THINKING SCHOOLS
ACADEMY TRUST

Safeguarding and Child Protection 2026 2027

Policy

Transforming Life Chances

Safeguarding and Child Protection Policy

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Date	Version No	Brief detail of change
July 2025	11	KCSIE updates 2025
July 2024 ….	10	KCSIE updates 2024
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July 2022….	8	KCSIE updates 2022
July 2021….	7	KCSIE updates 2021

Policy Statement:

This policy outlines Thinking Schools Academy Trust approach to Safeguarding and Child Protection.
The Thinking Schools Academy Trust is committed to ensuring consistency, transparency, and fairness in its practices across all schools within the Trust.

Glossary

For this document the following terminology should be considered:

Safeguarding is the overarching term for all actions taken to support children and young people, keep them safe, and promote their welfare. It encompasses the full spectrum of measures to prevent harm, promote wellbeing, and ensure children are able to achieve their best outcomes.

Keeping children safe in education - GOV.UKdefines safeguarding and promoting the welfare of children as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether within or outside the home, including online;
- preventing the impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Child protection, as defined in Working together to safeguard children 2026, refers to the activity undertaken to protect individual children who are suffering, or are likely to suffer, significant harm. This includes timely assessment, intervention, and referral to statutory services where necessary.

Safeguarding extends beyond child protection and includes:

- promoting children's health and wellbeing, including mental health;
- preventing harm from all forms of abuse, neglect, exploitation, or radicalisation;
- ensuring online safety and protection from digital risks;
- early identification and support for children with additional needs (early help);
- addressing risks in the wider environment (contextual safeguarding); and
- listening to children's voices and involving them in decisions affecting their welfare.

Staff refers to all those working for or on behalf of The Thinking Schools Academy Trust, full time or part-time, temporary or permanent, in either a paid or voluntary capacity.

DSL refers to the Designated Safeguarding Lead at the Victory Academy.

Child includes everyone under the age of 18.

Parent refers to birth parents and other adults who are in a parenting role, for example, step-parents, foster carers and adoptive parents.

Extra familial Harm - Extra-familial harm refers to abuse or exploitation occurring outside the family environment.

Contextual safeguarding refers to the approach used to understand and respond to the wider relationships, environments and circumstances in which such harm occurs.

Family Help refers to support provided to children and families as soon as problems emerge. It includes targeted early help and, where appropriate, statutory support provided to children in need under section 17 of the Children Act 1989.

Scope:

This policy applies to:

- All staff (including permanent, temporary, and agency staff).
- Governors and Trustees
- Volunteers and contractors
- Pupils and parents/carers (where applicable)
- All schools within The Thinking Schools Academy Trust

Introduction

At The Victory Academy we are committed to safeguarding children and young people, and we expect everyone who works in our academy to share this commitment. Adults in our academy take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.

We will always act in the best interest of the child.

All staff working in or on behalf of The Victory Academy, including those who do not work directly with children, are expected to read and understand at least Part One of Keeping Children Safe in Education 2026. The academy will ensure that appropriate arrangements are in place to support staff to understand and discharge their safeguarding responsibilities.

Roles and Responsibilities:

- Board of Trustees: Ensures strategic oversight and approves the policy.
- Executive Leadership Team: Implements and monitors compliance across the Trust.
- Headteachers/Principals: Ensure effective local implementation and adherence within each school.
- All Staff: Must read, understand, and follow the policy.
- Designated Safeguarding Lead carry out specialist duties related to the policy

Role	Name
Headteacher/Principal	Mr Oliver Owen
Designated Safeguarding Lead	Mrs Terri Hope
Deputy Designated Safeguarding Lead's	Mrs Jo Miles
Head of Safeguarding Thinking Schools Academy Trust	Mrs L Lucas Telephone: 01634 336535 07970 741 979 Email: l.lucas@tsatrust.org.uk

Regional Safeguarding Lead	Mrs Ann Pullen
Designated Teacher for Looked After and Previously Looked After Children	Mrs Andrea Clarkson
Nominated Academy Safeguarding Governor	Mr Richard Holdsworth
LA Details	Kent & Medway

Staff roles
Designated Safeguarding Lead (DSL)

Our Academy Designated Safeguarding Lead (DSL), Terri Hope, is a substantive member of the academy's Senior Leadership Team, directly line managed by the Head Teacher. They have the authority, time, training, knowledge, experience, skill and resources necessary to fulfil the responsibilities of the role.

During term time, the DSL or an appropriately trained deputy will always be available during academy hours for staff to discuss safeguarding concerns. Robust cover arrangements will be maintained during periods of illness, leave or other absence. These arrangements may include a confidential safeguarding mailbox or another secure communication system monitored by appropriately trained DSLs or deputy DSLs.

Appropriate DSL cover will also be available for academy activities taking place outside normal academy hours or during school holidays. Where necessary, availability may be provided remotely by telephone, video call or another secure means of communication.

The DSL:

- takes lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place at the Academy;
- is provided with the time, funding, training, resources and support necessary to carry out the role effectively;
- maintains oversight of the Academy's safeguarding picture and ensures that deputy DSLs have access to the information required to undertake their responsibilities;
- acts as a source of advice, support and expertise to staff on child welfare, safeguarding and child protection matters;
- has a working knowledge of local safeguarding procedures and acts as a point of contact with the safeguarding partners;
- ensures that all staff have access to and understand the Academy's child protection policy and procedures, with particular attention given to new and part-time staff;
- links with the local safeguarding partner arrangements to ensure staff are made aware of relevant training opportunities and the latest local safeguarding policies and procedures;
- undertakes role-specific training at least every two years, including Prevent awareness training, and refreshes their knowledge and skills at regular intervals and at least annually;

- understands the assessment process for providing Family Help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- understands the relevant referral arrangements for child criminal exploitation, child sexual exploitation, trafficking and modern slavery, including the National Referral Mechanism where appropriate;
- makes, or supports staff to make, referrals to local authority children's social care, the police, the Prevent programme and other relevant agencies, as appropriate;
- ensures that the Academy provides appropriate information and assistance to children's social care and other agencies;
- keeps safeguarding cases under review and ensures that concerns are reconsidered or escalated where risks increase, the child's circumstances do not improve or the support provided is not meeting the child's needs;
- keeps detailed, accurate, secure and up-to-date records of all safeguarding concerns, discussions and decisions, including the action taken, advice received, outcomes and rationale for making or not making a referral;
- ensures that child protection records are stored securely, accessed only by those who need to see them and managed in accordance with data protection and information-sharing requirements; tsat_protection_policy_nov_2025-1.pdf
- ensures that when a pupil leaves the Academy, their child protection file is transferred separately from the main pupil file, through secure means, and that confirmation of receipt is obtained; ensuring that child protection files are transferred within five days of an in-year transfer or within the first five days of the start of a new term;
- considers whether relevant safeguarding information should be shared with a receiving school in advance, particularly where it is needed to assess risk to the child or others and to establish appropriate safety and support arrangements;
- attends and contributes effectively to strategy discussions, child protection conferences, review conferences and other relevant multi-agency meetings;
- coordinates the Academy's contribution to child protection plans, assessments and other multi-agency safeguarding arrangements;
- liaises as appropriate with the Headteacher/Principal, the Multi-Academy Trust, the case manager, the LADO, children's social care, the police and other relevant agencies;
- liaises with relevant Academy staff, including pastoral leaders, the SENCO, attendance staff, IT staff and the senior mental health lead as well as PSHE/RSHE lead, so that children's needs are considered holistically;
- liaises with the senior mental health lead, the Mental Health Support Team where available, and relevant external services where safeguarding concerns are linked to a child's mental health;
- promotes supportive engagement with parents and carers in safeguarding and promoting children's welfare, unless doing so may place a child or another person at increased risk or compromise an investigation;
- understands the circumstances in which a child is entitled to an Appropriate Adult under Code C of the Police and Criminal Evidence Act;
- works with attendance staff and relevant agencies to identify and respond to safeguarding concerns associated with repeated or prolonged absence from education, making referrals where appropriate;
- works with the Headteacher/Principal and relevant strategic leaders to promote the educational outcomes of children who have or have had a social worker;

- promotes a culture in which children are listened to and their wishes and feelings are considered when decisions are made about their safety and welfare;
- ensures that the child protection policy and its implementation are reviewed at least annually and updated regularly in partnership with the governing body or proprietor; and
- ensures that the child protection policy is publicly available and that parents and carers understand the Academy's role in making safeguarding referrals.

Deputy Designated Safeguarding Lead (Deputy DSL)

Our Deputy Designated Safeguarding Lead is Jo Miles.

The Deputy DSL(s):

- are trained to the same standard as the DSL and receive the same regular safeguarding updates;
- support the DSL in carrying out the safeguarding and child protection responsibilities set out in this policy;
- have access to the safeguarding information and systems necessary to discharge their responsibilities effectively;
- act as a source of advice and support to staff on safeguarding and child protection matters; and
- carry out the necessary functions of the DSL during periods of absence to ensure the ongoing safety and protection of pupils.

Where the DSL is absent for a prolonged period, an appropriately trained Deputy DSL will undertake the day-to-day functions of the role in accordance with the academy's agreed cover arrangements.

Although safeguarding duties may be delegated to appropriately trained deputies, the DSL retains ultimate lead responsibility for safeguarding and child protection. This responsibility must not be delegated.

The responsibilities of the DSL and Deputy DSL(s) are clearly set out in the relevant postholders' job descriptions.

