THE KITE ACADEMY TRUST

SAFEGUARDING & CHILD PROTECTION POLICY

SEPTEMBER 2026

P1200

Contents

1 **Safeguarding Statement** 4
2 **Terminology** 4
3 **Introduction** 1
4 **Guidance & Documents referred to in this Policy** 1
5 **Equalities Statement** 2
6 **Policy Aims** 3
7 **Policy Principles & Values** 3
8 **Supporting Children** 4
9 **Our Academy will Support All Children** 4
10 **Professional Expectations, Roles, Responsibilities – the Academy** 5
11 **Professional Expectations, Roles, Responsibilities – All Staff** 6
11.2 **Professional Expectations, Roles, Responsibilities – The Kite Academy Trust HR Manager** 8
11.3 **Professional Expectations, Roles, Responsibilities – Academy Headteacher** 8
11.4 **Professional Expectations, Roles, Responsibilities – Designated Safeguarding Lead (DSL)** 9
11.5 **Professional Expectations, Roles, Responsibilities – Deputy DSL (DDSL)** 13
11.6 **Professional Expectations, Roles, Responsibilities –Trustees & Governors** 13
12 **Multi-Agency Working** 15
13 **Confidentiality, Sharing & Withholding Information** 15
14 **Reporting & Responding to Safeguarding Concerns** 16
15 **Dealing with Safeguarding Concerns** 17
16 **Safeguarding Concerns & Allegations against Staff, including supply staff, volunteers and contractors** 19
17 **Low-level Concerns** 20
18 **What is Child Abuse?** 20
19 **Sexual Violence & Sexual Harassment between Children in Academies (child-on-child abuse)** 22
20 **Harmful Sexual Behaviour (HSB)** 26
21 **Anti-Bullying/Cyberbullying** 26
22 **Online Safety/Cybercrime** 27
23 **Racist Incidents** 27
24 **Radicalisation, Extremism & Terrorism** 27
25 **Domestic Abuse** 29
26 **Homelessness** 30
27 **Child Sexual Exploitation (CSE) & Child Criminal Exploitation (CCE)** 30
28 **Child Sexual Exploitation (CSE)** 30
29 **Child Criminal Exploitation (CCE)** 31
30 **Serious Violence** 31
31 **Trafficked Children & Modern Slavery** 32
32 **Female Genital Mutilation (FGM)** 32
33 **Forced Marriage** 32
34 **So-called 'Honour' or Faith-based Abuse (HBA)** 33
35 **One Chance Rule** 33
36 **Private Fostering Arrangements** 33
37 **Looked After Children & Previously Looked After Children** 34
38 **Children with Special Educational Needs & Disabilities or Health Needs** 34
39 **Children who are Lesbian, Gay or Bisexual** 34
40 **Children who are Questioning their Gender** 35

41 Children Absent from Education 35
42 Pupils Missing Out of Education (PMOOE) 36
43 Academy Attendance & Behaviour 37
44 Restrictive Physical Intervention 37
45 Whistleblowing 37
46 Further Advice 38
Appendix 1 - Academy-specific Contact Information 39
Appendix 2 - Indicators of Abuse 40
Appendix 3 - Sexual Violence 45
Appendix 4 - Police and Criminal Evidence Act (1984) – Code C 47
Appendix 5 – Record of Concern Form 48
Appendix 6 – What to do if you have a safeguarding concern? 52
Appendix 7-Contextual information 53

1 Safeguarding Statement

"It could happen here"

Safeguarding is Everyone's Business.

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

We make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

The purpose of this policy is to provide staff, volunteers and governors with the framework they need in order to keep children safe and secure in our academies. The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

2 Terminology

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 impairment of children's mental and physical health or development;
- making sure that children grow up in circumstances consistent with the provision of safe and effective care.
- taking action to enable all children to have the best outcomes.

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

Early Help means the providing support as soon as any additional needs and support emerge or are identified at any point in a child's life.

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

Child(ren) includes everyone under the age of 18. On the whole, this will apply to pupils of our academies; however, the policy will extend to visiting children and students from other establishments.

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

Social Care refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.

MAP refers to the Surrey Multi-Agency Partnership.

C-SPA refers to the Surrey Children's Single Point of Access

DSL refers to Designated Safeguarding Lead

DSL, where appropriate, also refers to Deputy Designated Safeguarding Lead (DDSL)

RFS refers to the Request for Support form.

PSHE refers to Personal, Social, Health and Education.

RSE refers to Relationships and Sex Education.

3 Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended).

All action taken by Sandringham Infant and Nursery Academy will be in accordance with:

Statutory, national, and local guidance – this includes:

- **Working Together to Safeguard Children (2026)** which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of settings.
- **'What to do if you are Worried a Child is Being Abused' 2015 - Advice for Practitioners**
- **Keeping Children Safe in Education (KCSIE 2026)** is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- **The Prevent Duty** is statutory guidance for specified authorities in England and Wales on the duty in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.
- **Relationships Education, Relationships and Sex Education (RSE) and Health Education** is statutory guidance for governing bodies, proprietors, headteachers, principals, senior leadership teams and teachers.
- **Early Years Foundation Stage statutory framework (2025)** is statutory guidance which sets standards that school and childcare providers must meet for the learning, development, and care of children from birth to 5 years in Ofsted registered settings.
- **Local Guidance from the Local Safeguarding Partnership: Surrey Safeguarding Children Partnership (SSCP) including SSCP Procedures.**

The policy also reflects both statutory guidance in KCSIE 2026 and the Surrey Safeguarding Children Board (SSCP) Procedures (https://www.surreyscp.org.uk/)

The Board of Trustees of The Kite Academy Trust takes seriously its responsibility under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of children and to work together with other agencies to ensure there are robust arrangements within our academies to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

This policy applies to all employees, Trustees and Governors in The Kite Academy Trust.

4 Guidance & Documents referred to in this Policy

- Surrey Safeguarding Children Partnership protocols, guidance and procedures
- Working Together to Safeguard Children 2026
- Keeping Children Safe in Education 2026
- Disqualification under the Childcare Act 2006 (updated 2019)
- FGM Act 2003 Mandatory Reporting Guidance 2015 (updated January 2020)

- 'What to do if you are worried a child is being abused' 2015
- Teachers' standards
- Information sharing advice for safeguarding practitioners
- The Equality Act 2010
- The Prevent Duty
- Relationships Education, relationships and Sex Education (RSE) and Health Education
- Early years foundation stage (EYFS) statutory framework
- Restrictive interventions, including use of reasonable force, in schools (April 2026)
- SCC Safeguarding Children Missing Education (CME) and Educated Other Than at School (EOTaS) – available on Surrey Education Services (Education Safeguarding Team Resources Hub)
- SCC Touch and The Use Of Physical Intervention When Working With Children And Young People – available on Surrey Education Services (Education Safeguarding Team Resources Hub)

This policy should be read in conjunction with the following policies:

- Accessibility Plan
- Allergy & Anaphylaxis Policy
- Anti-bullying Policy
- Attendance Policy
- Behaviour Policy
- Code of Conduct for Governors & Staff
- Complaints Policy
- Equality & Diversity Policy
- Health, Safety & Environment Policy
- Online Safety / E-Safety
- Recruitment & Selection Policy
- Relationships & Sex Education Policy
- Restrictive Physical Intervention Policy
- Welfare Policy
- Whistleblowing Policy

5 Equalities Statement

With regards to safeguarding, we will consider our duties under the **Equality Act 2010** and our general and specific duties under the **Public Sector Equality Duty**. General duties include: Eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.

Advance equality of opportunity between people who share a protected characteristic and people who do not share it.

Foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

Details of our specific duties are published under Sandringham Infant and Nursery Academy equality statement and measurable objectives. These are available on our website https://www.sandringham.kite.academy/

Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND). This will be in line with our Special Educational Needs and Disability Policy: https://www.sandringham.kite.academy/about-us/sen/

Sandringham Infant And Nursery Academy also adheres to the principals of and promotes anti-oppressive practice in line of the **United Nations Convention of the Rights of the Child** and the **Human Rights Act 1998.**

6 Policy Aims

- To provide staff with the framework and robust systems to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the academy and ensure that safeguarding follows a whole academy approach.
- To clarify safeguarding expectations for members of the academy's community, staff, governing body, children, and their families.
- To contribute to the establishment of a safe, resilient, and robust safeguarding culture in the academy built on shared values; that children are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice and are listened to.
- To support contextual safeguarding practice, recognising that the academy's site can be a location where harm can occur.
- To set expectations for developing knowledge and skills within the academy's community (staff, children, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- To enable early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- To work in partnership with children, parents/carers and with other agencies in the Surrey and Hampshire Safeguarding Children's Partnerships.
- To enable the academy to effectively contribute to Early Help, assessments of need and support for those children.

7 Policy Principles & Values

- The welfare of the child is paramount.
- Maintain an attitude of "It could happen here."
- Maintain a "zero-tolerance" approach to sexual violence and sexual harassment.
- Children have a right to feel safe and secure, they cannot learn effectively unless they do so.
- All children have a right to be protected from harm and abuse.
- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the academy or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

- Whilst the academy will work openly with parents as far as possible, it reserves the right to contact Social Care or the Police without notifying parents, if this is believed to be in the child's best interests.

