Safeguarding & Child Protection Policy and Guidance

September 2026

The Local Governing Body of Portland Spencer Academy were notified of this policy 01.08.26

It will be reviewed should statutory guidance require changes.

This document comprises three parts.

- Part 1 - Portland Spencer Academy Safeguarding & Child Protection Policy
- Part 2 – Key Procedures
- Part 3 – Quality Assurance Commitment

This policy applies to all Academies within The Spencer Academies Trust (SAT) and to all employees, governors and volunteers working in each Academy. SAT is committed to safeguarding children and young people and expects everyone working in our academies to share this commitment. This is underpinned by four key principles:

1. Everyone has a role to play in safeguarding children. All Trustees, Governors, employees, trainees, volunteers and contractors have a responsibility to help identify concerns, share information appropriately and take prompt action.
2. Adults in SAT take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.
3. Employees maintain an attitude of "it could happen here" where safeguarding is concerned.
4. When concerned about a child's welfare, employees always act in the best interests of the child.

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This policy should be read alongside and in conjunction with other policies and documents regarding the safety and welfare of children. These together make up the suite of policies and documents to safeguard and promote the welfare of children;

Academy Level Policies

- ***Accessibility Plan***
- ***Alternative Provision Policy***
- ***Anti-Bullying Policy***
- ***Attendance Policy***
- ***Behaviour Policy***
- ***Child on Child Abuse Policy***
- ***Health and Safety Policy***
- ***Intimate Care Policy***
- ***Online Safety Policy***
- ***Relationships and Sex Education Policy***
- ***Special Educational Needs and Disability (SEND) Policy***
- ***Supporting Children with Medical Needs/Administration of Medicines Policy***

Trust Level Policies

- ***Complaints Policy and Procedures***
- ***Disciplinary Policy (including low-level concerns and managing allegations against staff)***
- ***Employee Expectations and Code of Conduct***
- ***Equality, Diversity and Inclusion Policy***
- ***Data Protection Policy and Information Governance arrangements***
- ***Grievance Policy***
- ***Visitor Protocol***
- ***Whistleblowing Policy***

Part One: Safeguarding Policy

1.0 Introduction

Safeguarding and promoting the welfare of children is everyone's responsibility.

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;
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes.

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

Children includes everyone under the age of 18.

This policy and the statutory guidance behind it are also applicable to government funded post 16 education, who are now required to have regard to KCSiE following the enactment of The Education and Training (Welfare of Children) Act 2021.

Please refer also to KCSiE Part 1

- *Safeguarding information for all staff*
- *What school and college staff should know and do*
- *A child centred and coordinated approach to safeguarding*

This means that our academy is committed to safeguarding and promoting the welfare of all its students. We believe that:

- *Our pupils will receive timely intervention at the earliest opportunity.*
- *Our pupils have the right to be protected from harm, abuse and neglect in and outside the home and online.*
- *Our pupils have the right to experience their optimum mental and physical health.*
- *Every child has the right to an education and children need to be safe and to feel safe in Portland Spencer Academy.*
- *Children need support that matches their individual needs, including those who may have experienced or witnessed abuse or with special education needs or other health conditions.*
- *Our pupils have the right to express their views, feelings and wishes and voice their own values and beliefs.*
- *Our pupils should be encouraged to respect each other's values and support each other.*
- *Our pupils have the right to be supported to meet their emotional, social and mental health needs as well as their educational needs. Portland Spencer Academy will ensure clear systems and processes are in place to enable identification of these needs. Including consideration of when mental health needs may become a safeguarding need.*
- *Our academy will contribute to the prevention of abuse, risk/involvement in serious violent crime, victimisation, bullying (including homophobic, biphobic, transphobic and cyber bullying), exploitation, sexually harmful behaviour, extreme behaviours, discriminatory views and risk-taking behaviours, in and outside the home and online.*

All staff, trustees, governors, volunteers, contractors and visitors have an important role to play in safeguarding our children and young people and protecting them from abuse and considering when mental health may become a safeguarding issue.

Portland Spencer Academy will fulfil their local and national responsibilities as laid out in the following documents: • Working Together to Safeguard Children (2026) • Working Together to Improve Attendance (2026) • Keeping Children Safe in Education (2026) • The Education Act 2002 *(Section 175)* • The Children Act (1989 & 2004) • UK GDPR & Data Protection Act (2018) • Local Safeguarding Partnership Child Protection and Safeguarding Procedures • Mental Health & Behaviour in Schools • Multi-agency Statutory Guidance on Female Genital Mutilation • The Prevent Duty Guidance for England and Wales • Child Criminal Exploitation and Child Sexual Exploitation guidance • Sexual Violence and Sexual Harassment Between Children in Schools and Colleges • Relationships Education, Relationships and Sex Education (RSE) and Health Education • Teaching Online Safety in Schools • Sharing nudes and semi-nudes: advice for education settings working with children and young people (UK Council for Internet Safety, 2024) • Voyeurism Offences Act (2019) • Children Missing Education: Statutory Guidance for Local Authorities and Education Settings (2016)	*At Portland Spencer Academy the following people will take the lead in these areas:* *Our Designated Safeguarding Lead (DSL) is:* ***Joe Handy*** ***0115 915 5747*** ***jhandy@portlandspencer.org.uk*** *Our Deputy Designated Safeguarding Lead (DDSL) are:* ***Kayleigh Beers 0115 9155747 kbeers@portlandspencer.org.uk*** ***Sarah Olney 0115 9155747 solney@portlandspencer.org.uk*** ***Marion Cotton 0115 9155747 mcotton@portlandspencer.org.uk*** ***Natasha Birch 0115 9155747 nbirch@portlandspencer.org.uk*** ***Laura Wright 0115 9155747 lwright@portlandspencer.org.uk*** *Our Designated Teacher for Looked After and Post-Looked After Children is:* **Natasha Birch** ***0115 9155747*** ***nbirch@portlandspencer.org.uk*** *Our lead for Mental Health is:* ***Sarah Olney*** ***0115 9155747*** ***solney@portlandspencer.org.uk*** *Our trusted adult for LGBT students is:* ***Kayleigh Beers*** ***0115 9155747*** ***kbeers@portlandspencer.org.uk*** ***Pastoral Hub*** *Our Safeguarding governor is:* ***Claire Sugrue*** ***0115 9155747*** ***Claire.Sugrue@spencertrust.org.uk*** *Our Trust Head of Safeguarding is:* ***Fiona Hallam*** ***07834 857 338*** ***fhallam@spencertrust.org.uk*** Within our Local Authority: *Our Virtual School Headteacher is:* ***Jasmin Howell*** ***0115 876 4692 / 4694*** ***thevirtualschool@nottinghamcity.gov.uk*** *Our Local Authority Designated Officer (LADO) is:* ***0115 87 65166*** ***LADO@nottinghamcity.gov.uk*** *Children's Social Care can be contacted on:* ***0115 876 4800*** ***https://www.nottinghamcity.gov.uk/information-for-residents/children-and-families/safeguarding/multi-agency-safeguarding-children-hub-mash/*** *Our Prevent Single Point of Contact is:* ***Number: 101 ext. 800 2962/2963 Email: prevent@nottinghamshire.pnn.police.uk***

• Information Sharing: Advice for Practitioners Providing Safeguarding Services for Children, Young People, Parents and Carers (2024) • Children's Wellbeing & School Act 2026 • Data (Use and Access) Act 2025 • Children's Wellbeing and Schools Act 2026 • Crime and Policing Act 2026 • Section 3 of the Early Years Foundation Stage Statutory Framework • Restrictive interventions, including the use of reasonable force in schools (2026) • DfE Mobile Phones in schools (2026)	*Our Attendance Champion is:* ***Marion Cotton*** ***0115 9155747*** ***mcotton@portlandspencer.org.uk*** *Our relevant safeguarding partnership website is:* **http://www.nottinghamcity.gov.uk/children-and-families/safeguarding-children-board/ (Nottingham)**

2.0 Overall aims	*This means that Portland Spencer Academy we will:*
This policy will contribute to the protection and safeguarding of our students and promote their welfare by: • Adopting a whole academy approach to safeguarding; • Ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development in our academy; • Clarifying standards of behaviour for staff and students; • Contributing to the establishment of a safe, resilient and robust ethos in the academy, built on mutual respect and shared values; • Introducing appropriate work within the curriculum; • Encouraging students and parents to participate; • Alerting staff to the signs and indicators that all may not be well; • Developing staff awareness of the causes of abuse; • Developing staff awareness of the risks and vulnerabilities our students face; • Addressing concerns at the earliest possible stage; • Reducing the potential risks students face of being exposed to multiple harms including violence, extremism, exploitation, discrimination or victimisation; • Recognising risk and supporting online safety for pupils, including in the home.	• *Identify and protect all students especially those identified as vulnerable.* • *Identify individual needs as early as possible; gain the voice and lived experience of vulnerable students and design plans to address those needs.* • *Work in partnership with students, parents/carers and other agencies.* *Our policy extends to any establishment our academy commissions to deliver education to our students on our behalf including alternative provision settings.* *The Spencer Academies Trust (SAT) will ensure that any commissioned agency will reflect the values, philosophy and standards of our academy. Confirmation will be sought by us that appropriate risk assessments are completed and ongoing monitoring is undertaken.*

3.0 Guiding Principles Spencer Academies Trust work with a child and family-first focus, using the following principles: • Have conversations and listen to children and their families as early as possible. • Understand the child's lived experience. • Work collaboratively to improve children's life experience. • Are open, honest and transparent with families in our approach. • Empower families by working with them to build resilience to overcome difficulties.	*This means that at Portland Spencer Academy all staff will be aware of this policy, any additional training that we provide and be aware of our local guidance issued by Nottingham City Local Authority.* *All staff will be enabled to listen and understand the lived experience of children and young people by facilitating solution focused conversations appropriate to the child's preferred communication style.* *It also means that where early help is appropriate, the DSL/DDSL will liaise with other agencies and complete an inter-agency assessment as appropriate. If required to, all staff will support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.* *Early help cases will be kept under constant review and if the child's situation does not improve or our concerns escalate, consideration will be given to a referral to children's social care for assessment for statutory services.*
4.0 Expectations All staff, central team members, governors, volunteers, contractors and visitors will: • Be familiar with this Safeguarding & Child Protection Policy. • Understand their role in relation to safeguarding. • Be alert to signs and indicators of possible abuse (See Appendix 1 for current definitions and indicators). • Record and report concerns to the DSL/DDSL in a timely manner, including disclosures of abuse from children. • Be involved, where appropriate, in the implementation of individual academy-based interventions, Early Help Assessments and Child in Need Plans and inter-agency Child Protection Plans. • Be alert to signs that children's mental health may be deteriorating or may present a safeguarding concern.	*This means that at Portland Spencer Academy:* *All staff, including those who do not work directly with children, must read and understand Part One of Keeping Children Safe in Education 2026.* *All staff will receive annual safeguarding training and update briefings as appropriate.* *Key staff will undertake more specialist safeguarding training as agreed by the governing body.* *Our Trustees and Governors will be subjected to an enhanced DBS check and 'Section 128' check.* *We will follow Safer Recruitment processes and relevant statutory checks for all staff.*

5.0 The Designated Safeguarding Lead (DSL)
 	
• The DSL will be a member of the Senior Leadership Team.
• Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL. This responsibility should not be delegated.
• DSLs should help promote educational outcomes by working closely with teachers about children's welfare, safeguarding and child protection concerns.
• Spencer Academies Trust will ensure that the DSL role is explicit in the post-holder's job description and appropriate time is made available to the DSL and deputy DSL(s) to allow them to undertake their duties. Their key duties can be summarised as:
  ○ Managing referrals from school staff and any others from outside the academy.
  ○ Working with others (including external agencies and professionals) on matters of safeguarding.
  ○ Undertake training to keep knowledge of local and national contexts up to date.
  ○ Raise awareness of safeguarding and child protection amongst staff, parents and students.
• Safeguarding and child protection information will be dealt with in a confidential manner.
• The DSL will ensure that the academy is clear on parental responsibility for children on roll, and report all identified private fostering arrangements to the local authority.
• Safeguarding records will be stored securely, separate from academic records. Individual files will be kept for each student: the academy will not keep family files. Files will be kept for at least the period during which the student is attending the academy, and beyond that in line with current data legislation and guidance.
• If a student moves from our academy, child protection and safeguarding
	This means the DSL team in our academy are:
	Lead: ***Joe Handy***
	Deputies: ***Kayleigh Beers, Sarah Olney, Marion Cotton, Natasha Birch, Laura Wright***
	
	Any steps taken to support a child/ young person who has a safeguarding vulnerability must be reported to the lead DSL.
	