The Headteacher/Principal will:

- ensure that the child protection policy and associated safeguarding procedures are understood and implemented consistently by all staff;
- ensure that all staff, including those who do not work directly with children, read and understand at least Part One of *Keeping Children Safe in Education 2026* and receive appropriate support to understand their safeguarding responsibilities;
- allocate sufficient time, funding, training, support and resources, including robust cover arrangements, to enable the DSL and Deputy DSL(s) to carry out their roles effectively, including attending strategy discussions, child protection conferences and other relevant meetings;
- ensure that appropriate and confidential DSL cover arrangements are maintained during illness, leave, other absence and academy activities taking place outside normal academy hours;
- ensure that all staff feel able to raise concerns about poor or unsafe practice and that concerns are responded to sensitively and in accordance with the academy's whistleblowing procedures;
- promote an open and transparent safeguarding culture in which concerns about children and

adults are reported, recorded, reviewed and acted upon promptly;

- ensure that the culture of the academy supports effective pastoral care, universal and community-based Early Help and targeted support through Family Help;
- ensure that staff provide appropriate information and assistance to social workers and other agencies when children's social care becomes involved;
- ensure that pupils are provided with age-appropriate opportunities throughout the curriculum to learn about safeguarding and how to keep themselves and others safe, including online;
- ensure that clear roles and responsibilities are assigned for filtering and monitoring and that the effectiveness of the academy's filtering and monitoring arrangements is reviewed at least once every academic year by the DSL and IT staff or provider, with a record retained of the checks undertaken;
- ensure that appropriate safeguarding due diligence is undertaken before commissioning alternative provision and that placements, provider arrangements and safeguarding risks are kept under regular review;
- ensure that allegations or concerns which may meet the harm threshold concerning staff, supply teachers, trainee teachers, volunteers or contractors are reported to the appropriate case manager and discussed with the Local Authority Designated Officer without delay, and within one working day, before any internal investigation is commenced;
- ensure that low-level concerns about adults working in or on behalf of the academy are reported, recorded and managed in accordance with the academy's Management of Safeguarding Allegations;
- ensure that referrals are made to the Disclosure and Barring Service as soon as possible where the statutory referral criteria are met, including where a member of staff or volunteer is removed from regulated activity or leaves before they can be removed;
- ensure that referral to the Teaching Regulation Agency is considered where a teacher has been dismissed, or would have been dismissed had they not resigned, because of serious misconduct;
- ensure that relevant staff are made aware of the requirements of the Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) Regulations 2018, including their responsibility to disclose relevant information;
- ensure that safeguarding policies, procedures and practice are reviewed regularly and updated in response to changes in statutory guidance, legislation, local arrangements, emerging risks and lessons from safeguarding incidents; and
- provide the governing body with sufficient information and assurance to enable it to scrutinise the effectiveness of the academy's safeguarding arrangements and confirm that those arrangements are implemented in practice.

The role of staff

All staff have a responsibility to provide a safe environment in which children can learn. The Teachers Standards sets out expectations that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils, including those with mental health needs. Any staff member who has a concern about a child's welfare should report this using the referral process on CPOMS. Staff should be prepared to identify children who may benefit from Family Help. School staff are particularly important as they are in a position to identify concerns early, promoting children's welfare and preventing concerns from escalating. The Teachers Standards 2012 states that they should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties

All staff will reassure children and young people that they are being taken seriously and that they will be supported and kept safe. No child or young person should ever be given the impression that they are creating a problem by reporting abuse, neglect, exploitation, sexual violence or sexual harassment. Nor should they ever be made to feel ashamed for making a report.

The Governing Bodies will:

Governing bodies and proprietors have strategic leadership responsibility for the Academy's safeguarding arrangements and must ensure that they comply with their duties under legislation.

- All governors and trustees receive appropriate safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction which will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding. This training is updated on an annual basis.
- Governors ensure that the academy safeguarding, recruitment and managing allegations procedures also consider the procedures and practice of the Local Authority, local safeguarding partnership and national guidance.
- Academy lettings policy will seek to ensure the suitability of adults working with children on Academy sites at any time.
- Community users organising activities for children are aware of the Academy Child protection guidelines and procedures.
- Governors consider how children may be taught about safeguarding. This may be part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (PSHE) and/or through sex and relationship education (RSE) including online safety.
- An enhanced DBS check is in place for Chairs of Regional Governing Bodies. The Chair of Directors is counter signed by the Secretary of State.
- Compliance with the requirements of the Counter Terrorism and Security Act to have due regard for the need to prevent people being drawn into terrorism and will act in accordance with its "Prevent" duty. This will include promoting British Values and building resilience to radicalisation, all staff completing Prevent training in order they can identify the signs of children being radicalised, working together with social care and Police Prevent Engagement Officer and referring as appropriate, the young person to the Channel Panel under the Prevent strategy *The Prevent Duty*
- Governing bodies and proprietors are aware of their obligations under the Human Rights Act 1998 21, the Equality Act 201022, (including the Public Sector Equality Duty23), and their local multi-agency safeguarding arrangements

The Governance Body/Head Teacher is accountable for ensuring the effectiveness of this policy and school compliance. The Governance Director Board has a named champion within Safeguarding; this is Mr A Minchin (Governance Safeguarding Lead)

Staff training

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern. All members of staff are trained

in and receive regular updates on safeguarding children and young people including e-safety, online abuse, Child Sexual Exploitation, FGM, Domestic Abuse to name but a few, as well as how and who to report concerns.

New staff, volunteers and governors will receive a briefing during their induction, which includes the Academies child protection policy and staff behaviour policy, reporting and recording arrangements, and details for the DSL. All staff, including the DSL, Headteacher (unless the Headteacher is the DSL) and governors will receive training that is regularly updated. All staff will also receive a wide range of comprehensive safeguarding and child protection updates, including Online safety, via email, weekly bulletins, website access and staff meetings throughout the year.

Staff understand the difference between a 'concern' and 'immediate danger or at risk of harm' ensuring appropriate action is taken through whole school safeguard training and fortnightly safeguarding bulletins. All members of staff, volunteers and governors know how to respond to a pupil who discloses abuse through delivery of whole school safeguard training.

Staff will be required to confirm that they have received, read and understood the relevant safeguarding guidance, policies and training. The academy will provide additional training, guidance or support where a member of staff requires further help to understand or discharge their safeguarding responsibilities.

Allegations against staff, including supply teachers, volunteers and contractors

All Academy staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

If an allegation is made, or information is received, the member of staff receiving the allegation or aware of the information, will immediately inform the Headteacher/Principal.

If the allegation made to a member of staff concerns the Headteacher/Principal, the person receiving the allegation will immediately inform the CEO, who will contact the LADO where threshold to do so has been met, without notifying the Headteacher/Principal first.

If an allegation is made about a member of the Proprietor Body, the person receiving the allegation will immediately inform the CEO, who will contact the LADO where threshold to so has been met.

If an allegation is made regarding the CEO, the person receiving the allegation will immediately inform the Chair of Directors, who will contact the LADO where threshold to so has been met.

When an allegation is made against a member of staff, our set procedures must be followed.

On all such occasions where the threshold for LADO has been met, the content of the allegation will be discussed with the Local Authority Designated Officer (LADO).

Low level concerns

As part of our whole school approach to safeguarding, The Victory Academy promotes an open and transparent culture in which all concerns about adults working in or on behalf of the Academy are dealt

with promptly and appropriately. The term 'low level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold as set out in KCSIE. A low-level concern is any concern – no matter how small and even if no more than causing a sense of unease or a 'nagging doubt' that an adult working in or on behalf of the Academy may have acted in a way that:

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

Low level concerns should be reported to the Head Teacher/Principal/DSL.

Further information on the low-level concerns can be found with the code_of_conduct_2425_1.pdf

All low-level concerns will be recorded in writing and retained securely. Records will include details of the concern, the context in which it arose, the decision reached, the reasons for that decision and any action taken.

Low-level concerns will be reviewed periodically to identify any patterns of inappropriate or concerning behaviour. Where a pattern is identified, the Academy will consider whether the matter should be managed under disciplinary procedures, whether the harm threshold may be met, whether the LADO should be consulted, or whether wider policy, practice, culture or training issues need to be addressed.

Other Adults

In some circumstances, the Academy may have to consider an allegation against an individual not directly employed by the Academy. In these circumstances, we will ensure that the allegation is dealt with properly. The employer of that person will be informed as will the LADO where threshold to do so has been met. The Academy will take the lead in protecting children, establishing the immediate facts and managing the safeguarding process. The agency, employer or training provider will normally lead any related employment, disciplinary or training process.

The Academy will not cease to use the services of a supply teacher, trainee teacher or contractor solely as an alternative to properly considering and managing a safeguarding concern or allegation. KCSIE 2026 expressly extends Part Four to trainee teachers and clarifies the shared responsibilities between schools and third-party organisations.

Allegations concerning staff who no longer work at the Academy or historical allegations will be reported to the Police and LADO as applicable.

All staff should be aware of their duty to raise concerns about the attitude and actions of colleagues. The vast majority of adults who work with children in education settings act professionally and seek to provide a safe and supportive environment, which secures the wellbeing and very best outcomes for children and young people in their care. Much relies on pupil and staff interactions where tensions and misunderstandings can occur. Allegations may be genuine, malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned.

Whistle blowing if you have concerns about a colleague

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation, and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. whistleblowing_policy_-_sept_26.pdf

enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place and is available on the website.

The NSPCC whistle-blowing helpline number 0800 028 0285. 8:00 AM to 8:00 PM, Monday to Friday NSPCC dedicated-helplines/whistleblowing-advice-line/

General guidance on whistleblowing can be found via https://www.gov.uk/whistleblowing

Safer recruitment

Our Academy complies with the requirements of Keeping Children Safe in Education 2026 and the arrangements of the local safeguarding partners. We operate safer recruitment procedures to help deter, reject or identify people who may pose a risk of harm to children.

The Academy will carry out all required pre-appointment checks and will verify, as appropriate, an applicant's identity, right to work in the UK, qualifications, employment history, references, mental and physical fitness, criminal record information and suitability to work with children.