8 Supporting Children

We recognise that the academy may provide a safe place and the only stability in the lives of children who have been abused or who are at risk of harm. We recognise that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. Research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Our academies will support all children:

- We will promote a caring, safe and positive environment within the academy.
- We will encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the academy community.
- We will ensure children are taught to understand and manage risk through PSHE, RSE and through all aspects of academy life. This includes online safety.
- We will respond sympathetically to any requests for time out to deal with distress and anxiety.
- We will offer details of helplines, counselling or other avenues of external support.
- We will liaise and work in partnership with other support services and agencies involved in Early Help and the safeguarding of children. All staff should be prepared to identify children who may benefit from Early Help. Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.
- We will notify Social Care immediately if there is a significant concern or immediate risk of significant harm.
- We will provide continuing support to a child about whom there have been concerns who leaves the academy by ensuring that information is shared under confidential cover to the child's new setting and ensure the academy medical records are forwarded as a matter of priority and within statutory timescales.
- The Designated Safeguarding Lead will consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.
- We recognise we play a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

9 Our Academy will Support All Children

The academy will:

- Establish and maintain an ethos where children feel safe and secure, are encouraged to talk and are always listened to.
- Include regular consultation with children e.g. through questionnaires, participation in anti-bullying activity, asking children to report whether they feel safe in the academy.

- Ensure that all children know they can access a trained adult in the academy whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including PSHE, RSE and health education opportunities which equip children with the skills they need to stay safe from harm, including online, and to know to whom they should turn for help. In particular, this will include anti-bullying work, online safety, accessing emergency services, road safety, pedestrian and cycle training. In addition to this, focussed work in Year 6 to prepare for transition to secondary school and more personal safety/independent travel. Effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special education needs or disabilities.
- Provide preventative education by creating a culture of zero tolerance for sexism, misogyny/ Misandry, homophobia, biphobia and sexual violence and sexual harassment.
- Ensure all staff are aware of academy guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

10 Professional Expectations, Roles, Responsibilities – the Academy

Role of the academy

We will ensure that:

- Details of the DSL and DDSL are available on Sandringham Infant And Nursery Academy website, in our newsletter, and on notice boards. These will also be stated in our welcome leaflets and displayed on posters around the school including in the main reception.
- The academy operates safer recruitment in line with KCSIE 2026 and that it includes statutory checks on the suitability of staff to work with children. Pre-interview searches of candidates' social media profiles, as well as references form a part of these checks.
- All staff receive information about the academy's safeguarding arrangements, the academy's safeguarding statement, Code of Conduct for Governors & Staff, Safeguarding & Child Protection policy, the role and names of the Designated Safeguarding Lead and their deputy(s), and **Keeping Children Safe in Education (2026),** part 1. All staff sign to say they have read and understood the key documents they are required to read. This applies to Trustees and Governors in relation to part 2 of the same guidance.
- All staff receive safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction in line with advice from Surrey Safeguarding Children Partnership https://surreyscp.org.uk/training-2/training-for-schools / which is regularly updated, and receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually to continue to provide them with relevant skills and knowledge to safeguard children effectively.
- All members of staff are trained in and receive regular updates in online safety and reporting concerns.
- All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment.

- All staff, Trustee and Governors have regular safeguarding and child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
- The Trust's academies use CPOMS to report and record all safeguarding and children protection information. All staff receive training in the use of CPOMS.
- The Safeguarding & Child Protection policy is made available via the academy website and parents/carers are made aware of this policy. A paper copy is available on request.
- All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures.
- We provide a coordinated offer of Early Help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans.
- Our Income & Lettings policy will seek to ensure the suitability of adults working with children on academy sites at any time and ensure that any groups who use the school premises have Safeguarding & Child Protection policies and procedures in place.
- Community users organising activities for children are aware of the academy's Safeguarding & Child Protection policy, guidelines and procedures.
- The name of the designated members of staff for child protection, the Designated Safeguarding Lead and deputy(ies), are clearly advertised in the academy with a statement explaining the academy's role in referring and monitoring cases of suspected harm and abuse.

11 Professional Expectations, Roles, Responsibilities – All Staff

11.1 All Academy Staff

All staff have a key role to play in identifying concerns early and in providing help for children. To achieve this, they will:

- Maintain an attitude of "it could happen here" with regards to safeguarding.
- Understand that Safeguarding is "everyone's responsibility."
- Maintain a "zero-tolerance" approach to sexual violence and sexual harassment.
- Read and understand Part 1 of statutory guidance KCSIE (2026). Those working directly with children will also read Annex B. Those who do not work directly with children will have the option of reading Annex A instead.
- In addition to this all staff will be aware of the systems in place which support safeguarding including reading this Safeguarding & Child Protection Policy; the Behaviour Policy; the staff behaviour policy (Code of Conduct for Governors & Staff); safeguarding response to children who go missing from education; and the role of the DSL.
- Know who and how to contact the DSL and DDSL, the academy's Executive Headteacher, the Trustee with responsibility for Safeguarding, Chair of the Hub Board Committee and the Trust Leader for SEND & Inclusion.
- Be aware of indicators of abuse and neglect understanding that children can be at understanding that children can be at risk of harm inside and outside of the academy, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.
- Be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:

  - who may need a social worker and may be experiencing abuse or neglect
  - requiring mental health support
  - may benefit from early help
  - where there is a radicalisation concern
  - where a crime may have been committed
- Provide a safe environment in which children can learn.
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the academy who they can approach if they are worried or have concerns.
- Ensure all staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Ensure only appropriately trained professionals will attempt to make a diagnosis of a mental health need. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health need or be at risk of developing one.
- Take immediate action if they have a mental health concern about a child that is also a safeguarding concern, following our Safeguarding & Child Protection Policy and procedures.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse and neglect.
- Know how to respond to a child who discloses harm or abuse following the training of **'Working Together to Safeguard Children (2026)'** and **'What to do if you are worried a child is being Abused' (2015).**
- **Report** their concerns if they are worried that a child is being abused to the DSL immediately and always within 30 minutes. If the DSL is not contactable immediately, a Deputy DSL should be informed. Once concerns have been reported, they must be **recorded** on CPOMs as soon as possible.
- Be prepared to refer directly to the Surrey reporting service, and the police if appropriate (if there is a risk of significant harm and the DSL/Deputy DSL is not available).
- Follow the allegations procedures, as set out in this policy and KCSIE 2026, if the disclosure is an allegation against a member of staff, supply staff, volunteer or contractor.
- Report low-level concerns (as defined in KCSIE 2026) about any member of staff/supply staff/volunteer or contractor to the Academy Headteacher (or Executive Headteacher if it is regarding the Academy Headteacher) in line with Local Authority LADO guidance. Reports are recorded on CPOMS Staff Safe.
- Provide support for children subject to early help, child in need or child protection and be involved where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
- A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.
- Notify the DSL or their Deputy of any child on a child protection plan or child in need plan who has unexplained absence.

- Understand Early Help and be prepared to identify and support children who may benefit from Early Help. All staff should also be aware of their local early help process and understand their role in it.
- Be aware that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and/or they may does not recognise these experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.
- Be mindful that the Teacher Standards states that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

11.2 Professional Expectations, Roles, Responsibilities – The Kite Academy Trust HR Manager

- Ensure that all staff sign to say they have read, understood and agree to work within the academy's Safeguarding & Child Protection policy, Code of Conduct for Governors & Staff and Keeping Children Safe in Education (KCSIE 2026) Part 1 and Annex B.
- Organise child protection and safeguarding induction, keeping a record of attendance and address any absences.

11.3 Professional Expectations, Roles, Responsibilities – Academy Headteacher

In addition to the role and responsibilities of all staff the Academy Headteacher will ensure that:

- The academy fully contributes to inter-agency working in line with Working Together to Safeguard Children (2026) guidance.
- The Safeguarding & Child Protection Policy and procedures are implemented and followed by all staff.
- That the academy has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.
- That the academy's staff have appropriate knowledge of KCSIE (2026) part 5.
- That all children are supported to report concerns about harmful sexual behaviour freely. That concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is case. Comprehensive records of all allegations are kept.
- A member of the senior leadership team has been appointed as the Designated Safeguarding Lead (DSL) who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- On appointment, the DSL and deputy(ies) (DDSLs) undertake DSL 'New to Role' and 'Refresher' training at least every two years as well as attending DSL network events to refresh knowledge and skills.
- All staff are aware of the role of the Designated Safeguarding Lead (DSL), including the identity of the DSL and any deputies (DDSLs).
- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively, including the provision of advice and support to academy staff on child welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.
- Provide opportunities for a co-ordinated offer of early help when additional needs of children are identified.

- With the Designated Safeguarding Lead, ensure robust cover arrangements are in place for any out of hours/out of term activities, and also consider what coverage there is during the evenings and weekends - during term time - particularly if they have means by which children can communicate with staff.
- Where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Child-centred systems and processes are in place for children to express their views and give feedback.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- That pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE) Surrey Safeguarding Children Partnership (SSCP) and Surrey County Council (SCC).
- Ensure that statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.
- Record "low level concerns" in cases which concern a member of staff/supply staff/contractor or a volunteer. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.
- Liaise with the 'Case Manager' and Local Authority Designated Officer (LADO) for child protection concerns in cases which involve a member of staff or a volunteer; refer cases where a person is dismissed or left employment/ service due to risk/ harm to a child to the Disclosure & Barring Service and Teaching Regulation Agency, as required.

11.4 Professional Expectations, Roles, Responsibilities – Designated Safeguarding Lead (DSL)

(Duties are further outlined in KCSIE, Annex C)

In addition to the role and responsibilities of all staff the DSL will:

- Hold the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place) in the academy; this responsibility is not able to be delegated.
- The Designated Safeguarding Lead and any deputies will liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children (2026).
- Where necessary, contact the Surrey Children's Single Point of Access (CSPA) Child Protection Consultation Line on 0300 470 9100 (press Option 3) for advice and support.
- Refer cases where a crime may have been committed to the Police as required. **NPCC - When to call the Police** should help Designated Safeguarding Leads understand when they should consider calling the Police and what to expect when they do.