	Staff will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to support an individual child and/or family. A written record will be made of what information has been shared, with whom, and when. These will be stored on CPOMS.
	
	During term time the DSL or a DDSL will always be available (during the school day), if no DSL/DDSL is available staff should speak to the Principal or another member of SLT who will contact the Head of Safeguarding for further advice or guidance as appropriate.
	
	Robust DSL cover arrangements will be in place during illness, leave or absence. Appropriate arrangements may include shared safeguarding email systems and delegated cover through trained Deputy DSLs.
	
	We maintain a safeguarding email inbox with appropriate members of staff who can access this. Details of this are:
	
	EMAIL ADDRESS
	safeguarding@portlandspencer.org.uk
	Accessed by: *Joe Handy*
	
	During out of academy hours, support can be found at:
	https://portlandspencer.org.uk/contact-us/
	
	Because we use CPOMS and store our records electronically we infrequently hold paper files. Where we do hold paper files, these are kept securely and separately from other student files.
	
	We will not disclose to a parent any information held on a child/young person if this would put the child at risk of significant harm.
	
	We will record where and to whom the records have been passed and the date.
	
	This will allow the new setting to continue to work in the best interests of the child and have appropriate support in place for when the child arrives with them.

records will be forwarded on to the DSL at the new education setting, with due regard to their confidential nature and in line with current government guidance on the transfer of such records. Direct contact between the two providers may be necessary, especially on transfer from primary to secondary settings. • All in-year applications and transfers will also be reported to the local authority. • The DSL is aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence. • The DSL takes lead responsibility for online safety and understanding the filtering and monitoring systems and processes in place at the academy.	
6.0 Contextual Safeguarding Contextual safeguarding is about the impact of the public/social context on young people's lives, and consequently their safety. It seeks to identify and respond to harm and abuse posed to young people outside their home, either from adults or other young people. As an approach it looks at how interventions can change the processes and environments, to make them safer for all young people, as opposed to focussing on an individual.	*DSLs will consider contextual safeguarding and give due regard to the effectiveness of the academy safeguarding system within the wider community. This will be evidenced in:* • *Informal and formal assessments of need/ risk for the child* • *Case discussions in DSL supervision sessions* • *Attendance at SAT DSL Network meetings* • *Completion of the SAT Safeguarding IEF* • *Completion of the Local Authority Safeguarding Audit*

7.0 Mental Health KCSiE 2026 requires all staff to be aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. We recognise that where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. We understand our responsibility to be aware of how children's experiences may impact on their mental health, behaviour and education. **Mental health support** Academy staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern. Academy staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Additional information and guidance is available in: Department for Education (DfE) (2017) Preventing bullying. https://www.gov.uk/government/publications/preventing-and-tackling-bullying Department for Education (DfE) (2018) Mental health and behaviour in Schools https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2 Promoting and supporting mental health and wellbeing in schools and colleges - GOV.UK	*At Portland Spencer Academy this means that:* *All staff will be trained to recognise 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.* *All staff will take immediate action and speak to a DSL if they have a mental health concern about a child that is also a safeguarding concern.* *We take seriously our organisational and professional role in supporting and promoting mental health and wellbeing of children/young people through:* • ***Prevention**: creating a safe and calm environment where mental health problems are less likely, improving the mental health and wellbeing of the whole academy population, and equipping pupils to be resilient so that they can manage the normal stress of life effectively. This will include teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through the academy activities and ethos;* • ***Identification:** recognising emerging issues as early and accurately as possible;* • ***Early support:** helping pupils to access evidence based early support and interventions; and* • ***Access to specialist support**: working effectively with external agencies to provide swift access or referrals to specialist support and treatment.* *Our Academy has an identified Senior Mental Health Lead. They are supported by the senior leadership team to help identify and co-ordinate provision for mental health.*

8.0 The Designated Teacher for Looked After and Previously Looked After Children • SAT will ensure that individual academies appoint a Designated Teacher and should work with local authorities to promote the educational achievement of registered students who are looked after. • Designated Teachers will have appropriate training and the relevant qualifications and experience. • Designated Teachers will have responsibility for promoting the educational achievement of children/ young people who have left care through adoption, kinship care, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. • Local Authorities have ongoing responsibilities to the young people who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a personal adviser who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training. Children with a social worker may face barriers to education because of complex circumstances Effective support for children with a social worker needs education settings and local authorities to work together. All agencies can play a crucial role in establishing a culture where every child is able to make progress. The Virtual School ensure that children with a social worker have barriers to their education removed, they are responsible for monitoring this. Education settings and local authorities will have different responsibilities but establishing shared priorities can help to drive change for children.	*In our academy the Designated Teacher is:* ***Natasha Birch*** *Our Designated Teacher will:* • *Work with the appropriate Virtual School to provide the best support utilising the pupil premium plus to ensure they meet the needs identified in the child's personal education plan.* • *Work with the Virtual School headteacher to promote the educational achievement of previously looked after children and looked after children and children.* *At Portland Spencer Academy we will work with the appropriate Virtual School and partners to effectively identify the needs of children with a social worker and ensure they can access interventions that make a difference to their education.* *The Designated Teacher will liaise, as necessary, with relevant agencies regarding any issues of concern affecting the care leaver.*

9.0 The Board of Directors & The Governing Body The SAT Board of Directors and the individual academy's Local Governing Body ensure that there are policies and procedures in place for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. They ensure that these are fully embedded within the ethos of each academy: • All Directors and governors will receive appropriate safeguarding and child protection training at induction to provide strategic challenge to assure themselves that safeguarding policies and procedures are effective and to support the delivery of a robust whole school approach, including regularly reviewing filtering and monitoring systems. This training will be updated annually. • Directors/Governors are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements. • The academy operates 'Safer Recruitment' procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers (including members of the governing body). • The Principal and all other staff who work with students undertake safeguarding training on an annual basis with additional updates as necessary within a two-year framework and a training record is maintained, including all staff understanding the expectations, applicable roles and responsibilities in relation to ICT filtering and monitoring. • All employees undertake mandatory induction training which includes: The Safeguarding & Child Protection Policy; the Behaviour Policy; the Staff Code of Conduct; the response to CME; the role of the DSL. • Temporary staff and volunteers are made aware of the academy's arrangements for safeguarding & child protection and their responsibilities.	*At Portland Spencer Academy this means that:* *All trustees and governors must read at least part 2 of KCSiE 2026 in addition to Part 1.* *Our nominated governor for safeguarding and child protection is:* ***Claire Sugrue*** *This governor receives safeguarding training relevant to the governance role and this is updated annually.* *The governing body will review all policies/procedures that relate to safeguarding and child protection annually.* *The Nominated Governor will liaise with the Principal and the DSL to produce a termly report for governors and ensure the Safeguarding IEF and Local Authority Safeguarding Audit is completed and submitted on time.*

• The academy remedies any deficiencies or weaknesses brought to its attention without delay. • The academy has a written policy and procedures for dealing with allegations of abuse against members of staff, visitors, volunteers or governors. • The Nominated Governor for Safeguarding is responsible for having oversight for safeguarding procedures in the academy. The governor role is strategic rather than operational – they will not be involved in concerns about individual students.	
10.0 Safer Recruitment and Selection The academy follows part 3 of 'Keeping Children Safe in Education 2026' (KCSiE) and pays full regard to 'Safer Recruitment' requirements including but not limited to: • verifying candidates' identity and academic or vocational qualifications • obtaining professional and character references • checking previous employment history and ensuring that a candidate has the health and physical capacity for the job, • UK Right to Work • clear, enhanced DBS check • any further checks as appropriate to gain all the relevant information to enable checks on suitability to work with children. • Informing candidates of the need to carry out online searches as part of due diligence. Evidence of these checks is recorded on the Single Central Record. All recruitment materials will include reference to SATs commitment to safeguarding and promoting the welfare and wellbeing of students.	*This means that at Portland Spencer Academy:* *The following key academy staff have undertaken Safer Recruitment training:* ***1 Joe Handy*** ***2 Natasha Birch*** ***3 Laura Wright*** ***4 Rebecca Hipkiss*** *However, a range of other staff have also completed the training and their certificates are held as part of the safeguarding training file.* *The following members of the governing body have also been trained:* ***1 Claire Sugrue*** *At least one of these will be involved in all staff recruitment processes and sit on the recruitment panel.*
10.1 Induction All staff are aware of systems within their setting which support safeguarding, and these are explained to them as part of the staff induction process. **10.2 Staff support**	*Our staff induction process covers:* • *The Safeguarding & Child Protection Policy* • *The Behaviour Policy* • *The SAT Code of Conduct* • *The safeguarding response to children who go missing from education*

• Regular safeguarding supervision will be offered to the Lead DSL within academy. • Usually offered half termly, safeguarding supervision may need to be offered more frequently and extended to other members of staff as deemed appropriate. • DSLs will be supported to access training as appropriate including training in behaviour and mental health. • All DSLs will attend the SAT DSL Network meeting as part of their ongoing CPD and to share relevant local and national guidance and safeguarding contexts. These will be held at least termly.	• *The role of the DSL (including the identity of the DSL and any deputies)* *Copies of policies and a copy of part one of KSCIE is provided* to *staff at induction*. *We recognise the importance of practice oversight and multiple perspectives in safeguarding and child protection work. We will support staff by providing opportunities for reflective practice including opportunity to talk through all aspects of safeguarding work within education with the DSL and to seek further support as appropriate.*
11.0 The Use of Reasonable Force There may be circumstances when it is appropriate for staff in the academy to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain a student. This can range from guiding a student to safety by the arm, to more extreme circumstances such as breaking up a fight or where a student needs to be restrained to prevent violence or injury to themselves or another person. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom. Further information about policies and procedures around the Use of Restrictive Interventions can be found within our Behaviour Policy.	*This means at Portland Spencer Academy:* *By planning positive and proactive behaviour support, the occurrence of challenging behaviour and the need to use reasonable force will reduce or not be necessary.* *We will write individual behaviour plans for our more vulnerable students and agree them with parents and carers.* *We will not have a 'no contact' policy as this could leave our staff unable to fully support and protect their staff and students.* *When using reasonable force in response to risks presented by incidents involving students including any with SEN or disabilities, or with medical conditions, our staff will consider the risks carefully.* *All incidents of reasonable force (also known as Restrictive Physical interventions) will be recorded on CPOMS, following Trust procedures.* *Leaders will monitor incidents involving restrictive intervention to identify patterns, trends, disproportionality or emerging safeguarding concerns and to inform preventative approaches which reduce the need for further intervention.*

12.0 The Academy's Role in the Prevention of Abuse This Safeguarding & Child Protection Policy cannot be separated from the general culture and ethos of the academy, which should ensure that students: • are treated with respect and dignity; • are taught to treat each other with respect; • feel safe; • have a voice and are listened to. Safeguarding issues will be addressed through the curriculum in an age appropriate way and will include opportunities to learn about: • healthy and respectful relationships • how to keep yourself and others safe online including information about the safe use of generative AI • boundaries and consent • stereotyping, prejudice and equality • body confidence and self-esteem • how to recognise an abusive relationship, including coercive and controlling behaviour • what constitutes sexual harassment and sexual violence and why these are always unacceptable. • the concepts of, and laws relating to sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support. • Prevent and radicalisation (educateagainsthate.com)	*This means Portland Spencer Academy:* *All staff will be made aware of our academy's unexplained and persistent absence procedures.* *We will provide opportunities for students to develop skills, concepts, attitudes and knowledge that promote their safety and well-being, in and out of school and online.* *These opportunities will include learning and developing understanding of safeguarding issues including, but not restricted to:* • *Racism* • *Misogyny* • *Misandry* • *Deepfakes* • *AI-Generated content* • *Online influencers* • *Physical violence and conflict* *Our curriculum will be fully inclusive and developed to be age and stage of development appropriate, with particular consideration given to students with SEND and other vulnerabilities.* *All our policies, which address issues of power and potential harm, will be inter-linked to ensure a whole academy approach.* *We recognise the particular vulnerability of children who have a social worker.*