- At least one member of each recruitment panel will have completed safer recruitment training.
- The academy obtains written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work in the academy have been appropriately checked.
- Trainee teachers will be checked either by the Academy or by the training provider, from whom written confirmation will be obtained.
- The academy maintains a single central record of recruitment checks undertaken.
- The Academy will not knowingly allow a barred person to engage in regulated activity with children.
- Where a trainee teacher is fee-funded, the training provider will be responsible for undertaking the required checks. The Academy will obtain written confirmation that the checks have been completed and that the trainee has been judged suitable to work with children.

All new employees (involved in early year's settings and/or before or after school care for children under eight) are made aware of the 2018 Childcare Disqualification Regulations and their obligations to disclose relevant information to the school, during the appointment process.

Abuse of position of trust

All Academy staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

Staff understand that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of

the school staff and a pupil under 18 may be a criminal offence.

The Staff Behaviour Policy/Code of Conduct states our expectations of staff. It is signed by all staff.

Volunteers

Volunteers, including governors, will undergo checks commensurate with their work in the school, their contact with pupils and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised. Where the statutory criteria are met, the Academy will make a referral to the Disclosure and Barring Service in relation to a volunteer who is removed from regulated activity, or who ceases volunteering before they can be removed

Contractors

The school checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the school's day.

The Academy will:

- obtain written confirmation from the contractor's employer that the appropriate checks have been completed;
- check the identity of contractors and third-party staff when they arrive at the Academy; and
- ensure that the individual presenting for work is the same person on whom the checks were completed.

Where a self-employed contractor is engaged, the Academy will obtain the appropriate check directly or verify that the individual holds a suitable and eligible check at the required level.

Where the Academy directs a pupil to attend alternative provision, it will obtain written assurance that adults working with pupils have undergone the appropriate safer recruitment checks. This assurance does not remove the Academy's responsibility to undertake its own safeguarding due diligence and keep the placement under review.

Site security and visitors

School has developed a system in-line with guidance below to ensure that Regulated activity with children - GOV.UK and staff supervision is understood across the school. The identification of volunteers, students, visitors can be clearly identified by our visitor system.

Visitors to the school, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. Any individual who is not known or identifiable should be challenged for clarification and reassurance. Academies have a responsibility for identifying approved adults who are collecting children from school.

All visitors are expected to observe the school's safeguarding and health and safety regulations. The Headteacher will exercise professional judgement in determining whether any visitor should be escorted

or supervised while on site. The Academy will not accept the behaviour of any parent or individual that threatens the Academy security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in the decision to refuse access to the Academy site for that individual. See the Trust Parent/Career Conduct Policy.

All staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. We operate within a whole-community ethos and welcome comments from pupils/students, parents and others about areas that may need improvement as well as what we are doing well. Our lettings policy will seek to ensure the suitability of adults working with children on Academy sites at any time. Community users organising activities for children are aware of the Academy child protection guidelines and procedures provided as part of the letting arrangement.

The Single Central Record

Under KCSIE, schools must record all staff on the Single Central Record (SCR). This includes all salaried employees, teacher trainees, agency workers, and third-party supply staff (even if working for a single day). Additionally, all governors/trustees and any volunteers subject to vetting checks must be recorded.

Our Single Central Record is recorded in such a way that allows for details of each individual academy to be provided separately, and without delay, to those entitled to inspect that information, including by inspectors. It is audited on a regular basis by the Headteacher/Principal, Chair of the RGB and TSAT Safeguarding Team.

Extended Academy and off-site arrangements

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the Academy, our own child protection policy and procedures apply. If other organisations provide services or activities on our site on behalf of our Academy, we will check that they have appropriate procedures in place, including safer recruitment procedures. When our pupils attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection arrangements are in place.

Any lettings arrangements that include services to children, the Governing Body/Proprietor will seek written assurances regarding appropriate safeguarding and child protection policies and procedures in place. Any failure to comply would lead to termination of the agreement. Terms and conditions are written into agreements to ensure the requirements for the safety and wellbeing of all children are adhered to.

The Victory Academy may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, The Victory Academy will follow the safeguarding policy and procedures, including informing the LADO.

Sport, toilets, changing facilities and showers

The Academy will manage participation in sport and the use of toilets, changing rooms and showers in accordance with Keeping Children Safe in Education 2026, the Equality Act 2010, the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014.

Where the nature of a sport means that physical strength, stamina or physique creates a safety or competitive disadvantage, pupils may be grouped according to biological sex. Where single-sex provision is necessary for safety, no exceptions will be made. In other circumstances, requests concerning participation will be considered individually, taking account of safety, fairness, the welfare and best interests of the child and other children, and the Academy's equality and human rights duties.

The Academy will provide separate toilet facilities for boys and girls where required by law. Pupils will not use toilets designated for the opposite biological sex. Where a pupil does not wish to use the facilities designated for their biological sex, the Academy will consider whether a suitable self-contained individual facility can be provided without compromising the safety, privacy, comfort or dignity of that pupil or any other child.

Pupils aged 11 or over at the start of the school year will not be required or permitted to undress in front of pupils of the opposite biological sex and will not use changing or shower facilities designated for the opposite sex. Where necessary, the Academy will consider an alternative fully enclosed facility or use of the facilities at a different time.

Any individual arrangements will be clearly recorded, communicated to relevant staff on a need-to-know basis and reviewed regularly.

Residential visits and sleeping arrangements

All residential visits, exchanges, sports tours, camps and other overnight activities will be subject to a documented safeguarding and educational-visits risk assessment.

Children will not share overnight accommodation with children of the opposite biological sex. This applies to shared bedrooms, dormitories, tents and other communal sleeping arrangements.

Where a child does not wish to share accommodation with children of the same biological sex, the Academy will consider whether suitable separate accommodation can reasonably be provided. Any alternative arrangement must preserve the safety, privacy, comfort and dignity of the child and all other children.

Sleeping arrangements will be agreed and documented before departure and will not be changed informally by individual staff during the visit. Any safeguarding concern arising during a residential activity will be reported to the visit leader and DSL without delay.

Physical Intervention/Use of Reasonable Force

There are circumstances when it may be appropriate for staff to use reasonable force to safeguard pupils. This covers a range of actions used by staff that involves a degree of physical contact to control or restrain children.

'Reasonable' in these circumstances means 'using no more force than is needed' and for 'the least amount of time'. Key staff have been trained in Positive Handling and will only exercise this duty when all de- escalation or distraction strategies have failed and as a last resort or in an emergency situation to prevent serious harm.

Positive and proactive support, including individual behaviour or risk-reduction plans agreed with parents or carers where appropriate, will be used to reduce the likelihood that restrictive intervention becomes necessary.

The Academy will not operate a blanket "no contact" policy, as this could prevent staff from appropriately supporting or protecting pupils. Decisions about physical contact or reasonable force will be based on professional judgement, the law and the individual circumstances.

Additional care will be taken where an incident involves a child with special educational needs or disabilities, a mental health need or a medical condition. Staff will consider the child's additional vulnerability, any reasonable adjustments required and the Academy's Public Sector Equality Duty

Any use of reasonable force or restrictive intervention will be recorded and reviewed in accordance with the Academy's Behaviour Policy. Where an incident raises concern about possible abuse, inappropriate practice or harm to a child, it will also be managed under this child protection policy.

DfE Use of Reasonable Force

Seclusion

Seclusion - a non-disciplinary intervention involving keeping a pupil confined to a place away from others and prevented from leaving - should only be used as a safety measure to protect others from harm when a pupil is experiencing high levels of emotional or behavioural dysregulation. In such circumstances, the pupil is not acting with intent. Seclusion should not be implemented by staff through threat of punishment.

The place to which the pupil is confined should be safe and not feel threatening or intimidating to the pupil. The pupil should be supervised at all times during the period of seclusion. As soon as the immediate risk of harm has reduced, the pupil should be allowed to leave.

An incident involving the use of seclusion must be recorded and reported in accordance with the procedures outlined in the Academy Behaviour Policy. Seclusion is not a disciplinary response to deliberate or willful misbehaviour. There are disciplinary measures that are similar, such as removal from the classroom.

Teaching our pupils about safeguarding

We recognise that the Academy plays a significant part in the prevention of harm to our children by teaching pupils about safeguarding including online, providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection. School staff are particularly important as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. This includes regular consultation with children e.g., through safety questionnaires, participation in anti-bullying week, asking children to report whether they have had happy/sad lunchtime.

At The Victory Academy, pupils are taught through various teaching and learning opportunities, as part of providing a broad and balanced curriculum, which equips children with the skills they need to stay safe from harm. Children are taught to recognise when they are at risk and how to get help when they need it.

Children who have or have had a social worker and educational outcomes

At The Victory Academy, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

We take these needs into account when making plans to support pupils who have a social worker.

The knowledge that a child has, or has previously had a social worker, will routinely inform decisions about attendance, pastoral provision, academic support and responses to absence.

The DSL will work with the Headteacher/Principal, the designated teacher and relevant strategic leads to promote the educational outcomes of children who have, or have had, a social worker including Children in Care.

The DSL will understand the welfare, safeguarding and child protection issues affecting these children and consider the impact that these experiences may have on their attendance, engagement, behaviour, progress and achievement.

This will include:

- maintaining an up-to-date overview of children who have, or have had, a social worker, including their attendance, progress and attainment;
- promoting a culture of high expectations and aspirations for these children;
- supporting teaching and pastoral staff to provide appropriate academic support, pastoral intervention and reasonable adjustments;
- recognising that the impact of abuse, neglect or other adverse experiences may continue after statutory social care involvement has ended; and
- working with children's social care, the Virtual School Head and other relevant professionals, where appropriate, to improve attendance, engagement and educational outcomes.

Looked after (and previously looked after) children

The most common reason for children becoming looked after is as a result of abuse or neglect. Leaders ensure that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about individual children's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child.