- Will manage and request support for a child if there are concerns about suspected harm or abuse via the Surrey Children's Single Point of Access (C-SPA), and act as a point of contact and support for academy staff. Requests should be made safely and securely by email to cspa@surreycc.gov.uk using the Request for Support form (RFS). Urgent referrals should be made by telephone - 0300 470 9100 - and ask for the priority line.
- The Designated Safeguarding Lead and any deputies can discuss any concerns before completing an RFS form by calling the Surrey Children's Single Point of Access (C-SPA) on 0300 470 9100. For urgent concerns outside of their Monday to Friday, 9 am to 5 pm hours, call the Emergency Duty Team at 01483 517898 or if the child is in immediate danger call 999.
- Report concerns that a pupil may be at risk of radicalisation or involvement in terrorism, following the Prevent referral process and use the Prevent referral form to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk/ If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought, dial 101 or 07795 043842 and ask to speak to the Prevent Supervisor for Surrey The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).
- Refer cases where a crime may have been committed to the Police as required. NB: **NPCC - When to call the Police** should help DSLs understand when they should consider calling the Police and what to expect when they do.
- Follow DfE and KCSIE 2026 guidance 'Child on Child Abuse' when a concern is raised that there is an allegation of a pupil abusing another pupil within the academy. Staff will recognise that child-on-child abuse is a safeguarding issue for both the victim and the perpetrator.
- When there has been a report of sexual violence, make an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and will be put in place as required.
- Be available during term time (during academy hours) for staff to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the academy leadership for any out of hours/term activities.
- Act as a source of support and expertise in carrying out safeguarding duties for the whole academy community.
- Ensure that the names of the DSL and DDSL, are clearly advertised, with a statement explaining the academy's role in referring and monitoring cases of suspected abuse.
- Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.
- Access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training should be updated at least every two years and their knowledge and skills refreshed termly through Trust updates and LA education safeguarding designated networks.

- Have an oversight of CPD for the staff at their academy by:
  - Liaising with HR Manager responsible for Trust-wide CPD to ensure that suitable initial child protection and safeguarding induction has taken place for all new employees.
  - Liaising with HR Manager responsible for Trust-wide CPD to ensure that staff new to DSL role are appropriately trained and that this is recorded on the centrally-held record.
  - Liaising with HR Manager responsible for Trust-wide CPD to ensure DSLs receive refresher training every 2 years.
  - Providing academy staff with regular updates (including online safety), at least annually, addressing any absences and keeping a record of attendance.
  - Attending (and encouraging deputy DSLs to attend Hampshire DSL Networks, free of charge, termly. Attendance to be reported to HR Advisor to be recorded on centrally-held CPD record. Deputy DSLs to be updated by DSL following these events.
- Have a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, including the local authority levels of need criteria and referral arrangements.
- Have a clear understanding of access and referral to the local early help offer and will support, advise and signpost members of staff where early help intervention is appropriate.
- Have a working knowledge of how Surrey County Council conduct an initial child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Understand the lasting impact that adversity and trauma can have, including on the children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- Understand and support the academy delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.
- Liaise with academy staff (such as ELSAs, Thrive practitioners, SLT, SENCOs) on matters of safety and safeguarding and consult Surrey Safeguarding Children Partnership and Children's Trust Threshold's chart to inform decision making and liaison with relevant agencies.
- Be alert to the specific needs of children in need, those with SEND and young carers.
- Understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep children safe whilst they are online at the academy; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- Work with the Academy Headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at the academy.
- Keep up-to-date, detailed, accurate records (on CPOMS), that include all concerns about a child even if there is no need to make an immediate referral and the rationale for decisions made and action taken.

- Ensure that an indication of the existence of the additional child protection file is marked on the pupil's main academy file record.
- Ensure that when a pupil transfers setting (including in-year), their safeguarding/child protection file is passed to the new setting as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.
- If the transit method requires that a copy of the Child Protection file is retained until such a time that the new school acknowledges receipt of the original file, the copy should be securely destroyed on confirmation of receipt.
- Ensure that all pupil names contained in the file (other than the pupil who is named on the file) should be redacted on transition (unless they are recorded by initials only). Staff names remain as they are in the public domain.
- Ensure that where a pupil transfers education provision and is on a child protection plan or is a child looked after, their information is passed to the new establishment immediately and that the child's social worker is informed. In addition, consideration should be given to a multi-agency schools transition meeting if the case is complex or on-going.
- Ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.
- Report to the Academy Headteacher any significant issues for example, use of Surrey Safeguarding Complaints Procedures, enquiries under section 47 of the Children Act 1989 and Police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the **Statutory guidance - PACE Code C 2019.**
- Ensure that the case-holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation.
- Alongside the Kite HR Manager, ensure staff receive child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school/college staff, keep a record of attendance and address any absences.
- Ensure each member of staff has access to, and understands, the academy's Safeguarding & Child Protection Policy procedures, especially new and part-time staff.
- Ensure that in collaboration with the academy leadership and Hub Board Committee, the Safeguarding & Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- Ensure that the Safeguarding & Child Protection Policy is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of the academy in this.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding

and child protection issues that children who have or have had a social worker are experiencing with teachers and leadership staff.

- Establish and maintain links with the Local Authority safeguarding partners to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.
- Contribute to and provide, with the Academy Headteacher and Hub Board Committee Chair, the 'Audit of Statutory Duties and Associated Responsibilities' to be submitted annually to Hampshire County Council and termly data collections to the Trust
- Ensure that all staff sign to say they have read, understood and agree to work within the Safeguarding & Child Protection policy, Code of Conduct for Governors & Staff and Keeping Children Safe in Education (KCSIE) Part 1 and Annex B and ensure that the policies are used effectively.
- Meet all other responsibilities as set out for DSLs in Keeping Children Safe in Education 2026.

11.5 Professional Expectations, Roles, Responsibilities – Deputy DSL (DDSL)

In addition to the role and responsibilities of all staff the Deputy DSL (DDSL) will:

- Be trained to the same standard as the Designated Safeguarding Lead and the role is explicit in their job description.
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
- In the absence of the DSL, carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the DDSL will assume all of the functions of the DSL.

11.6 Professional Expectations, Roles, Responsibilities –Trustees & Governors

All Trustees and Governors understand and fulfil their responsibilities to ensure that:

- There is a whole Trust and academy approach to safeguarding, involving everyone in the academy, and that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- A nominated Trustee and Governor is identified for safeguarding.
- All Trustees and Governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the academy are effective and support the delivery of a robust whole academy approach to safeguarding. Training should be regularly updated.
- The child's wishes and feelings are considered when determining what action to take and what services to provide.
- The academy has effective safeguarding policies and procedures including a Safeguarding & Child Protection Policy, a Code of Conduct, a Behaviour Policy and a response to children who go missing from education.
- Policies are consistent with Surrey Safeguarding Children Partnership (SSCP) and statutory requirements, are reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt and that the Safeguarding and Child Protection policy is available on the academy website.

- The SSCP is informed in line with local requirements about the discharge of duties via the Annual Statutory Audit for Safeguarding Arrangements
- At least one Trustee and Hub Board Committee Governor has completed safer recruitment training to be repeated every year.
- Ensure recruitment, selection and induction follow safer recruitment practice including all appropriate checks.
- Staff members have been trained appropriately and this is updated in line with guidance and all staff have read Keeping Children Safe in Education 2026 part 1. Additionally, there are mechanisms in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- Ensure that, as part of the requirement for staff to undergo regular updated safeguarding training, including online safety and the requirement to ensure children are taught about safeguarding, is integrated, aligned, and considered as part of the whole academy safeguarding approach and wider staff training and curriculum planning.
- Considering the above training requirements, Trustees and Governors should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all children.
- All staff including temporary staff/supply staff, volunteers and contractors are provided with the academy's Safeguarding & Child Protection policy and if applicable the staff behaviour policy.
- Take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors
- The academy has procedures for dealing with allegations of abuse against staff (including the Academy Headteacher), volunteers and against other children and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have, had they not resigned.
- Policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold or low-level concerns as defined in KCSIE 2026.
- Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through PSHE, RSE and health education.
- Alongside the academy, Trustees will ensure that the effectiveness of filtering and monitoring systems in place to safeguard children online are regularly reviewed.
- Ensure the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- The academy will comply with DfE and the Surrey County Council Policy Guidance for Safeguarding, Children Missing Education and Education Other than at School.
- Clear systems and processes are in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- Ensure that safeguarding and child protection files are maintained as set out in KCSIE 2026 Annex C.
- Enhanced DBS checks (without barred list checks unless the governor is also a volunteer at the academy) are in place for all Trustees and Governors.

- Ensure section 128 checks are undertaken as defined in KCSIE 2026.
- Ensure, where school facilities/premises are hired out to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities), they ensure that appropriate arrangements are in place to keep children safe.
- Any weaknesses in safeguarding are remedied immediately.

12 Multi-Agency Working

Our academies have a pivotal role to play in multi-agency safeguarding arrangements and it is important that they understand their role in and follow the new arrangements. Trustees and Academy Headteachers must ensure that the academy contributes to multi-agency working in line with Surrey Safeguarding Children arrangements.

Locally, the three safeguarding partners (the Local Authority; a clinical commissioning group for an area within the Local Authority; and the Chief Officer of Police for a police area in the Local Authority area) make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

Our academies work with social care, the Police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified, and contributing to inter-agency plans to provide additional support to children subject to child protection plans. Access is allowed for Surrey children's social care and, where appropriate, from a placing local authority, for them to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

13 Confidentiality, Sharing & Withholding Information

All matters relating to child protection will be treated as confidential and only shared as per the **'Information sharing: advice for practitioners providing safeguarding services' guidance**. The academy will refer to the guidance in the in the data protection: toolkit for schools - **https://www.gov.uk/government/publications/data-protection-toolkit-for-schools** guidance to support schools with data protection activity, including compliance with the General Data Protection Regulations (GDPR).

Information will be shared with staff within the academy who 'need to know'.

