uk).
- if the image was sent by an adult, staff should contact CEOP, the Child Exploitation and Online Protection Centre, as this may be part of the grooming process.
- All actions and information to be logged on CPOMS.
- Parents to be contacted as appropriate.

5.24.12 Staff must not:

- View, copy, print, share, store or save images.
- Ask a child to share or download images (if you have already viewed the images by accident, you must report this to the DSL).
- Delete the images or ask the child to delete it.
- Ask the child/children who are involved in the incident to disclose information regarding the
- image (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the child it involves or their, or other, parents and/or carers.

5.25 Upskirting

5.25.1 Under the Voyeurism (Offences) Act 2019, upskirting is a criminal offence punishable by up to two years in prison. Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission

and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

5.25.2 Any concerns related to upskirting must be reported to the DSL in line with the reporting process outlined within this policy and where appropriate staff will also consult the behaviour policy.

5.26 Homelessness

5.26.1 Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead is aware of routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

5.26.2 Indicators that a family may be at risk of homelessness include:

- household debt,
- rent arrears,
- domestic abuse and anti-social behaviour,
- as well as the family being asked to leave a property.

5.26.3 In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised that in some cases 16 and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.

5.26.4 Children's services will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

5.27 Children with Special Educational Needs (SEN) and disabilities

5.27.1 Children with SEN and disabilities can be more susceptible to safeguarding risks as:

- Staff may not be able to spot the signs of abuse in children with SEND or assume that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Children with SEND may be prone to peer group isolation and more vulnerable to bullying, coercion and 'grooming' without outwardly showing any signs
- Children with SEND may experience increased feelings of anxiety which prevent them from 'speaking out'
- Some children with SEND rely on adults for personal care, and this vulnerability puts them at greater risk of being harmed or abused
- Children with SEND are more likely to work alone with a single adult, putting them at greater risk of being harmed or abused
- Children with SEND may not be able to recognise that they are being abused

5.27.2 In addition to these increased risk factors, disabled children may have communication difficulties which make it difficult to tell others what is happening to

them. Adults, including professionals assessing their needs and caring for them, may concentrate on the child's special needs and overlook signs and symptoms that they are being maltreated.

5.27.3 All staff must therefore be aware of and extra vigilant to the possible indicators of abuse and/or neglect for disabled children. The designated safeguarding lead should liaise regularly with the special educational needs co-ordinator, the behaviour lead and the attendance lead, maintaining a culture of vigilance and being alert to any relevant new information or concerns.

5.27.4 If staff have a concern for a disabled child they must consider:

- The child's communication needs and how they can communicate effectively with them
- What information in relation to the child disability and special needs staff need to be aware of in order to assess risk of abuse
- What resources staff require in order to undertake an informed assessment of safeguarding risk
- Where child protection issues are considered regarding a child with disabilities, there must be involvement by key professionals who know the child well, including those who have a comprehensive understanding of the child's disability, method of communication, and any associated medical condition.

5.27.5 Schools should consider what specialist advice, guidance and training may be required in order for staff to understand why children with SEND can be more vulnerable to abuse and how to recognise signs of abuse and/or neglect of disabled Children

5.28 Mental Health

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

5.28.2 Only appropriately trained professionals should attempt to make a diagnosis of mental health problems. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing mental health problems or be at risk of developing one.

5.28.3 Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. We will ensure that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

5.28.4 We will ensure that we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

5.28.5 We seek to embed positive mental health and mental health awareness through our academy to create a culture where children can self-identify, signpost peers and seek support themselves. We undertake staff training and promote mental health awareness through the PHSE schemes

https://www.manorwayprimary.org.uk/assets/downloads/subjects/PSHERSESubjectOverview.pdf

5.28.6 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the referral mechanisms listed within this policy and speaking to the designated safeguarding lead or a deputy.

5.29 Children who are lesbian, gay, bisexual, or gender questioning

The DfE expects to publish the revised guidance on gender questioning children this summer. If published, we will signpost to this guidance in September 2025.

5.29.1 A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian,gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

5.29.2 It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

5.29.3 Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

5.30 Restrictive interventions and the use of reasonable force.

5.30.1 Windsor Academy Trust (WAT) is committed to proactively minimising the need for restrictive interventions through early support, prevention, and de-escalation strategies. We believe the use of restrictive interventions, including reasonable force and seclusion, should always be a last resort, used only when lawful and necessary to keep individuals and the wider school community safe. All interventions must be exercised in a manner that is necessary, proportionate, and involves the least amount of force for the shortest possible time. Consideration should be made to the latest reasonable force policy.