13.0 What We Will Do When We Are Concerned – Early Help Response Where emerging needs have been identified for a student but there is no evidence of a significant risk, the DSL will oversee the delivery of an appropriate Early Help response. The child's voice must remain paramount within a solution focused practice framework. If early help is appropriate, the DSL (or deputy) will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. The DSL will then oversee the agreed intervention from the academy as part of the multi-agency safeguarding response and ongoing academy-based support. **Any** child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who: • is disabled or has certain health conditions and has specific additional needs; • has special educational needs (whether or not they have a statutory Education, Health and Care plan); • has a mental health need; • is a young carer; • is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines; • is frequently missing/goes missing from education, home or care; • has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit; • is at risk of modern slavery, trafficking, sexual and/or criminal exploitation; • is at risk of being radicalised or exploited; • has a parent or carer in custody, or is affected by parental offending;	*This means that in our academy:* *All staff will notice and listen to children and young people, sharing their concerns with the DSL, in a timely manner following academy procedures.* *Senior leaders will analyse safeguarding data and practice to inform strategic planning and staff CDP.* *The DSL will lead on liaising with other agencies. The multi-agency plan will then be reviewed regularly, and progress updated towards the goals until the safeguarding needs have been addressed.* *In our academy although any member of staff can refer a situation to the Early Help team, it is expected that the majority are passed through the DSL team.*

• is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse; • is misusing alcohol and other drugs themselves; • is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage; • is a privately fostered child.	
13.1 Universal Early Help and Family Help Early Help may include universal services and community-based services delivered through education, health services, family hubs, youth services, housing services and voluntary organisations. Family Help may include targeted support coordinated through the Local Authority and partner agencies. Staff should understand local arrangements for: • Early Help • Family Help • Section 17 Child in Need • Section 47 Child Protection • Section 20 Accommodation • Section 31 Care Proceedings	*This means that in our academy:* *Staff with identified safeguarding responsibilities will engage with professional development provided by SAT to ensure that they are appropriately trained to understand and execute their safeguarding duties around Early Help delivery.* *Identified staff will engage with whole trust Early Help networks to share best practice and keep up to date with local and national offers of support available for families.* *Safeguarding staff will engage with the Local Authority offer of Early Help and external partners to ensure links between them and families can be utilised where needed, to provide tailored and appropriate support.*
14.0 Safeguarding Students Who Are Susceptible to Radicalisation From 1st July 2015, all academies are subject to the Prevent Duty and must have 'due regard to the need to prevent people being drawn into terrorism' (section 26, Counter Terrorism and Security Act 2015) The current threat from terrorism in the United Kingdom may include the exploitation of people who are susceptible to being drawn into terrorism through direct involvement or in activity in support of terrorism. The normalisation of extreme views may also make children and young people susceptible to future manipulation and exploitation. Definitions of radicalisation, terrorism and extremism, and indicators of vulnerability or being susceptible to radicalisation are in Appendix 2.	*This means that in our academy:* *We value freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values.* *Students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued.* *Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.*

14.1 Risk Reduction Our Trust, Principal and the DSL will assess the level of risk within the academy and put actions in place to reduce that risk. Risk assessment may include consideration of the academy's RE curriculum, SEND policy, assembly policy, the use of academy premises by external agencies, integration of students by gender and SEND, anti-bullying policy and other issues specific to the academy's profile, community and philosophy. To this end, open source due diligence checks will be undertaken on all external speakers invited to our academy. The setting is required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the DSL. The responsibilities of the SPOC are described in Appendix 2. The academy will monitor online activity within the academy to ensure that inappropriate sites are not accessed by students or staff. The academy has a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015). **14.2 Channel** Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Counter Terrorism Policing East Midlands (CTP EM), and it aims to: • Establish an effective multi-agency referral and intervention process to identify susceptible individuals; • Safeguard individuals who might be susceptible to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and • Provide early intervention to protect and divert people away from the risks they face and reduce susceptibility. Further guidance about duties relating to the risk of radicalisation is available in the Advice for Schools on **The Prevent Duty**.	*We are clear that exploitation and radicalisation must be viewed as a safeguarding concern and that protecting children from the risk of radicalisation from any group (including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo-Nazi/White Supremacist, Domestic Terrorism, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements) is part of our academy's safeguarding duty.* *The SPOC for our academy is:* **Joe Handy** *All staff within our academy will be alert to changes in a student's behaviour or attitude which could indicate that they are in need of help or protection.* *We will use specialist online monitoring software, called Smoothwall Monitor, which is updated at least annually.* *Our academy will make referrals to Channel if we are concerned that an individual might be vulnerable to radicalisation.* *Our academy has a Prevent Risk Assessment and Action Plan that is reviewed at least annually is updated appropriately.* *Staff will complete discrete Prevent training three-yearly and be kept up to date with at least annual local contexts.*

15.0 Students Who Are Vulnerable to Exploitation, Trafficking, or So-called 'Honour-Based' Abuse (Including Female Genital Mutilation and Forced Marriage) With effect from October 2015, all schools are subject to a mandatory reporting requirement in respect of female genital mutilation (FGM). When a teacher suspects or discovers that an act of FGM is going to be or has been carried out on a girl aged 18 or under, that teacher has a statutory duty to report it to the Police. Any other staff member has a duty to report such concerns to the DSL. Failure to report such cases will result in disciplinary action. The staff member will also discuss the situation with the DSL who will consult the local authority's children's services before a decision is made as to whether the mandatory reporting duty applies. Further information about FGM and indicators can be found in Appendix 4. 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 a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.	*This means that at Portland Spencer Academy we ensure:* *Our staff are supported to talk to families and local communities about sensitive concerns in relation to their children and to find ways to address them together wherever possible.* *Staff will complete discrete FGM training every three years.* *All staff are kept up-to-date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation around;* • *Forced marriage* • *FGM* • *Honour based abuse* • *Trafficking* • *Criminal exploitation and gang affiliation* *Our staff will be supported to recognise warning signs and symptoms in relation to each specific issue, and include such issues, in an age appropriate way, in their lesson plans.*
16.0 Children who are Absent from Education, including Unexplainable & Persistent Absences from Education A child going missing and/or patterns of repeated or prolonged authorised and unauthorised absence can act as a vital	*This means that at Portland Spencer Academy we will:* *Hold two or more emergency contact numbers for each pupil wherever possible.* *Ensure all our attendance work liaises closely with the DSL.*

warning sign of a range of safeguarding risks. These can include: abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse; and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risks and to help prevent the risk of them going missing in future. Work around attendance and children who are absent from education will be coordinated with safeguarding interventions. The academy must notify the local authority of any student who is to be deleted from the admission register under any of the prescribed regulations outlined in the Education (Pupil Registration) (England) Regulations 2016 amendments.	*Have an Attendance Champion.* *Adapt our attendance monitoring on an individual basis to ensure the safety of each student at our academy.* *Demonstrate that we have taken reasonable enquiries to ascertain the whereabouts of a student that would be considered 'missing'.* *Work closely with local authority partners who support with school attendance and CME/prolonged or repeated absence., making referrals to the relevant service if a student is unaccounted for.* *Attend SAT Attendance Network meetings, held at least termly.*
17.0 Child on Child Abuse The KCSiE 2026 guidance requires that additional information about child on child abuse should be included in the academy's safeguarding and child protection policies. All SAT academies have a zero-tolerance approach to sexual violence and sexual harassment. It is never passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys". All SAT academies recognise that children are capable of abusing other children, and that this abuse can include bullying, physical abuse, sharing nudes and semi-nudes, initiation/hazing, upskirting, sexual violence and harassment. Misogyny and misogynistic behaviour will be challenged and addressed at the earliest stage in order to prevent escalation into more serious harmful sexual behaviour, harassment or violence. The academy's values, ethos and behaviour policies provide the platform for staff and students to clearly recognise that abuse is abuse and it should never be tolerated or diminished in significance. It should be recognised that there is a gendered nature to child on child abuse i.e. that it is more likely that girls will be victims and boys' perpetrators.	*This means that at Portland Spencer Academy*: *All staff receive training on child on child abuse.* *We recognise that child on child abuse is a safeguarding concern for both the child who has experienced harm and the child alleged to have caused harm.* *We adopt the 'whole academy approach' to tackling child on child abuse.* *We fully understand that even if there are no reports of child on child abuse at the academy it may be happening. As such all our staff and students are supported to:* • *be alert to child on child abuse (including sexual harassment);* • *understand how the academy views and responds to child on child abuse* • *stay safe and be confident that reports of such abuse will be taken seriously.* • *Understand intra-familial harms and that support may be needed for siblings.* *We do not tolerate instances of child on child abuse and will not pass it off as "banter", or "part of growing up".* *We recognise that child on child abuse can occur between and across different age ranges.* *We follow both national and local guidance and policies to support any student subject to child on child abuse.* *DSLs will also use the Brook Traffic Light Tool (where appropriately trained) and the Hackett Continuum of Harmful Sexual Behaviour (see Child on Child Abuse Policy), to place sexualised behaviour within the context of the child's age and development.*

Sexual behaviour exists on a continuum from developmentally expected behaviour through inappropriate, problematic and harmful sexual behaviour to sexual violence. We recognise the impact of sexual violence and the fact young people can, and sometimes do, abuse other young people in this way. When referring to sexual violence this policy is referring to sexual offences under the Sexual Offences Act 2003 as described below: • **Rape**: A person (A) commits an offence of rape if: there is intentional penetration of 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: they intentionally penetrates the vagina, anus or mouth of another person (B) with a part of their 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: they 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. • **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: they 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.) **Our Academy has a separate Child on Child Abuse Policy which can be found here. This gives further details and guidance on how to manage reports of child-on-child abuse.**	*We will utilise the Child-on-Child Risk and Needs Assessment tool which can be found in the Child on Child Abuse Policy.* *In assessing and responding to harmful sexualised behaviour, we will follow published good practice guidance to enable provision of effective support to any student affected by this type of abuse.* *Where the victim asks the academy not to tell anyone about the sexual violence or sexual harassment, we recognise there are no easy or definitive answers to this request. 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 (or a deputy) will balance the victim's wishes against their duty to protect the victim and other children.*

18.0 Criminal exploitation Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. The Academy recognises that the child sexual exploitation can cause a great deal of harm to a child, including physically, emotionally, educationally and socially. Where it exists, it can also cause harm to communities including our Academy Further indicators of CCE can be found in Appendix 3.	*This means that in our academy we will:* *Notice and listen to students showing signs of being drawn in to anti-social or criminal behaviour, use the risk assessment screening tool to support our referrals to children's services for any children in our academy we are concerned about.* *Be aware of and work with the Police and local organisations to disrupt as much as possible criminal exploitation activity within our academy.* *Recognise that prevention is the best position with regard to CSE/CCE. We will support children to develop confidence and build resilience. We will endeavour to support their age and needs appropriate knowledge and raise awareness and understanding of what CSE/CCE is, to understand the risks of CSE/CCE and to spot the warning signs for themselves and also their friends and peers and by doing so keep safe.* *The DSL will remain professionally curious with regard to any unexplainable and/or persistent absence that could indicate a link to criminal exploitation.*

Part Two: Key procedures

Responding to concerns about a child

At **Portland Academy**

Our DSL(s) are **Joe Handy, Kayleigh Beers, Sarah Olney, Marion Cotton, Natasha Birch and Laura Wright**

Our safeguarding governor is **Claire Sugrue**

CONCERN ABOUT A CHILD:
Speak to Designated Safeguarding Lead (DSL) if urgent.

If not urgent,
record on CPOMS and speak to a DSL before the end of the day.

DSL(s) review concerns and decide next steps

- Consider discussing concerns with parent / carers and seek consent where appropriate.
- Consider completing Early Help Assessment (EHA).

At any point consider seeking advice:

Nottingham City MASH 0115 876 4800

In case of emergency phone police on 999

Universal / Universal+
Continue with early help process using the EHA as appropriate

Universal+/Additional
Continue with early help process using the EHA as appropriate. Consider request for support from external agencies.