The designated teacher for children in care and children who have previously been in care is Andrea Clarkson**.** Andrea Clarkson is a qualified teacher. They will work with the Virtual School Head's in supporting attendance and support their non-statutory role relating to children in kinship-care arrangements.

The designated teacher for children in care and the DSL have details of the child's social worker and the name and contact details of the Local Authority's virtual head for children in care.

Care Leavers

The Local Authority have on-going responsibilities to young people who cease to be looked after and become care leavers aged 16 or 17. A Personal Advisor should be appointed to develop a pathway plan with the young person describing how the care leaver will be supported to participate in education. The DSL therefore must ensure they have the details of the LA Personal Advisor and liaise with them as necessary.

Private fostering arrangements

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

Where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL and the Academy should notify the Local Authority of the circumstances.

Young carers

Young carers may experience additional pressures as a result of providing care or support to a family member. These responsibilities may affect their attendance, punctuality, attainment, behaviour, emotional wellbeing and ability to participate fully in academy life.

The Academy will seek to identify young carers at an early stage and will ensure that staff remain alert to indicators that a child may have caring responsibilities.

Where a young carer is identified, the Academy will:

- consider appropriate pastoral support and reasonable adjustments;
- work with the child and their family to understand their needs;

- monitor the impact of caring responsibilities on attendance, progress and wellbeing; and
- make referrals to relevant local young carer services or other agencies where additional support is required.

Extra-familial harms (aka. Contextual Safeguarding)

Extra-familial harm refers to abuse or exploitation that occurs outside a child's family environment. Contextual safeguarding is the approach used to understand and respond to the wider relationships, environments and circumstances in which such harm may occur.

Leaders will assess the risks and issues within the Academy and the wider community when considering the safety and wellbeing of pupils. These risks may include:

- child sexual exploitation and sexual harassment;
- abuse within children's intimate relationships, including physical, sexual or emotional abuse and stalking;
- child criminal exploitation, including county lines and financial exploitation (;
- serious youth violence, gang involvement and threats involving weapons;
- radicalisation; and
- online abuse, exploitation and harmful digital content.

The Academy will also identify and respond to risks that are specific to its local context, including particular locations, peer groups, times of day, transport routes and online environments. These risks will inform safeguarding practice, staff training, the curriculum and partnership work with parents, the police, children's social care and other relevant agencies.

Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. This may be in exchange for something the child needs or wants, for the financial advantage or increased status of the perpetrator or facilitator, or through violence or the threat of violence.

Children may be drawn into exploitation through apparent friendship or affection, gifts, money, drugs, alcohol, accommodation or the promise of status or belonging. Exploitation may occur over time or as a one-off incident and may take place without the child's immediate knowledge, including through the creation or sharing of images online.

Children cannot consent to their own exploitation. A child may not recognise that they are being exploited, may believe they are in a genuine relationship, or may be criminalised for actions undertaken under coercion.

Exploitation may be committed or facilitated by an individual, organised network or gang. It may also involve trafficking or constitute modern slavery and may require consideration of a referral through the National Referral Mechanism.

We include the risks of child sexual exploitation within the PSHE and RSE curriculum.
All staff are made aware of the indicators of child sexual exploitation and must report any concerns immediately to the DSL.
Further information is available here:

Child sexual exploitation

Resources for education settings | CSA Centre

Preventing Child Sexual Exploitation | The Children's Society

Criminal exploitation of children and County Lines

Child criminal exploitation (CCE) occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal activity. This may be in exchange for something the child needs or wants, for the financial advantage or increased status of the perpetrator or facilitator, or through violence or the threat of violence.

CCE may be committed or facilitated by an individual, organised criminal network or gang. Children may be forced or manipulated into transporting drugs or money, working in cannabis factories, shoplifting, pickpocketing, committing vehicle crime or threatening or committing serious violence.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile telephone lines or another form of “deal line”. This activity may take place locally or across the UK. Children and vulnerable adults may be exploited to move, store or sell drugs and money.

Gangs may establish a base within the home of a vulnerable person through force or coercion. This is commonly referred to as “cuckooing”. Children may also be recruited and exploited online through social media and other digital platforms.

Children may become trapped through threats of violence, intimidation, manufactured drug debts or threats against their families. They may be coerced into carrying weapons or may begin carrying a weapon because they believe it will protect them from harm.

A child cannot consent to being exploited, abused or trafficked. Criminal exploitation may have occurred even where the activity appears voluntary or the child identifies as belonging to the group involved. Children who are criminally exploited must be recognised and treated as victims, including where they have committed offences as a result of coercion.

CCE may involve trafficking and constitute modern slavery. Where a potential victim is identified, the Academy will follow its child protection procedures and consider a referral through the National Referral Mechanism, alongside any referral to children’s social care or the police.

Staff will remain alert to indicators of CCE and county lines and must report any concerns immediately to the DSL.

Further information is available here:
gangs-and-youth-violence and criminal exploitation of children and county-lines

Home Office Child missing from home or care; Drugs County Lines Toolkit For Professionals

Serious violence

Serious violence is a safeguarding concern and may involve physical assault, carrying, threatening with or using weapons, often in the context of peer conflict, bullying, gang involvement or criminal exploitation.

Staff will remain alert to indicators that a child may be at risk of, or involved in, serious violence.

These may include:

- increased or unexplained absence from education;
- changes in friendships or relationships with older individuals or groups;
- a significant decline in educational performance;
- signs of assault, unexplained injuries or self-harm;
- significant changes in behaviour or wellbeing;
- unexplained gifts, money or new possessions;
- involvement in peer conflict, gangs or criminal networks; or
- carrying a weapon, threatening to use a weapon or expressing an intention to do so.

The risk of serious violence may be increased for children who have experienced disrupted education, including repeated suspensions, permanent exclusion or time in alternative provision, or who have a history of offending. Staff will also remain alert to periods when children may be at increased risk, including immediately before or after the Academy day.

Any concern that a child is carrying, using or threatening to use a weapon, or intends to do so, must be reported immediately to the DSL or a Deputy DSL.

The DSL will assess the risk to the child and others, taking account of all available safeguarding and contextual information.

Depending on the level of risk, the Academy will:

- put in place an appropriate safety and support plan;
- take action to de-escalate peer conflict;
- consider the safety of other pupils and staff;
- share relevant information with children's social care, the police and other agencies; and
- provide or seek early, evidence-based support, including access to trusted adults, mentoring, therapeutic support or other targeted interventions.

Where a child is in immediate danger, or a weapon is present, staff will contact the police without delay.

Radicalisation and Extremism

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.

Safeguarding information connected with a Channel or Prevent concern will be shared with the police and other appropriate partners.

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.

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

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the Designated Safeguarding Lead (or deputy) making a Prevent referral.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the academy 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.

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online, so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

Academy staff receive training to help to identify signs of extremism.

Opportunities are provided through the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and leaders follow the DfE advice *Promoting fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools* (2014).

Visiting Speakers

The Prevent Duty sets out an expectation of clear protocols for ensuring that any visiting speakers are suitable and appropriately supervised. This includes a formal procedure for inviting speakers which involves approval by the Headteacher/Principal, appropriate checks on the suitability of the person, documented agreement that they understand they must abide by the Academies equality commitments including no statements that might cause offence to others or undermine tolerance of faiths or beliefs and no extremist material. Academy staff will know the content of the presentation before the event. Staff will bring any presentation that proves to be unsuitable will be brought to an early end by staff. Any presentation to raise funds will be with written permission by the Headteacher/Principal only. Normal visitor to the Academy procedures will be followed.

Police and Criminal Evidence Act (1984) – Code C

The Designated Safeguarding Lead (and deputy) are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code.
PACE also states that if at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMS.

If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The appropriate adult' means, in the case of a child:

1. the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
2. a social worker of a local authority
3. failing these, some other responsible adult aged 18 or over who is not:

a) a police officer;

b) employed by the police;

c) under the direction or control of the chief officer of a police force; or

d) a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the Statutory guidance - PACE Code C 2019.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them, or for crimes they have witnessed. The families of children may also be subject to child arrangements processes through the family court system.

We recognise that both circumstances may be stressful for children and appropriate support will be provided in line with local and national guidance.

Children absent from education

Knowing where children are during Academy hours is an important aspect of safeguarding. Repeated or prolonged absence from education may be an indicator of abuse, neglect or exploitation, including child criminal exploitation, child sexual exploitation, trafficking, modern slavery, serious violence, forced marriage or female genital mutilation.

The Academy will monitor attendance carefully and respond promptly to unexplained, repeated or prolonged absence. Particular consideration will also be given to children who:

- are repeatedly absent during parts of the Academy day;
- have experienced repeated classroom removal or multiple suspensions;
- are placed on a part-time timetable;
- are at risk of permanent exclusion; or
- fail to take up an allocated school place.

The Academy will:

- ensure that staff understand their responsibilities for responding to absence from education;
- maintain clear procedures for following up unexplained absence and escalating safeguarding concerns;
- make reasonable enquiries to establish a child's whereabouts and safety;
- work with parents, the local authority, children's social care, the police and other agencies where appropriate;
- notify the local authority where required under the relevant attendance and admission-register regulations; and
- follow the Academy's attendance and children-missing-education procedures when a pupil's whereabouts cannot be established.

When a pupil leaves the Academy, we will take reasonable steps to identify their destination, record the

name of the receiving school and expected start date, and transfer safeguarding information securely in accordance with this policy.

Staff must remain alert to patterns of absence or changes in attendance that may indicate a wider safeguarding concern. Where the relevant threshold is met, concerns will be referred to children's social care or the police.

Parents and carers are expected to provide the Academy with at least two current emergency contact numbers and to notify the Academy promptly of any changes.

Children and online harm

When children use the Academy's network to access the internet, they are protected through appropriate filtering and monitoring systems. However, pupils may also access online content through personal devices, mobile data and applications that are not controlled by the Academy.