5.30.2 All members of school staff have a legal power to use reasonable force (Section 93,

Education and Inspections Act 2006). This power may be used to prevent or stop a student from:

- Causing injury to themselves or others.
- Committing a criminal offence.
- Damaging property.
- Causing disorder among students.

5.30.3 Staff must be aware that the inappropriate or excessive use of force can constitute Physical Abuse.

- Punishment: It is strictly illegal to use force for the purpose of punishment.
- Life-Threatening Techniques: Techniques that affect a student's airway, breathing, or circulation, such as pressure to the neck, abdomen, or covering the mouth/nose are strictly prohibited.
- Ground Restraint: Use of force on the ground is dangerous; if a student is unintentionally held on the ground, staff must release or re-position them as quickly as possible.
- Seclusion: This is a non-disciplinary intervention involving confining a student alone and preventing them from leaving. It must not be used as a punishment and requires specific recording and reporting.

Listed below specific types of intervention as identified by the DfE:

Restrictive intervention: a means to prevent, restrict, or subdue movement of the body, or part of the body, of a pupil. This guidance uses ‘restrictive interventions’ as the umbrella term to describe both physical and non-physical actions aimed to restrain pupils in different ways.

- **Reasonable force**: a term used in legislation which includes physical restrictive interventions. All members of school staff have the legal power to use reasonable force in limited circumstances. Reasonable means using no more force than is necessary for the least amount of time, the application of which will depend on the circumstances.
- **Significant incident**: any incident where the use of force goes beyond appropriate physical contact between pupils and staff as described in ‘Other physical contact with pupils’ within this document. This includes when physical force is used to implement a non-physical restrictive intervention.
- **Seclusion**: a non-disciplinary intervention involving keeping a pupil confined to a place away from others, and preventing them from leaving either by physical obstruction, blocking, or making them believe they will be punished if they try to leave.
- **Restraint**: a term used in legislation referring to a non-disciplinary intervention which immobilises a pupil or limits their movement. This may or may not include direct physical contact. For example, holding a pupil’s arms to their sides or removing a pupil’s crutches would both be considered forms of restraint.

5.30.4 A significant incident is defined as any use of force that goes beyond appropriate physical contact (such as first aid or guiding a student). This ensures transparency and allows the Trust to monitor patterns, identify unmet needs, and support staff welfare.

5.30.5 Reporting to Parents (Statutory Guidance) Schools have a statutory duty to report each significant incident involving the use of force to the student’s parents in writing. This must be done as soon as practicable, ideally on the same day, unless doing so would place the student at risk of significant harm.

5.30.6 Staff likely to need to use restrictive interventions will receive adequate training in safe, lawful use and preventative strategies. Following any incident, students and staff

should receive support and, where appropriate, a medical assessment for any injuries.

5.30.7 This section must be read in conjunction with the school Behaviour Policy, Searching, Screening and Confiscation Guidance, and the Equality Act 2010 regarding students with SEND

Incident proforma

Suggested use by all schools (details included in CPOMS log)

Name of pupil
Name of staff member who used restrictive intervention/positive restraint
Date, time, location, and duration.
Pupil's SEN status (including code)/additional needs or disability.
De-escalation strategies attempted.
Type and degree of force/restriction used.
Justification: Why was it necessary?
Details of any injuries or medical treatment.
Parent(s) notified in writing.
Date and summary notes from parental meeting

6. Attendance

6.1 Unexplainable and/or persistent absences from education is a safeguarding issue and must act as a warning sign to a range of concerns including neglect, sexual abuse, child sexual and child criminal exploitation particularly county lines. It may also be an indication of child-on-child abuse including bullying and sexual harassment or significant mental ill health concerns. It must not be seen as an isolated concern.

6.2 Absence from education may increase known safeguarding risks.

6.3 We have a separate attendance policy (which includes protocols for children missing education and elective home education) in place which references both Working together to improve school attendance which sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns.

6.4 Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

Schools should always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. They should regularly review the alternative provision placements they make.

6.5 We have a named senior leader with strategic responsibility for attendance. Lisa Buffery

6.6 Academy attendance operational leads, in addition to the general safeguarding training that all staff receive are given access to role specific safeguarding training and ensure they understand the safeguarding implications behind poor or non-attendance.