Complex & Significant
Request for Support submitted to MASH for a multi-agency strategy discussion

19. Dealing with a disclosure of abuse against a child

19.1 When a child discloses abuse, staff should remember:

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the child. Tell them you are pleased that they are speaking to you.
- Never enter into a pact of secrecy with the child. Assure them that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why.
- Tell them that you believe them. Children very rarely lie about abuse; but they may have tried to tell others and not been heard or believed.
- Tell the child that it is not their fault.
- Encourage the child to talk but do not ask "leading questions" or press for information. Use the 'TED' approach (Tell me, Explain to me, Describe to me)
- Listen and remember.
- Check that you have understood correctly what the child is trying to tell you.
- Praise the child for telling you. Communicate that they have a right to be safe and protected.
- Do not tell the child that what they experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child may retract what they have told you. It is essential to record in writing all you have heard, though not necessarily at the time of disclosure.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.
- If the disclosure relates to a physical injury **do not photograph the injury** but use installed body maps and record in writing as much detail as possible.

19.2 Our Academy recognises that it is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk. Employees should never attempt to carry out an investigation of suspected child abuse by interviewing the child or any others involved. The only people who are authorised to investigate child abuse and harm are Social Care, Police or the NSPCC**.**

19.3 Staff should be aware that not all children will feel ready to talk about their abuse. However, they should be mindful of the importance of professional curiosity, supportive relationships and speaking to the DSL whenever they have a concern, even when a child hasn't made a direct disclosure.

19.4 Immediately after a disclosure:

- Staff should not deal with it themselves. Clear indications or disclosure of abuse must be reported to local authority children's services without delay, by the DSL/DDSL or in exceptional circumstances by the staff member who has raised the concern.

- Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child who has been abused can be traumatic for the adults involved. Support for you will be available from your DSL.

19.5 A written record of any concerns about a child will be made by the end of the school day. All SAT academy's use CPOMS for recording and monitoring child protection and other safeguarding issues. Records will comprise of a mixture of directly recorded information, uploads of electronic documents and scans of other evidence where appropriate. Digital images of children **should not** be uploaded and stored on the CPOMS system.

19.6 All records will provide a factual and evidence-based account with accurate recording of any actions. Records will identify the full name and job title of the person making the record and be dated. Where an opinion or professional judgement is recorded this should be clearly stated as such. Further training on record keeping can be accessed via our Ask Safeguarding training page or through access to the CPOMS Toolkit.

19.7 At no time should an individual teacher/employee of an Academy be asked to or consider taking photographic evidence of any injuries or marks to a child's person. This type of behaviour could lead to the employee being taken into managing allegations procedures. The body map approach should be used.

19.8 Any concerns should be reported and recorded without delay to the appropriate safeguarding services, e.g. MASH or the child's social worker if already an open case to social care.

19.9 The Academy will keep records of concerns about children even where there is no need to refer the matter to MASH/Children's Services (or similar) immediately. The rationale around decision making **must** be recorded even in cases where the DSL has chosen not to refer. Records will be kept up to date and reviewed regularly by the DSL to evidence and support actions taken by employees in discharging their safeguarding arrangements. Original notes will be retained (but clearly identified as such) as this is a contemporaneous account; they may be important in any criminal proceedings arising from current or historical allegations of abuse or neglect.

19.10 Where children leave the Academy, employees should ensure their concern/child protection file is transferred to the new setting as soon as possible (this should be a no later than 5 working days). This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained. For children transition between phases (primary to secondary and secondary to Post-16) files must be transferred within the first 5 days of the new term.

20. Involving parents/carers

20.1 We will discuss any safeguarding or child protection concerns with parents/carers before approaching other schools or agencies and will seek their consent to making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the DSL.

However, there may be occasions when the academy will contact another school or agency before informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child. In such cases, information will be shared under advice from local authority social care. Decisions should be recorded, as appropriate, on CPOMS.

20.2 Parents/carers will be informed about our Safeguarding & Child Protection Policy through the academy website.

21. Multi-agency Work & Information Sharing

21.1 We work in partnership with other agencies to promote the best interests of our children and keep them as a top priority in all decisions and actions that affect them. Our academy will, where necessary, liaise with these agencies to implement or contribute to an Early Help Assessment and make requests for support from the local authority children's services. These requests will be made by the DSL to the children's services team. Where the student already has a safeguarding social worker or family support worker, concerns around escalation of risks must be reported immediately to the social/ family support worker, or in their absence, to their team manager.

21.2 When invited, the DSL will participate in a strategy meeting adding academy-held data and intelligence to the discussion so that the best interests of the child are met.

21.3 We will co-operate with any child protection enquiries conducted by Children's Services: the academy will ensure representation at appropriate inter-agency meetings such as Children in Need, Initial and Review Child Protection Conferences, and Core Group meetings.

21.4 We will provide reports as required for these meetings. If the academy is unable to attend, a written report will be sent and shared with the relevant agency at least 24 hours prior to the meeting.

21.5 Where a student is subject to an inter-agency Child Protection Plan or a multi-agency risk assessment conference (MARAC) meeting, the academy will contribute to the preparation, implementation and review of the plan as appropriate.

21.6 We recognise that effective safeguarding relies on effectively, timely and appropriate information sharing. Concerns about data protection must not get in the way of sharing information where failure to do so would put a child at risk of harm. Data protection legislation, including UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025, does not prevent the sharing of information where doing so is necessary and proportionate to safeguard or promote the welfare of children. This includes allowing practitioners to share information without consent where there is lawful reason to do so, and that the sharing of information will

enhance the safeguarding of a child in a timely manner (including where it has not been possible to gain consent). Further guidance can be found in **Information Sharing, 2024.**

21.7 Decisions to share or withhold information should be recorded together with the rationale and outcome.

22. Our role in supporting children

22.1 Our academy staff will offer appropriate support to individual children who have experienced abuse, witnessed abuse, who have abused others (child on child abuse) or who act as Young Carers in their home situation.

22.2 Where necessary a Team Around the Child or Early Help Plan will be devised, implemented and reviewed regularly for these children. This plan will detail areas of support, who will be involved, and the child's wishes and feelings. A copy of the plan will be kept on the child's safeguarding record.

22.3 Children and young people who abuse others will be responded to in a way that meets their needs as well as protecting others within the academy community through a multi-agency risk assessment. Within our academy we will ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims.

22.4 We will ensure the academy works in partnership with parents/carers and other agencies as appropriate.

23. Artificial Intelligence (AI) and Emerging Technology Risks

23.1 Our academy recognises that advances in technology, including Artificial Intelligence (AI) are creating new safeguarding risks for children and young people. These risks may occur both within and outside the academy and may involve children as victims, witnesses or alleged perpetrators.

23.2 Our academy recognises that emerging technology risks may include but are not limited to:

- AI generated sexual images and videos
- Deepfake images, videos or audio recordings created without a person's consent
- Nudification applications which digitally manipulate images to create nude or semi-nude content
- Sextortion, blackmail or coercion using real or AI generated images
- AI-assisted bullying, harassment or discrimination
- Misinformation, disinformation and conspiracy theories
- Harmful interactions with generative AI systems or chatbots
- The sharing, creation or possession of AI generated nudes and semi-nudes
- The misuse of technology to target, threaten, humiliate, exploit or harm others.

23.3 Our academy recognises that these technologies may significantly increase the risk of emotional harm, reputational harm, online abuse, sexual abuse, child on child abuse, exploitation and criminal behaviour.

23.4 All concerns involving Artificial Intelligence, deepfakes, AI-generated imagery or other emerging technologies will be treated as safeguarding concerns where there is a risk of harm to a child.

23.5 Staff must report concerns to the Designated Safeguarding Lead. Where concerns are identified, the Designated Safeguarding Lead will consider;

- the welfare and safety of the child or children involved
- whether the behaviour may constitute child-on-child abuse
- whether criminal offences may have been committed
- whether support is required for any child affected
- whether referrals to external agencies are required
- whether additional preventative education, curriculum input or online safety interventions are necessary.

23.6 Our academy will ensure that online safety training, staff updates and preventative education reflect emerging technological risks, including Artificial Intelligence, deepfakes, nudification technology and AI generated sexual content.

23.7 The academy will work with children, parents and carers to promote safe, responsible and age-appropriate use of technology and to develop awareness of the risks associated with Artificial Intelligence and emerging technologies.

24.0 Filtering and Monitoring

24.1 Our academy recognises that effective filtering and monitoring systems form an important part of its safeguarding arrangements and help protect children from harmful, inappropriate and illegal online content.

24.2 Our academy will ensure that appropriate filtering and monitoring systems are in place and are proportionate to the age, ability and needs of pupils. These arrangements will support the academy to identify safeguarding concerns, prevent access to harmful content and respond appropriately to emerging risks.

24.3 The Designated Safeguarding Lead will take lead responsibility for understanding the filtering and monitoring systems used by the academy and will work closely with senior leaders, governors and those responsible for information technology to ensure systems remain effective.

24.4 Our academy will:

- maintain effective filtering and monitoring arrangements for all internet-enabled devices and networks under the academy's control;
- ensure staff understand the safeguarding role of filtering and monitoring systems;
- ensure concerns identified through filtering and monitoring systems are investigated appropriately;
- maintain records of concerns, actions and outcomes where appropriate;
- consider filtering and monitoring arrangements as part of risk assessments and safeguarding reviews; and
- review the effectiveness of filtering and monitoring arrangements at least annually.

24.5 The annual review will be undertaken by the responsible member of the Senior Leadership Team with support from the Designated Safeguarding Lead and relevant IT staff or providers. Records of these reviews will be retained.

24.6 Our academy recognises that filtering and monitoring systems are only one part of a wider safeguarding response. The academy will continue to educate children about online safety and maintain an open culture in which pupils feel able to seek help where they encounter concerns online.

Further information can be found in our **Filtering and Monitoring Policy.**

25.0 Mobile Phones and Smart Technology

25.1 Our academy recognises that mobile phones, smart devices and emerging technologies can provide important opportunities for learning, communication and inclusion. However, they may also present safeguarding risks if used inappropriately.

25.2 These risks may include:

- cyberbullying;
- online harassment;
- child-on-child abuse;
- accessing harmful or inappropriate content;
- sharing of nudes and semi-nudes;
- exploitation, coercion or blackmail;
- misuse of Artificial Intelligence and image manipulation technology;
- unauthorised recording of pupils or staff; and
- breaches of privacy or data protection.

25.3 Our academy will manage the use of mobile phones and smart technology in accordance with its Behaviour Policy, Online Safety Policy and any relevant academy procedures.

25.4 Our academy operates on the principle that schools should be mobile-phone-free by default, in line with DfE guidance Mobile Phones in Schools (2026). Any exceptions to academy procedures will be managed through local arrangements and may be permitted only where there is a clear educational, medical, safeguarding or accessibility need.

25.5 Staff should remain vigilant to safeguarding concerns that arise through the use of mobile phones, wearable technology, smart devices or other internet-enabled equipment and must report concerns in accordance with this policy.

25.6 Where concerns involve the creation, possession or sharing of harmful content, including AI-generated material, nudes and semi-nudes, images or videos, staff must not investigate the content themselves unless expressly advised to do so by the Designated Safeguarding Lead or external agencies.

25.7 Our academy will ensure that pupils are taught how to use technology safely, responsibly and respectfully through its curriculum, online safety education and wider safeguarding work.

26.0 Mental Health and Safeguarding

26.1 Our academy recognises that mental health concerns can be both an indicator of safeguarding issues and a safeguarding concern in their own right.

26.2 Some children may experience mental health difficulties because of abuse, neglect, exploitation, trauma, bereavement, family difficulties or other adverse childhood experiences. In some cases, a child's mental health may deteriorate to the extent that they are at risk of significant harm to themselves or others.

26.3 Staff should be alert to concerns relating to a child's emotional wellbeing and mental health, including significant changes in presentation, self-harm, suicidal thoughts, eating difficulties, risk-taking behaviours, social withdrawal, persistent distress or any other concerning behaviour.

26.4 Mental health concerns should not be viewed in isolation and should be considered alongside any wider safeguarding indicators. Where a member of staff has concerns regarding a child's mental health, they must share these concerns with the Designated Safeguarding Lead in accordance with this policy.

26.5 The Designated Safeguarding Lead will consider:

- whether the presenting concern may indicate abuse, neglect, exploitation or another safeguarding issue;
- whether the child's mental health is placing them at risk of harm;
- what support may be required within the academy;
- whether support from external health, mental health or safeguarding agencies is required; and
- whether the child and family require additional early help or statutory intervention.

26.6 Our academy will work collaboratively with children, families and relevant agencies to ensure children receive appropriate support at the earliest opportunity.

26.7 Where there is an immediate risk to life or a child is believed to be at risk of serious harm, staff should seek urgent assistance from emergency services or appropriate health services without delay and inform the Designated Safeguarding Lead as soon as possible.