Relevant staff have due regard to Data Protection principles which allow them to share (and withhold) information.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the **Data Protection Act 1998** and GDPR are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential and the Academy Headteacher or DSLs will only disclose information about a child to other members of staff on a need to know basis.

All staff will always undertake to gain parent/carers consent to refer a child to Social Care unless to do so could put the child at greater risk of harm or impede a criminal investigation.

14 Reporting & Responding to Safeguarding Concerns

The following procedures apply to all staff working in the academy and will be covered by training to enable staff to understand their role and responsibility.

The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:

1. **Report it to the DSL/DDSL immediately, and always within 30 minutes. This may include sharing written notes made during the conversation that was held with a child/adult.**
2. Make a **record** of the information related to the concern, **immediately after reporting it to the DSL/DDSL, on CPOMS** (using their own CPOMS account). Include details of:
   - Dates and times of their observations/discussions in which they were involved
   - Where
   - Who was present
   - Context
   - Explanations given by the child / adult (use the child's words)
   - Demeanour/non-verbal behaviours of the child
   - Child's voice
   - Any injury details (including a body map to record these)
   - Rationale for decision making and action taken
   - Actions taken
3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
4. Make an accurate record using their CPOMS account (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details.
5. The records must be signed and dated by the author or / equivalent on electronic based records (this is recorded via staff using their own CPOMS accounts to log records).
6. In the absence of the DSL or their Deputy (DDSL), staff must be prepared to refer directly to Surrey Children's Services (and the police if appropriate) if there is the potential for immediate significant harm (SCC CSPA: 0300 4709100)

Following a report of concern, the DSL must:

1. Using the **Surrey Safeguarding children thresholds chart** decide whether or not there are sufficient grounds for suspecting significant harm, in which case a request must be made to the Surrey Children's Services via a RFS and the police if it is appropriate.
2. The academy should try to discuss any concerns about a child's welfare with the parent/carer and

where possible obtain their agreement before making a referral to the Surrey Children's Services (including completing a RFS) However, this should only be done when:

- it will not place the child at increased risk
- or sexual/organised abuse is suspected
- or the fabrication of an illness is suspected
- or where the discussion could impede a Police investigation or Social Work enquiry.

Where there are doubts or reservations about involving the child's family, the DSL should clarify with Surrey Children's Services or the Police whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation. The child's views should also be considered.

3. If it is suspected that a child is suffering, or is likely to suffer, harm or abuse the DSL must contact Surrey Children's Services via an RFS form. If the DSL feels unsure about whether a referral is necessary, they can phone Surrey Children's Services (CSPA: 0300 4709100) to discuss concerns.
4. When a child needs urgent medical attention and there is suspicion of abuse the DSL should take the child to the accident and emergency unit at the nearest hospital, having first notified Surrey Children's Services. The DSL should seek advice about what action Surrey Children's Services will take and about informing the parents/carers, remembering that parents/carers should normally be informed that a child requires urgent hospital attention.
5. The exception to this process will be in those cases of known FGM where there is a **mandatory reporting duty** for the teacher to report directly to the Police where they either:
   - Are informed by a girl under 18 that an act of FGM has been carried out on her; or
   - Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.

   The DSL should also be made aware.
6. If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify C-SPA of the occurrence and what action has been taken. If the DSL feels unsure about whether a referral is necessary, they can contact Surrey Children's Services (CSPA: 0300 4709100) to discuss concerns and for advice and support to ensure they are directed to the most appropriate service to meet the children and families' needs.
7. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider early help.

15 Dealing with Safeguarding Concerns

All Staff

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those

whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable. All staff have the right to make a referral to Surrey Children's Services (CSPA: 0300 4709100) or Police directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on the academy premises at the time and have concerns about sending a child home.

Guiding Principles - the seven R's

Receive

- Listen to what is being said, remaining calm, without displaying shock or disbelief and being aware of body language and facial expressions.
- Accept what is said and take it seriously.
- Make a note of what has been said as soon as practicable.

Reassure

- Reassure the pupil, but only so far as is honest and reliable.
- Don't make promises you may not be able to keep e.g. "I'll stay with you" or "everything will be alright now" or "I'll keep this confidential."
- Do reassure, for example, you could say: "I believe you", "I am glad you came to me", "I am sorry this has happened", "We are going to do something together to get help."

Respond

- Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details.
- Do not ask 'leading' questions i.e. "did he touch your private parts?" or "did she hurt you?" Such questions may invalidate your evidence (and the child's) in any later prosecution in court.
- Do not ask the child why something has happened.
- Do not criticize the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible.
- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff, naming the DSL or DDSL.

Report

- **Report concerns verbally with the DSL immediately, and always within 30 minutes.**
- **Record the details of your concern on CPOMs immediately after making your verbal report to the DSL.**
- If you are not able to contact your DSL or the Deputy DSL, and the child is at risk of immediate harm, contact the Surrey Children's Services (CSPA: 0300 470 9100) or Police, as appropriate directly.
- If you are dissatisfied with the level of response, you receive following your concerns, you should press for re-consideration.

Record

- If possible, make some very brief notes at the time, and write them up as soon as possible (on CPOMS).

- Keep any original notes on CP file.
- Record the date, time, place, persons present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words.
- If appropriate, complete a body map to indicate the position of any noticeable bruising.
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'.

Remember

- Support the child: listen, reassure, and be available.
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues.
- Seek support for yourself – you may wish to contact your academy's Inclusion Leader or the Trust's Lead Inclusion Advisor.

Review (led by DSL)

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information, they should seek it out.

If they have concerns that the disclosure has not been acted upon appropriately, they might inform the Academy Headteacher or Safeguarding Governor of the academy and/or may contact the Surrey Children's Services (CSPA: 0300 470 9100) for advice.

Receiving a disclosure can be upsetting for the member of staff and academies should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.

In some cases, additional counselling might be needed, and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

16 Safeguarding Concerns & Allegations against Staff, including supply staff, volunteers and contractors

Procedure

The Local Authority LADO procedure will be followed where it is alleged that anyone working in the academy that provides education for children under 18 years of age, including supply staff, volunteers and contractors or another adult who works with children has:

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

The last bullet point above includes behaviour that may have happened outside of the academy, that might make an individual unsuitable to work with children, this is known as transferable risk.

The academy may also receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities).

In dealing with allegations or concerns against an adult, staff must:

- Report any concerns about the conduct of any member of staff or volunteer to the Academy Headteacher immediately.
- If an allegation is made against the Academy Headteacher, the concerns need to be raised with the Executive Headteacher and/or the Chair of the Hub Board Committee as soon as possible. If neither of these are available, then the LADO should be contacted directly.

There may be situations when the Academy Headteacher or Chair of the Hub Board Committee will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

Once an allegation has been received by the Academy Headteacher, Executive Headteacher or Chair of the Hub Board Committee, they will contact the Surrey LADO on 0300 123 1650 option 3 or email LADO@surreycc.gov.uk (as part of their mandatory duty).

In liaison with the LADO, the academy will determine how to proceed and, if necessary, the LADO will refer the matter to Children's Social Care and/or the police.

If the matter is investigated internally, the LADO will advise the academy to seek guidance in following procedures set out in part 4 of Keeping Children Safe in Education 2026 and the SSCP procedures.

17 Low-level Concerns

The term 'low-level concern' does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the academy may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO. The purpose of reporting low-level concerns is to create and embed a culture of openness, trust and transparency in which the academy's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

The academy creates an environment where staff are encouraged and feel confident to self-refer where they have found themselves in a situation.

Reports should be made to the Academy Headteacher in a timely manner. If the Academy Headteacher has any doubt as to whether the information which has been shared about the individual as a low-level concern in fact meets the harm threshold, they will consult with the LADO.

18 What is Child Abuse?

The following definitions are taken from Working Together to Safeguard Children (2026). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited,

honour-based violence, forced marriage or female genital mutilation. To support the local context, all staff have access to Surrey's Continuum of Need Matrix:

https://surreyscp.org.uk/documents/continuum-of-support-for-children-and-families-in-surrey/

Forms of Abuse & Neglect

Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse

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

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including online). Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers);
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. The Surrey Neglect Risk Assessment Tool is available to provide a more detailed information regarding neglect: https://surreyscp.org.uk/neglect-tools/

For further information on indicators of abuse can be accessed via **NSPCC.**

See Appendix 2 for detailed definitions.

19 Sexual Violence & Sexual Harassment between Children in Academies (child-on-child abuse)

Child-on-Child Abuse

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their education attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and academy staff are supported and protected as appropriate.

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse).

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying) abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse');
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;

- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) **UKCIS guidance: Sharing nudes and semi-nudes advice for education settings**;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

See Appendix 3 for detailed definitions.

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults and other children in the academy.

We recognise that children are capable of abusing other children and their peers and this will be dealt with under our Safeguarding & Child Protection Policy and in line with KCSIE 2026 (Part 5). We are clear that sexual violence and sexual harassment is not acceptable and will never be tolerated.

We will minimise the risk of child-on-child abuse by:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It will never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". We believe that failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts as we believe that dismissing or tolerating such behaviours risks normalising them.

Prevention

- Taking a whole academy approach to safeguarding & child protection;
- Providing training to staff;
- Providing a clear set of values and standards, underpinned by the academy's behaviour policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum;
- Engaging with specialist support and interventions

Responding to reports of sexual violence and sexual harassment

Children making a report of sexual violence or sexual harassment including 'upskirting' (the Voyeurism Offences Act 2019) will be taken seriously, kept safe and be well supported. If the report includes an online element, staff will be mindful of the **Searching, Screening and Confiscation: Advice for Schools (DfE July 2022)** guidance.

The key consideration is for staff not to view or forward illegal images of a child. The guidance provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more

appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

Staff taking the report will inform the DSL or the Deputy DSL immediately.