Online and offline safeguarding risks are often connected. These may include harmful content or contact, child-on-child abuse, exploitation, cybercrime, misogynistic or harmful online influences, generative artificial intelligence, deepfakes and the creation or sharing of AI-generated sexual imagery.

Where pupils use Academy devices or systems, appropriate supervision will be provided and the effectiveness of filtering and monitoring arrangements will be reviewed regularly.

Where staff have concerns they must be reported to the DSL and managed in accordance with this policy, including referral to children's social care or the police where appropriate.

Online safety away from the academy

Online teaching and communication with pupils will follow the same safeguarding principles and professional standards that apply to face-to-face contact. Staff must comply with the Staff Code of Conduct, and any approved remote-learning procedures.

The Victory Academy will ensure that online learning tools and systems are approved, secure and used in accordance with data protection and privacy requirements.

Staff will:

- use only platforms and accounts approved by the Academy;
- maintain appropriate professional boundaries and language;
- ensure that online sessions are conducted in a suitable and professional manner;
- follow Academy procedures for one-to-one communication and online lessons;
- record relevant details of sessions where required; and
- report any safeguarding concern arising during online contact without delay.

All staff who interact with children online must continue to look out for signs that a child may be at risk. Any concern will be managed in accordance with this child protection policy and referred to children's social care or the police where appropriate.

Mobile phones and generative artificial intelligence

The Academy will operate as a mobile phone-free environment by default. Pupils will not have access to mobile phones during lessons, movement between lessons, breaktimes or lunchtimes. Any exception must be authorised and documented in accordance with the Academy's Mobile Phone Policy, for example where access is required because of a medical need, disability or other exceptional circumstance.

Safeguarding concerns involving mobile phones, personal devices, mobile data, messaging applications, image sharing, online harassment or access to harmful content will be reported to the DSL and managed under this policy.

Only generative artificial intelligence systems approved by the Academy may be used for Academy purposes. Their use will be subject to appropriate safeguarding, data-protection, confidentiality, ethical and intellectual-property controls.

Staff and pupils must not enter confidential or identifiable information about a child into a generative AI system unless its use has been expressly authorised and the Academy is satisfied that appropriate data-protection safeguards are in place.
Harmful interactions with generative AI applications, AI-generated explicit imagery, deepfakes, manipulation, bullying or any other AI-related safeguarding concern must be reported to the DSL without delay.

Artificial Intelligence (AI) Wearables and Emerging Technologies

The Academy recognises that rapidly developing Artificial Intelligence (AI) technologies, including AI-enabled wearables such as smart glasses, smart watches, body-worn devices, audio recording devices and similar technologies, may present safeguarding, privacy, behaviour and security risks within educational settings.

The inappropriate use of AI wearables may:

- Record, capture or transmit images, audio or video without the knowledge or consent of others.
- Facilitate bullying, harassment, intimidation or online abuse.
- Breach an individual's privacy, dignity or confidentiality.
- Enable the collection, sharing or misuse of personal or sensitive information.
- Be used to generate, manipulate or distribute misleading, inappropriate or harmful content.
- Support academic dishonesty, malicious behaviour or activities that place pupils, staff or visitors at risk of harm.
- Increase the risk of child-on-child abuse, exploitation, coercion or other safeguarding concerns where technology is used to target, monitor or intimidate individuals.

Where AI-enabled devices are used inappropriately, the school will consider this a safeguarding concern and respond in accordance with the Behaviour Policy, Child Protection and Safeguarding Policy, Staff Code of Conduct and relevant data protection requirements.

All members of the school community are expected to:

- Use technology responsibly, ethically and lawfully.
- Respect the privacy, safety and dignity of others.
- Report any concerns regarding the misuse of AI-enabled devices immediately to a member of staff.
- Comply with school expectations relating to recording, photography, communication and digital conduct.

Staff must remain vigilant to the evolving risks associated with AI technologies and report any safeguarding concerns through established safeguarding procedures. Where the misuse of AI wearables presents a risk of significant harm, criminal behaviour, exploitation, harassment, image-based abuse, or other safeguarding concerns, appropriate referrals will be made to statutory agencies and/or the police.

The Designated Safeguarding Lead (DSL) will ensure that emerging technology risks, including AI-enabled wearables, are considered within safeguarding training, risk assessments, online safety education, behaviour management processes and the school's safeguarding arrangements.

Filtering and Monitoring

Filtering and monitoring systems are essential to safeguarding children at The Victory Academy. We will take all reasonable steps to minimise pupils' exposure to harmful and inappropriate content through the Academy's IT systems and internet-connected devices.

The Academy uses the following filtering and monitoring system: Smoothwall and Classroom Cloud.

Clear roles and responsibilities are assigned for the management and oversight of filtering and monitoring.
The Academy's eSafety/Online Safety Lead is the DSL: Terri Hope.

- The effectiveness of the Academy's filtering and monitoring arrangements will be reviewed at least once every academic year. Checks will cover all relevant internet-connected devices and locations, and a record of the review, findings and any actions taken will be retained.

- The Academy will ensure that its systems block access to harmful and inappropriate content, including content associated with abuse, exploitation, violence, extremism, pornography, self-harm and AI-generated sexual imagery, while avoiding unreasonable restrictions on teaching and learning.

- Monitoring arrangements will reflect the Academy's safeguarding risks and enable concerns to be identified and acted upon promptly. Staff will understand their responsibilities for reporting concerns, and any safeguarding information identified through monitoring will be referred to the DSL and managed in accordance with this policy.

Children and Young People who may be particularly vulnerable

Some children may be at greater risk of abuse, neglect or exploitation, or may face additional barriers to recognising or reporting harm. Factors may include prejudice and discrimination, isolation, dependency on adults, communication difficulties and assumptions that indicators of abuse relate to a child's disability or additional needs.

To ensure that all pupils receive appropriate protection and support, we will give particular consideration to children who:

- are disabled, have special educational needs or certain medical conditions;
- are young carers;
- are pregnant or are parents themselves;
- are affected by parental substance misuse, domestic abuse, parental mental health needs or parental offending;
- are asylum seekers or refugees;
- are living away from home, in temporary accommodation or experiencing homelessness;
- live transient lifestyles or in chaotic and unsupportive home circumstances;
- are looked after, previously looked after or have a social worker;
- are vulnerable to bullying, prejudice, discrimination or social isolation;
- have communication needs or do not have English as their first language;
- are dependent on adults for personal or intimate care;
- may have difficulty recognising that behaviour towards them is abusive;
- have experienced repeated removal from the classroom, multiple suspensions or a part-time timetable, or are at risk of permanent exclusion;
- display early signs of abusive, violent or harmful behaviour;
- are at risk of child sexual exploitation, child criminal exploitation, trafficking or modern slavery;
- are at risk of female genital mutilation, forced marriage, or other honour or faith-based abuse;
- are involved in the court system or have a family member in prison;
- are at risk of serious violence, gang involvement or county lines; or
- are at risk of being radicalised into terrorism.

This list provides examples and is not exhaustive. The Academy will consider each child's individual circumstances and ensure that safeguarding information and support are provided in accessible formats and, where appropriate, community languages.

We recognise that a child who is abused or witnesses' violence may feel helpless and humiliated, may blame itself and find it difficult to develop and maintain a sense of self-worth. The Academy may provide the only stability in the lives of children who have been abused or who are at risk of harm.

Intimate Care

All children have a right to safety, privacy and dignity when contact of an intimate nature is required (for example assisting with toileting or removing wet/soiled clothing). A care plan should be drawn up and agreed with parents for all children who require intimate care on a regular basis. Children should be encouraged to act as independently as possible and to undertake as much of their own personal care as is practicable. When assistance is required, staff should ensure that another appropriate adult is in the vicinity and is aware of the task to be undertaken.

Children who associate as LGBTQ+

The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

LGBTQ+ inclusion is part of the statutory Relationships Education, Relationships and sex education (RSE) and health education and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

Children who are questioning their gender and requests for support with social transition

The Academy will provide a respectful and supportive environment for children who are questioning their gender. Bullying, harassment and discrimination will not be tolerated, and any related safeguarding or wellbeing concerns will be addressed promptly.

The Academy will not initiate social transition. Individual members of staff must not independently make changes relating to social transition, including changes to names, pronouns, uniform, facilities, sport or other arrangements.

Where a child or their parent or carer requests support involving social transition, the matter will be referred to the Headteacher/Principal and the DSL. The request will be considered through a careful, documented and case-by-case process.

Parents or carers will be involved as a matter of priority, and their views will be given proper consideration. In the rare circumstances where there is reason to believe that involving parents or carers may place the child at increased risk, the DSL will determine what safeguarding action is necessary before parents are contacted or any decision is made.

Decisions will take account of:

- the welfare and best interests of the child and other children;
- the child's age, development, wishes and individual circumstances;
- any wider mental health, medical, neurodevelopmental or safeguarding needs;
- relevant clinical or other professional advice;
- the impact of agreeing or declining the request;
- the Academy's safeguarding responsibilities; and
- its duties under the Equality Act 2010 and Human Rights Act 1998.

Primary-age requests will be approached with particular caution. Staff will not provide clinical advice or

undertake functions that require clinical expertise.

The Academy will explain that support with social transition will not include access to toilets, changing rooms, showers or residential accommodation designated for the opposite biological sex, or participation in sport designated for the opposite sex where single-sex participation is necessary for safety.

The child's biological sex will be recorded accurately. Information will only be shared with staff who need it to safeguard and support the child and other pupils. Decisions and their rationale will be recorded and reviewed where circumstances change, including where a child wishes to reverse or amend an earlier arrangement.

Recognising abuse, neglect and exploitation

To ensure that pupils are protected from harm, staff must understand the behaviours and indicators associated with abuse, neglect and exploitation.

