



CHILD PROTECTION AND SAFEGUARDING POLICY

September 2026

**ADOPTED BY
THE SUTTON
ACADEMY**

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SERVE CHALLENGE EMPOWER

Document Control

Version	Date	Action
1	01/09/2024	Centralised policy ratified
2	05/09/2025	Updated to include safeguarding arrangements for students aged 18 and over in post-16 settings.
3	11/09/2025	Updated recording expectations for visible marks and injuries.
4	10/10/2025	Updated governance, allegations management and case management wording to reflect Trust responsibilities, including trustees as proprietor and case manager where required.
5	01/09/2026	Updated in line with KCSIE 2026, including terminology, statutory expectations, safeguarding practice, training expectations, Trust-wide implementation arrangements and relevant Independent School Standards requirements.

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.

TABLE OF CONTENTS

1. AIMS.....	5
2. STAFF QUICK REFERENCE: WHAT TO DO IF.....	5
3. LEGISLATION AND GUIDANCE	6
4. DEFINITIONS	7
5. SAFEGUARDING STUDENTS AGED 18 AND OVER	8
6. WHOLE ACADEMY AND TRUST APPROACH TO SAFEGUARDING.....	9
7. SAFEGUARDING POLICIES AND PROCEDURES	9
8. ROLES AND RESPONSIBILITIES	10
8.1 ALL STAFF.....	10
8.2 THE DESIGNATED SAFEGUARDING LEAD	11
8.3 HEADTEACHERS AND PRINCIPALS	12
8.4 ADDITIONAL SAFEGUARDING ROLES	12
8.5 GOVERNANCE	13
8.6 CENTRAL SAFEGUARDING TEAM / TRUST SAFEGUARDING LEAD	13
9. CONFIDENTIALITY AND INFORMATION SHARING	14
10. OPPORTUNITIES TO TEACH SAFEGUARDING	15
11. SAFEGUARDING CONCERNS OR ALLEGATIONS ABOUT STAFF	17
12. USE OF REASONABLE FORCE IN ACADEMIES	17
13. USE OF ACADEMY PREMISES FOR NON-ACADEMY ACTIVITIES.....	18
14. ALTERNATIVE PROVISION	18
15. SAFER RECRUITMENT	18
16. CHILDREN POTENTIALLY AT GREATER RISK OF HARM	19
17. RECOGNISING AND RESPONDING TO SAFEGUARDING CONCERNS.....	20
17.1 If you are worried about a child	20
17.2 Recording concerns, patterns and small pieces of information.....	21
17.3 If a child is in immediate danger or is suffering, or likely to suffer, significant harm	21
17.4 If a child makes a disclosure	21
17.5 Attendance, absence and part-time timetables	21
17.6 Children who are questioning their gender	22
17.7 Early help or family help	22
17.8 Referral to children's social care or the police	22
17.9 If you have concerns about radicalisation or extremism.....	23
17.10 If you have concerns about a child's mental health	23
17.11 Recording physical marks and injuries.....	23
17.12 If FGM is known, suspected or a child is at risk.....	23
17.13 If you have concerns about child-on-child abuse, harmful sexual behaviour, sexual harassment or sexual violence.....	24
17.14 If there is concern about the sharing of nudes or semi-nudes	24
17.15 Local pupil reporting systems	25

18. WORKING WITH PARENTS AND CARERS	25
19. RECORD KEEPING.....	26
APPENDIX 1: ACADEMY SPECIFIC INFORMATION	27
IMPORTANT CONTACTS.....	27
LOCAL SAFEGUARDING REFERRAL AND ESCALATION ROUTES	27
LOCAL SAFEGUARDING IMPLEMENTATION ARRANGEMENTS.....	28
APPENDIX 2: KCSIE PART ONE STAFF CHECKLIST	29

1. AIMS

The Challenge Academy Trust, TCAT, is committed to safeguarding and promoting the welfare of all children and young people. Safeguarding is everyone's responsibility and all staff, volunteers, governors, trustees, contractors and visitors have a role to play in protecting children from harm and promoting their welfare.

The Trust is committed to a child-centred approach which places the needs, views and best interests of children at the heart of all safeguarding practice. The Trust works in partnership with children, families and other agencies to ensure that children receive the right help at the right time and that concerns are identified, assessed and responded to promptly and effectively.

This policy has been deliberately structured to broadly follow the order of Keeping Children Safe in Education 2026, so that staff, leaders, trustees and governors can more easily cross-reference Trust policy expectations with the relevant statutory guidance. The Trust expects all academies and staff to refer to KCSIE as the primary statutory safeguarding guidance when making safeguarding decisions, reviewing practice or interpreting the requirements set out in this policy.

All staff must read and understand Part One of Keeping Children Safe in Education 2026. Staff who work directly with children must also read Annex B. This policy supports staff to apply those duties in TCAT academies but does not replace the statutory guidance.

This policy should not be read in isolation. It summarises the Trust's safeguarding expectations and signposts to KCSIE, statutory guidance and linked TCAT policies. Where there is uncertainty, staff must seek advice from the DSL and refer to KCSIE and relevant statutory guidance.

Through this policy, the Trust aims to ensure that:

- Appropriate, proportionate and timely action is taken to safeguard and promote the welfare of children and young people.
- All staff understand and fulfil their safeguarding responsibilities in accordance with statutory guidance, legislation and local safeguarding partnership arrangements.
- Staff are appropriately trained and supported to recognise, respond to, record and report safeguarding concerns.
- Safeguarding concerns are managed through clear recording, reporting, information-sharing and escalation processes, ensuring robust analysis of risk and defensible decision-making.
- Children, young people and families receive effective support at the earliest opportunity, reducing the risk of harm and improving outcomes.
- Effective multi-agency working and information sharing underpin safeguarding practice across the Trust.
- Safeguarding arrangements are subject to appropriate leadership, oversight, quality assurance and challenge to ensure statutory duties are met and practice remains effective.
- A strong safeguarding culture is embedded across the Trust where children feel safe, staff are professionally curious, concerns are acted upon, and the welfare of children is paramount in all decision-making.

2. STAFF QUICK REFERENCE: WHAT TO DO IF...

- **I am worried about a child:** speak to the DSL or deputy DSL without delay and record the concern on CPOMS in line with the TCAT Safeguarding Recording and Reporting Policy. If in doubt, record and report it.
- **The child is in immediate danger or at risk of significant harm:** call 999 if there is an immediate risk to life, a medical emergency or a crime in progress. Inform the DSL or deputy DSL immediately. If they are unavailable, make a direct referral to children's social care and/or the police and tell the DSL as soon as possible.

- **A child discloses abuse, neglect, exploitation or harm:** listen, take them seriously, reassure them, do not promise confidentiality, do not investigate, report to the DSL immediately and record the child's words as accurately as possible.
- **I am worried about an adult working in or on behalf of the academy:** report the concern immediately in line with the TCAT LADO and Low-Level Concerns Policy. Do not investigate it yourself.
- **The concern involves sharing nudes or semi-nudes:** report to the DSL immediately. Do not view, copy, print, forward, share, store, save, download or delete the imagery, and do not ask the child to do so.
- **I am worried about a child's attendance:** record the concern on CPOMS and speak to the DSL, deputy DSL or attendance lead. Attendance concerns may indicate unmet need, abuse, neglect, exploitation, mental health concerns or wider contextual risk.
- **I receive information from another pupil, parent or professional:** record the information factually, share it with the DSL or deputy DSL without delay, and do not assume it has already been reported.
- **I see something concerning online or through SENSO:** report it to the DSL or deputy DSL, follow academy online safety procedures and ensure the concern is recorded on CPOMS where it relates to safeguarding.
- **I am worried about a child aged 18 or over:** share the concern with the DSL or appropriate senior safeguarding colleague and record it in line with Trust procedures. Safeguarding, welfare and risk management continue to matter beyond a child's eighteenth birthday.
- **I am concerned a child may need early help or family help:** speak to the DSL or deputy DSL and record the concern. Staff do not need to determine thresholds before reporting concerns.
- **I am unsure whether something is a safeguarding concern:** speak to the DSL or deputy DSL and record the concern on CPOMS. Staff must never decide alone that no action is needed or that a concern is too small to share.
- **I do not think my concern has been acted on:** follow up with the DSL or deputy DSL. If you remain concerned, speak to the Headteacher or Principal, Trust Safeguarding Lead, children's social care or police, or use whistleblowing procedures where appropriate. Safeguarding responsibility does not end once a concern has been recorded.

If staff are ever unsure whether something is a safeguarding concern, they must speak to the DSL or deputy DSL and record the concern on CPOMS. Staff must not decide alone that no action is needed. Small concerns can build a safeguarding picture over time.

Staff are not expected to determine whether a concern meets a statutory threshold before reporting it; this is considered by the DSL in discussion with safeguarding partners where needed.

When responding to a disclosure, staff must not investigate, ask leading questions, promise confidentiality, delay reporting, assume someone else has acted, or contact parents or carers without DSL advice.

3. LEGISLATION AND GUIDANCE

This section should be read alongside Keeping Children Safe in Education 2026, Part Two, including the section on management of safeguarding.

Keeping Children Safe in Education 2026 comes into force on 1st September 2026. This policy version applies from that date and replaces all previous versions of the TCAT Safeguarding and Child Protection Policy. This policy has been developed in accordance with the statutory safeguarding duties placed upon schools, colleges, academies and academy trusts and should be read alongside current legislation, statutory guidance and local safeguarding partnership arrangements.