Staff taking a report will never promise confidentiality

Parents or carers should usually be informed (unless this would put the child at greater risk).

If a child is at risk of harm, is in immediate danger, or has been harmed, a Surrey RFS form will be completed or police contacted as appropriate.

Risk Assessment

Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis. The risk assessment will consider:

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any sanction.
- All other children at the academy.
- The victim and the alleged perpetrator sharing classes and space at the academy.
- The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the academy's approach to supporting and protecting pupils.

Action

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the academy should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

The DSL will consider:

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- That sexual violence and sexual harassment can take place within intimate personal relationships between children.
- Importance of understanding intra familiar harms and any necessary support for siblings following incidents.
- Ongoing risks to victim, other children, adult students, or staff.
- Other related issues or wider context.

Confidentiality

The victim may ask the academy not to tell anyone about the sexual violence or sexual harassment. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. The DSL should consider:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the Police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the Police remains. The Police will take a welfare, rather than a criminal justice approach, in these cases.

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

Options

The DSL decision making regarding the issue with the following possible options:

- Manage internally
- Early Help intervention
- Refer to Surrey Children's Services
- Report to the police (generally in parallel with a referral to Surrey Children's Services via RFS

All concerns, discussions, decisions and reasons for decision will be recorded on CPOMS.

Ongoing Response

The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Children's Social Care.

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, settings should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.

The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on academy premises and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the academy will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same academy would seriously harm the education or welfare of the victim (and potentially themselves and other children).

Where a criminal investigation into sexual assault leads to a conviction or caution, the academy will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the academy, the Academy Headteacher should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on academy premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The victim, alleged perpetrator and any other children and adults affected will receive appropriate support and safeguards on a case-by-case basis.

The academy will take any disciplinary action against the alleged perpetrator in accordance with The Kite Academy Trust Behaviour Policy.

The academy recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

The academy will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

The academy recognises that children who have experienced sexual violence display a wide range of responses to their experiences including clear signs of trauma, physical and emotional responses, or no overt signs at all.

Physical Abuse
While a clear focus of child on child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive.

These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the Police.

The principles from the anti-bullying and behaviour policy will be applied in these cases, with recognition that any Police investigation will need to take priority.

20 Harmful Sexual Behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent; it may escalate into sexual harassment or sexual violence. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB will be considered in a child protection context.

The academy's response to HSB:

DSLs within Sandringham Infant And Nursery Academy have completed Brooks training.

The **Brook Traffic Light Tool** uses a traffic light system to categorise the sexual behaviours of children it can be used to help professionals:

- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people
- Understand healthy sexual development and distinguish it from harmful behaviour

By categorising sexual behaviours, the academy can work with other agencies to the same standardised criteria when making decisions and can protect children with a multi-agency approach.

The academy recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

21 Anti-Bullying/Cyberbullying

The academy's policy on anti-bullying includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying).

We keep a record of known bullying incidents which is reported to the Board of Trustees. All staff are aware that children with SEND and/or children who identify as Lesbian, Gay, Bisexual, Transgender, Queer or Questioning (LGBTQ+) are more susceptible to being bullied/victims of child abuse.

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

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

When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the Academy Headteacher and the DSL will also consider child protection procedures.

PSHE education regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help settings counter homophobic, biphobic and transphobic bullying and abuse.

22 Online Safety/Cybercrime

The academy has an online safety policy which empowers us to protect and educate pupils, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The academy also has a clear policy on the use of mobile and smart technology (including wearable technology). The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk, content, contact, conduct and commerce.

Children are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated.

The academy's online safety co-ordinator is Gina Hylton.

The academy will follow the guidance around **harmful online challenges and online hoaxes** when supporting children and sharing information with parents/carers.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL (or a deputy), will consider a referral into the **Cyber Choices** programme.

This programme aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

23 Racist Incidents

Our policy on racist incidents is set out separately and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents. All racist incidents are reported on CPOMS.

24 Radicalisation, Extremism & Terrorism

The Prevent Duty for England and Wales (2023) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

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

Radicalisation refers to 'the process of a person legitimising support for, or use of, terrorist violence'.

Terrorism is 'an action that endangers or causes serious violence to a person/people; causes serious

damage to property; or seriously interferes with an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.'

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

The academy is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a **Prevent Referral**.

The DSL should report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the **Prevent referral form Surrey** to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk/. If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or Surrey Children's Services on phone 0300 470 9100 (alternatively, Anti-Terrorist Hotline on 0800 789 321)

There is a dedicated telephone helpline 0800 0113764 for staff, Trustees and Governors to raise concerns around Prevent.

Academy staff receive training to help identify early signs of radicalisation and extremism.

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

The Hub Board Committee Governors, the Academy Headteacher and the Designated Safeguarding Lead (DSL) will assess the level of risk within the academy and put actions in place to reduce that risk. Risk assessment may include, due diligence checks for external speakers and private hire of facilities, anti-bullying policy and other issues specific to the academy's profile, community and philosophy.

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

Further information and a list of such indicators can be found at **Managing Risk of Radicalisation in your Education Setting**.

Indicators of vulnerability to radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Extremism is defined by the Crown Prosecution Service as:

- The demonstration of unacceptable behaviour by using any means or medium to express views which:
  - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
  - Seek to provoke others to terrorist acts;
  - Encourage other serious criminal activity or seek to provoke others to serious criminal acts;
  - Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a "typical extremist": those who become involved in extremist actions come

from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Pupils may become **susceptible** to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that academy staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the pupil may have perceptions of injustice or a feeling of failure,
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration;
- Special Educational Needs and Disability – pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and/or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism. The Department of Education guidance **The Prevent Duty** should be referred to.

25 Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

The academy is enrolled onto the Operation Encompass scheme, a joint project between Hampshire Police, Hampshire County Council, Hampshire Domestic Abuse Service and Hampshire. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL in the setting before the child or children arrive at the setting the following day. This ensures that the setting has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

26 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL is aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

27 Child Sexual Exploitation (CSE) & Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

28 Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. It can be committed by an individual or organised network and most sexual abuse is committed by those previously known to the victim.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.

The academy is aware there is a clear link between regular non-attendance and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at and make reasonable enquiries with the child and parents/carers to assess this risk.

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the academy and/or can occur between children outside of these environments. All staff, but especially the DSL will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

In all cases if the DSL identifies any level of concern the DSL should contact Surrey Children's Services (CSPA: 0300 4709100) or via a RFS to discuss concerns. If a child is in immediate danger the Police should be called on 999.

The academy is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

The academy includes the risks of sexual exploitation in the PSHE and RSE curriculum.

29 Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". Children are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. We understand that children who are criminally exploited should have their vulnerabilities recognised by adults and professions and we will treat any child who may be criminally exploited as a victim. We understand that it is not possible for a child to give informed consent to engage in criminal or other exploitative activity, and they cannot give consent to be exploited, abused or trafficked.

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The DSL will then contact the Surrey Children's Services via the professional line and if there is concern about a child's immediate safety, the Police will be contacted on 999.

The academy is aware there is a clear link between regular non-attendance at the setting and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at the setting and make reasonable enquiries with the child and parents/carers to assess this risk.

30 Serious Violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with or using weapons, often in the context of peer conflict or bullying and it can also be associated with criminal exploitation. Concerns about a child carrying or using a weapon (or expressing an intent to do so) should be reported and actions taken, which may include any action needed to de-escalate peer conflict.

Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk or, or involved in violence (who are victims themselves).

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from the academy;
- a change in friendships or relationships with older individuals or groups;
- a significant decline in performance;
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries;
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff are aware that violence can often peak in the house just before and after the children attend the academy which includes travelling to and from the academy.

Early evidence-based support for those considered at risk, as well as in 'teachable moments' when issues emerge, is vital. This includes access to trusted to adults, social and emotional skill support, and where available, targeted interventions such as mentoring or therapeutic support.

31 Trafficked Children & Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude, criminal financial exploitation and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

32 Female Genital Mutilation (FGM)

FGM is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. **A mandatory reporting duty,** requires teachers to report directly and immediately to the Police 101 where they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM as been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.

The duty applies to all persons who are employed or engaged to carry out 'teaching work' whether or not they have qualified teacher status.

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the DSL; however, the DSL should be informed.

Academy staff are trained to be aware of risk indicators of FGM. Concerns about FGM outside of the mandatory reporting duty should be reported using the academy's Safeguarding & Child Protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female children about going on a long holiday during the summer holiday.

There should also be consideration of potential risk to other girls in the family and the wider community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the Police by calling 999.

There are no circumstances in which a member of staff should examine a girl.

33 Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into marriage. Coercion may include physical,

psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. T**he legal age of marriage in England and Wales is 18 years old.**

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. In addition, since February 2023, it is also a crime to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

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

Academy staff should never attempt to intervene directly as an academy or through a third party. Contact should be made with Surrey Children's Services via the professional line and/or the Forced Marriage Unit (FMU) on 020 7008 0151.

34 So-called 'Honour' or Faith-based Abuse (HBA)

Honour or faith-based abuse (HBA) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour or faith-based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage; become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage;
- want to get out of a forced marriage;
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

35 One Chance Rule

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBA. Staff recognise they may only have 'one chance' to speak to a child who is a potential victim and have just one chance to save a life. The academy is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

36 Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

Looked After Children by the Local Authority or who are place in residential schools, children's homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures and children may be privately fostered at any age.

The academy recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care immediately. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this will the DSL and the DSL will notify Surrey Children's Services immediately.

37 Looked After Children & Previously Looked After Children

The most common reason for children becoming looked after is because of abuse and/or neglect.

Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

The designated teacher will have the appropriate level of training to equip them with the knowledge and skills to undertake their role.

The designated teacher will work with the Local Authority's Head of Virtual School for both looked after children and previously looked after children.

