



## **The Sutton Academy**

# **CHILD PROTECTION AND SAFEGUARDING POLICY**

**December 2025**

SERVE CHALLENGE EMPOWER

## Document Control

Version	Date	Action
2	05/09/2025	Section 18 added for post-16 settings regarding post-18 students
3	11/09/2025	Section 7.2.1 added regarding recording photos of marks and injuries
4	10/10/2025	<p>Updates to three sections to reflect TCAT and the Trustees as proprietors and case managers during LADO investigations:</p> <ul style="list-style-type: none"><li>• Section 5.3 Governance and oversight of safeguarding</li><li>• Section 7.7 Concerns or allegations about a staff member, supply teacher, volunteer or contractor</li><li>• Section 15.3 Trustees and Governors</li></ul> <p>Removal of Appendix 3 and replaced with reference to TCAT LADO and Low Level Concern Policy in its place throughout the policy</p> <p>Change of terminology from schools/colleges to academies.</p>

<b>Key to updates (Delete this box and remove highlights before uploading)</b>
Statutory updates in line with KCSIE 2025 / Trust wide updates

**This policy is a Trust-wide policy and applies without exception to all staff, students, trustees and governors who attend or work at all academies and settings in the Trust or in the central Trust structure.**

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## 1. Important Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding Lead (DSL) LAC Teacher	Kevin Harker	01744 678859 safeguarding@thesuttonacademy.org.uk
Deputy DSL	Gemma Potter	01744 678859 safeguarding@thesuttonacademy.org.uk
Safeguarding Officer	Katie Beales	01744 678859 safeguarding@thesuttonacademy.org.uk
Mental Health Lead	Katie Beales	01744 678859 safeguarding@thesuttonacademy.org.uk
Chair of Governors	Gordon Pennington	Gordonpennington1986@gmail.com
Safeguarding Governor	Nicola Kearney	Nicola.kearney@sthelens.gov.uk
Local Authority Designated Office (LADO)		01744 671252 sthelenslado@sthelens.gov.uk
MASH Emergency Duty Team (out of hours)	St Helens MASH	01744 676767 03450500148
LA Attendance Officer	Lorraine Garton	07851385076/01744 673151 lorrainegarton@sthelens.gov.uk
LA "Children missing from education" Officer	Diane Russell	01744 673151 Dianerussell.sthelens.gov.uk

## Aims

This Policy should be read in conjunction with the TCAT Statement on Safeguarding and Child Protection.

### The Sutton Academy as one of the academies within TCAT aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

## 2. Legislation and Guidance

This policy is based on the Department for Education's statutory guidance **Keeping Children Safe in Education 2025** and [Working Together to Safeguard Children \(2023\)](#) and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), and 'Safeguarding Children and Safer Recruitment in Education DFE, 2011' which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school/academy.
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools'/academies duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- 'The Teacher Standards 2012'
- 'What to do if you are worried a child is being abused' Advice for Practitioners (DFE, 2015)
- **The Human Rights Act 1988, The Equality Act 2010 and The Public Sector Equality Duty (PESD)**

Primary academies within TCAT also follow:

- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

### 3. Definitions

**Safeguarding and promoting the welfare of children** means:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment whether that is within or outside the home including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse

**Neglect** is a form of abuse and 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. Appendix 1 defines neglect in more detail.

**Sexting** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children

**Children** includes everyone under the age of 18.

**In all cases of Child on Child Abuse (section 7) the following definitions will be used:**

- **Victim-** the child or young person who discloses



- **Alleged Perpetrator- the child or young person who is subject to the allegation.**

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

TCAT academies comply with the Pan-Cheshire Safeguarding and Child Protection arrangements and support the work and scrutiny of the Children's Safeguarding Partnerships in all Local Authorities in which its academies are based.

Warrington - [Warrington Safeguarding Partnerships - Welcome to the Safeguarding Children Partnership](#)

St Helens - [St. Helens Safeguarding Children Partnership - Home](#)

Wirral - [Welcome to the Wirral Safeguarding Children Partnership - Wirral Safeguarding Children Partnership](#)

## 4. Equality Statement

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 (see section 9)
- 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 (see section 11)

## 5. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the academy and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended academy and off-site activities.