Abuse and neglect are forms of maltreatment. A person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse may occur within or outside the home, within an institution or community, and online.

Abuse, neglect and exploitation are rarely isolated issues and may overlap. Children may be harmed by adults or by other children. Children may also cause harm to parents, carers or other family members, sometimes referred to as child-to-parent or caregiver abuse.

Keeping Children Safe in Education 2026 identifies four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect. These are set out in Appendix 1, together with relevant indicators of harm.

Children who display harmful sexual behaviour

Children who display harmful sexual behaviour may themselves have experienced abuse, neglect, trauma or exploitation. Safeguarding procedures will therefore consider the needs and welfare of both the child who has experienced harm and the child displaying the behaviour.

Harmful sexual behaviour exists on a continuum, ranging from developmentally expected behaviour through inappropriate and problematic behaviour to abusive and violent behaviour. The child's age, developmental stage, understanding, vulnerability, any difference in age or power and the context of the behaviour will be considered.

Staff who are concerned about a pupil's sexual behaviour, including behaviour occurring online, must speak to the DSL without delay.

All incidents involving the making or sharing of nudes and semi-nudes require a safeguarding response, whether apparently consensual or non-consensual. This includes photographs, videos, livestreams, digitally altered images and content generated using artificial intelligence, including deepfakes or "deep nudes". The Academy will follow current UK Council for Internet Safety - GOV.UK guidance when responding to such incidents.

Child-on-child sexual harassment, sexual violence and Child on child abuse

At The Victory Academy, we believe that every child has the right to attend and learn in a safe environment. Child-on-child abuse, sexual harassment and sexual violence are never acceptable and will not be tolerated.
Although girls are more likely to experience sexual harassment and sexual violence, any child can be a victim, and abuse may occur between children of any age or sex. All children who report abuse will be taken seriously, supported and kept safe, regardless of how long it has taken them to come forward.

We recognise that child-on-child abuse may be occurring even where no reports have been made. Children may not feel ready or able to describe their experiences, may not recognise the behaviour as harmful, or may communicate their concerns indirectly through their behaviour, presentation or relationships. Reports may also be made by friends, parents or other adults, or arise from something witnessed or overheard by a member of staff.

Staff must act immediately where they have concerns about a child's welfare and must not wait for a direct disclosure.

Child-on-child abuse may include, but is not limited to:

- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- abuse within intimate personal relationships between children;
- physical abuse, including hitting, kicking, shaking, biting, hair pulling, a serious physical assault and threats involving weapons;
- sexual harassment including sexual comments, remarks, jokes and online
- sexual violence; including rape, assault by penetration and sexual assault;
- harmful sexual behaviour;
- misogynistic or misandrist abuse and harassment;
- causing another child to engage in sexual activity without consent;
- making or sharing nudes and semi-nudes, including digitally altered or AI-generated images, deepfakes and "deep nudes";
- upskirting; and
- initiation or hazing-type violence and rituals.

Sexual behaviour exists on a continuum, ranging from developmentally expected behaviour through inappropriate and problematic behaviour to abusive and violent behaviour. The Academy will consider the child's age, developmental stage, understanding, vulnerability, the nature and frequency of the behaviour, any difference in age or power and the wider context.

Staff must never dismiss abusive or harmful behaviour as "banter", "just having a laugh", "part of growing up" or "boys being boys". Doing so can create an unsafe culture, normalise abuse and discourage children from reporting concerns.

Child-on-child abuse is preventable. The Academy will seek to identify concerns early and provide timely, appropriate and evidence-based support to reduce the risk of behaviour escalating. All staff will maintain

an attitude that '**it could happen here'**

There is further guidance available at Sexual violence and harassment between children in schools as well as KCSIE 2026 part 5; Child on child sexual violence and sexual harassment containing various links providing support.

Whole Academy approach to harmful sexual behaviours and abuse

The Academy will maintain a whole-Academy approach to preventing and responding to child-on-child abuse by:

- providing an age-appropriate preventative curriculum covering healthy relationships, consent, respectful behaviour, online safety and how to seek help;
- ensuring that staff receive appropriate training to recognise, report and respond to concerns;
- providing children with clear, accessible and trusted routes for reporting concerns;
- challenging inappropriate, abusive, misogynistic and misandrist behaviour;
- completing prompt and proportionate risk assessments and safety and support plans;
- monitoring patterns, trends, locations and times where concerns are more likely to arise;
- sharing relevant safeguarding information and emerging local trends with safeguarding partners, where appropriate; and
- using incidents and pupil voice to review the curriculum, behaviour systems, staff training and the Academy's physical and online environments.

Responding to concerns and reports of harmful sexual behaviours and abuse

All concerns and reports must be shared with the DSL without delay and recorded in accordance with the Academy's safeguarding procedures.

The DSL will determine what immediate action is required and whether advice should first be sought from children's social care or the police. Staff should use only limited and open questions necessary to clarify what has been reported. They must not undertake an investigation or routinely seek written statements from the children involved where this may interfere with a statutory investigation.

The Academy will give immediate safeguarding consideration to, with the **DSL** taking the leading role:

- consider the immediate safety and welfare of the child who may have experienced harm, the child alleged to have caused harm, any other children involved and the wider pupil body;
- decide what limited and open questions are necessary to clarify the concern, taking care not to undertake an investigation or compromise any police or social care enquiries;
- seek advice from children's social care, the police or other relevant agencies where appropriate;
- complete or update a proportionate risk assessment and safety and support plan;
- consider the wishes and feelings of the children involved;
- ensure that appropriate support is provided to both the child who has experienced harm and the child alleged to have caused harm; and
- record the concern, decisions, actions and outcomes on CPOMS.

A proportionate risk assessment and safety and support plan may include changes to supervision,

timetables, movement around the site, seating, transport or other arrangements required to keep children safe.

Parents and carers will normally be informed and involved unless doing so may place a child or another person at increased risk, compromise an investigation or otherwise be contrary to the child's welfare.

Appropriate support will be provided to the child who has experienced harm and to the child alleged to have displayed the harmful behaviour. Children who display harmful behaviour may themselves have experienced abuse, neglect, exploitation or trauma and may require safeguarding intervention.

Mediation, restorative work or direct contact between the children will not be used where it may place pressure on, blame or retraumatise a child. Any such work will only be considered following a careful assessment of risk, suitability and the wishes and welfare of the child who has experienced harm.

Safety and support arrangements will be reviewed for as long as safeguarding risks or support needs remain. The decision to close a safeguarding concern will be made professionally by the DSL, based on the available evidence, the level of risk and the effectiveness of the support in place. Closure will not depend on both children agreeing that the matter has been resolved.

Where a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child who made the report, or any other child involved, requires support or may have experienced harm from another source. A referral to children's social care or another agency will be considered where appropriate.

Where there is clear evidence that a report was deliberately invented or malicious, the Academy may consider proportionate action under the Behaviour Policy. The fact that a report is not substantiated does not, by itself, mean that it was deliberately false or malicious.

Safety and support arrangements will be reviewed for as long as risks or support needs remain. The decision to close the safeguarding concern will be made by the DSL based on the available evidence, level of risk and effectiveness of the support in place. Closure will not depend on both children agreeing that the matter has been resolved.

Temporary separation of pupils for safeguarding purposes

In rare circumstances, it may be necessary to temporarily prevent a pupil from attending the Academy's premises in order to separate them from another pupil for safeguarding purposes. This may include circumstances where an allegation of serious harm has been made by one pupil against another.

This is not a suspension or permanent exclusion on disciplinary grounds and will not be used as an informal or precautionary exclusion. A decision will only be made where:

- there is an identified safeguarding risk;
- separating the pupils is essential to protect one or more children; and
- the separation cannot practicably be achieved through arrangements that allow the pupils to remain on the Academy premises.

The decision will be made on a case-by-case basis. The DSL or a Deputy DSL will take a lead role and will complete or update an appropriate risk and needs assessment. Advice will be sought from children's social care, the police, the Local Authority, the Trust or other relevant agencies where required.

The Academy will consider:

- the best interests, safety and welfare of all children involved;
- the wishes and feelings of the children, where appropriate;
- its duties under the Equality Act 2010 and Human Rights Act 1998;
- whether reasonable adjustments or alternative on-site arrangements could safely manage the risk;
- the educational and support needs of the pupil who will not attend the premises; and
- how long the arrangement is necessary and how frequently it will be reviewed.

Parents or carers will be informed of the reason for the temporary separation. The Chair of Governors and The Thinking Schools Executive Leaders will also be notified without delay.

The arrangement will be kept under regular review and will remain in place only for as long as it is necessary and proportionate. Appropriate education, pastoral support and contact will be maintained throughout the period, and a clear reintegration and safety plan will be established before the pupil returns.

The guidance also states that, where the school or parent does not arrange education during this period, the local authority must arrange it under section 19 of the Education Act 1996. Reintegration arrangements should be planned and regularly reviewed with the pupil, parents and relevant professionals.

Honour and faith-based abuse

'Honour-based' abuse (HBA) encompasses 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. All forms of HBV are abuse.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales, the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in England.

Female Genital Mutilation (FGM)

FGM is the collective name given to a range of procedures involving the partial or total removal of

external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so Academy staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by a female pupil about going on a long holiday during the summer vacation period.

Teachers have a mandatory duty to personally report to the police cases where they discover that an act of FGM appears to have been carried out. This should be done with the support of the DSL so that wider concerns for the child or young person are also considered. This will also enable leaders to support the staff member through this process.

Work experience

We have detailed procedures to safeguard pupils undertaking work experience and will ensure that placement providers have appropriate policies and procedures in place to protect children from harm.

Where an adult provides teaching, training, instruction, care or supervision to a pupil frequently, for more than three days in any 30-day period, or overnight, this will be treated as regulated activity, even where the adult is supervised. The placement provider must ensure that no person who is barred from working with children undertakes such activity.