The Trust has reviewed the KCSIE 2026 changes annex and has updated this policy to reflect the relevant changes to terminology, statutory expectations and safeguarding practice.

The policy is based on:

- Keeping Children Safe in Education 2026 (KCSIE), the statutory guidance issued by the Department for Education which all schools and colleges must have regard to when carrying out their safeguarding responsibilities.
- Working Together to Safeguard Children 2026, which sets out statutory expectations for multi-agency working to help, support, protect and promote the welfare of children, including family help, child protection, information sharing and safeguarding partnership arrangements.
- The Governance Handbook, which outlines the safeguarding responsibilities of trustees, governors and academy committee members.
- Relevant procedures, threshold documents and arrangements published by the safeguarding partners in the local authority areas served by the Trust.

The Trust complies with all relevant safeguarding legislation and statutory guidance referenced within Keeping Children Safe in Education, including legislation relating to child protection, family help, safer recruitment, information sharing, online safety, attendance, children absent from education, Prevent, equality, domestic abuse, data protection and the welfare of children.

For academies and provisions delivering Early Years education, this policy should also be read alongside the current Statutory Framework for the Early Years Foundation Stage (EYFS) and associated safeguarding and welfare requirements.

The Trust recognises its duties under the Equality Act 2010 and Public Sector Equality Duty. Safeguarding arrangements will be implemented in a manner that is inclusive, equitable and responsive to the individual needs of children. When assessing risk and determining appropriate support, staff will consider any additional vulnerabilities, barriers to disclosure or access to support, including those arising from disability, special educational needs, health needs, protected characteristics, family circumstances or other factors that may impact a child's safety and wellbeing. Safeguarding practice across the Trust will be child-centred, anti-discriminatory and focused on achieving the best outcomes for all children.

4. DEFINITIONS

The definitions used throughout this policy are taken from, or aligned with, Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026. This section provides only the key definitions needed to support the policy. Staff should refer to KCSIE Annex A: Further Information for important additional information about specific forms of abuse and safeguarding issues, and to Annex B for the role of the Designated Safeguarding Lead.

Safeguarding and promoting the welfare of children

Safeguarding and promoting the welfare of children is defined as:

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

Safeguarding is everyone's responsibility. Effective safeguarding practice is child-centred and recognises that the welfare of the child is paramount.

Child Protection

Child protection is part of safeguarding and promoting welfare and refers to the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Abuse, neglect and exploitation

Abuse, neglect and exploitation are forms of maltreatment or harm. They may involve someone inflicting harm on a child, failing to act to prevent harm, or manipulating, coercing, controlling, deceiving or pressuring a child into activity that benefits another person or group. Harm can happen within or outside the home, in person, online, or through a combination of both. Children may be harmed by adults or by other children.

KCSIE Part One sets out the indicators of abuse, neglect and exploitation. KCSIE Annex A provides further information about specific safeguarding issues and forms of abuse. Staff must not wait to categorise a concern before reporting it; if in doubt, record and report it.

Children

For the purposes of this policy, a child is anyone under the age of 18.

Child-on-Child Abuse

Where reports of child-on-child abuse are made, the Trust will maintain a child-centred approach and provide appropriate support to all children involved. Within this policy, the terms victim and alleged perpetrator may be used for clarity when describing safeguarding processes, although these terms do not imply guilt, responsibility or outcome.

Early Help / Family Help

Early help or family help refers to support provided as soon as problems emerge, at any point in a child's life. It is intended to improve outcomes, strengthen family resilience and reduce the likelihood of concerns escalating to statutory intervention.

Significant Harm

Significant harm is the threshold that justifies compulsory intervention in family life in the best interests of a child. A child may be suffering, or likely to suffer, significant harm where there is evidence or reasonable cause to suspect abuse, neglect, exploitation or serious risk to their health, development or welfare.

Designated Safeguarding Lead

The Designated Safeguarding Lead is the senior member of academy leadership with lead responsibility for safeguarding and child protection. The DSL provides advice and support to staff, manages referrals, works with safeguarding partners and other agencies, maintains oversight of safeguarding records and ensures that safeguarding practice is effective within the academy.

Further detail on specific forms of abuse and safeguarding issues, including those not defined in this section, can be found in KCSIE Annex A: Further Information. Further detail on the role of the DSL can be found in KCSIE Annex B. Staff must use this policy alongside KCSIE, statutory guidance and local safeguarding procedures when recognising, reporting and responding to concerns.

5. SAFEGUARDING STUDENTS AGED 18 AND OVER

Students who turn 18 while enrolled at a TCAT academy remain subject to the safeguarding culture, expectations and procedures set out in this policy. Risk does not automatically end when a student becomes an adult, so safeguarding practice must remain welfare-focused, risk-led and proportionate.

Where safeguarding or welfare concerns arise for a student aged 18 or over, the academy must consider the most appropriate pathway. This may include:

- internal academy support or Trust Safeguarding Lead advice;

- adult safeguarding, mental health, health, housing, police or social care involvement;
- children's services where there is a linked concern involving a child under 18;
- support from parents, carers or other relevant partners where this is necessary and proportionate.

Adult safeguarding pathways may be relevant where the student:

- 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.

Academies must consider transitional safeguarding. Risks such as abuse, neglect, exploitation, domestic abuse, mental health crisis, homelessness, substance misuse, harmful relationships, criminal exploitation and online harm do not cease at 18.

Information may be shared with parents, carers or agencies where this is necessary and proportionate to safeguard the student or others. Data protection legislation and UK GDPR do not prevent information sharing where there is a safeguarding need.

Where possible and safe, academies should involve the student in decisions about support, information sharing and referrals. Consent is not required where sharing information is necessary to prevent harm, protect the student or others, support a safeguarding referral, respond to an emergency, or meet a legal or statutory duty.

Where an 18-year-old student is involved in a concern relating to another student, including child-on-child abuse, harmful sexual behaviour, sexual harassment or sexual violence, academies must take account of the age, vulnerability and legal status of all individuals involved. The response may require coordination across children's safeguarding, adult safeguarding, police, parents or carers, specialist services and Trust oversight. Incidents must be managed with the same seriousness, rigour and safeguarding curiosity as concerns involving children under 18.

Concerns about students aged 18 and over must be shared with the DSL, deputy DSL or named post-16 safeguarding lead where this role exists, without delay. Concerns must be recorded in line with Trust procedures and escalated to the Trust Safeguarding Lead where the matter is complex, high risk or requires multi-agency coordination.

6. WHOLE ACADEMY AND TRUST APPROACH TO SAFEGUARDING

The Trust adopts a whole academy and Trust approach to safeguarding, recognising that safeguarding and promoting the welfare of children is not the responsibility of one person or team, but is embedded in the culture, leadership, governance and day-to-day practice of every academy. This means that all staff, trustees, governors, leaders, volunteers and central Trust colleagues share responsibility for creating safe, supportive and inclusive environments where children are listened to, risks are identified early, concerns are acted upon without delay, and effective support is secured through strong internal systems and partnership working with children, families and external agencies.

7. SAFEGUARDING POLICIES AND PROCEDURES

This policy should be read alongside the Trust's wider suite of safeguarding, conduct, behaviour, curriculum, wellbeing, recording and safer recruitment policies and procedures. In line with Keeping Children Safe in Education, this is not an exhaustive list. Other Trust, academy, local authority, safeguarding partnership or statutory documents may also be relevant depending on the context, the needs of the child and the nature of the concern.

Relevant TCAT policies and procedures include but are not limited to:

- TCAT Behaviour Policy
- TCAT Staff Code of Conduct
- TCAT Disciplinary Policy
- TCAT Whistleblowing Policy
- TCAT LGCB Code of Conduct

- TCAT Trustees Code of Conduct
- TCAT LADO and Low-Level Concerns Policy
- TCAT Attendance Policy
- TCAT Prevent Statement
- TCAT Prevent Risk Assessment
- TCAT Caseload Management Policy
- TCAT Online Safety Policy
- TCAT Mobile Phone policy
- TCAT Mental Health and Wellbeing Policy
- TCAT SRE Policy
- TCAT Looked After Children Policy
- TCAT Supporting Young Carers Policy
- TCAT Safeguarding Recording and Reporting Policy
- TCAT Recruitment Code of Practice
- TCAT CCTV Policy

All Trust policies are available to all staff via IAmCompliant.

8. ROLES AND RESPONSIBILITIES

This section sets out the Trust-wide responsibilities for safeguarding. It should be read alongside Keeping Children Safe in Education 2026, Part Two, including the sections on management of safeguarding and multi-agency working.

Safeguarding and promoting the welfare of children is everyone's responsibility. All staff, volunteers, trustees, governors, contractors and visitors must play their part in protecting children from harm, identifying concerns and taking appropriate action.

Effective safeguarding requires a whole Trust approach, underpinned by a child-centred culture, professional curiosity, timely information sharing, robust recording and effective multi-agency working.

Academy-specific information, including named safeguarding staff, local referral pathways, safeguarding partnership arrangements and operational procedures, must be recorded in Appendix 1 and kept up to date by each academy.

Staff, trustees, governors and relevant Trust colleagues must complete mandatory annual safeguarding training within the month of September each academic year, or within an agreed timeframe where they are absent, join later, or where an alternative deadline is agreed by the Trust Safeguarding Lead. The National College is the Trust's platform for staff safeguarding training. Trustees and governors complete safeguarding training through the NGA platform. Safeguarding knowledge is also reinforced through half-termly newsletters from the Trust Safeguarding Lead, Safeguarding Hub meetings, Trust safeguarding briefings and the annual safeguarding conference.