### 5.1. All Staff

All staff will read and understand part 1, Annex of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education 2025, and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the role and identity of the designated safeguarding lead's (DSL) and Safeguarding Officer, the behaviour policy, and the safeguarding response to children who go missing from education
- The Early Help process and their role in it, including identifying emerging problems, liaising with the DSL and or Pastoral Staff and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The filtering and monitoring systems and processes in place on devices and networks in their academy
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), Child Criminal Exploitation (CCE) indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- That abuse can happen to children on and offline line with equal significance for the child.
- That whilst all children should be protected, it is important to recognise that some groups of children, are potentially at greater risk of harm than others (both online and offline). The list below, is not exhaustive, but highlights some of those groups.
  - Children who need a social worker (Child in Need and Child Protection Plans)
  - Children who are absent from education
  - Elective Home Education (EHE)
  - Children requiring mental health support
  - Looked after children and previously looked after children
  - Care leavers
  - Children with special educational needs, disabilities or health issues
  - Children who are lesbian, gay, bi, or gender questioning.
- Abuse online may include:
  1. Sending abusive, harassing or misogynistic comments
  2. Non-consensual sharing of indecent mages
  3. Sharing abusive images and pornography to those who do not want to receive such images.
- The need to emphasise the importance of online safety when communicating with parents/carers
- The need to advise LGBT pupils of safe spaces/people where they are able to find support
- The nature of Serious violence (including that linked to county lines)
- That children are vulnerable to abuse and harm both inside and outside the home
- Children at young people who are LGBTQ or are perceived to be are at risk of being targeted by other children and young people.
- Staff will be aware of what to look for to identify those who may need help or protection
- What sexual violence and sexual harassment are and actions to take if suspected or disclosed
- That children may and do abuse other children and the actions to take when child on child abuse is suspected or disclosed.

Section 15 and Appendix 3 provide more details on staff support and training.

## 5.2. The Designated Safeguarding Lead (DSL)

The Sutton Academy has a DSL who is a Vice Principal. The Deputy DSL and the Safeguarding Officer primarily work daily with the students.

Role	Name	Email	Phone
DSL	Kevin Harker	safeguarding@thesuttonacademy.org.uk	01744 678859



Deputy DSL	Gemma Potter	<a href="mailto:safeguarding@thesuttonacademy.org.uk">safeguarding@thesuttonacademy.org.uk</a>	01744 678859
Safeguarding Officer	Katie Beales	Safeguarding:thesuttonacademy.org.uk	01744 678859

During term time, the DSL's and Safeguarding Officer will be available during school hours for staff to discuss any safeguarding concerns. During extra-curricular activities and residential, the DSL or appropriate member of senior staff will be available. Where incidents become known during the school day but are unresolved at the end of the school day the DSL, appropriate member of staff will remain on site until the next course of action for the child, or young person has been resolved.

When the academy is closed contact arrangements may be put in place for those students judged to be at most risk. All academies will ensure that Safeguarding partners are signposted on the web site.

The DSL's and the Safeguarding Officer will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour including the local picture and participate in sharing information with local partners and police
- Be confident in accessing local specialised support for children and young people involved in sexual violence and harassment
- Understand that any child or young person must have an 'appropriate adult' in the case of a Police search or investigation.
- Be responsible for understanding the filtering and monitoring systems and processes in place on devices and networks in their academy

The DSL will also keep the Headteacher and Safeguarding Governor informed of any issues, liaise with local authority case managers, and designated officers for child protection concerns as appropriate. Their full responsibilities are laid out in their job description.

### 5.3. Governance and Oversight of Safeguarding

As the proprietor, **The Challenge Academy Trust (TCAT)** and its **Trustees** hold strategic responsibility for safeguarding across all member academies.

The Trust Board will:

- **Approve this policy** at each review, ensuring it complies with statutory guidance, including *Keeping Children Safe in Education (KCSIE) 2025*, and hold academy leaders to account for its implementation.
- **Appoint a panel of Trustees with responsibility for safeguarding**, who will monitor the effectiveness of this policy in conjunction with the Trust's Quality and Standards Committee.

All **Trustees and Local Governors** will:

- Read *Keeping Children Safe in Education*, with particular focus on **Part 1 and Part 5**, and Part 2 where relevant to governance responsibilities.
- Complete **annual TCAT Safeguarding Essentials training**.
- Complete **Safer Recruitment training** every 2 years via the National College if they are to be involved in recruitment.

- The **Safeguarding Trustee** and **Chair of Trustees, Chairs of LGCBS and Local Safeguarding Governors** will also complete the **Annual Certificate for Trustees and Governors** via the National College.

Section 15 of this policy outlines how Trustees and Local Governors are supported to fulfil their safeguarding responsibilities effectively.

## 5.4. The Headteacher/Principal

The Principal/Headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of the systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents when their child joins the academy and via the academy website
- Ensuring that the DSL and Safeguarding Officer has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see TCAT LADO and Low Level Concern Policy)
- Make decisions regarding the management and actions to 'low level' concerns about staff in collaboration with the DSL

TCAT academies which are Early years providers and primary schools, will also,

- Ensure the relevant staffing ratios are met, where applicable
- Make sure each child in the Early Years Foundation Stage is assigned a key person

## 5.5. Virtual School Headteachers

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of pupils with a social worker and those in 'Kinship Care' (those who live in Private fostering arrangements or on SGO's) TCAT Principal's and Headteacher will work supportively with Virtual Headteacher for their Children in Care.