6.7 Academy leaders and governors ensure that attendance data, particularly for identified vulnerable groups, is closely and regularly monitored, identifying trends or patterns which may indicate safeguarding concerns.

6.8 Where appropriate, social workers will be involved, informed and updated about attendance issues.

6.9 Children Missing Education (CME)

6.9.1 Children who go missing from education are at significant risk. Children who are already known to children's social care, who are on a child in need or child protection plan or in the care of the local authority (looked after children) are additionally vulnerable and in need of additional protection.

6.9.2 We will follow the protocols laid out in our attendance policy.

6.9.3 The DSL will ensure the academy response to identifying children missing from education supports identifying potential abuse or exploitation and also prevents them going missing in the future.

6.9.4 The academy will ensure compliance with the guidance and regulations contained in the appropriate sections of the Keeping Children Safe in Education document and Working Together to Improve School Attendance.

6.10 Elective Home Education (EHE)

6.10.1 We will follow the protocols laid out our attendance policy, being mindful that as well as being less visible some of these children are “not in receipt of suitable education”

6.11 Children with medical conditions who cannot attend school

6.11.1 We will follow the protocols laid out our attendance policy

7.Recruitment of staff and volunteers

7.1 The academy will ensure that safer recruitment practices always follow KCSIE and will be adhered to by staff.

7.2 Every interview panel will have at least one member who has a current certificate in safer recruitment. These certificates will be updated every two years. We will check on the identity of candidates, follow up references with referees and scrutinise applications for gaps in employment. We will record the answers to safeguarding questions asked during the interview process on staff personnel files. We will ensure that safeguarding considerations are at the centre of each stage of the recruitment process including carrying out an online search as part of due diligence on shortlisted candidates.

7.3 As part of our due diligence, we will carry out an online search on shortlisted candidates to help identify, through publicly available information, any incidents or issues which can be explored at interview.

7.4 We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our academy.

7.5 We will ensure that any alternative provision facility working with the academy provides us with evidence that they have made the appropriate level of safeguarding checks on individuals working in their provision.

7.6 Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.

7.7 We will ensure that all staff involved in recruitment are aware of government guidance on safer recruitment and that its recommendations are followed.

7.8 The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. The academy will ensure the correct level of DBS certificate is sought and ensure a prohibition check is undertaken.

7.9 The types of checks undertaken will be in accordance with the guidance given in

the Keeping Children Safe in Education (KCSIE) document.

7.10 Any offer of appointment made to a successful candidate (including one who has lived or worked abroad) will be conditional on satisfactory completion of the necessary pre-employment checks as required in the guidance given in the Keeping Children Safe in Education (KCSIE) document.

7.11 Where an enhanced DBS Certificate is required, it will be obtained from the candidate before or as soon as is practicable after the person is appointed.

7.12 The academy will always ask for written information about previous employment history and check that information is not contradictory or incomplete. References will be sought on all shortlisted candidates, including internal ones, before interview (unless the candidate has expressly denied permission for the employer to approach their referees). Where references have been sought, any issues or concerns they raise can be explored further with the referee and taken up with the candidate at interview.

7.13 The academy will keep a single central record in accordance with the regulations given in the Keeping Children Safe in Education (KCSIE) document.

7.14 Recruitment and/or deployment checks will be undertaken as stated in the Keeping Children safe in Education (KCSIE) document.

7.15 The academy will carry out all relevant checks if there are concerns about an existing member of staff and refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

8. Dealing with allegations against staff and volunteers which meet the harms threshold

8.1. The academy holds a comprehensive 'Allegations against staff' policy and a staff code of conduct which outline in detail expected standards of adult behaviour and procedures to take where there are concerns. Where any member of the academy staff or any volunteer has concerns that a person has caused harm or poses a future risk of harm to vulnerable groups, including children they must act in accordance with this academy policy.

8.2. We will prevent people who pose risks to children from working in our academy by ensuring that all individuals working in any capacity at our academy have been subjected to safeguarding checks in line with the statutory guidance Keeping Children Safe in Education.

8.3. At Manor Way Primary Academy we recognise the possibility that adults working in the academy may harm children. Any concerns about the conduct of other adults in the academy should be taken to the Head Teacher without delay (or where that is not possible, to the designated safeguarding lead); any concerns about the Head Teacher should go to a member of the Executive Team who is nominated to be responsible for liaising with the local authority and other partner agencies.