TCAT academies currently operate across three local authority areas. Academies must refer to the relevant local safeguarding partnership procedures, threshold guidance and escalation arrangements as required:

Warrington: [Warrington Safeguarding Partnerships](#)

St Helens: [St Helens Safeguarding Children Partnership](#)

Wirral: [Wirral Safeguarding Children Partnership](#)

8.1 ALL STAFF

All staff must read and understand Part One of Keeping Children Safe in Education 2026 and must review this guidance at least annually. Staff who work directly with children must also read Annex B. The Part One overview is a complementary quick reference only and does not replace Part One. Staff who work directly with children, and those who do not, are expected to understand their safeguarding responsibilities and the systems in place across the Trust and within their academy to support them. In line with KCSIE 2026, Part Two, page 37, paragraphs 120–137, all staff must understand that safeguarding is most effective when

concerns are shared promptly and appropriately so that DSLs and academy leaders can work with children, families and multi-agency partners to secure the right help at the right time.

Staff must know who the DSL and deputy DSLs are in their academy, how to contact them during the academy day, and where to find academy-specific contact details, local referral routes and escalation information in Appendix 1.

All staff are responsible for:

- Maintaining a child-centred, inclusive and anti-discriminatory approach and acting immediately where they have concerns about a child's welfare, safety or wellbeing.
- Understanding the academy's safeguarding systems, including the role and identity of the DSL and deputy DSLs, the process for recording and reporting concerns, the behaviour policy, attendance procedures, online safety arrangements, filtering and monitoring, local pupil reporting routes, and the response to children who are absent from education.
- Recognising indicators of abuse, neglect and exploitation, including where harm may occur outside the home, online or through child-on-child abuse.
- Being alert to children who may be at greater risk of harm, including children with a social worker, children who are absent from education, children who are electively home educated, children with SEND or health needs, looked after and previously looked after children, care leavers, children requiring mental health support, children affected by domestic abuse, children who are young carers, children who are questioning their gender, and children who may face additional barriers to seeking help.
- Sharing concerns with the DSL or deputy DSL without delay so that, where appropriate, the academy can work with multi-agency partners including children's social care, family help or early help services, police, health, education, Virtual Schools, attendance services and local safeguarding partners. Where necessary, any member of staff may make a direct referral to children's social care or the police if a child is at risk of significant harm or in immediate danger.
- Recording safeguarding concerns accurately, factually and promptly in line with the TCAT Safeguarding Recording and Reporting Policy.
- Maintaining appropriate confidentiality, never promising secrecy to a child, and sharing information in line with safeguarding duties and data protection requirements.
- Understanding their responsibilities in relation to online safety, including filtering and monitoring systems and the safe use of technology, mobile and smart devices.
- Completing mandatory annual safeguarding training within the month of September each academic year through The National College, or within an agreed timeframe where they are absent, join later, or where an alternative deadline is agreed by the Trust Safeguarding Lead, together with any additional safeguarding updates, briefings or training required by the Trust and the academy.
- Raising concerns about poor or unsafe safeguarding practice through the appropriate academy or Trust procedures, including whistleblowing arrangements where necessary.

8.2 THE DESIGNATED SAFEGUARDING LEAD

Further detail on the role of the DSL is set out in Keeping Children Safe in Education 2026, including the section on the designated safeguarding lead, Annex B: Role of the designated safeguarding lead, and Part Two, page 37, paragraphs 120–137 on multi-agency working.

Each academy must appoint an appropriately trained Designated Safeguarding Lead who is a member of the academy senior leadership team. Deputy DSLs may be appointed to support the DSL, but the lead responsibility for safeguarding remains with the DSL and must not be delegated. Named academy safeguarding contacts must be recorded in Appendix 1. The DSL should also work in line with the TCAT Caseload Management Policy when assessing capacity, supervision, escalation and workload linked to safeguarding casework.

The DSL is responsible for:

- taking lead responsibility for safeguarding and child protection within the academy;
- managing referrals and supporting staff to report concerns promptly;
- contributing to strategy discussions, child protection processes and multi-agency meetings;
- ensuring safeguarding records are accurate, secure and reviewed appropriately;

- working with the Headteacher or Principal to embed a strong safeguarding culture;
- working with relevant partners so children receive timely, coordinated and proportionate support.

The DSL must maintain effective working relationships with safeguarding partners and ensure that concerns are escalated where appropriate. Decisions, including the rationale for actions taken or not taken, must be clearly recorded.

The DSL must ensure that staff understand academy procedures for reporting concerns, that safeguarding information is shared appropriately, and that child protection files are held, transferred and retained in line with Trust policy and statutory expectations. The DSL must also support staff to understand the views, wishes and lived experiences of children when assessing risk and planning support.

The DSL and deputy DSLs must complete mandatory annual safeguarding training within the month of September each academic year, or within an agreed timeframe where they are absent, join later, or where an alternative deadline is agreed by the Trust Safeguarding Lead. They must maintain the additional knowledge and skills required for the role. This may include, but is not limited to, DSL refresher training, Prevent training, Single Central Record monitoring training every two years, safer recruitment training where relevant, supervision training, online safety and filtering and monitoring training, and any further training identified by the Trust Safeguarding Lead, Headteacher or Principal, local safeguarding partners or statutory guidance.

8.3 HEADTEACHERS AND PRINCIPALS

Headteachers and Principals are responsible for ensuring that safeguarding is implemented effectively across the academy. This includes:

- embedding safeguarding within leadership, culture, curriculum, behaviour, attendance, pastoral care, online safety and staff practice;
- ensuring academy practice is informed by effective partnership working;
- making sure the DSL and deputy DSLs have the time, training, funding, resources and support needed for their role;
- ensuring suitable safeguarding cover is available during academy hours, extended provision, educational visits and academy-led activities;
- sharing significant safeguarding concerns, emerging risks, allegations, escalation issues, capacity concerns and matters requiring Trust oversight with the Trust Safeguarding Lead.

They must ensure safeguarding policies and procedures are understood by staff, pupils, parents and carers, and that academy-specific arrangements are maintained in Appendix 1.

Headteachers and Principals must ensure that staff complete mandatory annual safeguarding training within the month of September each academic year, or within an agreed timeframe where they are absent, join later, or where an alternative deadline is agreed by the Trust Safeguarding Lead. They must also ensure that DSLs, deputy DSLs and staff with specific safeguarding responsibilities are released to attend required Trust training, Safeguarding Hub meetings, briefings and the annual safeguarding conference.

Where allegations or concerns are raised about staff, supply staff, volunteers, contractors or organisations using academy premises, Headteachers and Principals must follow the TCAT LADO and Low-Level Concerns Policy. Where the concern relates to the Headteacher or Principal, or where there is a conflict of interest, the matter must be referred directly to the Central Safeguarding Team / Trust Safeguarding Lead.

8.4 ADDITIONAL SAFEGUARDING ROLES

Each academy must identify named colleagues for additional safeguarding-related roles, including the Designated Teacher for Looked After Children, Carer Champion, Attendance Lead and Mental Health Lead. These roles do not replace the statutory responsibility of the DSL or the leadership responsibility of the Headteacher or Principal, but they provide specialist oversight, coordination and support for groups of children who may be at greater risk of harm or who may require additional pastoral, welfare, attendance or multi-agency support. Named role holders must be recorded in Appendix 1 and must work closely with the DSL, academy leaders and relevant Trust colleagues.

- The Designated Teacher for Looked After Children must promote the educational achievement, welfare and safeguarding of looked after and previously looked after children. They must work with the DSL, Virtual Schools, carers, social workers, parents or carers where appropriate, and other relevant partners to ensure that safeguarding, attendance, wellbeing, personal education planning and support arrangements are coordinated and kept under review.
- The Carer Champion must support the identification, understanding and support of young carers and children with caring responsibilities. They must work with the DSL, attendance colleagues, pastoral teams, families and relevant external services to ensure that caring responsibilities are recognised, recorded and considered within safeguarding, attendance, wellbeing and support planning.
- The Attendance Lead, including the Senior Attendance Champion or Strategic Attendance Lead where this role is separate, must ensure that attendance concerns are understood as a potential safeguarding indicator. They must work with the DSL, academy leaders, families, local authority attendance services, early help or family help, children's social care and other partners where absence may indicate risk, vulnerability, exploitation, neglect, mental health concerns or children being absent from education.
- The Mental Health Lead must support the academy's approach to mental health and wellbeing, ensuring that concerns are identified, recorded, responded to and escalated appropriately. They must work with the DSL, pastoral teams, parents and carers, health professionals, mental health services and other agency partners where mental health concerns may indicate, contribute to or increase safeguarding risk.

Role holders must share concerns with the DSL without delay, contribute to safeguarding analysis and review, maintain appropriate records in line with the TCAT Safeguarding Recording and Reporting Policy, and complete any additional training required by the Trust, the academy or statutory guidance. Where concerns are complex, high risk or require Trust oversight, the DSL should seek advice from the Trust Safeguarding Lead in a timely and open manner.

8.5 GOVERNANCE

As the proprietor, The Challenge Academy Trust and its Trustees hold strategic responsibility for safeguarding across all academies. The Trust Board must ensure that the Trust complies with statutory safeguarding duties, that this policy is reviewed and approved at the required intervals, and that safeguarding arrangements are subject to effective oversight, scrutiny and challenge. This includes seeking assurance that academies understand and follow the multi-agency working expectations set out in KCSIE 2026, Part Two, page 37, paragraphs 120–137.