## 5.6 Alternative Provision

TCAT academies may place pupils in Alternative Provision. In such instances the home academy maintains responsibility of the pupils safeguarding. The home academy will seek written reassurance that the Safeguarding responsibilities of the provider are fully in line with KCSIE 2025 and will have the name of the DSL/DDSL within the AP.

Specifically, the academy should seek written confirmation:

- All staff have had appropriate Safeguarding checks
- New staff have been appropriately checked prior to employment.
- The home academy should know where pupils are each day and maintain address of any sub-contracted AP provision and oversee the same Safeguarding checks.
- Academics should review placement at AP at least once per half term
- Attendance should be checked to ensure the pupil is attending regularly

In the event of a Safeguarding concern being raised the placement should be reviewed and terminated, if necessary, until concerns have been satisfactorily addressed

If using TCAT'S own Alternative Provision Re-Route academies will adopt the TCAT Re-Route Safeguarding Addendum

## 6. Confidentiality

TCAT academies are committed to maintaining the responsibility to protect data as laid down in the Data Protection Act and the TCAT GDPR Policy. We are also committed to ensuring that we share information with the Safeguarding Partners to ensure that: Timely information sharing is essential to effective safeguarding.

- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- When staff process data to protect the vital interests of an individual (i.e. recording safeguarding concerns on CPOMS), the information recorded will be relevant to the case and chronology. When an individual or the parent/carer of the individual is not informed that the data is being recorded this will be in circumstances where professionals consider that to inform them would increase the risk to the individual and/or the harm threshold.

### **If a victim asks the academy not to tell anyone about the sexual violence or sexual harassment:**

There is no definitive answer, because even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies.

The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

### **Regarding anonymity, all staff will:**

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identity
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

## 7. Recognising Abuse and Taking Action

Staff, volunteers and governors of The Sutton Academy must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)” or Safeguarding Officer

### 7.1. If a child is suffering or likely to suffer harm, or in immediate danger

- If it is a medical emergency contact 999.
- Inform the DSL immediately if a child is suffering or likely to suffer significant harm.
- If contact with either DSL or the Safeguarding Officer cannot be made then you should make a referral to Social Care and/or the Police. **ANYONE CAN MAKE A REFERRAL**
- Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.
- The contact details and process for making a referral can be found below:

Warrington - <https://www.warrington.gov.uk/mars>

St Helens - [Concerned about a child's safety or welfare? - St Helens Borough Council](#)

Wirral – [Children and families request for support form - Log in or sign up for a MyWirral account](#)

### 7.2. If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Reassure the child they have done the right thing in telling you.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words record on CPOMS if you have access if not forward to the DSL/Safeguarding Officer who will do so. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers
- None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

#### 7.2.1 Recording Physical Marks and/or Injuries

In accordance with *Keeping Children Safe in Education (KCSIE)* and local safeguarding protocols in Warrington, St Helens, and Wirral, the Trust does not permit the photographing of marks, bruises, injuries, or other physical indicators on children for any purpose, including safeguarding or health and safety incidents. This includes requests from external agencies such as social care. Instead, staff must use

approved bodymap diagrams alongside detailed written descriptions, including the size, shape, colour, and precise location of the mark or injury, as well as the date, time, and context in which it was observed.

This approach protects children's dignity, maintains professional boundaries, and ensures accurate, ethical documentation. It also aligns with the Data Protection Act 2018 and UK GDPR, recognising that images of injuries may constitute sensitive personal data and require strict controls that are not compatible with routine safeguarding practice. Staff will receive training on how to complete bodymaps and descriptive records confidently and consistently, and all safeguarding documentation is subject to regular audit by the Central Safeguarding Team.

If an external agency requests photographic evidence, the matter must be escalated to the Central Safeguarding Team before any action is taken. This policy does not prevent or diminish the seriousness with which concerns are raised or responded to by appropriate agencies. Any individual cases requiring further consideration should be discussed with the Central Safeguarding Team.

### **7.3. If you discover FGM has taken place or a pupil is at risk of FGM**

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in Appendix 3.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a pupil under 18 must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose by the Police, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

### **7.4. If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)**

It is important to share any concerns that you have with those in a position to further monitor and where necessary act on the concern. All TCAT academies prioritise the safeguarding and welfare of pupils in their care. At The Sutton Academies the welfare of pupils is supported by a Head of Year/Achievement Leader for each year group and Pastoral Support Staff including a dedicated Mental Health Lead. All concerns about a pupil should be shared with HOY or Achievement Leader in the first instance for the child's year group. They will decide if action is needed including support for the child directly from the academy or referral through to Early Help. Where external agencies are involved the DSL and Safeguarding Officer must be informed.