8.4. If for any reason you cannot make a referral through these routes you have a duty to refer directly to the Local Authority Designated Officer (LADO) whom you can

contact here:

- For Yvonne Nelson-Brown – 01384 813110
- For Sukhchandan Kaur – 01384 813066
- General line: 01384 813061

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

8.6. Allegations against staff should be reported to the Head Teacher. Allegations against the Head Teacher or the designated safeguarding lead should be reported to a member of the Executive Team who is nominated to be responsible for liaising with the local authority and other partner agencies

8.7. Where a child makes an allegation against a staff member, supply teacher or volunteer, the allegation will be taken seriously and acted upon immediately and assessed to determine if they meet the 'harms' threshold or can be dealt with under the 'low level concerns' advice in KCSIE. Parents will be contacted as soon as reasonably possible. The child will be offered support and their wishes will be carefully considered before any actions are carried out.

8.8. Under its duty of care for its employees, the academy will ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. The academy will ensure its obligations for confidentiality when an allegation has been made.

8.9. Concerns or allegations that do not meet the harm threshold/low level concerns

8.9.1 The academy holds a comprehensive 'Allegations against staff' policy and a staff code of conduct which can be found on our website and which outline, in detail, expected standards of adult behaviour and procedures to take where there are concerns. Where any member of the academy staff or any volunteer has concerns about a member of staff, they must act in accordance with this academy policy

8.9.2 A low-level concern is described in KCSIE as

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

8.9.3 All staff will be made aware that is it crucial that all low-level concerns are shared responsibly with the Head Teacher or DSL, recorded and dealt with appropriately, to create and embed a culture of openness, trust and transparency in which the school or college's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

9.Training for all staff and children

9.1. Every year all staff (including non-teaching and volunteers) must undertake a variety of Child Protection and Safeguarding training including on KCSIE. This training will be informed by national and local context as well as identified gaps in knowledge and understanding

9.2. Training is recorded and logged. All staff are informed clearly as to how to report anything of concern to Lisa Buffery immediately. See Appendix 1 for a flow diagram of how concerns are dealt with at the academy. In addition all staff must read KCSIE part 1.

9.3. All new members of staff, including newly-qualified teachers and teaching assistants, will be given induction that includes basic child protection training on how to recognise signs of abuse, how to respond to any concerns, online safety, including filtering and monitoring and familiarisation with the safeguarding and child protection policy, behaviour policy, staff code of conduct, systems and processes for CME and Keeping Children Safe in Education: Statutory Guidance for Academies and Colleges, Part One and Annex A, and other related policies.

9.4. The designated safeguarding lead will undergo updated level 3/DSL level child protection training every two years and in addition to formal training, their knowledge and skills will be refreshed at least annually.

9.5. All staff members of the academy will undergo safeguarding and child protection training (whole-academy training) which is regularly updated.

9.6. All governors must undergo governor specific online awareness training at least every two years.

9.7. Staff members who miss the whole-academy training should notify the DSL and will be required to undertake other relevant training to make up for it, e.g., by joining another academy's whole academy training. It is the responsibility of each member of staff to ensure they have completed all mandatory safeguarding training.

9.8. We will ensure that staff members provided by other agencies and third parties, e.g., supply teachers and contractors, have received appropriate child protection training commensurate with their roles before starting work. They will be given the opportunity to take part in whole academy training if it takes place during their period of work for the academy.

9.9. The designated safeguarding lead will provide an annual briefing to the academy on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews. Weekly safeguarding bulletins are sent to all staff.

9.10. The DSL will ensure the academy maintains accurate records of staff induction and training.

10. Establishing a safe environment in which children can learn and develop

10.1. Anti-bullying

10.1.1 We hold a comprehensive anti-bullying policy

10.1.2 At this academy we do the following to raise awareness of bullying and what to do about it
https://www.manorwayprimary.org.uk/assets/downloads/policies-and-procedures/MW-Anti-Bullying-Policy-2024_2025.docx.pdf

10.1.3 If any child / member of staff / parent / carer has a concern about bullying, they should report it to: the student's teacher in the first instance and the Deputy Headteacher if concerns were not dealt with adequately

11. Confidentiality and sharing information

11.1. Staff should only discuss concerns with the designated safeguarding lead, Head Teacher or Executive member (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a need-to-know basis.

11.2. All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that anything being released into the public domain does not compromise evidence.