38 Children with Special Educational Needs & Disabilities or Health Needs

Children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in settings or the consequences of doing so.

Any reports of abuse will require close liaison with the DSL and the Inclusion Leader (SENCO). The academy will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

39 Children who are Lesbian, Gay or Bisexual

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

are. We will consider how to address vulnerabilities such as the risk of bullying and take steps to prevent it, including putting appropriate sanctions in place.

40 Children who are Questioning their Gender

Children may question the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society. Sometimes young children go through a period of questioning their gender, but for the majority this will not continue into adulthood, while a small proportion may continue to question their gender and this feeling may intensify into puberty.

All staff will have training to ensure they understand that it is not for the school to initiate any action in this area and that members of staff should not adopt any changes relating to social transition unless a decision has been made by the school in consultation with parents or carers.

When responding to a request relating to social transition from a child or their parents, the school will:

- take time to understand the thoughts and feelings of children who are questioning their gender
- be professionally curious about the full range of the child's experiences
- remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychological needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying
- consider the best interests of the child
- consider everything that could be affecting a child, including whether they have any wider health issues or neurodiversity

In making decisions about supporting social transition, the school will comply with their obligations under safeguarding legislation and human rights law, ensuring that any assessment of discrimination is informed by an evaluation of the welfare and best interests of the child and other children. In responding to any request relating to social transition or detransition, the school will follow the guidance in KCSiE 2026 and liaise with parents and carers and external agencies as appropriate.

41 Children Absent from Education

All children are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude, and any SEND they may have.

The academy recognises that when children are absent from education, this can be a vital warning sign of a range of safeguarding possibilities. They are also at significant risk of underachieving, being victims of abuse and harm, exploitation, radicalisation, and not being in education, employment or training (NEET) later in life.

Where possible the academy will hold more than one emergency contact number for each child.

The academy will ensure that there is a record of joiners and leavers as defined in **The Education (Pupil Registration) (England) 2006 (amended 2016)**

When removing a child's name, the academy will notify the Local Authority of:

- the full name of the child
- the full name and address of any parent with whom the child normally resides
- at least one telephone number of the parent
- the child's future address and destination school, if applicable, and
- the grounds in regulation 8 under which the child's name is to be removed from the academy register.

The academy will make reasonable enquiries to establish the whereabouts of a child jointly with the local authority, before deleting the child's name from the school register if the deletion is under regulation of **The School Attendance (Pupil Registration) (England) Regulations 2024**

The academy will:

- Enter pupils on the admissions register on the first day on which the academy has agreed, or has been notified, that the pupil will attend the academy.
- Notify the Local Authority within five days of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new pupil.
- Monitor each child's attendance through their daily register and follow the SCC procedure in cases of unauthorised absence.
- Remove a child's name from the admissions register on the date that the child leaves the academy.
- The academy will notify the Local Authority when they are about to remove a child's name from the academy register under any of the fifteen grounds listed in the regulations, no later than the date that the child's name is due to be removed.

Where parents notify the academy, in writing, of their intention to Electively Home Educate (EHE) the academy will forward a copy of the letter to the Local Authority Education Inclusion Team.

Where parents orally indicate that they intend to withdraw their child to EHE and no letter has been received, the academy will not remove the child from roll and will notify the Education Inclusion Team at the earliest opportunity.

42 Pupils Missing Out of Education (PMOOE)

Most children engage positively with school and attend regularly. However, in order to flourish, some children require an alternative education offer or may require a modified timetable to support a return to full time education provision. It is recognised that children accessing alternative provision or a reduced or modified timetable may have additional vulnerabilities. Ofsted refer to these as Pupils Missing Out On Education (PMOOE), because they are not accessing their education in school in the 'usual way'.

The academy will gain consent (if required in statute) from parents to put in place alternative provision and/or a reduced or modified timetable.

The academy will ensure that and parents/carers (and the local authority where the pupil has an EHCP) are given clear information about alternative provision placements and reduced or modified timetables: why, when, where, and how they will be reviewed.

The academy will keep the placement and timetable under review and involve parents in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the pupil is benefitting from it.

The academy will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child. The academy continues to be responsible for the safeguarding of that pupil. The academy will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment.

The academy will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable.

The academy leadership will report to the Hub Board Committee information regarding the use and effectiveness of alternative provision and modified/reduced timetables. The academy will also report to the Hub Board Committee any formal direction of a child to alternative provision to improve behaviour.

43 Academy Attendance & Behaviour

Additional policies and procedures are in place regarding academy attendance and behaviour.

The academy recognises that children being absent, particularly repeatedly and/or for prolonged periods and exclusion from may be indicators of abuse and neglect, including the exploitation of children.

The DSL will regularly liaise with members of staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

The academy will work in partnership with the Police and other partners for reporting children that go missing from the academy site during the academy day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

44 Restrictive Physical Intervention

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is at immediate risk of harming him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness (this is reported in the Bound and Numbered book and recorded on CPOMS).

Staff who are likely to need to use physical intervention will be appropriately trained in the Team Teach approach.

Staff understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection and/or disciplinary procedures.

We recognise that touch is appropriate in the context or working with children, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundaries.

When applying disciplinary measures such as physical intervention or isolation for children with SEND, the academy will consider the risks, given the additional vulnerabilities of these children.

The Kite Academy Trust approach to the use of restrictive physical intervention gives due regard to the Department for Education's '**Restrictive interventions, including use of reasonable force, in schools (April 2026)**' guidance and the statutory responsibilities contained therein.

Please refer to the Restrictive Physical Intervention Policy for further information.

45 Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff, including temporary staff/supply staff and volunteers, should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the academy's safeguarding arrangements.

If it becomes necessary to consult outside the academy, they should speak in the first instance, to the Area Schools Officer or LADO in accordance with the Whistleblowing Policy.

Staff are encouraged to use an external, independent and confidential service provided by Navex Global, who can be contacted on their freephone helpline number 0800 069 8180 and through the **Navex Global web pages**

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by

their setting. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.

Whistle-blowing regarding the Academy Headteacher should be made to the Chair of the Hub Board Committee whose contact details are available to staff.

46 Further Advice

Further advice on safeguarding and child protection is available from:

Surrey Safeguarding Children Partnership webpages

Graded Care Profile 2

NSPCC | The UK children's charity | NSPCC

CEOP ThinkuKnow webpages

Anti Bullying Alliance webpages

Childnet International

Safer Internet Centre webpages

Contextual Safeguarding Network webpages

Lucy Faithfull Foundation webpages

Document Management

Document ID:	P1200		
Last Review:	September 2026	**Review Period:**	1 year
Responsibility of:	Deputy CEO	**Ratified by:**	Trustees (**.**.**)

Appendix 1 - Academy-specific Contact Information

Designated Safeguarding Lead (DSL):	Name Ali Stone Email ali.stone@sandringham.kite.academy Academy telephone number 01252 837538
Deputy DSL(s):	Name Anna Prince Email Anna.Prince@sandringham.kite.academy Academy telephone number 01252 837538
	Name Laura Hensley Email Laura.Hensley@sandringham.kite.academy Academy telephone number 01252 837538
	Name Emma Robinson Email Emma.Robinson@sandringham.kite.academy Academy telephone number 01252 837538
	Name Palaq Sanghavi Email Palaq.sanghavi@sandringham.kite.academy Academy telephone number 01252 837538
Academy Headteacher:	Name Ali Stone Email ali.stone@sandringham.kite.academy Academy telephone number 01252 837538
Chair of Hub Board Committee:	Name David Hobson Email David.hobson@lakeside.kite.academy Academy telephone number 01276 469200
Governor with responsibility for Safeguarding	Name Robbie Ridgway Email Robbie.ridgway@sandringham.kite.academy Academy telephone number 01276 469200
Online Safety Co-ordinator:	Name Gina Hylton Email gina.hylton@crossfarm.kite.academy Academy telephone number 01252 835847

Appendix 2 - Indicators of Abuse

Neglect

The nature of neglect:
Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter;
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision or stimulation;
- ensure access to appropriate medical care or treatment.

NSPCC research has highlighted the following examples of the neglect of children under 12 years old:

- frequently going hungry;
- frequently having to go to school in dirty clothes;
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse;
- being abandoned or deserted;
- living at home in dangerous physical conditions;
- not being taken to the doctor when ill;
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (*What to do if You're Worried a Child is Being Abused* DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns academy staff have should be discussed with the DSL.

Indicators of neglect
The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The Surrey Neglect Tools https://surreyscp.org.uk/neglect-tools/

provide staff with a resource to identify and act on concerns regarding neglect.

Physical indicators of neglect:

- Constant hunger and stealing food;
- Poor personal hygiene - unkempt, dirty or smelly;
- Underweight;

- Dress unsuitable for weather;
- Poor state of clothing;
- Illness or injury untreated.

Behavioural indicators of neglect:

- Constant tiredness;
- Frequent absence from school or lateness;
- Missing medical appointments;
- Isolated among peers;
- Frequently unsupervised;
- Stealing or scavenging, especially food;
- Destructive tendencies.

Emotional Abuse

The nature of emotional abuse:

It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

- Emotional abuse is difficult to define, identify/recognise and/or prove;
- Emotional abuse is chronic and cumulative and has a long-term impact;
- All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself;
- Children can be harmed by witnessing someone harming another person – as in domestic abuse;
- Most harm is produced in *low warmth, high criticism* homes, not from single incidents.

Indicators of emotional abuse:

Developmental Issues

- Delays in physical, mental and emotional development;
- Poor school performance;
- Speech disorders, particularly sudden disorders or changes.