Figure 1 on page 14 illustrates the procedure to follow if you have any concerns about a child's welfare.

## Early help

Early Help is 'support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

If early help is appropriate, the DSL or Safeguarding Officer will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL or Safeguarding Officer will keep the case under constant review and the academy will consider a referral to local authority children's social care if the situation does not seem to be improving.

Timelines of interventions will be monitored and reviewed.

Early Help is an important aspect of Safeguarding and many children and families can be supported by the process. Consideration to the offer of Early Help should be given to:

- Pupils with health conditions
- Pupils with mental health conditions
- Pupils at risk of honour-based abuse (such as forced marriage or female genital mutilation)
- Pupils who are persistently absent from the academy including persistent absences for part of the school day
- Pupils who have had repeated suspensions and is at risk of Permanent Exclusion
- Pupils who have a parent/carer in custody or is affected by parental offending.
- Pupils who are frequently missing from education, care or home

For further details see the following links:

Warrington - <https://www.warrington.gov.uk/early-help>

St Helens - [St. Helens Safeguarding Children Partnership - Early Help](#)

Wirral - [Early help | wirral.gov.uk](#)

## Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL or Safeguarding Officer will make the referral.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or Safeguarding Officer who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

### **7.5. If you have concerns about extremism**



**All TCAT Academies have adopted the TCAT Prevent Statement accessible on each academy's website.**

If a child is suffering or likely to suffer from harm, or in immediate danger then you should refer the matter to the DSL with responsibility for the Prevent Duty, at The Sutton Academy this is Kevin Harker. In the exceptional case of this not being possible then speak to the Deputy DSL Gemma Potter. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which academy staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

## **7.6. If you have a mental health concern**

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. Poor mental health can also be the result or cause of bullying. Therefore, all staff should be familiar with the academy's Anti-Bullying Policy.

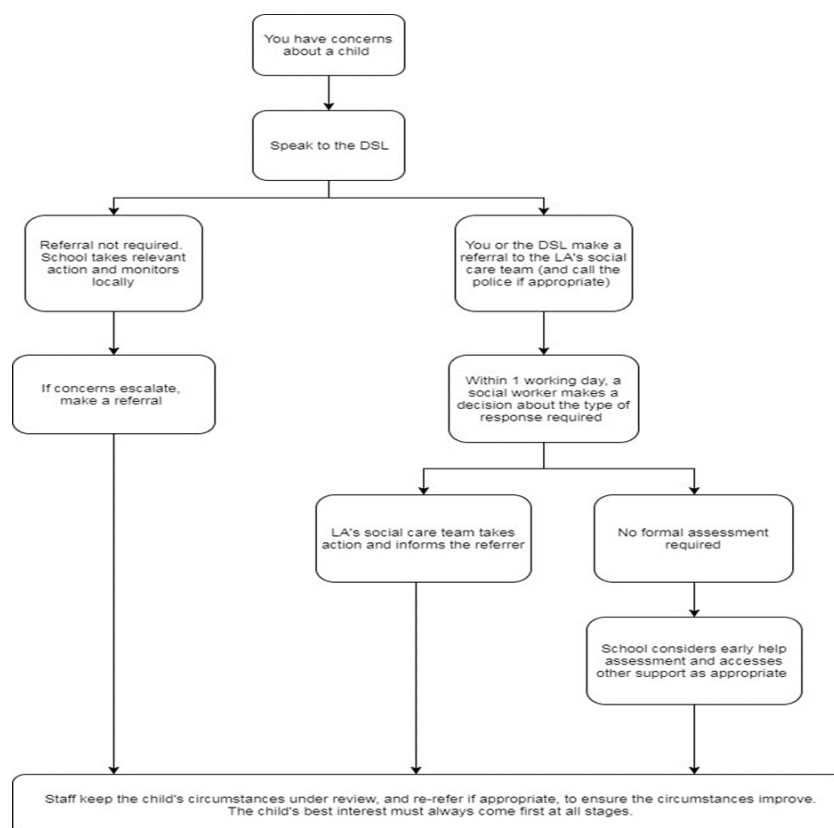
All TCAT academies have identified staff who are trained in responding to mental health concerns. At The Sutton Academy we have a dedicated Mental Health Lead, Katie Beales. All concerns about a child's mental health will be shared with the mental health lead who will decide how to respond. This may be through direct support from the academy or referral to external avenues of support like Kooth or CAMHS. If the concern around mental health is also a concern around safeguarding then the DSL or Safeguarding Officer must be informed.