Trustees and local governors must understand their safeguarding responsibilities, complete mandatory annual safeguarding training within the month of September each academic year through the NGA platform, or within an agreed timeframe where they are absent, join later, or where an alternative deadline is agreed by the Trust Safeguarding Lead, and assure themselves that safeguarding arrangements are effective within the academies they oversee. Chairs of Governors and Safeguarding Links may be required to complete additional safeguarding training relevant to their oversight role. This includes seeking assurance in relation to safer recruitment, staff training, safeguarding culture, online safety, filtering and monitoring, attendance, child-on-child abuse, allegations management, record keeping, local safeguarding arrangements and the effectiveness of multi-agency working with safeguarding partners and other relevant agencies.

Governance oversight must not replace operational safeguarding decision-making. Trustees and governors provide support, scrutiny and challenge, while operational safeguarding decisions remain with academy leaders, DSLs and, where appropriate, the Central Safeguarding Team / Trust Safeguarding Lead.

8.6 CENTRAL SAFEGUARDING TEAM / TRUST SAFEGUARDING LEAD

The Central Safeguarding Team, including the Trust Safeguarding Lead, provides strategic safeguarding leadership, professional advice, quality assurance and operational support across the Trust.

The Central Safeguarding Team supports academies with:

- complex safeguarding matters and escalation;

- policy implementation and statutory updates;
- safeguarding audits, reviews and quality assurance;
- training, supervision, Safeguarding Hub meetings and briefings;
- recording and reporting expectations, including CPOMS systems;
- vulnerable pupil oversight, online safety monitoring and Trust-wide safeguarding priorities;
- effective working with safeguarding partnerships, local authorities, children's social care, family help or early help, police, health and education services.

The Trust Safeguarding Lead will provide advice and challenge where safeguarding practice requires escalation, including concerns relating to allegations against staff, low-level concerns, whistleblowing, information sharing, external agency involvement, local safeguarding partnership processes, and matters requiring Trust oversight or coordination.

The Central Safeguarding Team will report safeguarding themes, risks, compliance and quality assurance findings through the Trust's agreed governance structures. This supports the Trust Board and relevant committees to maintain effective strategic oversight of safeguarding across all academies.

The Trust Safeguarding Lead will support the Trust-wide safeguarding training programme through half-termly safeguarding newsletters, half-termly Safeguarding Hub meetings, targeted briefings and an annual safeguarding conference. The Central Safeguarding Team will use audits, safeguarding themes, statutory changes, case learning and emerging risks to identify where additional training, guidance or quality assurance is required across academies.

9. CONFIDENTIALITY AND INFORMATION SHARING

This section should be read alongside Keeping Children Safe in Education 2026, Part Two, page 38, paragraphs 138–150, which set out expectations for information sharing.

The Trust recognises that effective safeguarding depends on appropriate, timely and proportionate information sharing.

Confidentiality is important, but it must never be used as a reason to delay or prevent action to safeguard a child. All staff must understand that safeguarding concerns should be shared with the DSL or deputy DSL without delay, and that information may need to be shared with children's social care, police, health, education, safeguarding partners or other relevant agencies where this is necessary to safeguard or promote the welfare of a child.

- The Data Protection Act 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.
- Staff should be open and honest with children, parents and carers about how information will be used and shared, unless doing so would increase risk, prejudice a police investigation, or place a child or another person at risk of harm.
- Staff must never promise a child that they will keep a disclosure or concern secret. They should explain that they may need to share information with the DSL or other professionals to keep the child or others safe.
- Where special category personal data needs to be shared for safeguarding purposes, the Data Protection Act 2018 provides a safeguarding condition which allows information to be shared without consent where necessary and proportionate, including where seeking consent is not possible, cannot reasonably be expected, or would place a child at risk.
- Information shared for safeguarding purposes must be relevant, necessary, proportionate, accurate, timely and shared securely with those who need to know.
- Decisions to share, or not to share, safeguarding information must be recorded clearly, including the rationale for the decision and any advice received.

CPOMS is the Trust's single system for recording safeguarding concerns, actions and outcomes. Records must be factual, timely, accurate, clear, proportionate and written in professional language. Staff must

record what they saw, heard or were told, using the child's own words where appropriate, and must avoid personal opinion, assumptions, speculation or unsupported conclusions. Records should reflect the child's lived experience and support a clear chronology of concerns, actions, decisions and outcomes.

Where a child asks that information is not shared

The child's wishes and feelings should be taken seriously and considered carefully. However, staff must not agree to keep safeguarding information confidential where doing so could leave the child or another person at risk of harm. The DSL will balance the child's views against the Trust's duty to safeguard and promote the welfare of children, taking account of the nature of the concern, the level of risk, the need for early help or statutory intervention, and whether information needs to be shared with parents, carers or external agencies.

Parents and carers will normally be informed where there is a safeguarding concern, unless doing so would place the child at greater risk, compromise a police or social care response, or undermine the safeguarding action being taken. Where there is uncertainty, the DSL should seek advice from children's social care, police or the Trust Safeguarding Lead.

Where a report relates to sexual violence, sexual harassment or harmful sexual behaviour

- The DSL must consider the child's wishes and feelings but must also consider the duty to protect the child and other children from harm.
- 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 and/or the police as appropriate.
- 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. Domestic abuse, including coercive or controlling behaviour, exploitation, serious violence, threats, assault, harassment, stalking, image-based abuse, forced marriage, honour-based abuse, FGM and other suspected criminal offences may also require referral to, or advice from, 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.
- The DSL must consider whether sharing information with parents or carers would increase risk to the child and should seek advice from children's social care or police where needed.
- Information about reports of sexual violence, sexual harassment or harmful sexual behaviour must only be shared with staff who need to know to safeguard and support the children involved.

Anonymity and sharing on a need-to-know basis

- All staff must do all they reasonably can to protect the anonymity and dignity of children involved in safeguarding concerns, particularly where there are reports of sexual violence or sexual harassment.
- Information must be shared on a need-to-know basis, balancing the need to protect children with the need to provide appropriate support, supervision and risk management.
- Staff must consider the potential impact of social media, messaging groups and online platforms in spreading rumours, exposing children's identities or increasing risk.
- If staff are unsure whether information should be shared, they must speak to the DSL or deputy DSL. Where the matter is complex, high risk or requires Trust oversight, the DSL should seek advice from the Trust Safeguarding Lead in a timely and open manner.
- The Trust will follow current government information sharing advice, ICO guidance and the expectations set out in KCSIE 2026, Part Two, page 38, paragraphs 138–150, when making safeguarding information-sharing decisions.

10. OPPORTUNITIES TO TEACH SAFEGUARDING

This section should be read alongside Keeping Children Safe in Education 2026, Part Two, page 42, paragraphs 156–170.

All academies must ensure pupils and students are taught how to keep themselves and others safe, including online, through a broad, balanced and age-appropriate curriculum. This must be planned through the relevant curriculum and framework for the phase, including the National Curriculum for key stages 1 to

4, the Early Years Foundation Stage statutory framework for early years provision, and appropriate post-16 programmes of study, tutorial, enrichment, personal development and pastoral curriculum arrangements.

Safeguarding education should be planned, inclusive and responsive to pupils' age, stage, needs and local context. It should be informed by safeguarding records, pupil voice, behaviour and attendance data, online safety monitoring, community intelligence and work with safeguarding partners.

Safeguarding education must also reflect current statutory expectations around online harms, including misinformation, disinformation, conspiracy theories, artificial intelligence, image-based abuse, harmful content, online coercion and commercial or financial risks.

For post-16 learners, safeguarding education should be developmentally appropriate and reflect the risks, choices and responsibilities relevant to older students, including online safety, healthy relationships, consent, exploitation, mental health, financial or commercial risk, substance misuse, attendance, independent travel, work experience, transition, and preparation for adulthood.

Opportunities to teach safeguarding may include:

- Personal Development, PSHE, RSE/SRE, Relationships Education, Health Education, Citizenship and Computing.
- Assemblies, tutor time, pastoral programmes and enrichment activities.
- Targeted interventions, transition work and responsive curriculum inputs where a safeguarding theme has emerged.
- Age-appropriate teaching that is accessible for pupils with SEND, additional vulnerabilities or barriers to seeking help.

What pupils must be taught

- Safe, responsible and respectful use of technology, including social media, gaming, messaging platforms, mobile and smart devices, artificial intelligence, deepfakes and image-based abuse.
- Online relationships, digital consent, privacy, personal information and reporting concerns.
- The four KCSIE areas of online risk: content, contact, conduct and commerce, including how these risks can be intensified by artificial intelligence, algorithms, anonymity and online platforms.
- Risks linked to harmful content, grooming, exploitation, online bullying, sharing nudes and semi-nudes, misinformation, disinformation, scams, gambling, advertising and financial or commercial risks.

What academies must have in place

- Have robust processes for online safety across the academy community.
- Protect and educate pupils, staff, volunteers, governors, parents and carers in the safe and responsible use of technology.
- Set clear expectations for mobile phones, smart technology, cameras and acceptable use of academy ICT systems.
- Ensure pupils, parents and carers know how to report online safety concerns.
- Identify, intervene in and escalate online safety incidents or concerns where appropriate.
- Refer to the TCAT Online Safety Policy and academy-specific procedures for further detail.

Staff, parents and wider academy community

- Staff will receive online safety training during induction and at least annually, including cyberbullying, online radicalisation, filtering and monitoring, and the safe use of mobile phones and cameras.
- Staff must not take photographs or recordings of pupils on personal phones or cameras.
- Parents and carers will receive online safety information through academy websites, direct communication and parent-facing opportunities.
- Pupils, parents and carers, staff, volunteers and governors will be made aware of acceptable use expectations for the internet, academy ICT systems, mobile phones and smart technology.
- Academies will explain the sanctions that may apply where pupils breach acceptable use or mobile phone expectations.