Behaviour

- Acceptance of punishment which appears excessive;
- Over-reaction to mistakes;
- Continual self-deprecation (I'm stupid, ugly, worthless etc.);
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking);
- Self-mutilation;
- Suicide attempts;
- Drug/solvent abuse;
- Running away;
- Compulsive stealing, scavenging;
- Acting out;
- Poor trust in significant adults;
- Regressive behaviour – e.g. wetting;
- Eating disorders;
- Destructive tendencies;
- Neurotic behaviour;
- Arriving early at school, leaving late.

Social issues

- Withdrawal from physical contact;
- Withdrawal from social interaction;
- Over-compliant behaviour;
- Insecure, clinging behaviour;
- Poor social relationships.

Emotional responses

- Extreme fear of new situations;
- Inappropriate emotional responses to painful situations ("I deserve this");
- Fear of parents being contacted;
- Self-disgust;
- Low self-esteem;
- Unusually fearful with adults;
- Lack of concentration, restlessness, aimlessness;
- Extremes of passivity or aggression.

Physical Abuse

The nature of physical abuse:

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g. knees, shins.

Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the academy.

In the context of the academy, it is normal to ask about a noticeable injury. Concern should be increased when:

- the explanation given does not match the injury;
- the explanation uses words or phrases that do not match the vocabulary of the child (adult words);
- no explanation is forthcoming;
- the child (or the parent/carer) is secretive or evasive;
- the injury is accompanied by allegations of abuse or assault.

Indicators of physical abuse / factors that should increase concern:

- Multiple bruising or bruises and scratches (especially on the head and face);
- Clusters of bruises – e.g. fingertip bruising (caused by being grasped);
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head;
- Bruises on the back, chest, buttocks, or on the inside of the thighs;
- Marks indicating injury by an instrument – e.g. linear bruising (stick), parallel bruising (belt), marks of a buckle;
- Bite marks;
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g. electric fire, cooker, cigarette;
- Scalds with upward splash marks or tide marks;
- Untreated injuries;

- Recurrent injuries or burns;
- Bald patches.

You should be concerned if a child:

- is reluctant to have parents/carers contacted;
- runs away or shows fear of going home;
- is aggressive towards themselves or others;
- flinches when approached or touched;
- is reluctant to undress to change clothing for sport;
- wears long sleeves during hot weather;
- is unnaturally compliant in the presence of parents/carers;
- has a fear of medical help or attention;
- admits to a punishment that appears excessive.

Sexual Abuse

The nature of sexual abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Sexual exploitation is seen as a separate category of sexual abuse. The SSCP professionals' guidance provides academy staff with information regarding indicators of CSE.

Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic;
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent (this may occur online);
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but women and other children can commit sexual abuse too.

Indicators of sexual abuse

Physical observations:

- Damage to genitalia, anus or mouth;
- Sexually transmitted diseases;
- Unexpected pregnancy, especially in very young girls;
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching;
- Unexplained recurrent urinary tract infections and discharges or abdominal pain.

Behavioural observations:

- Sexual knowledge inappropriate for age;
- Sexualised behaviour or affection inappropriate for age;
- Sexually inappropriate behaviour;
- Hinting at sexual activity;
- Inexplicable decline in education progress;
- Depression or other sudden apparent changes in personality as becoming insecure;

- Lack of concentration, restlessness, aimlessness;
- Socially isolated or withdrawn;
- Overly-compliant behaviour;
- Acting out, aggressive behaviour;
- Poor trust or fear concerning significant adults;
- Regressive behaviour;
- Onset of wetting, by day or night; nightmares;
- Arriving early at school, leaving late, running away from home;
- Suicide attempts, self-mutilation;
- Suddenly drawing sexually explicit pictures;
- Eating disorders or sudden loss of appetite or compulsive eating;
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys;
- Become worried about clothing being removed;
- Trying to be ‘ultra-good’ or perfect; overreacting to criticism.

Appendix 3 - Sexual Violence

It is important that settings are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of setting. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape
A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration
A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault
A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- Settings should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent
A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is consent?
Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

Further information about consent can be found here: **Rape Crisis England & Wales - Sexual consent.**

Sexual Harassment
When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of the setting. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;

- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. Settings should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim;
- displaying pictures, photos or drawings of a sexual nature;
- upskirting (this is a criminal offence); and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
    - consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. **Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk);**
    - sharing of unwanted explicit content;
    - sexualised online bullying;
    - unwanted sexual comments and messages, including, on social media;
    - sexual exploitation; coercion and threats; and
    - coercing others into sharing images of themselves or performing acts they're not comfortable with online.

It is important that settings consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Appendix 4 - Police and Criminal Evidence Act (1984) – Code C

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

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code.

PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

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

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

A person whom there are grounds to suspect of an offence must be cautioned[1] before questioned about an offence[2], or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

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

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

- the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation;
- a social worker of a local authority;
- failing these, some other responsible adult aged 18 or over who is not:
  - a police officer;
  - employed by the police;
  - under the direction or control of the chief officer of a police force; or
  - a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions.

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

https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible

[1] The police caution is: *"You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."*

[2] A person need not be cautioned if questions are for other necessary purposes, e.g.: (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek co-operation while carrying out a search; or to seek verification of a written record.

Appendix 5 – Record of Concern Form

The Kite Academy Trust

Record of Concern Form (Pupil)

(Please immediately report your concern verbally to the DSL /DDSL and then complete this form electronically or in pen. Once completed pass the form to the DSL/DDSL.)

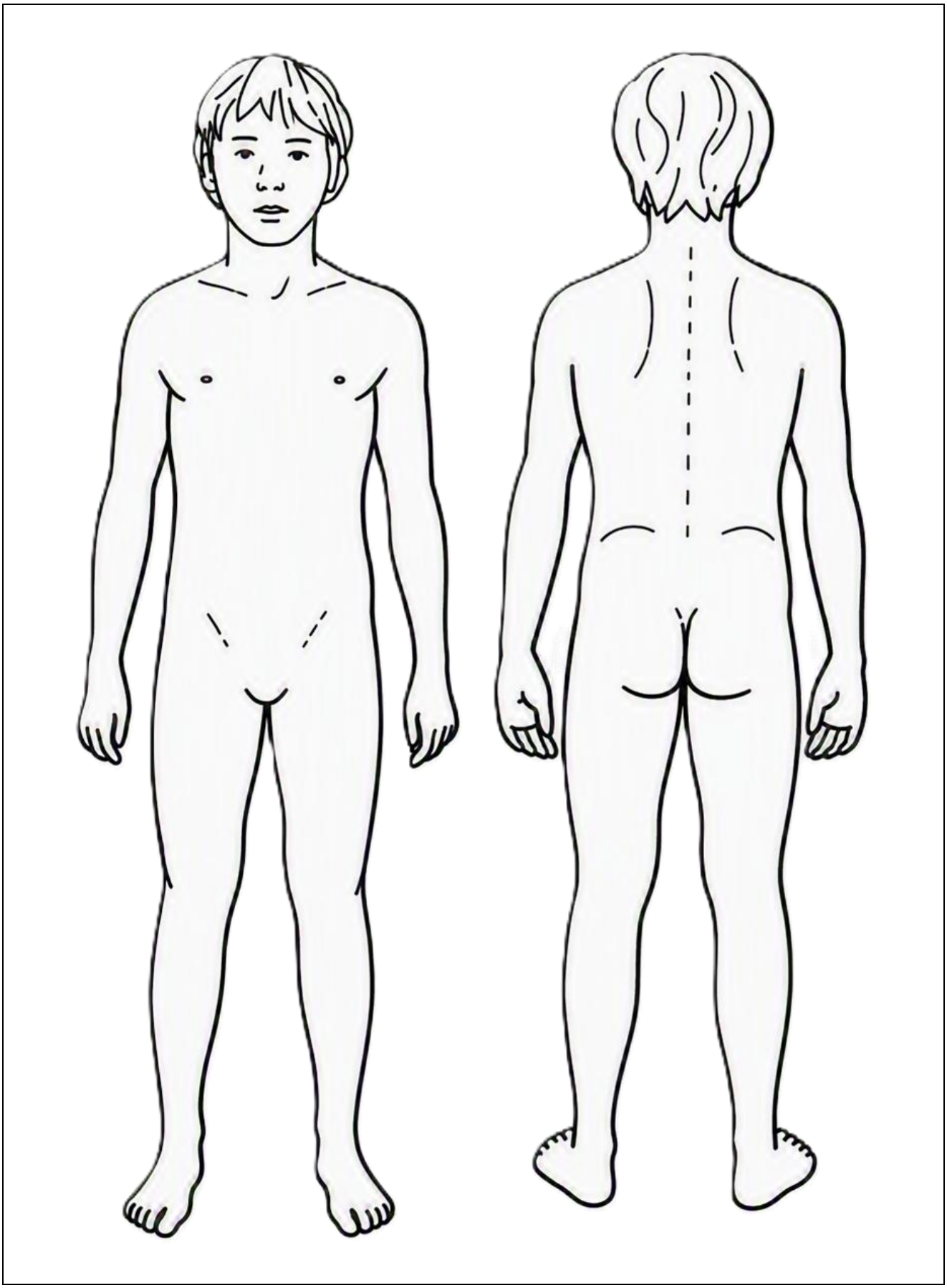
Child's Name:			**Date and Time of Concern:**	
Male/Female:	**Ethnic Origin:**	**Disability:** Y/N	**Religion:**	**Class:**
Your account of the concern: *(what was said, observed, reported and by whom -think who, what, when, where)*				
Additional information: *(context of concern/disclosure)*				
Your response: *(what did you do/say following the concern)*				
Your Name:		Your Signature:		

Date and Time of this reporting:			
Action and Response of DSL/DDSL /HT:			
Name:		Date:	