### **Figure 1: Procedure if you have concerns about a child's welfare**

Warrington - <https://www.warrington.gov.uk/mars>

St Helens - [Concerned about a child's safety or welfare? - St Helens Borough Council](#)

Wirral - [Children and families request for support form - Log in or sign up for a MyWirral account](#)



## 7.7. Concerns or allegations about a staff member, supply teacher, volunteer or contractor

If you have a concern or an allegation is made about a member of staff, including supply teachers, volunteers, or contractors, that **may** indicate a risk of harm to children, you must report it to the **Headteacher/Principal** immediately.

If the concern involves an **individual or organisation using academy premises** to deliver activities for children (e.g. community groups or external providers), the academy's safeguarding procedures must be followed, including **notifying the TCAT Safeguarding Team and the Local Authority Designated Officer (LADO)** in line with statutory guidance.

Where the concern or allegation involves the **Headteacher/Principal**, it must be reported to the **TCAT Central Safeguarding Team**, who will appoint a case manager in accordance with Trust procedures. The **Chair of Governors** may be informed, but case management will be led by TCAT as the proprietor.

If you believe there is a **conflict of interest** in reporting the concern to the Headteacher/Principal, you should report it **directly to the TCAT Safeguarding Team who will liaise with the LADO** as soon as possible.

TCAT academies with **Early Years provision** must also notify **Ofsted**, where appropriate, of the allegation and actions taken, within the required timescales.

In all cases, TCAT academies will follow the **TCAT LADO and Low-Level Concerns Policy**, ensuring that concerns are managed promptly, proportionately, and in line with statutory and Trust-wide safeguarding expectations.

## **7.8 Allegations of abuse made against other pupils (Child on Child Abuse)**

We recognise that children can abuse their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our academy’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the academy at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 3 for more information about child-on-child abuse.

### **Procedures for dealing with allegations of child-on-child abuse**

If a pupil makes an allegation of abuse against another pupil or if you are concerned that child-on-child abuse is happening then you must inform the DSL

- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering academy transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The Sutton Academy we have trained Designated Sexual Misconduct Liaison Officers who will, under the direction of the DSL support that victim and alleged perpetrator
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

### **Creating a supportive environment in the academy and minimising the risk of child-on-child abuse**

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils can easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- TCAT academies may signpost pupils/young people to 'Shore Space', a confidential chat service for young people concerned about their own or someone else's sexual thoughts and behaviors. <https://shorespace.org.uk/>

### **Ensure staff are trained to:**

- Recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in the academy, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
- Children can show signs or act in ways they hope adults will notice and react to
- A friend may make a report
- A member of staff may overhear a conversation
- A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- The DSL will take the lead role in any disciplining of the alleged perpetrator(s). Safeguarding Partners will provide support at the same time as taking any disciplinary action. Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident does not (in itself) prevent our academy from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

## **7.9 Sharing of nudes and semi-nudes ('sexting')**

We follow the suggested approach based on [guidance from the UK Council for Internet Safety](#) for all staff and for DSLs and senior leaders.

### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-

nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

**You must not:**

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

**You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.**

**Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate academy staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another academy, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

**The DSL will make an immediate referral to police and/or children's social care if:**

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Headteacher/principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

**Further review by the DSL**

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing parents/carers**

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through contact with the academies allocated Police officer or through 101.

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on CPOMS. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

### **Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Personal Development Curriculum incorporating RSHE. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images
- This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the academy will follow in the event of an incident.

## **7.10 Reporting systems for our pupils**

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Pupils at The Sutton Academy are made aware of the names and how to contact the DSL and Safeguarding Officer through signage and regular assemblies. Pupils also have access to a Year specific email address to contact their Head of Year and Pastoral Support. Pupils can make their thoughts and feelings known on Safeguarding arrangements through a team of Safeguarding Ambassadors and through single sex focus groups held routinely.

## **8. Online Safety**



We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our academy aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole academy community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole academy community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

**This is further elaborated in the Online Safety Policy which is available on the academy's website and overseen by the Online Safety Group and reviewed annual by the Safeguarding Committee**

### **The 4 key categories of risk**

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation including fake news, Conspiracy theories.
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

### **To meet our aims and address the risks above we will:**

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to the academy for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in the academy, use of the academy's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- As part of their safeguarding and online safety training, all staff will understand their expectations, roles and responsibilities around filtering and monitoring systems.