27.0 Serious Violence

27.1 All staff must be aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing
- signs of assault of unexplained injuries.

27.2 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 (see Appendix 3).

27.3 All staff are aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having unexplained and persistent absence or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

27.4 Weapon possession, threats involving weapons and serious physical assaults must always be reported to the DSL.

27.5 Risk assessments and safety plans should be considered where appropriate.

28.0 Responding to an allegation about a member of staff

28.1 This procedure must be used in any case in which it is alleged that a member of staff, governor, contractor, visiting professional or volunteer has:

- Behaved in a way that has harmed a child/young person or may have harmed a child/young person;
- Possibly committed a criminal offence against or related to a child/young person; or
- Behaved in a way that indicates they may not be suitable to work with children/young people.
- Behaved towards a child or children in a way that indicated they may pose a risk of harm to children.

Inappropriate behaviour by staff/volunteers could take the following forms, but are not limited to:

- **Physical** For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects, or rough physical handling.
- **Emotional** For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability or sexuality.
- **Sexual** For example, sexualised behaviour towards pupils, sexual harassment, inappropriate phone calls and texts, images via social media, sexual assault and rape.
- **Neglect** For example, failing to act to protect children/young people, failing to seek medical attention or failure to carry out an appropriate risk assessment.
- **Spiritual Abuse** For example, using undue influence or pressure to control individuals or ensure obedience, follow religious practices that are harmful such as beatings or starvation.

28.2 Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in our academy to abuse children. In our academy we also recognise that concerns may be apparent before an allegation is made.

28.3 All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children and young people **immediately**.

- In the case of concerns about a member of staff, governor, visitor or volunteer the Principal must be informed immediately and contact their relevant HR link at our Trust.
- If the concern relates to the Principal or a member of our Trust central team, it must be reported immediately to the line manager in the Executive Leadership Team. For example, a concern regarding a member of the Inclusion Team would be reported to the Director of Inclusion. A concern about an Executive Leader should be reported to the Chief Executive Officer – Interim post holder, Kate Green.
- If the safeguarding concern relates to the CEO or a Trust Board Member then the concern must be made to the Chair of our Trust Board of Directors, Malcolm Batchelor.

28.4 The academy should conduct basic, preliminary enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. Following this, an internal strategy meeting should be requested with the Director of Inclusion & HR Partner. The internal strategy meeting will identify next steps, including where allegations should be reported to the LADO without delay.

28.5 Under guidance on 'transferable risk,' a risk assessment will be carried out where there is reason to believe that an individual has behaved or may have behaved in a way that indicates they may not be suitable to work with children. This might include an incident outside the academy which did not involve children but could have an impact on an individual's suitability to work with children.

28.6 The Principal has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see paragraph 23 below).

28.7 Where an allegation involves harm or potential harm to a child at the academy the subsequent referral to social care must be kept on CPOMS, with reference to a LADO referral having been made. **The LADO referral**

must not be uploaded to CPOMS - this is for personnel files only and should be uploaded to Every, as per process. A record must be kept of outcome and justification by the Principal and the LADO on Every.

(See Appendix 8 for supporting work flowchart)

29.0 Low level allegations or concerns about a member of staff

29.1 Concerns may be graded low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.

Example behaviours include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

29.2 All staff working within our organisation must report any potential low-level concerns about an individual's behaviour towards children and young people immediately to the Principal. It is recognised that depending on the role of the DSL in the school, the Principal may which to consult with the DSL and take a more collaborative decision-making approach.

29.3 If the concern has been raised via a third party, the Principal should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

29.4 Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

29.5 Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

29.6 Low-level concerns should be recorded in writing on Every, including:

- name* of individual sharing their concerns (* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible);
- details of the concern;
- context in which the concern arose;
- action taken.

29.7 Records must be kept confidential, held securely and comply with the Data Protection Act 2018. The Academy will retain such information until the individual leaves their employment.

29.8 Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter will be referred to the LADO (see paragraph 28 above).

29.9 The records' review might identify that there are wider cultural issues within the Academy that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

29.10 Low-level allegations about supply staff/contractors should be referred to their employers so that any potential patterns of inappropriate behaviour can be identified. Where there is any doubt about concern meeting the harms threshold, the academy should consult the LADO.

30.0 Children with additional needs including those with medical conditions and young carers

30.1 Our academy recognises that all children have a right to be safe. Some children may be more vulnerable to abuse, for example:

- Children with a disability or SEND
- Children living with domestic violence
- Children with parents who are misusing drugs and/or alcohol
- Children who are pregnant
- Young parents
- Children repeatedly removed from lessons
- Children on part-time timetables
- Children experiencing disrupted education
- Children at risk of financial exploitation
- Children at risk of faith-based abuse
- Children showing early abusive, violent or harmful behaviour

30.2 Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. We understand that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children 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, and
- 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 schools or colleges or the consequences of doing so.

30.3 Any reports of abuse involving children with SEND will typically involve close liaison between the DSL and SENCO.

30.4 Our academy recognises that medical management concerns may not automatically require safeguarding intervention. However, medical concerns may become a safeguarding concern where they indicate neglect, abuse or exploitation, including repeated failure to provide essential medication, treatment or healthcare support.

30.5 When the academy is considering suspending or permanently excluding a vulnerable child or one who is the subject of a Child Protection Plan, or where there is an existing child protection file, we will conduct an holistic multi-agency risk-assessment prior to making the decision to exclude. In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment should be completed prior to convening a meeting of the governing body and in consultation with the Director of Inclusion.

30.6 The academy recognises the impact caring responsibilities may have on attendance, attainment, behaviour, emotional wellbeing and safeguarding vulnerability. Staff will identify Young Carers early and ensure appropriate support and referrals are made.

31.0 Gender Questioning Children

31.1 Our academy recognises that a child may question their gender identity at any stage of their development. Such circumstances will be considered on an individual basis, with the welfare, safety and best interests of the child remaining the academy's primary consideration.

31.2 Decisions relating to support, provision and arrangements for gender-questioning children will be informed by current statutory guidance, safeguarding principles, the rights and needs of all children and, where appropriate, the views of parents/carers and relevant professionals.

31.3 Staff will approach these situations with sensitivity, respect and professional curiosity, recognising that gender questioning may arise alongside a range of safeguarding, wellbeing, mental health, SEND or other vulnerabilities which require careful consideration and support.

31.4 Our academy will maintain appropriate records of decisions made, actions taken and the rationale underpinning those decisions. Where appropriate, safeguarding risk assessments and support plans will be developed and regularly reviewed.

31.5 Our academy will ensure that arrangements relating to safeguarding, privacy, dignity, welfare and participation in school life are considered carefully and in accordance with current statutory guidance.

31.6 Further guidance and protocols can be found in Gender Questioning Children: DSL Quick Reference Guide (2026), stored on Ask Safeguarding SharePoint.

32.0 Private Fostering

32.1 Many adults find themselves looking after someone else's child without realising that they may be involved in private fostering. A private fostering arrangement is one that is made privately (without the involvement of children's services) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

32.2 The Children Act 1989 defines an immediate relative as a grandparent, brother, sister, uncle or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent.

32.3 Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

32.4 People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children/young people who need alternative care because of parental illness;
- Children/young people whose parents cannot care for them because their work or study involves long or antisocial hours;
- Children/young people sent from abroad to stay with another family, usually to improve their educational opportunities;
- Unaccompanied asylum seeking and refugee children/young people;
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents;
- Children/young people staying with families while attending an academy away from their home area.
-

32.5 Our academy has a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although the academy has a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the academy. However, it should be clear to the academy who has parental responsibility.

32.6 Academy staff should notify the DSL when they become aware of private fostering arrangements.

Part 3: Quality Assurance Commitment

33.0 Quality assurance	*This means that at Portland Spencer Academy:*
Quality assurance is about assessing the quality of the work we undertake in safeguarding children and understanding the impact of this work in terms of its effectiveness in helping children and young people feel safe. This Quality Assurance Framework is aimed at: • Ensuring that data and quality assurance outputs are regularly reviewed through the SAT Safeguarding IEF, Termly Three-Line Action Plans (TLAPs), the IEF Quality Assurance Visits, local authority audits and related governance and challenge arrangements. • Ensuring that the safeguarding data our academies generate is of good quality and contributes to a culture and ethos of continuous learning and improvement whereby key learning is embedded into practice, policies and guidance. As a minimum, in order to review safeguarding data, each academy will report to governors: • The number of LADO referrals • The number of prevent referrals • The number of FGM referrals • The number of EHA referrals • The number of children's services referrals • The number of open Child Protection cases • The number of open Child in Need cases • Child on Child Abuse data and analysis • Attendance figures • Permanent exclusion/ suspension data • Removal from roll data The Director of Inclusion will periodically collate and review this information to present to the Board of Directors for review.	*We will complete the Safeguarding IEF and TLAPs on time, implement and review any identified actions by the Head of Safeguarding. We will participate fully in the Safeguarding Quality Assurance Visit process.* *We will use our safeguarding reporting and recording system (CPOMS) as outlined in the CPOMS toolkit (available on Ask Safeguarding SharePoint) so that there is consistency in data held across our organisation.* *We will report termly to governors using the SAT Principals Report to LGB template and data from our CPOMS, encouraging challenge and review.* *We will engage with Local Authority expectations around their Section 175 safeguarding audits, also sharing the completed versions of these with Head of Safeguarding for SAT.* *We will participate in activities that demonstrate the strength of partnership working and contribute our data to identify aspects that could have been better.* *Safeguarding leads will quality assure their work through attendance at DSL Network meetings.*

Appendices

Appendix 1

Definitions and indicators of abuse

1. Neglect

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

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

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

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger
- Stealing, scavenging and/or hoarding food
- Frequent tiredness or listlessness
- Frequently dirty or unkempt
- Often poorly or inappropriately clad for the weather
- Poor attendance or often late
- Poor concentration
- Affection or attention seeking behaviour
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones, for example growth, weight
- Failure to develop intellectually or socially
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- The child is regularly not collected or received from the academy
- The child is left at home alone or with inappropriate carers

2. 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 or when a child witnesses physical abuse of another family member.

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape
- Bruises that carry an imprint, such as a hand or a belt
- Bite marks
- Round burn marks
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks;
- An injury that is not consistent with the account given
- Changing or different accounts of how an injury occurred
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Fear of changing for PE
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

3. Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by rape and/or penetration 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. 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.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate
- Thrush, persistent complaints of stomach disorders or pains
- Eating disorders, for example anorexia nervosa and bulimia
- Attention seeking behaviour, self-mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusual compliance
- Regressive behaviour, enuresis, soiling
- Frequent or openly masturbating, touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming
- Bruises or scratches in the genital area

4. Child sexual exploitation

Child sexual exploitation is a form of child sexual abuse that can happen to any young person. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

(a) In exchange for something the victim needs or wants, and/or
(b) For financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Some children will be particularly vulnerable to being exploited, for example if they have had a chaotic upbringing or if they are in care or go missing, involved in gangs or being bullied. We recognise however that any child can become a target for exploitation, particularly where the internet and social media are involved. This is because the normal life events that go with being a child or teenager in today's age can be a challenge and make them susceptible to being groomed and exploited. The presence of any significant indicator for sexual exploitation should trigger a referral to local authority children's services. The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity)
- Entering and/or leaving vehicles driven by unknown adults
- Possessing unexplained amounts of money, expensive clothes or other items
- Frequenting areas known for risky activities
- Being groomed or abused via the Internet and mobile technology; and
- Having unexplained contact with hotels, taxi companies or fast food outlets.
- Missing for periods of time (CSE and county lines)

5. Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child/young person such as to cause severe and persistent adverse effects on the child/young person's emotional development. It may involve conveying to children/young people 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/young person 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 the child/young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child/young person participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children/young people frequently to feel frightened or in danger, or the exploitation or corruption of children/young people. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes themselves in very negative ways – as stupid, naughty, hopeless, ugly
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B: Some situations where children stop communicating suddenly (known as “traumatic mutism”) can indicate maltreatment.

6. Domestic Abuse

In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

(a) physical or sexual abuse;

(b) violent or threatening behaviour;

(c) controlling or coercive behaviour;

(d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and

(e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person. Witnessing the domestic abuse of another person is a key indicator of abuse.