11.3. Child protection files must be transferred to a new school within 5 days for in year transfers or within the first 5 days of the start of a new term

11.4 Storage and handling of records

11.4.1 Child protection information will be stored and handled in line with the principles set out in the Data Protection Act 1998 and the GDPR (2018) and the academy's Data Protection Policy).

11.4.2 The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information will not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

11.4.3 Any paper record of concern forms and other written information will be stored in a locked facility accessed only by the Head Teacher and Designated Safeguarding Lead. Any electronic information will be password protected and only made available to relevant individuals. Every effort will be made to prevent unauthorised access. Sensitive information will not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive; these items will also be password protected and kept in locked Storage.

11.4.4 Child protection information will be stored separately from the child's academy file and the academy file will be 'tagged' to indicate that separate information is held. If such records need to be sent to a new school or academy they will be sent separately from the child's file and under a confidential cover or in an encrypted electronic file.

11.4.5 Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a child or

parent to see child protection records, they will refer the request to the Head Teacher or Designated Safeguarding Lead. The Data Protection Act does not prevent academy staff from sharing information with relevant agencies, where that information may help to protect a child.

11.4.6 We will ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

11.4.7 being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.

11.4.8 understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

11.4.9 for schools, not providing children's personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious 'harms' test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR.

11.4.10 Further details on information sharing can be found:

- in Working Together to Safeguard Children, which includes a myth-busting guide to information sharing.
- at Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers. The seven golden rules for sharing information will be especially useful.
- The Information Commissioner's Office (ICO), which includes ICO GDPR FAQs and guidance from the department in Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR. When in doubt the academy will contact the WAT Data Protection Officer.

12. Use of academy premises for non-academy activities

12.1. Where the academy premises are hired or rented out the academy leadership will ensure that appropriate arrangements are in place to keep children safe.

12.2. The academy policies will apply where the services or activities are provided by the academy and are under the direct supervision or management of academy staff.

12.3. Where services or activities are provided separately by another body, the governors and academy leadership will seek written assurance that the body concerned has appropriate child protection and safeguarding policies in place

(including inspecting these as needed) and ensure that there are arrangements in place to liaise with the academy on these matters where appropriate.

12.4. This applies whether or not the children who attend any of these services or activities are children on the academy roll.

12.5. The academy leadership and governors should also ensure safeguarding arrangements 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.

12.6. The guidance found in 'Keeping children safe in out-of-school settings' details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

13. Management of the Policy

13.1. The academy will at all times adhere fully to the statutory guidance in place from the Department of Education issued under Section 175 of the Education Act 2002, the Education (Independent Academy Standards) Regulations 2014 and the Education (Non-Maintained Special Academies) (England) Regulations 2011, Current: Keeping children safe in education: Statutory guidance for academies and colleges and the departmental advice: What to do if you are worried a child is being abused – Advice for practitioners (September 2016). Nothing written in this policy overrides the academy's duties under such legislation.

13.2. Board members will oversee the policy, ensure its implementation and review its content on an annual basis.

13.3. The Head Teacher will report on safeguarding activity and progress within the academy to the Head of Safeguarding.

13.4 Feedback on this policy

Staff are encouraged to give feedback to Windsor Academy Trust directly through email at any point in the year ggriffiths@windsoracademytrust.co.uk.

Appendix 1

Raising safeguarding concerns about a child – (this outline cannot cover every eventuality – all cases will keep the best interests of the child at the heart of any decision)

DSL: Lisa Buffery

DDSL: Laura Brettle

Concern put in writing and added as an incident on CPOMS (or placed on paper form in the absence of CPOMS)

Female Genital Mutilation (FGM) appears to have been carried out

Teacher has a statutory duty to report directly to the police and inform the Designated Safeguarding Lead

Concern shared with Safeguarding Team

Designated Safeguarding Lead (DSL) reviews concern and makes a decision about next steps

Prevent and Radicalisation

Inform NAME Single Point of Contact (SPOC) in person within one hour

Call Police immediately/ inform DSL

Decision made to monitor the concern

Decision made to discuss the concern with the parents/carers

Decision made to refer the concern to Social Care
Or
Early Help

DSL to inform Social Care

Class teacher asked to monitor the child and feedback to the DSL within an agreed timescale

Once discussed with Parents, Safeguarding Lead decides to monitor or refer to Social Care

Designated Safeguarding Lead discusses decision with Head Teacher (where necessary) and agrees to refer to Social Care