- TCAT academies will be guided by the 'plan technology for your school service' to ensure a robust response to online safety [Plan for technology](#)
- TCAT academies will develop safe use of AI in schools guided by DFE's 'Generative AI in education' [Generative AI:product safety expectations](#)
- TCAT academies use the online safety SENSO filtering program to ensure that any misuse of academy based technology and platforms are identified and can be responded to staff, pupils and parents are made aware of this system and how it is monitored and responded to throughout the day.

## 9. Notifying Parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL. If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

## 10. Pupils with Special Educational Needs

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication and language barriers

At The Sutton Academy we support pupils with SEND to overcome these barriers through our commitment to inclusion and specifically by:

- Liaison with the academy Assistant Headteacher Inclusion/Assistant SENCO/Designated Provision Lead where Safeguarding concerns involve a pupil with additional needs.
- Ensuring all SEND pupils have a member of the EST who knows the pupil well
- Maintaining strong communication between home and the academy
- Ensuring that all curriculum coverage aimed at helping pupils to keep themselves safe is accessible to pupils with SEND.
- Ensuring a member of the EST is part of the Safeguarding Team
- Ensuring that all pupils with SEND can access all aspects of academy life and be a full part of the academy community

## 11. Pupils with a Social Worker and Those Vulnerable

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. All TCAT academies maintain a register of Vulnerable Pupils including those with allocated Social Workers. At The Sutton Academy this is the Vulnerable Pupils Registers.

## 12. Looked After and Previously Looked After Children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL's and Safeguarding Officer has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Kevin Harker who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#). Gemma Potter is the Deputy DSL and attends all PEPs meetings and completes all PEPs.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role. As part of their role they will work closely with the Safeguarding Officer to ensure that all Safeguarding matter are dealt with promptly. Further details of arrangements for Looked after and previously looked after children are available in the Looked After and Previously Looked after children Policy.

## 13. Complaints

All complaints will be dealt with under the TCAT Complaints Policy and procedure

## 14. Record Keeping

We will hold records in line with the TCAT records retention schedule.

- All safeguarding documentation will be logged and stored on CPOMS (Child Protection Management System)
- Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the academy.

If a child for whom the academy has, or has had, safeguarding concerns moves to another school or academy, the DSL will ensure that their Safeguarding information is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school/academy and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child. All TCAT academies use CPOMS an electronic secure information management system for the Child Protection and Safeguarding matters.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- TCAT LADO and Low Level Concern Policy sets out our policy on record-keeping with respect to allegations of abuse made against staff

## 15. Training

### 15.1. All Staff

All staff at The Sutton Academy and all staff in TCAT academies will undertake Child Protection and Safeguarding training at an appropriate level annually via the National College. The training covers:

- **Safeguarding Children** including recognizing different types of abuse, FGM, Forced Marriage, Peer on Peer Abuse and Children Missing Education.
- **Radicalisation and Extremism** including Prevent Strategy guidance
- **Mental Health and Wellbeing** including types of mental health needs
- **How to Keep Children Safe** including raising concerns about a child
- **Online Safety** including cyber bullying and sexting

In addition, the DSL's within each of the academies will direct regular briefings to all staff in local and national context. The TCAT Safeguarding Hub will further disseminate guidance and provide training to individual academies and DSL's and broader Safeguarding staff.

At The Sutton Academy supply teachers and those volunteering will read the Child Protection Awareness document prior to commencing their role within the academy and all visitors to the academy will be issued with information regarding Safeguarding principals and how to identify and respond to any safeguarding concerns.

## 15.2. The DSL, Deputy DSL and Safeguarding Officer

The DSL's and Safeguarding Officers will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training every 2 years.

## 15.3. Governors & Trustees

All **Trustees and Local Governors** will:

- Read *Keeping Children Safe in Education*, with particular focus on **Part 1 and Part 5**, and Part 2 where relevant to governance responsibilities.
- Complete **annual TCAT Safeguarding Essentials training**
- Complete **Safer Recruitment training** every 2 years via the National College if they are to be involved in recruitment.
- The **Safeguarding Trustee** and **Chair of Trustees, Chairs of LGCBS and Local Safeguarding Governors** will also complete the **Annual Certificate for Trustees and Governors** via the National College.

While the **Chair of Governors** may be informed of allegations involving the Headteacher/Principal, **only a member of TCAT Central, including Trustees**, may be appointed as **case managers** in such cases. Trustees appointed to this role will receive appropriate **training in managing allegations**, in line with the TCAT LADO & Low-Level Concerns Policy.

## 15.4. Recruitment – Interview Panels

At least one person conducting any interview for a post at the academy will have undertaken safer recruitment training. At The Sutton Academy all members of the Senior Leadership Team and Governors who are involved in recruitment undertake Safer Recruitment Training every 2 years via the National College. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, *Keeping Children Safe in Education*, and will be in line with local safeguarding procedures.