(The definition can be found here: https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Where staff have a concern about a child being a victim of domestic abuse, it is the responsibility of DSLs (and deputies) to provide support. It is the responsibility of all staff to refer concerns about domestic abuse to the DSL. Our Academy will work with external agencies and Early Help teams to ensure that children are supported to manage their experiences of domestic abuse.

7. Responses from parents/carers

Research and experience indicate that the following responses from parents may suggest a cause for concern across all five categories:

- Delay in seeking treatment that is obviously needed
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to their age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- A persistently negative attitude towards the child
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Parents request removal of the child from home; or
- Violence between adults in the household
- Evidence of coercion and control.

8. Special Education Needs & Disabled children or certain health conditions

When working with children with disabilities or certain health conditions, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that may not be of concern on an ambulant child such as the shin, maybe of concern on a non-mobile child
- Not getting enough help with feeding leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries
- Unwillingness to try to learn a child's means of communication
- Ill-fitting equipment, for example, callipers, sleep boards, inappropriate splinting
- Misappropriation of a child's finances; or
- Inappropriate invasive procedures.

All academies will be mindful that children with SEND may require extra support to access preventative work in the curriculum to help safeguard them. Such children are especially vulnerable when identifying concerns due to their impaired capacity to resist or avoid abuse.

Staff should recognise that children with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges.
These can include:

- assumptions that indicators of abuse, neglect or exploitation relate to a child's disability, additional needs or health condition rather than a safeguarding concern;
- communication barriers that make it more difficult for children to recognise, disclose or report abuse;
- an increased risk of bullying, harassment, child-on-child abuse and exploitation;
- social isolation and reduced peer support;
- greater dependency on adults for care, support or personal needs;
- intimate care arrangements that may increase vulnerability if not appropriately managed;
- difficulties understanding that behaviours directed towards them are abusive, harmful or inappropriate; and
- increased online and offline vulnerability to exploitation, coercion, grooming and abuse.

Staff should maintain a heightened level of professional curiosity when working with children with SEND and consider whether safeguarding concerns, changes in presentation, behaviour or wellbeing may indicate abuse, neglect, exploitation or unmet need.

The SENCO and DSL will work closely together to ensure all staff are supported to understand the additional vulnerabilities of SEND children, including issues of cognitive understanding.

9. Extra-familial harm

All staff, but especially the DSL (and deputies) 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 abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Appendix 2

Indicators of susceptibility to radicalisation

1. Radicalisation is defined in KCSiE 2026 as:

   The process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

2. Extremism is defined by the government in the Prevent Strategy as:

   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. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

3. 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; or
   - Foster hatred which might lead to inter-community violence in the UK.

4. KCSiE 2026 describes terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat 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.

   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.

5. Students 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 and susceptibilities.

6. Indicators of susceptibility include:
   - **Identity crisis -** the student is distanced from their cultural/religious heritage and experiences discomfort about their place in society
   - **Personal crisis -** the student 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 student'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 student may have perceptions of injustice; a feeling of failure; rejection of civic life
   - **Experiences of criminality -** which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration
   - **Special educational need -** students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. This list is not exhaustive, nor does it mean that all children/young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

8. More critical risk factors could include:
   - Being in contact with extremist recruiters
   - Family members convicted of a terrorism act or subject to a Channel intervention
   - 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
- Significant changes to appearance and/or behaviour; and
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

Preventing violent extremism - Roles and responsibilities of the Single Point of Contact (SPOC)

The SPOC for Portland Spencer Academy is **Joe Handy**, who is responsible for:

- Ensuring that staff of the academy are aware that you are the SPOC in relation to protecting students from radicalisation and involvement in terrorism;
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing students from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;
- Raising awareness about the role and responsibilities of Portland Spencer Academy in relation to protecting students from radicalisation and involvement in terrorism;
- Monitoring the effect in practice of the academy's RE curriculum and assembly policy to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs;
- Raising awareness within the academy about the safeguarding processes relating to protecting students from radicalisation and involvement in terrorism;
- Acting as the first point of contact within the academy for case discussions relating to students who may be at risk of radicalisation or involved in terrorism;
- Collating relevant information in relation to referrals of susceptible students into the Channel[1] process;
- Attending Channel meetings as necessary and carrying out any actions as agreed;
- Reporting progress on actions to the Channel co-ordinator; and sharing any relevant additional information in a timely manner.

Appendix 3

Child Criminal Exploitation (CCE)

The Academy adheres to the local safeguarding partnership procedure in relation to CCE.

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

(a) in exchange for something the victim needs or wants, and/or
(b) for the financial or other advantage of the perpetrator or facilitator and/or
(c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

As an Academy we recognise that prevention is the best position regarding CCE. We seek to support children to develop confidence and build resilience. We will endeavour to support their age-appropriate knowledge and raise awareness and understanding of what CCE is, to understand the risks of CCE and to spot the warning signs for themselves and also their

[1] Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Counter Terrorism Policing East Midlands, and it aims to

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;
- Safeguard individuals who might be susceptible to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce susceptibility.

friends and peers and by doing so keep safe. Much of this work will be through out RSE and Personal Development curriculum.

If prevention is not possible, we aim to identify children who are at risk of, or are being exploited very early, intervention is key to effectively working with the child to prevent or reduce the level of risk. Once they have been groomed some children will find it difficult to withdraw from their abusers and we need to contribute to helping to protect them. Some children feel that they are in a relationship with these people. We commit to working with our inter-agency partners to safeguard and protect children.

An important part of educating our children is focussing on what is a healthy relationship and issues of consent. This will also target potential abusers at an early age with the intention of helping to shape their attitudes to others. We want to have a culture where the welfare of children is actively promoted and employees and students are vigilant. As part of this children will feel listened to and safe.

Appendix 4

Female Genital Mutilation

FGM is a procedure that includes the partial or total removal of the external female genital organs for non-medical reasons. It is illegal in the UK to subject a child to female genital mutilation (FGM); to assist or facilitate the practice; or to take a child abroad to undergo the procedure – Female Genital Mutilation Act 2003. The age at which girls are subject to FGM varies greatly from shortly after birth to any time up to adulthood. The majority of girls have the procedure between the ages of 5-8 years. It is estimated that 24,000 girls in the UK are at risk and 66,000 women living with the physical and psychological consequences.

Employees and governors need to have an awareness of the signs that a girl may have undergone FGM or be at risk of the practice. The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In our Academy, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases. The duty only applies in cases where the victim discloses. If someone else, such as a parent or guardian, discloses that a girl under 18 has had FGM, a report to the police is not mandatory. However, in these circumstances' disclosures should still be handled in line with wider safeguarding responsibilities.

The 'cutting season' during the summer months is often the riskiest time for girls as the healing time required following the procedure, often necessitates it being carried out during the long summer holiday. The main indicators and risk factors are highlighted below but all employees and the nominated governor for safeguarding will need to have undergone at least basic awareness raising training to ensure they can identify when a girl may be at risk.

Academy employees should be alert to the following indicators:

- The family comes from a community that is known to practise FGM or is less integrated within the community.
- A child may talk about a long holiday to a country where the practice is prevalent.
- Parents who wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays).
- A child may talk about 'special female visitors' or 'elder' who are staying with the family, especially during the 'cutting season'
- A child may confide that she is to have a 'special procedure' or to attend a special occasion or celebration to become a woman
- A child may request help, directly or indirectly, from a teacher or another adult
- Any female child born to a woman or has a sister who has been subjected to FGM must be considered to be potentially at risk, as must other female children in the extended family
- A girl is withdrawn from PSHE/SRE without any specific reason being given
- Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- Difficulty walking, sitting or standing and may even look uncomfortable
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.

- Frequent urinary, menstrual or stomach problems
- Prolonged or repeated absence, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girls return.
- Reluctance to undergo normal medical examinations
- Confiding in a professional without being explicit about the problem due to embarrassment or fear.
- Talking about pain or discomfort between her legs.

Where it is suspected that a girl may have undergone or is likely to undergo FGM, employees must share concerns with the DSL who in turn should consult the MASH.

Where you suspect that FGM has occurred:

- Be sensitive to the child, and family, be gender sensitive, make no assumptions, be non-judgemental, use simple language, record clearly
- You have a duty to protect, safeguard and share information
- Refer to Children's Social Care for coordination of careful assessment (not necessarily with consent)
- There will be potential enquiries under Section 47
- Potential police enquiries
- Possible use of police protection or legal orders such as FGM PO, prohibitive steps but not necessarily the removal of the child.

Whilst all staff should speak to the DSL (or deputy) about any concerns about female genital mutilation (FGM), there is a specific **legal** duty on **teachers.** If a **teacher**, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police.

Appendix 5

Online Safety

Our Academy ensures that children are able to use the internet and related communications technologies appropriately and safely and this is part of our wider duty of care. We recognise that the use of technology can be a significant component of many safeguarding issues including child sexual exploitation; radicalisation and sexual predation.

Our children and young people are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it. This includes information about risks around misinformation, disinformation, conspiracy theories and the safe use of generative AI.

Online safety covers the safety issues associated with all information systems and electronic communications. This encompasses not only the internet but all wireless electronic communications including mobile phones, games consoles, cameras and webcams. It also needs to consider the increasing mobility of access to digital technology through the range of mobile devices.

We recognise that many children have unlimited and unrestricted access to the internet via mobile phone networks (ie 3G, 4G and 5G). Technology often provides a platform to facilitate harm. However, it important to remember that the issue at hand is not the technology but the behaviour around how it is used; the use of new technologies in education brings more benefits than risks.

We will ensure that we meet our statutory obligations to ensure that children and young people are safe and are protected from potential harm, both within and outside our Academy. This also forms part of our Academy's protection from legal challenge, relating to the use of digital technologies.

There are additional duties under the Counter Terrorism and Securities Act 2015 which requires our Academy to ensure that children are safe from terrorist and extremist material on the internet.

Our academy ensure that there are filter and monitoring systems in place, provided by central trust services, to limit exposure to risks when children are using the Academy's IT systems and technology that can be used online. These are formally reviewed regularly from a central point of view and we engage in this process where appropriate. We also conduct and record academy level reviews flagging concerns to central IT services so any concerns can be managed effectively. In our Academy the filtering software we use is Smoothwall Monitor and it is regularly reviewed for effectiveness and updated. However, many children are able to access the internet using their own data plan. To minimise inappropriate use, as an Academy we use teaching opportunities to educate children about safe use on the internet.

Our Academy recognises that whilst we have appropriate filters and monitoring systems in place, we also do not "over block" so that we do not restrict this teaching opportunity to teach children about keeping safe online.

We observe our responsibilities under the relevant Data Protection Act and DfE Guidance Document Teaching Online Safety in Schools (2019) https://www.gov.uk/government/publications/teaching-online-safety-in-schools.

Further specific guidance regarding Artificial Intelligence (AI), deepfakes, nudification technology and emerging technological safeguarding risks can be found in Part 2 of this policy.

Providing Remote Education (2023) – Portland Spencer Academy continues to consider the safety of children when they are asked to work online. The starting point for online teaching is that the same principles as set out in our Trust code of conduct should be followed. This policy, amongst other things, includes acceptable use of technologies, staff/student relationships and communication including the use of social media. The policy applies equally to any existing or new online and distance learning arrangements which are introduced.

We will continue to ensure any use of online learning tools and systems are in line with privacy and data protection requirements.

Appendix 6

Making or Sharing Nudes and Semi-nudes
Our Academy recognises that the making or sharing of nude and semi-nude images is a form of sexual abuse and can be part of child-on-child abuse. The making or sharing of nude and semi-nude images can expose children to risks, particularly if the imagery is shared further. It can lead to embarrassment, bullying and increased vulnerability to sexual exploitation. Producing and sharing images of under-18's is illegal.

It is recognised that the term "making or sharing nudes and semi nudes" refers to the creation, sending, posting or sharing of nude or semi-nude images, videos or livestreams by children under the age of 18. This included photographs, videos, livestreams, digitally altered images, deepfakes, deep nudes and wholly AI-generated images.

This guidance refers to incidents which involve:

- A person under the age of 18 creating and sharing nudes and semi-nudes of themselves with another child under the age of 18
- A person under the age of 18 sharing nudes and semi-nudes created by another person under the age of 18 with another child under the age of 18
- A person under the age of 18 in possession of nudes and semi-nudes created by another person under the age of 18.