How filtering and monitoring informs safeguarding practice

Filtering and monitoring form part of the Trust's wider online safety and safeguarding arrangements. The Trust uses SENSO remote monitoring software across TCAT academies and central services. SENSO alerts must be reviewed, escalated and recorded in line with Trust safeguarding procedures.

- Pupils should be taught why filtering and monitoring systems are in place, how they help keep children safe, how to report concerns, and that systems are reviewed by the academy and Trust as part of wider safeguarding assurance.
- SENSO alerts and online safety monitoring information should inform safeguarding practice, pastoral responses, curriculum planning, staff briefings and communication with pupils, parents and carers where appropriate.
- Academies should use emerging themes to respond to risks such as self-harm, suicide ideation, bullying, harassment, exploitation, radicalisation, harmful sexual behaviour, misogyny, hate speech, harmful online challenges, inappropriate searches and unsafe contact.
- Academy leaders, DSLs, online safety leads, IT colleagues and curriculum leaders should review filtering and monitoring arrangements at least annually, and whenever significant risks, system changes or safeguarding concerns indicate that further review is needed. Reviews should consider whether additional teaching, assemblies, targeted intervention, parental communication, staff training or Trust escalation is required.
- Academies should be guided by relevant DfE guidance, including planning technology for schools and generative AI in education.

Contextual safeguarding and local priorities

Academies must ensure safeguarding teaching reflects the lived experiences of pupils and local communities. Relevant themes may include:

- child criminal exploitation, child sexual exploitation, county lines, serious violence and knife crime;
- radicalisation, extremism, hate crime, racism, sexism, homophobia, transphobia and bullying;
- substance misuse, mental health and wellbeing, self-harm, suicide prevention and bereavement;
- attendance, children missing from education, young carers and domestic abuse;
- forced marriage, FGM, honour-based abuse, poverty, community safety, public transport, local parks and risks linked to events, trends or locations.

Academy leaders, DSLs, curriculum leaders, pastoral teams, online safety leads and mental health leads should work together to ensure safeguarding education is planned, sequenced, evidence-informed and responsive. Where safeguarding information identifies emerging risks, academies should adapt curriculum content, assemblies, targeted work or communication with pupils, parents and carers as needed.

11. SAFEGUARDING CONCERNS OR ALLEGATIONS ABOUT STAFF

This section should be read alongside Keeping Children Safe in Education 2026, Part Four, page 104, paragraphs 431–525.

Any safeguarding concern or allegation about a member of staff, supply teacher, trainee teacher, volunteer, contractor or other adult working in or on behalf of an academy must be reported immediately in line with the TCAT LADO and Low-Level Concerns Policy. This includes concerns that may meet the harm threshold and concerns that do not meet the harm threshold. Staff must not investigate concerns themselves and must follow the reporting routes set out in the Trust policy without delay.

All low-level concerns about staff must be recorded on the academy's low-level concern tracker in line with the TCAT LADO and Low-Level Concerns Policy. The tracker must be maintained securely, reviewed by the Headteacher or Principal and used to identify any patterns, themes or cumulative concerns that may require further action, advice or escalation to the Trust Safeguarding Lead.

12. USE OF REASONABLE FORCE IN ACADEMIES

This section should be read alongside Keeping Children Safe in Education 2026, Part Two, page 53, paragraphs 203–205, the TCAT Behaviour Policy, the TCAT Safeguarding Recording and Reporting Policy and relevant statutory guidance on the use of reasonable force.

Any use of reasonable force or restrictive intervention must be lawful, necessary, proportionate and in the best interests of keeping children and others safe.

All use of Team Teach holds must be recorded on CPOMS using the Physical Intervention - Restrictive Holds form. The relevant TCAT Team Teach letter must be sent to parents or carers and the response slip retained by the academy. Where this is the first use of a Team Teach hold, the first-instance letter must be used; where the hold forms part of an agreed plan, the planned-use letter must be used.

Where reasonable force or a Team Teach hold is used for the first time, a risk assessment must be completed and any foreseeable future use of reasonable force must be detailed in the child's plan, including known triggers, de-escalation strategies and agreed responses.

Staff do not need to be Team Teach trained to intervene in an emergency. Where a child is at risk of harming themselves or others, or there is a risk of serious damage to property, any member of staff may use reasonable force if it is necessary, reasonable and proportionate in the circumstances. Staff must use the minimum force necessary for the shortest time possible, seek support as soon as it is safe to do so, and ensure the incident is reported, recorded and reviewed in line with Trust procedures.

13. USE OF ACADEMY PREMISES FOR NON-ACADEMY ACTIVITIES

This section should be read alongside Keeping Children Safe in Education 2026, Part Two, page 54, paragraphs 206–207, and the TCAT Lettings Policy.

Where academy premises are used by external organisations or individuals for non-academy activities, academies must ensure that appropriate safeguarding arrangements are in place as a condition of use. This includes ensuring that providers understand and comply with safeguarding expectations, that concerns or allegations are reported through the appropriate routes, and that any use of premises is consistent with Trust policy and statutory guidance.

14. ALTERNATIVE PROVISION

This section should be read alongside Keeping Children Safe in Education 2026, Part Two, page 55, paragraphs 208–213.

Where a TCAT academy places a pupil in alternative provision, the home academy remains responsible for the safeguarding and welfare of that pupil and must be satisfied that the provider has appropriate safeguarding arrangements in place. Academies must seek written assurance from the alternative provision provider that safeguarding responsibilities, safer recruitment checks, staff training, attendance reporting, referral routes and named DSL arrangements are in line with statutory guidance and Trust expectations.

The Trust will maintain a central list of all alternative provision providers used by TCAT academies, together with the annual letters of assurance obtained from those providers. Academies must ensure that any new alternative provision placement is notified to the Central Safeguarding Team so that the central record remains accurate and assurance documentation is reviewed each year.

The home academy must know where pupils are each day, monitor attendance closely, maintain regular contact with the provider and pupil, and review the placement at appropriate intervals. Where provision is subcontracted or delivered from more than one site, the academy must be satisfied that the same safeguarding standards and assurance arrangements apply.

If a safeguarding concern is raised in relation to an alternative provision placement, the home academy must review the placement without delay, take appropriate safeguarding action, and consider whether the placement should be paused or ended until concerns have been satisfactorily addressed. Significant concerns must be shared with the Trust Safeguarding Lead in a timely and open manner.

15. SAFER RECRUITMENT

This section should be read alongside Keeping Children Safe in Education 2026, Part Three, page 71, paragraphs 283–430, and the TCAT Safer Recruitment Code of Practice.

The Trust is committed to preventing unsuitable people from working with children by applying robust safer recruitment, selection, vetting and ongoing safeguarding procedures across all academies and central Trust roles.

All recruitment activity must be carried out in line with statutory guidance, Trust procedures and the TCAT Safer Recruitment Code of Practice. This includes appropriate safeguarding statements in recruitment materials, scrutiny of applications, shortlisting checks, consideration of online searches as part of due diligence for shortlisted candidates, references, interview questions, pre-employment checks, identity and right to work checks, DBS and barred list checks where required, prohibition and section 128 checks where applicable, overseas checks where relevant, regulated activity considerations, checks for adults supervising children on work experience where required, and accurate recording on the Single Central Record. The Trust will take account of the KCSIE 2026 regulated activity clarification when deciding whether a role involves regulated activity and what checks are required.

At least one person involved in any recruitment process must have completed appropriate safer recruitment training. Academies and central Trust teams must also remain alert to ongoing safeguarding suitability after appointment, including through induction, supervision, probation, training, staff conduct expectations and the management of concerns in line with the TCAT LADO and Low-Level Concerns Policy.

16. CHILDREN POTENTIALLY AT GREATER RISK OF HARM

This section should be read alongside Keeping Children Safe in Education 2026, Part Two, page 56, paragraphs 214–282, which identify groups of children who may be potentially at greater risk of harm.

The Trust recognises that any child can experience abuse, neglect or exploitation, but some children may face additional vulnerabilities, barriers to being heard, or barriers to accessing help. All academies must maintain an inclusive, anti-discriminatory and child-centred safeguarding culture where staff are professionally curious, understand the lived experiences of children, avoid assumptions, actively challenge racism and discrimination, and take account of individual needs, identity, family circumstances, attendance, health, wellbeing, disability, communication needs and wider contextual risks when identifying concerns and planning support.

Children identified within this section of KCSIE include:

- Children who need a social worker, including children in need and children subject to child protection plans.
- Children who are absent from education.
- Children who are electively home educated.
- 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 with medical conditions.
- Children who are lesbian, gay or bisexual.
- Children who are questioning their gender.

All TCAT academies must ensure that these vulnerabilities are considered within safeguarding practice, attendance monitoring, pastoral support, curriculum planning, behaviour responses, mental health and wellbeing support, SEND provision, medical care arrangements, online safety, child-on-child abuse responses and multi-agency working. Staff must be alert to the possibility that children in these groups may not always recognise their experiences as harmful, may not feel able to disclose, may communicate distress through behaviour, attendance, relationships or presentation, or may require reasonable adjustments and trusted adults to support them to seek help.