## **15.5. Staff who have contact with pupils and families**

All academies within TCAT will have access to Supervision for DSL's and Safeguarding Leads through TCAT's Lead Practitioner for Safeguarding supported by the TCAT Safeguarding Hub. The Sutton Academy also recognises that staff who have regular and often intense contact with children and families will also require supervision. We will provide this through the function of the Safeguarding Team and through the Supervision Lead Gemma Potter

## **16. Monitoring Arrangements**

This policy will be reviewed **annually** by Paul Willerton Principal with the Local Governing Challenge Board

## **17. Links with Other Policies**

This policy links to the following policies and procedures:

### **TCAT Policies**

- a. GDPR
- b. CCTV
- c. Whistle Blowing
- d. Complaints
- e. Equality
- f. Health and Safety
- g. Attendance Policy
- h. Online Safety Policy
- i. LADO and Low Level Concerns Policy

### **The Sutton Academy Policies:**

- j. Behaviour Policy and Manual of Procedures
- k. Drugs and Substance abuse Policy
- l. RSE Policy
- m. SEND Policy
- n. Privacy and Acceptable Use Policies
- o. Anti-Bullying Policy
- p. Mental Health and Wellbeing Policy
- q. Looked After and Previously Looked After Children.

## **18. Safeguarding Students Aged 18 and Over**

Students who turn 18 while enrolled at The Sutton Academy remain subject to the full content of our safeguarding policy and all other relevant Trust policies. Although statutory guidance such as Keeping Children Safe in Education (KCSIE, 2025) and Working Together to Safeguard Children (2025) applies specifically to individuals under the age of 18, the principles of safeguarding and promoting welfare continue to underpin our approach to supporting young adults.

Where safeguarding concerns arise for learners aged 18 and over, referrals will be made to Adult Services rather than Children's Services, in accordance with the Care Act 2014. Adult safeguarding duties apply when an individual:

- has needs for care and support,
- is experiencing or at risk of abuse or neglect, and
- is unable to protect themselves due to those needs.

We recognise the importance of transitional safeguarding, which acknowledges that risks do not cease at 18 and that young adults may face a 'cliff edge' in support. Our safeguarding team will work collaboratively with adult services and other agencies to ensure continuity of care and protection.

In cases where an 18-year-old student is involved in a child-on-child (peer-on-peer) incident, either as the alleged perpetrator or victim, the Sutton Academy will continue to apply the same safeguarding principles and procedures outlined in our child protection and safeguarding policy.

These incidents will be addressed with the same seriousness and rigour, ensuring that all parties are safeguarded appropriately. Where necessary, referrals will be made to adult safeguarding services, and The Sutton Academy will work with both children's and adult services to ensure a coordinated response. Staff must remain alert to the complexities of peer dynamics and the potential vulnerabilities of young adults, particularly in mixed-age settings.

All staff must continue to follow safeguarding procedures for all learners, regardless of age, ensuring that concerns are acted upon promptly and appropriately.

**These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2025**

## **Appendix 1: Types of Abuse**

**Abuse**, including neglect and exploitation are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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



- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**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
- 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** 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)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Appendix 2: Safer Recruitment and DBS Checks – Policies and Procedures**

### **Recruitment and selection process**

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

### **Advertising**

When advertising roles, we will make clear:

- Our academies commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

## **Application forms**

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

## **Shortlisting**

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns
- Once we have shortlisted candidates, we will ask shortlisted candidates to:
- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they can share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online and candidates will be informed that this check may happen.

## **Seeking references and checking employment history**

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is academy based, we will ask for the reference to be confirmed by the Headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

## **Interview and selection**

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children

- Record all information considered and decisions made

## **Pre-appointment vetting checks**

We will record all information on the checks carried out in the academies single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### **New staff**

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher. For non-teaching staff who will be pupil facing we will check their name against the prohibition from teaching list.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state
- Management positions are most likely to include, but are not limited to, Headteachers, principals and deputy/assistant Headteachers.

Academies with pupils aged under 8 will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the academy has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

TCAT Academies with pupils aged under 8 will:

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

TCAT Academies with pupils under 8 will in both cases check to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

## **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

TCAT academies with pupils aged under 8 will:

- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

## **Governors and members**

All governors and trustees will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity. The Chair of the Trust board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- Identity
- Right to work in the UK

## **Adults who supervise pupils on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

## **Pupils staying with host families**

Where the academy makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the academy is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools or academies abroad to ensure that similar assurances are undertaken prior to the visit.

## Appendix 3: Specific Safeguarding Issues

This appendix is mostly based on the advice in Keeping Children Safe in Education, in particular annex B – it identifies key aspects of Safeguarding that staff need to be aware of.