All checks and safeguarding arrangements will be considered in accordance with Part Three of Keeping Children Safe in Education 2026, including the specific checking restrictions that apply where pupils aged 16 or 17 undertake work experience.

Children staying with host families

Leaders may make arrangements for pupils to stay with a host family during a foreign exchange trip or sports tour. Some overseas pupils may reside with host families during term time and we will work with the Local Authority to check that such arrangements are safe and suitable. In such circumstances, we follow the guidance set out in Keeping Children Safe in Education (2026) to ensure that hosting arrangements are as safe as possible.

Children with family members in prison

Children who have family members that are sent to prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We recognise that these children may need support. Support will be provided in line with guidance from the National Information Centre on Children of Offenders and local agencies

Domestic abuse

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.

Domestic abuse affecting young people can also occur within their relationships, as well as in the context of their home life.

When the police attend a domestic abuse incident the Designated Safeguarding Lead receives an Operation Encompass notification. Appropriate and considerate support is offered to the family without automatically questioning the child about the incident.

Homelessness

Being homeless, at risk of homelessness or living in temporary accommodation can present a significant risk to a child's welfare, attendance, wellbeing and educational outcomes.

In most cases, staff will consider homelessness in the context of children living with their families. However, some 16- and 17-year-olds may be living independently, including following exclusion from the family home, and may require a different level of assessment and support.

The DSL will support and signpost pupils and families to appropriate housing, welfare and local support services. Where homelessness or temporary accommodation gives rise to concerns that a child may be suffering, or is likely to suffer, harm, the Academy will make a referral to children's social care.

The Academy will respond appropriately to any temporary-accommodation notifications received from the local authority and will consider the impact on the child's safeguarding, attendance and support needs.

Children with medical conditions

A concern relating to the management of a child's medical condition will not automatically be treated as a safeguarding concern. However, staff must report the matter to the Designated Safeguarding Lead where the circumstances may indicate abuse, neglect or exploitation.

This may include, for example, where a child is repeatedly sent to the Academy without essential medication or medical equipment, where necessary treatment or appointments are persistently withheld, or where there are concerns that symptoms are being fabricated or deliberately induced.

The DSL will consider the child's individual circumstances, seek appropriate advice and determine whether support, a referral to children's social care or other safeguarding action is required.

Taking action

Any child, in any family in any school, could become a victim of abuse. Staff should always maintain an attitude of "it could happen here".

Key points for staff to remember for taking action are:

- in an emergency take the action necessary to help the child, if necessary, call 999;

- report your concern as soon as possible to the DSL, definitely by the end of the day;
- do not start your own investigation;
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- complete a record of concern in writing (to the DSL) via CPOMs;
- seek support for yourself if you are distressed.

Any verbal conversations around safeguarding should be recorded in writing and shared with the DSL.

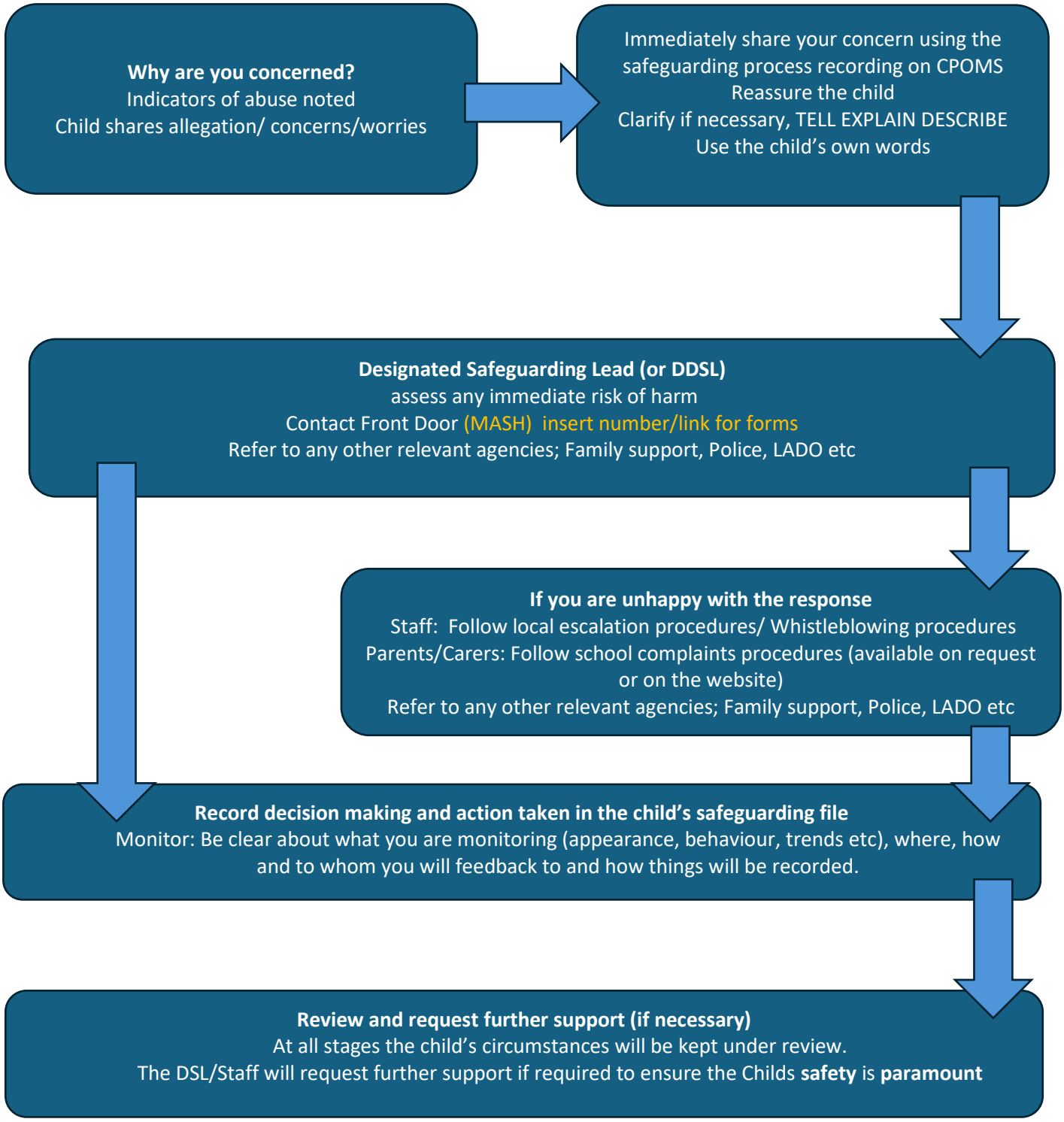
Staff should be familiar with *'What to do if you're worried a child is being abused'* as it contains excellent examples of the different types of safeguarding issues.

If the DSL is not available, staff should speak to a member of the Senior Leadership Team and/or take advice from local children's social care [1](KCSIE, 2026).

Staff can always seek advice and guidance from the Head of Safeguarding or Regional Safeguarding Lead, if they are unable to contact the Designated Safeguarding Lead, a Deputy, or a member of the Senior Leadership Team.

[1] Contact details available in section 1.

What to do flow map



If you are concerned about a pupil's welfare

There will be occasions when staff may suspect that a pupil may be at risk. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should use CPOMS to record these early concerns. If the pupil does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff has concerns, they should alert the DSL to their concern.

CPOMS is the single point for the delivery of concerns. Once staff record a concern on CPOMS, it will automatically alert the Designated Safeguarding Lead that a concern form has been raised.

If a pupil discloses to you

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, the staff member will, at the appropriate time, let the pupil know that to help them they must pass the information on to the DSL. The point at which they tell the pupil this, is a matter for professional judgement. During their conversations with the pupils', staff will:

- allow them to speak freely;
- remain calm and not over-react;
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me';
- not be afraid of silences;
- under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the pupil's mother think about it;
- at an appropriate time tell the pupil that to help them, the member of staff must pass the information on and explain to whom and why
- not automatically offer any physical touch as comfort;
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' may be interpreted by the child to mean that they have done something wrong;
- tell the pupil what will happen next;
- report verbally to the DSL even if the child has promised to do it by themselves;
- complete the record of concern form on CPOMS and submit it for the attention of the DSL as soon as possible;
- seek support if the staff member feels distressed.

Referral to children's social care

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

The below hyper link directs you to your local children's social care contact number; Report-child-abuse-to-local-council

In the above circumstance, contact should be made with the MASH on 01634 334466 and/or the police (in an emergency on 999 or on 101) Emergency Out of Hours Social Work Service Tel. 03000 419191.

Professionals can consult with a children's Social Worker in the Local Authority if they are unsure whether a Social Work Assessment is necessary and this can be done directly to the Locality Children's Team but if a referral is to be made, this should be done through the MASH.

Any member of staff may make a direct referral to children's social care if they genuinely believe independent action is necessary to protect a child.

Staff should 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, their deputy, the Headteacher/Principal and the Trust Safeguarding Team are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil's safety
- for any other reason, they make a judgement that direct referral is in the best interests of the child.

Escalating concerns

Staff need to be aware of those times when concerns may look as though they are not progressing to an outcome or some form of action. This may be indicated by:

- difficulty in getting hold of a DSL;
- staff not being satisfied with the decision of the DSL or headteacher/principal;
- staff aware that a colleague has not passed on a concern;
- external agencies not accepting a referral from a Academy when it is felt one is needed;
- staff not aware of what has happened to their concern because of a lack of feedback.

Staff must not close down a concern because they feel "stuck" or "they can't do any more". It is important to escalate concerns to DSLs, headteacher/principals, other senior staff or if necessary, to the Chief Executive.

If there are concerns about the work of an external agency staff the DSL will follow the escalation steps outlined in the locally agreed procedures documents.