This guidance does not cover;

- The making or sharing of nudes or semi-nudes of under 18s by adults (18 and over) as this constitutes child sexual abuse and the academy will always inform the police and children's social care
- Children and young people under the age of 18 sharing adult pornography or exchanging sexual texts which do not contain images

In such circumstances, our academy will follow Nottingham City's local authority's guidance and ensure that statutory safeguarding guidance, as set out in KCSIE 2026 is followed.

In the latest advice for schools and colleges (UKCIS, 2024), "sharing nudes and semi-nudes" is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as those who are not in a relationship. It is also possible for a young person.

The purpose of this guidance is to make expectations clear to pupils and their parents and carers as well as to be clear to employees about the Academy's safeguarding policy and procedure in responding to incidents.

Handling Incidents

All incidents involving the creating and sharing of nude or semi-nude imagery will be dealt with in line with our safeguarding and child protection policy. Where an incident comes to our attention staff will:

- **report it the DSL (or deputy) immediately.**
- **Never** view, copy, print, share, store or save the image, or ask a child to share or download – **this is illegal**;
- report to the DSL if they have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), and seek support;
- **not** delete the image or ask the young person to delete it;
- **not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL;
- **not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers;
- **not** say or do anything to blame or shame any young people involved;
- explain to the child that the incident needs to be reported and reassure them that they will receive support and help from the DSL.

Once reported to the DSL, the DSL will carry out the following steps;

- seek to gather further information from relevant staff. This may involve staff who have heard the disclosure and safeguarding/leadership team who deal with safeguarding concerns.
- Hold subsequent interviews with children involved
- Inform parents or carers at an early stage in the process in order to support the child, unless there is good reason to believe that involving them would put the child at risk of harm
- A referral made to children's social care and/or the police immediately in there is a concern that a child or young person has been harmed or is at risk of harm at any point in the process

The response taken by the DSLs will be guided by Finkelhor and Wolak's Typology of Sexting Typology (see below). DSLs will also use the Brook Traffic Light Tool (where appropriately trained) and the Hackett Continuum of Harmful Sexual Behaviour (see Child on Child Abuse Policy), to place sexualised behaviour within the context of the child's age and development. The DSL will also consider the questions within Annex A of the UK Centre for Internet Safety Guidance on Sharing Nudes and Semi-Nudes.

The Academy recognises that creating and sharing nudes and semi-nudes of under 18s (including those taken by children of themselves, or those created and shared with consent) is illegal and that this can make responding to incidents very complex. However, the Academy also are aware that the law criminalising indecent imagery of children was designed to protect children from adults seeking to sexually abuse them, it was not intended to criminalise children. Children who create and share images can often do so because of natural curiosity about sex and their exploration of relationships. Therefore, all situations will be considered on a case-by case basis. In our Academy, the DSL will consider a range of risks and put in place of support to carefully manage each circumstance.

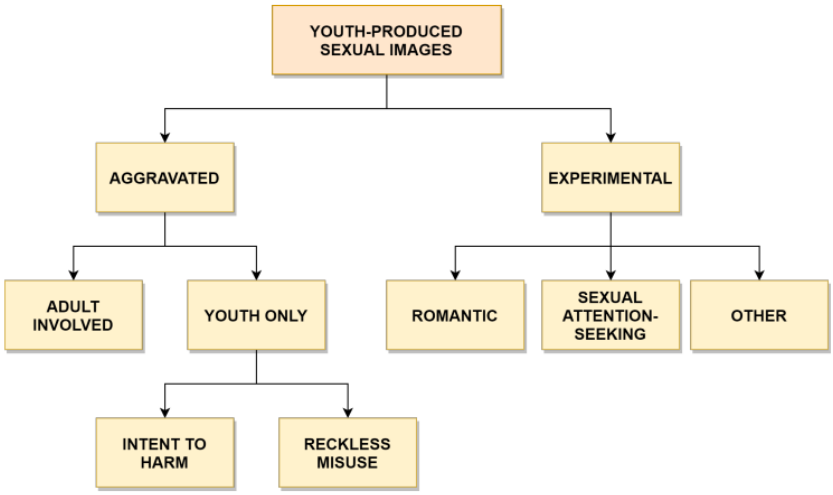


Fig 1: Sexting, a typology (Finkelhor and Wolak)

The DSL will ensure that any response to an incident of self-generated sexual imagery will be guided by the principle of proportionality and primary concern will always be the welfare and protection of the children involved. The National Police Chief's Council has made it clear that the immediate focus should always be on safeguarding children. Therefore, as outlined in the guidance published by UK Council for Child Internet Safety, it may not always be necessary to notify the police where incidents are classified as experimental and with no aggravating factors.

Where incidents suggest evidence of abusive and/or aggravating factors, the DSL will refer these to the police and/or Children's Services Social Care. This will include, as a minimum, any incident where information at the initial stages indicates:

- the involvement of an adult
- that there is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs)
- what is known about the images or videos suggest the content depicts sexual acts which are unusual for the child's developmental stage, or are violent
- the images involve sexual acts and any pupil in the images or videos is under 13
- that there is reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example they are presenting as suicidal or self-harming)

Assessing the Risks

If a decision is made not to inform the police and/or children's social care, the DSL will ensure that the rationale for this decision making is recorded on CPOMS. The DSL will then conduct a review to establish facts and assess risk. This will build upon any initial assessments using the flow chart above. When assessing the risk to determine if a referral is needed, the DSL will consider the following:

- Why was the nude or semi nude shared? Was it consensual or was the child put under pressure or coerced?
- Has the nude or semi nude been shared beyond its intended recipient? Was it shared without consent of the child who produced the image?
- Has the nude or semi nude been shared on social media or anywhere else online. If so, what steps have been taken to contain the spread?
- How old are any of the children involved?
- Did the child send the nude or semi nude to more than one person?
- Do you have concerns about the child or young person's vulnerability?
- Are there additional concerns if the child's parents or carers are informed?

DSLs will seek to:

- Identify, **without viewing wherever possible**, what the image contains and whether anyone else has been involved.
- Find out whether the image has been shared between two people or shared further
- Discuss what actions and support might be needed to support the children involved, including preventing further spread. This will take in to account the views and wishes of the children involved.
- Reassure the child that they will be listened to and supported
- Recognise the pressures that children can be under to create and share nude and semi-nude images
- Remain solution-focussed and avoid victim blaming questions and language
- Signpost to relevant organisations, including the Internet Watch Foundation and Childline's Report Remove tool

Searching Devices, Viewing and Deleting Nude and Semi-nude Images

Staff and parents or carers must not intentionally view any nude or semi-nude images, unless there is a good reason to do so. This may include:

- Cases in which viewing the image is necessary to decide whether to involve external agencies because it is not possible to establish the facts from any children or young person
- Situations in which it is necessary to report it to a website, app or suitable reporting agency (such as the Internet Watch Foundation), to have the content removed.

- Situations in which it is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network

If it is necessary to view the imagery, the DSL will:

- Never copy, print, share, store or save them; this is illegal. If this has already happened, the DSL will contact police for advice and to explain the circumstances
- Discuss the decision with the Principal
- Ensure viewing is undertaken by the DSL (or equivalent) or another member of the safeguarding team with delegated authority from the Principal or a member of the senior leadership team
- Ensure viewing takes place with another member of staff present in the room, ideally the Principal or a member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible, make sure viewing takes place on the premises of the education setting, ideally in the Principal or a member of the senior leadership team's office
- Ensure, wherever possible, that they are viewed by a staff member of the same sex as the child or young person in the images.
- Record on CPOMS how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions.
- If any devices need to be taken and passed onto the police, confiscate the device(s) and call the police. The device should be disconnected from Wi-Fi and data and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device should be placed in a secure place, for example in a locked cupboard or safe until the police are able to come and collect it.

Staff will follow the guidance within the DfE's guidance on Screening, Searching and Confiscation and ensure that any searches are recorded on CPOMS.

The DSL will ensure that ongoing support is in place to all children involved and the Academy will continue to work with partner agencies where required. The DSL will with closely with parents throughout the process and will closely follow guidance within the UK Council for Child Internet Safety.

Appendix 7

Role of the Appropriate Adult - 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[2] before questioned about an offence[3], 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:

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

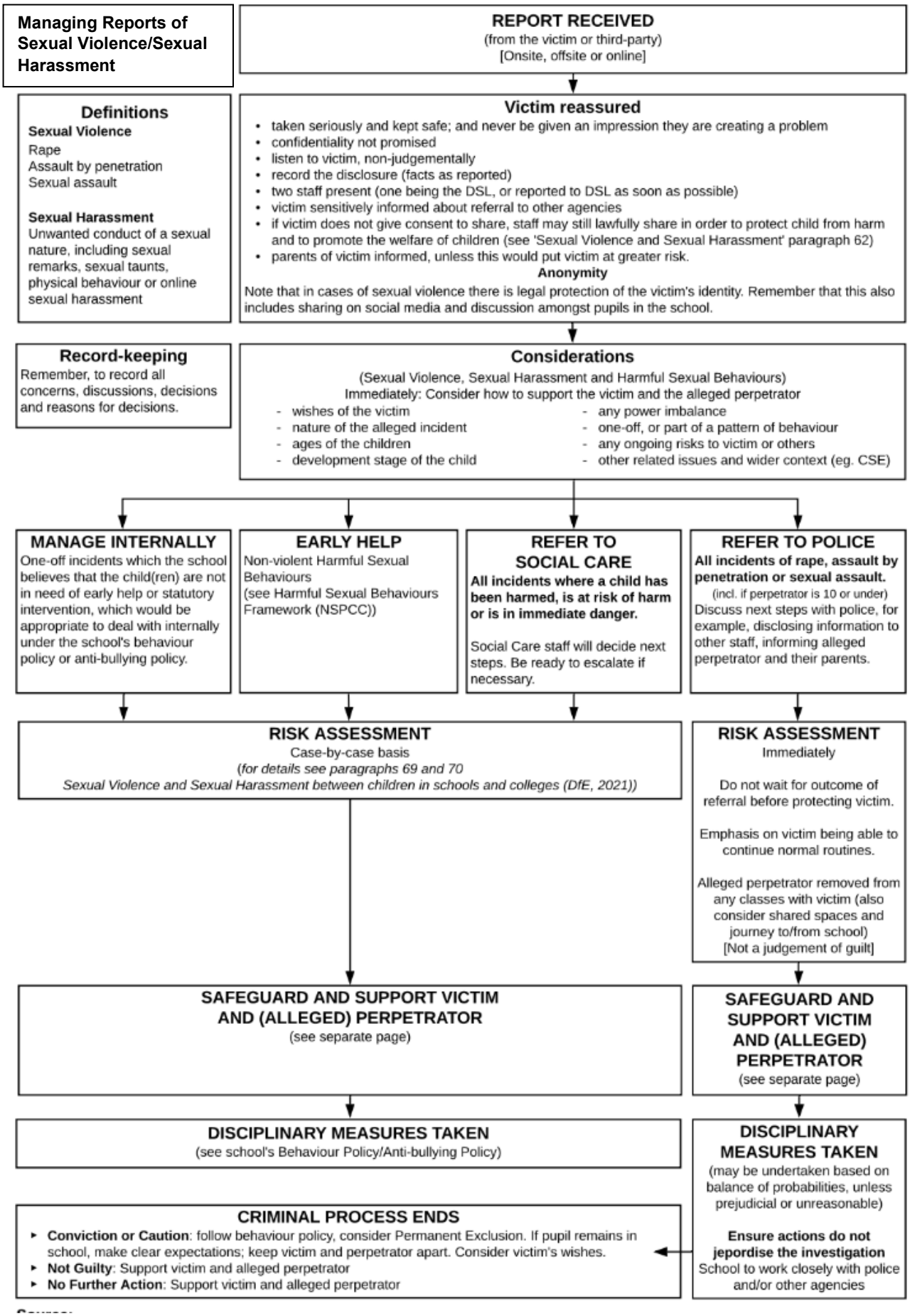
Further information can be found in the Statutory guidance - PACE Code C 2019.