### Children missing from education

A child being absent from education – deliberately missing education for prolonged periods and/or on repeat can act as a warning sign to a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. Supporting children who are absent from education helps prevent the risk of them becoming a child missing education in the future

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend an academy
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of becoming missing from education in the future. This includes informing the local authority if a child leaves the academy without a new school or academy being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Warrington - [School attendance | warrington.gov.uk](https://www.warrington.gov.uk/school-attendance)

St Helens – [Child missing from education - St Helens Borough Council](https://www.sthelens.gov.uk/child-missing-from-education)

Wirral – [Wirral Attendance Team | wirral.gov.uk](https://www.wirral.gov.uk/wirral-attendance-team)

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger

### Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.



The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **Child-on-child abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our academy has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content. If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our academies approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

## **County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including academies, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and the academy), when the victim may have been trafficked for the purpose of transporting drug. If a pupil is suspected to be at risk of or involved in county lines a member of staff will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and police, if appropriate using referral through to CESOG.

## **Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. Children can be victims of abuse if they hear, see or experience domestic violence. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in the academy (usually the designated safeguarding lead) before the child or children arrive at the academy the following day. This is the procedure where police forces in the areas where the child lives are part of [Operation Encompass](#) – the academy may also be made aware if the incident via a VPA (Vulnerable Person's Assessment) However, academies become informed appropriate supportive measures for the pupil should be implemented and the incident logged on CPOMS.

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL [and deputy/deputies] will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

## **So-called 'honour-based' abuse (including FGM and forced marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

## **FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from the academy, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from the academy
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive

## **Forced marriage**

Forcing a person into marriage is a crime. It is a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages. A forced marriage is one

entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmufco.gov.uk](mailto:fmufco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or academy counsellor, as appropriate

## Preventing radicalisation

**Radicalisation** refers to the process by which a person legitimising support for or use of terrorists violence'

**Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

**Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Academies have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our academy being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at the academy and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance

- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

All TCAT academies deliver education on Equality and Diversity including Fundamental British Values within their Personal Development and PSHE curriculums and extra-curricular aspects of the academy.

## **Sexual violence and sexual harassment between children in academies**

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same academy.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the academy that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and Gender Questioning Children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our academies approach to this type of abuse.

## **Serious violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from the academy
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from the academy
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

## **Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of staff and sign in showing the reason for the visit and who they are visiting. All visitors will be issued with a visitors badge.

Visitors to the academy who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the academy any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using academy facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

## **Non-collection of children**



If a child is not collected at the end of the session/day, we will:

- Exhaust all points of contact to ensure that the child is collected
- Ensure those with responsibility are aware of their responsibility and the academy duty in regard to Safeguarding.

## **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing for example are not in the academy when expected to be or have not returned home when expected, we will

- Consider the potential vulnerability of the child including consideration of age and whether they have other vulnerable factors
- Exhaust all possible points of contact including where appropriate safe direct contact to the pupils themselves.
- Ensure those with parental responsibility are informed unless we have sound reason to believe that this may put the child at greater risk. In this instance Social Care and Police will be informed.
- The overriding aim will be to ensure that the child is safe and to ensure the child is returned to the place that they should be,
- Details of the incident will be recorded on CPOMS and discussed with the DSL and Safeguarding Officer to assess risk for the pupil.

## **Child Abduction and community safety incidents**

- Child abduction is when children are taken from their parents or carers without permission. It can be committed by parents or other family members, by people known but not related to the child (like neighbours, friends, acquaintances) and by strangers
- Community safety incidents are things like unknown adults loitering near the academy or trying to talk to children. When an academy is made aware of this the DSL will liaise with the local Police to decide on appropriate actions.
- Always follow our pick-up procedures to make sure that children go home safely with their designated adult(s)

**If you see anything suspicious that doesn't feel right, report it immediately.**

## **Modern Slavery**

- This includes human trafficking and slavery, servitude and forced or compulsory labour
- The exploitation can take many forms for example sexual exploitation, forced labour, forced criminality and the removal of organs
- There are national referral mechanisms for modern slavery- speak to your DSL if you need to know more about this.

## **Cybercrime**

- This is defined as criminal activity committed using computers and/or the internet
- This includes activities such as hacking, 'denial of service' attacks (where a website is made unavailable), and creating and using malware such as viruses
- Children who are particularly skilled in computing and technology may be drawn into cybercrime-either deliberately or inadvertently.

## **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. Similarly, making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be particularly stressful for children. In both instances additional pastoral support will be offered to pupils affected and DSL will liaise with social care, police and other services to support pupils and their families.

## **Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Any pupils who have a parent or carer in prison will be offered additional pastoral support as required and the DSL will liaise with police, probation and social care as required