The Trust's approach is inclusive and protective. Staff must respond to children with dignity, respect and sensitivity, while maintaining clear safeguarding expectations and acting where risk is identified. Support should be proportionate, evidence-informed and coordinated with the child, family, academy staff and relevant partners, including children's social care, Virtual Schools, health services, early help or family help,

attendance services, SEND professionals, mental health services and other safeguarding partners. Academy-specific arrangements, named leads, local pathways, monitoring systems and additional contextual priorities should be recorded in the relevant appendix or linked academy documentation.

Each academy must maintain its own Vulnerable Register, disadvantaged list and academy support records in line with the definitions and expectations agreed through the Trust Safeguarding Hub. These systems must be used to identify pupils who may require additional oversight, pastoral support, attendance monitoring, early help or family help, safeguarding analysis or multi-agency coordination. The DSL and academy leaders must ensure these records are kept under regular review and used to inform safeguarding practice, pastoral provision, curriculum planning and Trust quality assurance activity.

17. RECOGNISING AND RESPONDING TO SAFEGUARDING CONCERNS

This section should be read alongside Keeping Children Safe in Education 2026, Part One: What school and college staff should do if they have concerns about a child, and the TCAT Safeguarding Recording and Reporting Policy.

All staff, volunteers, trustees and governors must act immediately where they have any safeguarding concern. The Trust expectation is clear: if in doubt, record and report it. Concerns must be shared with the DSL or deputy DSL without delay, recorded on CPOMS in line with the TCAT Safeguarding Recording and Reporting Policy, and escalated where a child is at risk of harm, likely to suffer significant harm or in immediate danger.

Staff must not wait until they are certain that a concern meets a threshold before recording or reporting it. Safeguarding is often built from patterns, context and cumulative information. A single concern may appear minor in isolation, but it may be one small part of a much bigger picture when considered alongside previous concerns, attendance, behaviour, presentation, peer relationships, online activity, family context or information held by other professionals.

For this reason, all concerns, including low-level worries, changes in presentation, comments made by a child, patterns of behaviour, contextual information, professional curiosity, actions taken, advice received and decisions made, must be recorded promptly and factually on CPOMS. CPOMS is the Trust's single safeguarding recording system. For safeguarding assurance and chronology purposes, concerns, actions and decisions must be recorded on CPOMS as soon as possible. If safeguarding action is not recorded, the academy may be unable to evidence that it took place.

For the purposes of this section, references to the DSL include the deputy DSL where the DSL is unavailable. Academy-specific names, contact details, local authority referral links and local operational arrangements must be held in Appendix 1 and kept up to date by each academy. Where staff are unsure whether something should be recorded or reported, they must speak to the DSL or deputy DSL and record the concern. Staff must never decide alone that a concern is too small, too vague or not important enough to share.

17.1 IF YOU ARE WORRIED ABOUT A CHILD

Where staff have any concern about a child's welfare, safety, attendance, behaviour, presentation, mental health, relationships, online activity or lived experience, they must share the concern with the DSL or deputy DSL without delay and record it on CPOMS in line with the TCAT Safeguarding Recording and Reporting Policy. Staff should not wait for proof, investigate the matter themselves, assume that someone else has already acted, or decide that the concern is not serious enough to record. If in doubt, record and report it.

- Speak to the DSL or deputy DSL without delay.
- Record the concern on CPOMS as soon as possible, using factual, clear and proportionate language.
- Include what you saw, heard or were told, using the child's own words where appropriate.
- Do not wait for evidence, ask investigative questions, make assumptions or decide alone that no action is needed.
- Follow up with the DSL if you do not think the concern has been acted upon or if further information becomes known.

17.2 RECORDING CONCERNS, PATTERNS AND SMALL PIECES OF INFORMATION

Small pieces of information matter. Staff may not know what else is already known, what has previously been recorded, or what pattern is emerging. Recording concerns on CPOMS allows the DSL to build a chronology, identify patterns, analyse risk and make defensible safeguarding decisions.

Examples of information that should be recorded include:

- changes in mood, presentation, behaviour, attendance or friendships;
- comments made by a child, parent, carer or professional;
- concerns about online activity or peer relationships;
- parental interactions or family context;
- professional curiosity, actions taken, advice received and decisions made.

The DSL will consider the level of need and risk, taking account of the child's wishes and feelings, known vulnerabilities, attendance, family context, previous concerns, professional advice and any relevant information from safeguarding partners. The DSL can only make informed decisions where concerns are shared and recorded; therefore, all staff must follow the TCAT Safeguarding Recording and Reporting Policy and ensure CPOMS records are completed promptly.

17.3 IF A CHILD IS IN IMMEDIATE DANGER OR IS SUFFERING, OR LIKELY TO SUFFER, SIGNIFICANT HARM

If there is an immediate risk to life, a medical emergency or a crime in progress, call 999 immediately. Inform the DSL or deputy DSL immediately and do not wait until the end of the day.

- If the DSL or deputy DSL is not available, and you believe the child is at risk of significant harm or in immediate danger, make a referral directly to children's social care and/or the police. Anyone can make a referral.
- Tell the DSL or deputy DSL as soon as possible if you have made a referral directly.
- Record the concern, actions taken, decisions made, who was spoken to, advice received and the outcome in line with the TCAT Safeguarding Recording and Reporting Policy.
- Use the local referral pathways and emergency contact details set out in Appendix 1.

17.4 IF A CHILD MAKES A DISCLOSURE

- Listen carefully, remain calm and allow the child to speak freely.
- Take what the child says seriously. Do not dismiss, minimise or investigate the concern yourself.
- Do not ask leading questions. Use open prompts only if clarification is needed, such as "tell me what happened" or "is there anything else you want to tell me?"
- Reassure the child that they have done the right thing by telling you.
- Do not promise confidentiality. Explain that you will need to share the information with the DSL or another appropriate professional to help keep them and others safe.
- Explain, in an age-appropriate way, what will happen next.
- Report the concern to the DSL or deputy DSL immediately.
- Record the disclosure as soon as possible, using the child's own words where possible. Records must be factual, dated, timed and free from personal opinion or assumptions.

Staff must remember that some children may not feel ready or know how to tell someone that they are being abused, neglected or exploited. They may not recognise their experiences as harmful, may feel embarrassed, humiliated or threatened, or may face additional barriers linked to vulnerability, disability, communication needs, language, sexual orientation, gender, family circumstances or previous experiences. This must not prevent staff from maintaining professional curiosity and speaking to the DSL where they have concerns.

17.5 ATTENDANCE, ABSENCE AND PART-TIME TIMETABLES

Attendance is a safeguarding issue. Repeated absence, unexplained absence, persistent lateness, reduced attendance, part-time timetables, managed moves, alternative provision attendance, unexplained withdrawal from lessons, or patterns around particular days, subjects, staff or peer groups may all indicate

vulnerability, unmet need, abuse, neglect, exploitation, mental health concern, bullying, child-on-child abuse, family difficulty or wider contextual risk.

Staff must report and record attendance-related safeguarding concerns on CPOMS and must not assume that attendance concerns are solely pastoral, behavioural or administrative. The DSL, attendance lead and relevant pastoral colleagues should work together to consider patterns, context, previous concerns, family circumstances, pupil voice and multi-agency information.

Part-time timetables must be exceptional, time-limited, clearly recorded, regularly reviewed and subject to appropriate senior oversight. They must never be used informally as a behaviour management response, a safeguarding workaround, or a way of reducing attendance without clear rationale, parental involvement, safeguarding consideration and review arrangements. Where a child is on a part-time timetable, the academy must remain professionally curious about their safety, supervision, welfare and access to education when they are not on site.

17.6 CHILDREN WHO ARE QUESTIONING THEIR GENDER

Where a child is questioning their gender, staff must respond calmly, respectfully and sensitively, while following the academy's safeguarding-led process. Staff must not make individual arrangements, agree changes, promise confidentiality or act alone. The matter must be shared with the DSL or deputy DSL and recorded on CPOMS so that the child's welfare, wishes and feelings, family context, safeguarding information, peer context and any potential risks can be considered carefully.

The DSL will lead the safeguarding response, taking account of KCSIE 2026, the child's best interests, the child's wishes and feelings, the views and involvement of parents and carers unless doing so would place the child at risk of harm, the welfare and safeguarding of other children, equality considerations, professional advice where required, and the need for clear recording and review. Any decision-making must be proportionate, evidence-informed, child-centred and recorded in line with the TCAT Safeguarding Recording and Reporting Policy.

17.7 EARLY HELP OR FAMILY HELP

Early help or family help means providing support as soon as problems emerge, at any point in a child's life. It can prevent concerns from escalating and should be considered where a child or family would benefit from coordinated support before statutory intervention is required.

If early help or family help is appropriate, the DSL will lead, or identify an appropriate colleague to support, liaison with the child, family and relevant agencies. Staff may be asked to contribute information, attend meetings, support an assessment or help deliver the agreed plan.

The DSL will keep early help or family help under review. If the child's situation does not appear to be improving, or risk increases, the DSL will consider referral to children's social care and/or escalation through local safeguarding procedures.

Early help or family help should be considered for any child who may benefit from additional support, including children who are absent from education, affected by mental health concerns, at risk of exploitation or abuse, affected by domestic abuse, experiencing family difficulties, showing changes in behaviour or presentation, repeatedly suspended or at risk of exclusion, affected by parental offending, missing from education, care or home, or otherwise identified as vulnerable.

17.8 REFERRAL TO CHILDREN'S SOCIAL CARE OR THE POLICE

Where a referral to children's social care or the police is required, the DSL will usually make the referral. If the DSL or deputy DSL is not available and the child is at risk of significant harm or in immediate danger, any member of staff must make the referral directly.

If a member of staff makes a referral directly, they must tell the DSL or deputy DSL as soon as possible and ensure the referral, rationale, advice received and outcome are recorded.