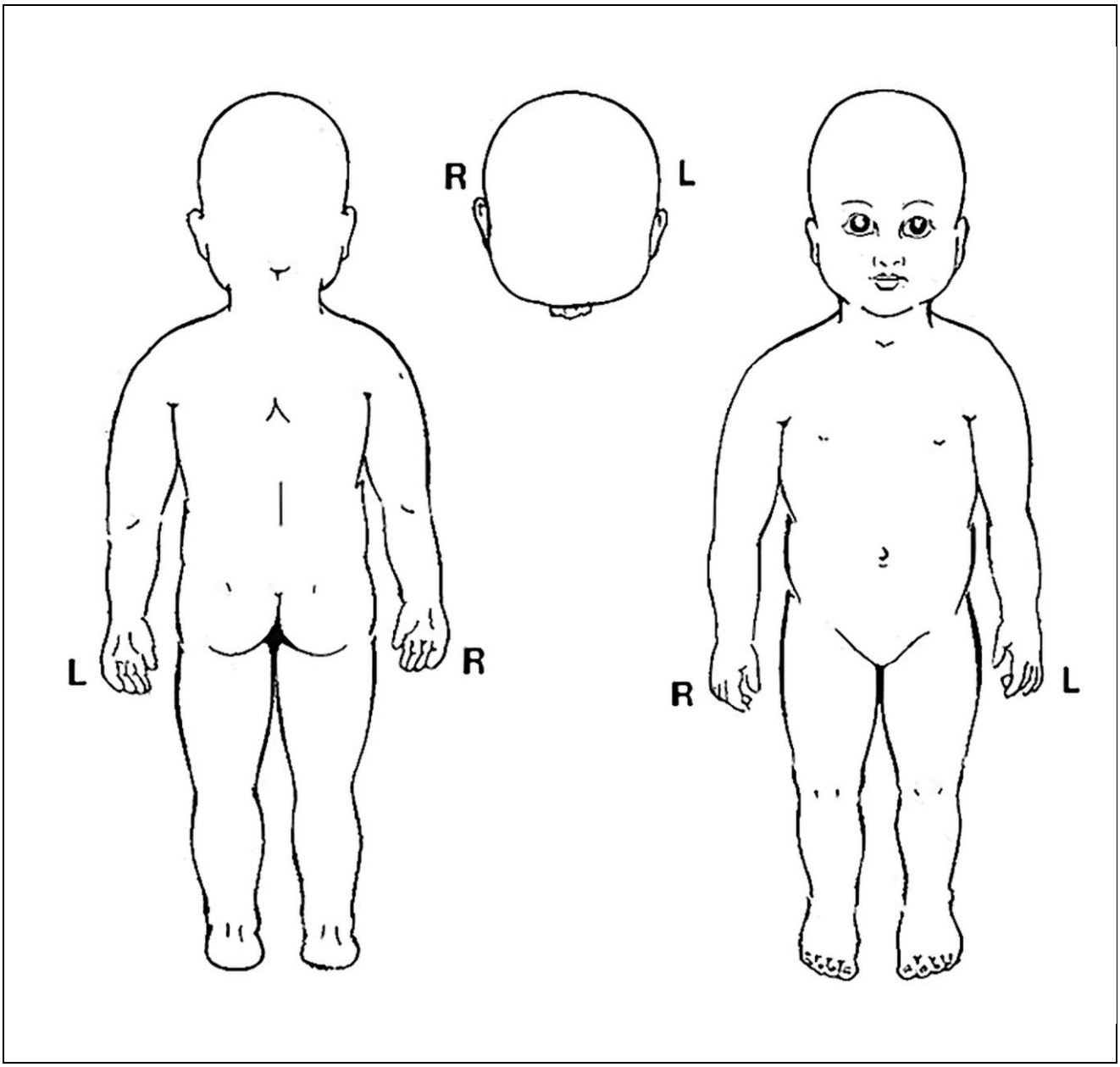
Body Maps

To be used alongside a paper record of concern where applicable.

Child Body Map



Baby/infant Body Map



Appendix 6 – What to do if you have a safeguarding concern?

Why are you concerned?

For example:

- A child has made a disclosure
- You are concerned about a child's appearance
- You are concerned about a child's comments
- You have noticed a change in behaviour
- You have witnessed concerning behaviour
- The actions of others have left you, a child or another adult feeling uncomfortable

Immediately inform the Designated Safeguarding Lead and always within 30 minutes (or Deputy Designated Safeguarding Lead in their absence)

- Clarify your concerns
- Use child's own words
- Reassure the child

If the concern is about a professional, inform the Academy Headteacher

After reporting your concerns (above) record them:

If you are a member of the staff on the academy site, record your concerns on CPOMS.

CPOMS

If you are a visitor to the academy, complete the **Record of Concern Form** available in the academy office.

The DSL/DDSL will review the concern and decide on the next steps.

Feedback (on a need-to-know basis) is given to the referrer on the next steps.

DSL/DDSL next steps must be recorded on CPOMS.

Referral/Further Decision

- Consider whether a child is at immediate risk of harm e.g. unsafe to go home
- Discussion/refer to other agencies as appropriate
- If allegation is against a professional, the Academy Headteacher will notify their Executive Headteacher and the LADO

In School Monitoring

- Be clear about what is being monitored- behaviour, trends, appearance, attendance
- How long will this be monitored for?
- Where, how and whom will you feedback/ record monitoring (teacher/referrer/SLT)
- Where and how will you record?
- Inform parent/carer of support provided
- Meetings/support plans

Record the decision

Child is deemed at risk of significant harm or the likelihood of danger or significant harm and/or risk. Decision made to refer to Children's Services. CPOMs updated.

At all stages, the child's circumstances will be kept under review. The DSL/staff member will re-refer if required to ensure the child's ongoing safeguarding and welfare needs are addressed.

Appendix 7 Sandringham Infant and Nursery Academy Contextual information

Sandringham Infant and Nursery Academy is a two-form entry Infant school for children aged 4-7 years with a Nursery for 2-4-year olds.

At Sandringham Infant and Nursery Academy, safeguarding is rooted in a strong, compassionate support network that reflects the needs of our Frimley community, particularly families living on and around the Paddock Hill Estate. We work closely with our families, recognising that domestic abuse, family vulnerability and challenges around regular school attendance are among the most significant pressures faced by some households in our area. Our staff maintain trusted relationships with parents and carers, offering early help, practical guidance, and a safe, non-judgemental space for families who may be struggling to get children into school consistently. Through collaboration with local services, including Surrey's Early Help teams and community support partners, we ensure that every child is protected, nurtured, and able to thrive. Our approach is proactive, relational, and deeply rooted in understanding the lived experiences of the families we serve.

For children who reside outside Surrey, safeguarding concerns will be shared with the relevant local authority where the child normally lives, in line with statutory guidance.

Sandringham Infant and Nursery Academy works closely with Surrey Police and the Surrey Multi-Agency Safeguarding Hub (MASH) to ensure that children in Frimley are protected from harm. Local policing priorities, particularly around domestic abuse, violence and sexual offences, anti-social behaviour, and family vulnerability, reflect the needs of many families in our community. Through Operation Encompass (section 25), the school receives timely notifications when police have attended domestic incidents. We share relevant safeguarding information with police partners when concerns arise, and we work jointly on attendance, welfare checks, and early-help interventions for families who may struggle to get children into school. The partnerships ensure that our safeguarding practice is informed by local intelligence, responsive to community needs, and centred on the wellbeing of every child.

Local Police Context for Safeguarding

https://www.police.uk/pu/your-area/surrey-police/frimley-heatherside-and-parkside/?yourlocalpolicingteam=about-us&tab=crimemap

Surrey Police plays a central role in safeguarding children and young people across the Surrey Heath district, including Frimley. The force works closely with schools, children's services, health, and partner agencies to identify risk early and respond effectively to concerns. Local policing priorities are informed by crime patterns, community vulnerability, and safeguarding intelligence within the area.

Key safeguarding priorities relevant to schools locally include:

Domestic Abuse, Violence and Sexual Offences

Domestic abuse and violence (including sexual offences) continue to represent one of the highest-volume safeguarding concerns across Surrey Heath. Police regularly support schools where children may be exposed to coercive control, emotional harm, or domestic conflict within the household. Such experiences can significantly affect a child's emotional wellbeing, behaviour, and educational engagement, even where the child is not the direct victim of abuse. Violence and sexual offences remain the most commonly reported crime category within the Frimley, Heatherside and Parkside area.

Child Criminal and Sexual Exploitation

Although Surrey Heath is less urban than other areas of the county, Surrey Police closely monitor risks relating to:

- County lines activity
- Online grooming and exploitation
- Peer-on-peer abuse and harmful sexual behaviour

Police intelligence and early intervention help to identify children who may be vulnerable to exploitation through social media, informal peer networks, or association with older individuals or groups.

Missing Children and Attendance Concerns

Patterns of poor attendance, persistent absence, or sudden changes in routine can be indicators of underlying safeguarding risk. Surrey Police regularly work alongside Early Help and education providers where missing episodes or welfare concerns suggest that a child or family may require additional support or protective intervention.

Public Order and Community Safety

Local public order issues, including neighbourhood disputes, antisocial behaviour, substance misuse, and incidents of disorder, can impact children indirectly by increasing stress, fear, or instability within families and communities. Anti-social behaviour is one of the most commonly reported crime categories within the Frimley, Heatherside and Parkside neighbourhood area. Surrey Police respond to public order concerns with a safeguarding lens, recognising that exposure to community tension or disorder can affect children's sense of safety and wellbeing.

Community Vulnerability

Police data also highlights wider vulnerability factors within the community, including:

- Mental health-related incidents
- Parental crisis or breakdown
- Substance misuse
- Housing instability and neighbourhood tension

Surrey Police operate through the Multi-Agency Safeguarding Hub (MASH), which brings together police, children's services, health, and education to share information quickly and make decisions about risk. Schools are recognised as key partners because they often see early signs of harm before other agencies do.