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

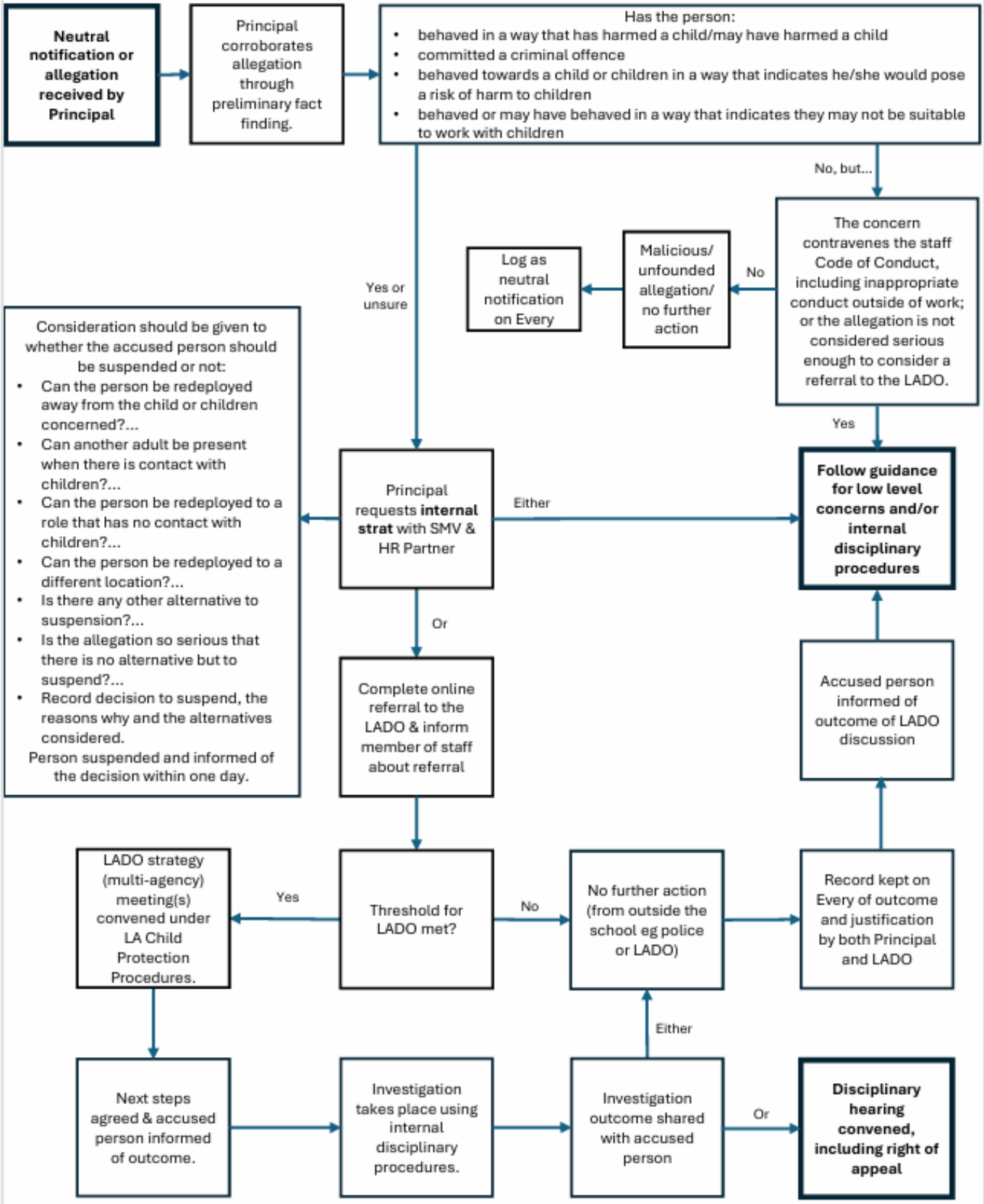
[2] The police caution is: *"You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."*

[3] 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 8: Flowcharts



Incident, concern or allegation process in relation SAT employees and volunteers.



Appendix 9

Safeguarding requirements for Early Years Foundation Stage children in nursery or reception classes

Aspect	Requirement
Child Protection	
Policy and Procedures	The safeguarding policy and procedures **must** include: • Action to be taken in respect of an allegation being made against a member of staff (This is included in this academy's overarching model child protection & safeguarding policy) • the use of mobile phones and cameras in the setting – Induction of all adults helping or working within the academy regarding the use of mobile phones/ cameras is carried, the use of personal mobile phones is not permitted unless prior discussion with the Head for emergency situations (eg school trip). School ipads and mobile phones are to be used for school purposes and evidence in EYFS is recorded on school devices only.
Suitable person	• Providers **must t**ell staff that they are expected to disclose any convictions, cautions, court orders, reprimands and warnings that may affect their suitability to work with children (whether received before or during their employment at the setting • Providers **must** also meet their responsibilities under the Safeguarding Vulnerable Groups Act 2006, which includes a duty to make a referral to the Disclosure and Barring Service where a member of staff is dismissed (or would have been, had the person not left the setting first) because they have harmed a child or put a child at risk of harm. • Volunteers who work in schools for more than three days in 30-day period must have an enhanced DBS check with a children's barred list check – this includes those who are 16 or over and on work experience. • People must not start the setting until DBS check, including Children's barred list, has been reviewed.
Disqualification	• A provider or a childcare worker may be disqualified from registration. Where a person is disqualified, the provider must not employ that person in connection with early years' provision. Where an employer becomes aware of relevant information that may lead to disqualification of an employee, the provider must take appropriate action to ensure the safety of children. • A provider or a childcare worker may also be disqualified because they live in the same household as another person who is disqualified, or because they live in the same household where a disqualified person is employed. • The information **must** be provided to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the provider became aware of the information or ought reasonably to have become aware of it if they had made reasonable enquiries.
Staff taking medication/ other substances	• If practitioners are taking medication which may affect their ability to care for children, those practitioners should seek medical advice. • Providers **must** ensure that those practitioners only work directly with children if medical advice confirms that the medication is unlikely to impair that staff member's ability to look after children properly. Staff medication on the premises must be securely stored, and out of reach of children, at all times.
Staff qualifications, training, support and skills	
Induction	• Induction training must include information about emergency evacuation procedures, safeguarding, child protection, and health and safety.
Key person	• Each child **must** be assigned a key person. Their role is to help ensure that every child's care is tailored to meet their individual needs to help the child become familiar with the setting, offer a settled relationship for the child and build a relationship with their parents. This will often be the teacher.
Staff: child ratios	• Providers **must** inform parents and/or carers about staff deployment, and, when relevant and practical, aim to involve them in these decisions. Children must **usually** be within sight **and** hearing of staff and **always** within sight **or** hearing. • Only those aged 17 or over may be included in ratios (and staff under 17 should be supervised at all times). Students on long term placements and volunteers (aged 17 or over) and staff working as apprentices in early education (aged 16 or over) may be included in the ratios if the provider is satisfied that they are competent and responsible. • The ratio and qualification requirements below apply to the total number of staff available to work directly with children.

	For children aged two: • there must be at least one member of staff for every four children • at least one member of staff must hold a full and relevant level 3 qualification • at least half of all other staff must hold a full and relevant level 2 qualification **For children aged three and over in maintained nursery schools and nursery classes in maintained schools**: • there **must** be at least one member of staff for every 13 children • at least one member of staff must be a school teacher as defined by s.122 of Education Act 2002 • at least one other member of staff must hold a full and relevant level 3 qualification **Reception classes** in maintained schools and academies are subject to infant class size legislation. The School Admissions (Infant Class Size) Regulations 2012 limit the size of infant classes to 30 pupils per school teacher (subject to permitted exceptions) while an ordinary teaching session is conducted. 'School teachers' do not include teaching assistants, higher level teaching assistants or other support staff. **Where schools have provision run by the governing body (under section 27 of the Education Act 2002) for three- and four-year-olds** who are not pupils of the school, they can apply: a 1:13 ratio where a person with a suitable level 6 qualification is working directly with the children; or a 1:8 ratio where a person with a suitable level 6 qualification is not working directly with children but at least one member of staff present holds a level 3 qualification. **Where children in nursery classes attend school for longer than the school day or in the school holidays, in provision run directly by the governing body** or the proprietor, with no teacher present, a ratio of one member of staff to every eight children can be applied if at least one member of staff holds a full and relevant level 3 qualification, and at least half of all other staff hold a full and relevant level 2 qualification. • Some schools may choose to **mix their reception classes with groups of younger children** (such as nursery pupils or younger children from a registered provider), in which case they must determine ratios within mixed groups, guided by all relevant ratio requirements and by the needs of individual children within the group. In exercising this discretion, the school must comply with the statutory requirements relating to the education of children of compulsory school age and infant class sizes. Schools' partner providers must meet the relevant ratio requirements for their provision. • Where the provision is solely before/after school care or holiday provision for children who normally attend Reception class (or older) during the school day, there must be sufficient staff as for a class of 30 children. It is for providers to determine how many staff are needed to ensure the safety and welfare of children, bearing in mind the type(s) of activity and the age and needs of the children. It is also for providers to determine what qualifications, if any, the manager and/or staff should have.
Health	
Illness and medication	Schools **must** have a procedure, discussed with parents and/or carers, for responding to children who are ill or infectious, take necessary steps to prevent the spread of infection, and take appropriate action if children are ill. Providers **must** have and implement a policy and procedures, for administering medicines.
Smoking	Wider legislation **must** be met (i.e. signage and no smoking in cars with children)
Food and drink	• Where children are provided with meals, snacks and drinks, they **must** be healthy, balanced and nutritious. Before a child is admitted to the setting the provider must also obtain information about any special dietary requirements, preferences and food allergies that the child has, and any special health requirements. Fresh drinking water must be available and accessible at all times. Providers must record and act on information from parents and carers about a child's dietary needs. • There **must** be an area which is adequately equipped to provide healthy meals, snacks and drinks for children as necessary. There must be suitable facilities for the hygienic preparation of food for children. Providers must be confident that those responsible for preparing and handling food are competent to do so. In group provision, all staff involved in preparing and handling food must receive training in food hygiene. • Registered providers must notify Ofsted of any food poisoning affecting two or more children cared for on the premises.
Accident or injury	Registered providers must notify Ofsted of any serious accident, illness or injury to, or death of, any child while in their care, and of the action taken. Notification must be made as soon as is reasonably practicable, but in any event within 14 days of the incident occurring. A registered provider, who, without reasonable

	excuse, fails to comply with this requirement, commits an offence. Providers must notify local child protection agencies of any serious accident or injury to, or the death of, any child while in their care, and must act on any advice from those agencies.
Screen time	Children under 2 should have no screen time other than exceptional circumstances such as video call with parents and carers Children between 2 and 5 should have a maximum of one hour, preferably less.
First Aid	Any group outings should ensure that there is a paediatric first aider present.
Premises	
Risk assessment	Risk assessments should identify aspects of the environment that need to be checked on a regular basis, when and by whom those aspects will be checked, and how the risk will be removed or minimised.
Outings	A trained paediatric first aider must be available on all trips.
Information for parents and carers	
Information and records	Providers **must** enable a regular two-way flow of information with parents and/or carers, and between providers, if a child is attending more than one setting. If requested, providers should incorporate parents' and/or carers' comments into children's records.
Policy statements	Details of the provider's policies and procedures should be published and they must make copies available on request, including the procedure to be followed in the event of a parent and/or carer failing to collect a child at the appointed time, or in the event of a child going missing at, or away from, the setting.
Special Educational Needs	**Inspecting safeguarding in early years, education and skills settings** • the child protection policy should reflect the additional barriers that exist when recognising the signs of abuse and neglect of children who have special educational needs and/or disabilities. • All staff and carers should have a copy of and understand the written procedures for managing allegations of harm to a child or learner. They should know how to make a complaint and understand policies on whistleblowing and how to manage other concerns about the practice of adults in respect of the safety and protection of children and learners. (This is included in this academy's overarching model child protection & safeguarding policy).
Complaints	Providers must put in place a written procedure for dealing with concerns and complaints from parents and/or carers, and must keep a written record of any complaints, and their outcome.
Changes that must be notified to Ofsted	
All registered early years providers **must** notify Ofsted of any change: • in the address of the premises (and seek approval to operate from those premises where appropriate); • to the premises which may affect the space available to children and the quality of childcare available to them • any proposal to change the hours during which childcare is provided; • any significant event which is likely to affect the suitability of the early years provider or any person who cares for, or is in regular contact with, children on the premises to look after children; • where the early years provision is provided by a company, any change in the name or registered number of the company; • where the childcare is provided by a partnership, body corporate or unincorporated association, any change to the 'nominated individual'; • where the childcare is provided by a partnership, body corporate or unincorporated association whose sole or main purpose is the provision of childcare, any change to the individuals who are partners in, or a director, secretary or other officer or members of its governing body.	