Children's social care should decide within one working day of a referral about the type of response required. The DSL or person making the referral must follow up if this information is not received and must record the outcome.

If the child's situation does not appear to improve after a referral, or if staff remain concerned that the response is not sufficient, the DSL must follow local escalation procedures and, where appropriate, seek advice from the Trust Safeguarding Lead.

If staff believe that a safeguarding concern has not been acted upon, or that the response is not sufficient to protect the child, they must follow up with the DSL or deputy DSL. If concerns remain, staff must escalate to the Headteacher or Principal, Trust Safeguarding Lead, children's social care, police or through whistleblowing procedures as appropriate. The child's welfare must remain the paramount consideration.

17.9 IF YOU HAVE CONCERNS ABOUT RADICALISATION OR EXTREMISM

All TCAT academies must follow the TCAT Prevent Statement, TCAT Prevent Risk Assessment and local safeguarding procedures where there are concerns about radicalisation, extremism or vulnerability to being drawn into terrorism.

Staff must report any Prevent concern to the DSL or Prevent Lead without delay. If a child is at risk of significant harm or in immediate danger, staff must follow the immediate danger pathway above, including contacting 999 where required. The DSL or Prevent Lead will consider academy support, early help or family help, referral to children's social care, police advice, Channel referral or other local Prevent arrangements as appropriate.

In an emergency, staff must call 999. Where there is information that may relate to terrorism but there is no immediate danger, staff must speak to the DSL or Prevent Lead and follow the academy's local reporting arrangements set out in Appendix 1.

17.10 IF YOU HAVE CONCERNS ABOUT A CHILD'S MENTAL HEALTH

Mental health concerns can be a safeguarding concern and may also indicate that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Staff must take mental health concerns seriously and share them with the DSL or appropriate academy mental health lead in line with local arrangements.

Where there is any indication of immediate risk, self-harm, suicidal ideation, abuse, neglect, exploitation or risk to others, staff must inform the DSL immediately and follow the immediate danger or referral pathway as appropriate. The DSL will consider academy support, mental health support, family help, external referral and safeguarding action in line with the TCAT Mental Health and Wellbeing Policy and local procedures.

Staff should be alert to changes that may indicate emerging mental health or safeguarding concerns, including withdrawal, significant changes in behaviour, presentation, attendance, relationships, sleep or eating patterns, expressions of hopelessness, self-harm indicators, neglect of self-care, increased risk-taking, distress linked to online activity, or comments suggesting suicidal thoughts or intent.

17.11 RECORDING PHYSICAL MARKS AND INJURIES

Staff must record visible marks, bruises, injuries or physical indicators using the Trust's approved recording processes, including a body map and clear written description where appropriate. Records should include the size, shape, colour, location, date, time, context and the child's explanation where one is given.

Staff must not take photographs of marks, bruises or injuries on children for safeguarding recording purposes, including where an external agency requests this. This protects children's dignity, maintains professional boundaries and supports proportionate information sharing under data protection legislation.

If an external agency requests photographic evidence, staff must not take or share photographs. The request must be escalated to the DSL and the Central Safeguarding Team before any action is taken. This does not prevent urgent safeguarding action or referral where a child is at risk of harm.

17.12 IF FGM IS KNOWN, SUSPECTED OR A CHILD IS AT RISK

Female Genital Mutilation is illegal in the UK and is a form of child abuse. Staff must be alert to indicators that FGM may have taken place or that a child may be at risk. Staff must never examine a child.

If a teacher, in the course of their professional duties, discovers that an act of FGM appears to have been carried out on a girl under 18, they must personally report this to the police. This is a statutory duty. They must also inform the DSL unless advised not to do so by the police.

If any member of staff suspects that a child is at risk of FGM or has concerns but does not know that FGM has taken place, they must report this to the DSL immediately. The DSL will follow local safeguarding procedures and consider referral to children's social care and/or the police.

17.13 IF YOU HAVE CONCERNS ABOUT CHILD-ON-CHILD ABUSE, HARMFUL SEXUAL BEHAVIOUR, SEXUAL HARASSMENT OR SEXUAL VIOLENCE

All concerns about child-on-child abuse, harmful sexual behaviour, sexual harassment or sexual violence must be taken seriously and reported to the DSL immediately. Staff must maintain the mindset that "it could happen here" and must not dismiss concerns as banter, joking, part of growing up, boys being boys or normal behaviour.

Concerns may occur in person, online, outside academy premises or within the wider community. They may include harmful sexual behaviour, misogyny, sexism, unwanted sexual comments, sexualised language, sexual jokes, online harassment, sharing sexual images, pressuring others, sexual assault or sexual violence. A lack of reports does not mean these issues are not happening; it may mean children do not feel able, safe or confident to report them.

If a child makes a report, or staff become aware of behaviour that may indicate child-on-child abuse, harmful sexual behaviour, sexual harassment or sexual violence, staff must report this to the DSL immediately and record the concern on CPOMS. Staff must not investigate, ask leading questions, view or share images, or attempt to resolve the matter informally.

The DSL will consider immediate safety, risk assessment, support for the child who has experienced harm, support and safeguarding needs for the child alleged to have caused harm, support for any witnesses, online risks, parental communication, referral to children's social care and/or police, and whether Trust Safeguarding Lead oversight is required.

The Trust's preferred screening tool for harmful sexual behaviour is the ERASE tool. DSLs must use appropriate screening and risk assessment to inform decisions, support planning and referrals. The Trust also follows the Hackett Continuum to support professional judgement about whether sexualised behaviour is developmentally appropriate, problematic, abusive or violent.

Responses must be child-centred, trauma-informed, proportionate and coordinated with parents, carers and external agencies where appropriate. The DSL must consider confidentiality, anonymity, social media, retaliation, peer group pressure, curriculum response, supervision, separation where needed, and ongoing support for all children involved.

17.14 IF THERE IS CONCERN ABOUT THE SHARING OF NUDES OR SEMI-NUDES

Where staff become aware of an incident involving the creation, possession, request or sharing of nude or semi-nude images, videos or live streams involving children, they must report it to the DSL immediately. The Trust follows current UKCIS guidance and statutory safeguarding guidance when responding to these concerns.

Staff must not:

- View, copy, print, forward, share, store, save or download the imagery.
- Ask a child to share, forward, show or download the imagery.
- Delete the imagery or ask a child to delete it.
- Ask children involved to provide detailed accounts about the imagery. This is the DSL's responsibility.
- Share information with other staff, pupils, parents or carers unless directed by the DSL.
- Say or do anything that blames, shames or increases risk to any child involved.

The DSL will assess risk, consider whether there is coercion, exploitation, blackmail, grooming, immediate harm or criminal behaviour, and decide whether to involve children's social care, police, parents or carers, and other relevant agencies.

Staff should explain that the concern must be shared with the DSL and reassure the child that support will be provided.

17.15 LOCAL PUPIL REPORTING SYSTEMS

Academies must ensure that pupils know how to report worries, concerns, abuse or unsafe behaviour, including concerns that happen online, outside the academy or within peer relationships. Reporting routes must be well promoted, accessible, age-appropriate and responsive to the needs of pupils with SEND, communication needs or additional vulnerabilities.

Pupils must be reassured that they will be listened to, taken seriously and supported. Academy-specific reporting routes, named adults, pupil voice systems and anonymous reporting mechanisms must be recorded in Appendix 1 or linked academy documentation.

18. WORKING WITH PARENTS AND CARERS

Academies should work openly and constructively with parents and carers wherever it is safe and appropriate to do so. This may include:

- sharing concerns and seeking views;
- agreeing support and explaining next steps;
- working with relevant agency partners;
- reducing risk and promoting the child's welfare.

Staff must not contact parents or carers about a safeguarding concern without first speaking to the DSL or deputy DSL, unless there is an immediate emergency and doing so is necessary to protect life or prevent immediate harm.

Parents and carers will normally be informed where there is a safeguarding concern. They should not be contacted first where doing so could:

- place the child or another person at greater risk;
- compromise a police or social care response;
- prejudice an investigation;
- increase the risk of coercion or retaliation;
- undermine the safeguarding action being taken.

Where concerns relate to child-on-child abuse, harmful sexual behaviour, sexual harassment, sexual violence, sharing nudes or semi-nudes, exploitation, online harm or other complex safeguarding matters, the DSL must carefully consider how and when parents or carers are informed. This must include consideration of confidentiality, anonymity, the safety and welfare of all children involved, the potential impact of social media or peer pressure, and whether advice from children's social care or police is required before contact is made.

In line with the KCSIE 2026 additions on children who are questioning their gender, academies must take a careful, child-centred and safeguarding-led approach where a child or parent raises a request relating to social transition. Parents and carers should be involved as a priority unless doing so would place the child at risk of harm. Any decision-making must be led by the DSL, informed by the child's best interests, consider the welfare and safeguarding of the child and other children, and be clearly recorded. Staff must not make individual arrangements or agree changes without the agreed academy safeguarding process being followed.

For learners aged 18 and over, academies should continue to work with the learner wherever possible and respect their developing autonomy. However, where there are safeguarding, welfare, mental health, exploitation, coercion, serious risk or vulnerability concerns, it may still be necessary and proportionate to involve parents, carers, adult safeguarding, police, health, social care or other agency partners. Data

protection legislation and UK GDPR do not prevent information sharing where this is necessary to safeguard the learner or others, and the rationale for any decision to share or not share information must be recorded.