The important principle is not to allow a concern to be "closed down" without it having received the

necessary attention, assessment and resolution.

Universal and community-based Early Help and Family Help

Providing help and support as soon as problems emerge is an important part of safeguarding children and promoting their welfare.

Universal services and community-based Early Help provide support at an early stage, before statutory intervention is required. Support may be delivered through education, health services, family hubs, youth services, housing services and voluntary or community organisations.

The DSL and Deputy DSL(s) will understand the local Early Help arrangements, threshold document and referral pathways and will ensure that staff know how to identify children and families who may benefit from additional support.

Where appropriate, the Academy will work with the child, their parents or carers and relevant agencies to:

- identify the child's needs and any emerging safeguarding concerns;
- consider the child's wishes and feelings;
- agree the support required and the outcomes to be achieved;
- coordinate services through an identified lead practitioner where appropriate; and
- regularly review whether the support is improving the child's circumstances.

Some children and families may require more targeted support than that available through universal or community-based Early Help. Family Help includes:

- targeted early help coordinated by the local authority and its partners; and
- statutory support and services for children in need under section 17 of the Children Act 1989.

Targeted early help is a voluntary arrangement and will ordinarily require the consent and participation of the child and their family. An appropriately qualified practitioner may lead the assessment and coordinate the Family Help plan. Where local arrangements permit, the same practitioner may continue to work with the family where the child is subsequently assessed as a child in need under section 17.

Where a child or family does not consent to targeted early help, or does not engage with the support offered, the DSL will consider whether the child's needs are likely to increase or whether there is a safeguarding risk that requires referral to local authority children's social care.

Family Help and Early Help cases will be kept under regular review. Where the child's circumstances do not improve, the support is not meeting their needs or concerns increase, the DSL will consider whether the matter should be escalated or referred for statutory assessment.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a referral will be made immediately to local authority children's social care under section 47 of the Children Act 1989 and, where appropriate, to the police.

The Academy will also understand and follow the local criteria and procedures relating to:

- section 20 of the Children Act 1989, concerning the local authority's duty to accommodate a child;
- section 31 of the Children Act 1989, concerning care and supervision orders;
- disabled children;
- children managed within the youth secure estate; and
- children affected by abuse, neglect, exploitation, trafficking or modern slavery.

The Academy will support children's social care and other agencies with assessments and multi-agency plans. All concerns, discussions, decisions and the reasons for those decisions will be clearly recorded.

Children's Mental Health

All staff will 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. Mental health difficulties may also develop into a safeguarding concern, including where a child is experiencing self-harm, an eating disorder, suicidal ideation or a risk of suicide.

Only appropriately trained professionals should diagnose mental health conditions. However, staff are well placed to observe children day to day and identify changes in behaviour, presentation or emotional wellbeing that may indicate a child requires additional support.
Possible indicators may include:

- significant changes in behaviour, mood or educational engagement;
- becoming withdrawn, fearful, aggressive or unusually distressed;
- changes in friendships, sleep, eating or personal care;
- a loss of interest in activities previously enjoyed;
- signs of self-harm, self-neglect or disordered eating; or
- statements or behaviour indicating suicidal thoughts or intent.

Children who have experienced abuse, neglect, exploitation or other traumatic experiences may experience a lasting impact on their mental health, behaviour, attendance, relationships and educational outcomes.

Where a member of staff has a mental health concern about a child that is also a safeguarding concern, they must take immediate action by recording the concern on CPOMS and speaking to the DSL or a Deputy DSL.

Where a child is in immediate danger or there is an immediate risk of serious harm, staff will contact the emergency services by calling 999 or arrange urgent attendance at an emergency department. Urgent mental health support that is not an emergency may be sought through NHS 111 and the mental health option, alongside local crisis services.

The Academy will work with the child, their parents or carers where appropriate, the Senior Mental Health Lead, Mental Health Support Team and other relevant professionals and agencies. Support and interventions provided by the Academy will be safe, evidence-based, appropriate to the child's age,

developmental stage and level of need, and kept under regular review.

Staff will have regard to relevant government guidance, including Mental Health and Behaviour in Schools, and will work with local partners to identify children who may benefit from additional support and ensure that appropriate help is put in place.

Working together with parents

The school is committed to working in partnership with parents/carers to safeguard and promote the welfare of child/ren and to support them to understand our statutory responsibilities in this area. We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to safeguard a child from harm.

We will seek to share with parents any concerns we may have about their child unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the school has about a child will not prevent the Designated Safeguarding Lead making a referral to Children's Social Care and Multi – Agency Risk Assessment Conference (MARAC) and any other Local Authority referral routes in those circumstances where it is appropriate to do so.

Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

In order to keep children safe and provide appropriate care for them, the school requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives;
- To hold two emergency contact numbers;
- Full names and contact details of all persons with parental responsibility (if different from above);
- Emergency contact details (if different from above);
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above);
- Any legal or criminal changes which effects parental responsibility e.g. Bail condition, contact orders, non-molestation orders, court orders etc

The Victory Academy will offer guidance and support to parents via newsletters, on request via phone, email or in person reinforcing the importance of children being safe online

Equality statement

Schools and colleges have obligations under the Equality Act 2010 (the Equality Act). Schools **must** not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise

children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

In the UK, an individual can apply for a Gender Recognition Certificate (GRC) at the age of 18 or over. Since children under 18 cannot obtain a GRC, the ruling applies directly and fully to almost all pupils in schools, as their legal sex and biological sex are always the same in law. This means that:

There is no legal ambiguity about their sex under the Equality Act. A pupil's sex in law is their biological sex at birth, regardless of how they identify. Even if a child socially transitions or intends to apply for a GRC in future, this has no effect on how the law recognises their sex.

For clarity, the Equality Act 2010 has not changed. However, the Supreme Court has now made clear that sex under the Equality Act should not be interpreted to mean gender identity but should only apply the definition as determined by biological sex.

Legal duties under the Equality Act 20106 must be complied with, including putting special provision in place to support dialogue with children who may not be able to convey their wishes and feelings as they may want to. This might include, for example, those who have communication difficulties, unaccompanied children, refugees, those children who are victims of modern slavery and/or trafficking and those who do not speak English or for whom English is not their first language.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at Equality Act 2010: advice for schools - GOV.UK (www.gov.uk), it may also be useful for colleges. For further information Equality Act guidance Equality Act guidance | Equality and Human Rights Commission (equalityhumanrights.com)

Human Rights Act 83.

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:
Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, neglect and exploitation, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at equality human rights

Record Keeping and Confidentiality

Records will be maintained in accordance with Trust data protection procedures.
All concern's, discussions and decisions made, and the reasons for those decisions, should be recorded in writing.
Information should be kept confidential and stored securely.
Each child will have a separate child protection file when there are concerns for that child.
Records will include:

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

Following completion of a record of concern, staff will be provided with feedback of action taken by the DSL. Staff have a duty to challenge this action with the DSL if they disagree and retain a duty to refer to social care themselves if they believe this to be the correct course of action.

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that information being released into the public domain does not compromise evidence. Staff are expected to treat information they receive about children and young people in a discreet and confidential manner. Confidential information should never be used casually in conversation or shared with any person other than a need-to-know basis. The use of PMR (walkie talkies) radios will not be used as a method of communication when discussing personal or sensitive safeguarding information.

Child protection information will be stored and handled in line with the Data Protection Act 2018. Information sharing is guided by the following principles. The information is:

- necessary and proportionate
- relevant
- adequate
- accurate
- timely
- secure

Information sharing decisions will be recorded, whether or not the decision is taken to share.

Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information with outside agencies. However, where there is good reason to do so, the DSL may share information *without* consent and will record the reason for not obtaining consent.

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 pupil or parent to see child protection records, they will refer the request to the Head teacher

The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. The Trust Subject Access policy is available to parents and pupils via the website or on request. Data Protection toolkit for schools **TSAT** data_protection_policy_nov_2025-1.pdf

Monitoring and Compliance

- Regular audits, reviews, or spot-checks may be undertaken by the relevant Trust's service team.
- Local Governing Bodies and Headteachers must ensure compliance at school level.
- Breaches of this policy may lead to disciplinary action.

Review of the Policy

This policy will be reviewed:

- Annually, or
- In response to changes in legislation, guidance, or operational need.

Legislation and Guidance

This policy forms part of the academy's wider safeguarding framework and should be read alongside:

- Keeping children safe in education 2026: September 2026
- Working together to safeguard children 2026
- EYFS statutory framework for group and school-based providers 2026, where applicable; and

- the local safeguarding partners' multi-agency safeguarding arrangements, threshold documents and referral procedures. https://www.medway.gov.uk/info/200170/children_and_families/600/concerned_about_a_child

This policy has regard to the following principal legislation:

- Children Act 1989; 2004
- Children and Social Work Act 2017;
- Education Act 2002;
- Safeguarding Vulnerable Groups Act 2006, as amended;
- Statutory guidance on FGM which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- Data Protection Act 2018 and UK General Data Protection Regulation;
- Data (Use and Access) Act 2025;
- Children's Wellbeing and Schools Act 2026; and
- Crime and Policing Act 2026.
- Statutory guidance on the Prevent duty

Related Policies

This policy should be read alongside:

- The Thinking Schools Academy Trust (awaiting updated policy)
- Behaviour Policy;
- Anti Bullying Policy;
- Thinking Schools Academy Trust staff (awaiting updated policy)
- ict_acceptable_use_policy.pdf The Thinking Schools Academy Trust
- Mobile Phone Policy
- Attendance Policy
- Whistleblowing Policy

Appendix 1 – Four categories of abuse

Physical abuse

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

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

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

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;

- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty.

For these reasons, it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school, arrive late or leave the Academy for part of the day
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new 'friends'.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL decide how to proceed.

Appendix 2

Governance Structure