All decisions about working with parents and carers, including decisions not to inform them, must be recorded clearly on CPOMS in line with the TCAT Safeguarding Recording and Reporting Policy. Records must include the concern, who was consulted, the rationale for the decision, advice received, actions taken, information shared, and any agreed next steps or review arrangements.

19. RECORD KEEPING

Safeguarding records must be created, stored, reviewed, transferred and retained in line with the TCAT Safeguarding Recording and Reporting Policy, the Trust records retention schedule and any relevant statutory guidance. CPOMS is the Trust's single system for recording safeguarding concerns, actions and outcomes across TCAT academies. For safeguarding assurance and chronology purposes, concerns, actions and decisions must be recorded on CPOMS as soon as possible. If safeguarding action is not recorded, the academy may be unable to evidence that it took place.

- All safeguarding concerns, disclosures, low-level worries, patterns, actions, decisions, referrals, advice received, communication with parents or carers, multi-agency discussions, chronologies, body maps and review notes must be recorded on CPOMS unless an alternative Trust-approved process applies.
- Records must be factual, timely, accurate, clear, proportionate and written in professional language. Staff must record what they saw, heard or were told, using the child's own words where appropriate, and must avoid personal opinion, assumptions, speculation or unsupported conclusions.
- The DSL is responsible for oversight of safeguarding records, including ensuring that concerns are reviewed, actions are followed up, chronology and analysis are maintained, and records support defensible decision-making.
- Confidential information and records must be held securely and only accessed by those with a legitimate professional need. CPOMS access must be managed carefully and reviewed where staff roles change.
- Safeguarding records relating to individual children will be retained and transferred in line with the TCAT Safeguarding Recording and Reporting Policy, the Trust records retention schedule and statutory expectations.

If a child with safeguarding concerns moves to another school, academy, college or education provider, the DSL must ensure that safeguarding information is transferred promptly, securely and separately from the main pupil file.

- Where concerns are significant, complex or current, the DSL must speak directly to the receiving DSL or safeguarding lead.
- The transfer must include relevant risk, support needs, chronology and agency involvement.
- Records must be transferred in line with the TCAT Safeguarding Recording and Reporting Policy and Trust retention schedule.

In addition:

- The TCAT Recruitment Code of Practice and safer recruitment procedures set out record-keeping requirements for recruitment and pre-employment checks, including the Single Central Record.
- The TCAT LADO and Low-Level Concerns Policy sets out record-keeping expectations for allegations, concerns about adults and low-level concerns.
- Academies must ensure that CPOMS categories, user access, alert groups and recording practice are maintained in line with Trust expectations and reviewed through safeguarding quality assurance activity.

APPENDIX 1: ACADEMY SPECIFIC INFORMATION

IMPORTANT CONTACTS

Academies should add, remove or amend roles as appropriate to reflect their local staffing structure.

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Headteacher / Principal	Lynsey Gobin	Lynsey.gobin@thesuttonacademy.org.uk
Designated Safeguarding Lead (DSL)	Lynsey Gobin	Lynsey.gobin@thesuttonacademy.org.uk
Deputy Designated Safeguarding Lead (DDSL)	Claire Sidhu	Claire.sidhu@thesuttonacademy.org.uk
Safeguarding Officer	Gemma Potter Sharon Farrell Katie Beales-Hilton	Gemma.potter@thesuttonacademy.org.uk Sharon.farrell@thesuttonacademy.org.uk Katie.beales-hilton@thesuttonacademy.org.uk
Early Help Lead		
Mental Health Lead	Meg Letts	Meg.letts@thesuttonacademy.org.uk
Senior Attendance Champion / Strategic Attendance Lead	Gemma Medare	Gemma.medare@thesuttonacademy.org.uk
Attendance Champion		
PREVENT Lead		Lynsey.gobin@thesuttonacademy.org.uk
Online Safety Lead		
Designated Teacher for Looked After Children	Claire Sidhu	Claire.sidhu@thesuttonacademy.org.uk
Carer Champion	Gemma Potter	Gemma.potter@thesuttonacademy.org.uk
Team Teach Level 2 Trained Staff		
Chair of Governors	Gordon Pennington	
Safeguarding Link Governor	Nicola Kearney	

LOCAL SAFEGUARDING REFERRAL AND ESCALATION ROUTES

Local Authority	Children's Social Care / MASH Referral	Email	Out of Hours	LADO Contact	LADO Email	Escalation Procedures
Warrington	01925 443322 (Option 1, Option 2)	childreferral@warrington.gov.uk	Council switchboard: 01925 443322	01925 442079	LADO@warrington.gov.uk	Pan-Cheshire escalation policy
St Helens	01744 676767 (Option 2)	MASH@sthelens.gov.uk	0345 050 0148 (Emergency Duty Team)	01744 671252	sthelenslado@sthelens.gov.uk	St Helens multi-agency resolution policy
Wirral	0151 606 2008 (Integrated Front Door)	ifd@wirral.gov.uk	0151 677 6557	Contact via Safeguarding Unit	safeguardingunit@wirral.gov.uk	Wirral multi-agency escalation procedure

LOCAL SAFEGUARDING IMPLEMENTATION ARRANGEMENTS

Academies must use the table below to set out how they meet the local implementation requirements in this policy. DSLs should keep this section brief and practical. The academy arrangement column should be completed using short bullet points only, so staff can see key local information at a glance. This should not become a narrative description or duplicate the main policy. It should be reviewed at least annually and updated whenever local arrangements change.

Area	Academy arrangement / named lead
DSL cover and safeguarding availability	Set out DSL and deputy DSL cover arrangements during the academy day, before and after academy hours, educational visits, alternative provision, enrichment, lettings and periods of absence.
CPOMS and safeguarding recording arrangements	Set out who receives CPOMS alerts, how concerns are triaged, how body maps are completed, where staff find the TCAT Safeguarding Recording and Reporting Policy, and arrangements for staff who do not have CPOMS access.
Attendance, absence and part-time timetable oversight	Set out how attendance concerns are reviewed with safeguarding, who authorises part-time timetables, review frequency, recording arrangements and how alternative provision attendance is monitored.
Children at greater risk of harm / vulnerable register arrangements	Set out who maintains the Vulnerable Register, how it links with attendance, SEND, mental health, pastoral and safeguarding systems, review frequency and how emerging concerns are escalated.
Online safety, filtering and monitoring arrangements	Set out the SENSO alert triage arrangements, who reviews alerts, how themes inform curriculum, assemblies and staff briefings, and how online safety concerns are reported.
Alternative provision and off-site arrangements	Set out who approves alternative provision, how safeguarding assurance is checked, how attendance and welfare are monitored, review frequency and the named academy lead.
Local pupil reporting systems	Set out email or online forms, anonymous reporting mechanisms, how pupils are told about reporting routes and how reports are monitored and responded to.

APPENDIX 2: KCSIE PART ONE STAFF CHECKLIST

This checklist supports staff induction, annual safeguarding training and ongoing professional reflection. It does not replace reading and understanding Part One of Keeping Children Safe in Education 2026.

- I know who the DSL and deputy DSLs are in my academy.
- I know how to contact the DSL or deputy DSL during the academy day and where to find local safeguarding contact details in Appendix 1.
- I know that safeguarding and promoting the welfare of children is everyone's responsibility.
- I know the indicators of abuse, neglect and exploitation, including physical abuse, emotional abuse, sexual abuse and neglect as detailed in KCSIE Part One.
- I know that abuse, neglect and exploitation can happen outside the home, online and between children.
- I know what to do if I am worried about a child's welfare, safety, attendance, behaviour, presentation, mental health, relationships, online activity or lived experience.
- I know what to do if a child is in immediate danger or is suffering, or likely to suffer, significant harm.
- I know that I can make a referral directly to children's social care and/or the police if the DSL or deputy DSL is unavailable and a child is at risk of significant harm or in immediate danger.
- I know how to respond if a child makes a disclosure, including listening, taking the child seriously, not promising confidentiality, avoiding leading questions and reporting to the DSL immediately.
- I know how to record a safeguarding concern on CPOMS and understand that records must be factual, timely, accurate, clear and proportionate. I understand that small concerns can build a safeguarding picture over time and that safeguarding action must be recorded so the academy can evidence the concern, action taken and outcome.
- I know that data protection legislation does not prevent information sharing where this is necessary to safeguard a child.
- I know what to do if I have a concern about a member of staff, supply teacher, trainee teacher, volunteer, contractor or other adult working in or on behalf of the academy.
- I know what to do if I am concerned about child-on-child abuse, harmful sexual behaviour, sexual harassment or sexual violence.
- I know what to do if a concern involves sharing nudes or semi-nudes, including that I must not view, copy, print, forward, share, store, save, download or delete the imagery.
- I know what to do if I have a concern about radicalisation, extremism or vulnerability to being drawn into terrorism.
- I know that mental health concerns can be safeguarding concerns and may indicate abuse, neglect or exploitation.
- I know that online harms may include misinformation, disinformation, conspiracy theories, artificial intelligence, deepfakes, image-based abuse, harmful content and commercial or financial risks.
- I know that children may not always feel ready or able to disclose abuse, neglect or exploitation, and that this must not prevent me from maintaining professional curiosity.
- I know which children may be potentially at greater risk of harm and understand that some children may face additional barriers to seeking help.
- I know what to do if I am unsure whether something is a safeguarding concern.
- I know that if I believe a concern has not been acted upon, I must follow up and escalate through the DSL, Headteacher or Principal, Trust Safeguarding Lead, children's social care, police or whistleblowing procedures as appropriate.

- If I work directly with children, I have also read and understood KCSIE Annex A: Further Information.