Ormiston Academies Trust

Ormiston Sudbury Academy
Safeguarding and Child Protection policy

Policy version control

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Description of changes	**Substantive changes to document** Updated throughout to reflect changes to: - • KCSIE 2026

	• Working Together to Safeguard Children 2026 • EYFS Statutory Framework 2026 • Terrorism (Protection of Premises) Act 2025. (Martyn's Law) • Children's Wellbeing and Schools Act 2026, including section 34 -Benedict's Law Additional and substantive organizational changes for clarity including insertion of additional headings and sub-headings. **Terminology changes/clarifications** • Early help definition updated • Parents includes carers/guardians • Adults includes all employees, supply/agency staff, governors, volunteers, contractors, visitors and external service or activity providers). **Corrections** GDPR/Data Protection - removed incorrect references and updated to 2018 Data Protection Act **New material: Additional sections/sub-sections:** **Generative AI** Safeguards when using generative AI for child protection and Safeguarding purposes. **Separation for safeguarding purposes** Section added to comply with KCSIE 2026 **Early Years Foundation Stage (EYFS)** Section added to comply with EYFS Framework 2026 **Single-sex premises arrangements** Section added to comply with KCSIE 2026 **Young Carers** Strengthens expectations on identifying and supporting young carers **Bruising in non-mobile children** Section added to comply with EYFS Framework **Children with family members in prison** New cohort recognised in the policy **Communication difficulties** New sub-section recognising the safeguarding risk to children who have barriers to communication **Children affected by parental separation, court orders or family disputes** Section added to comply with EYFS Framework **Safeguarding related to school premises** Section added to comply with KCSIE 2026

	Changes/additions to pre-existing sections **Safeguarding roles and responsibilities** Reorganised under subheadings **Compliance and assurance** Section moved to final section of policy **Types of safeguarding concerns** Reorganised into 8 sections for clarity **Recruitment of staff and volunteers** Amended title and paragraphs divided into discrete points for clarity **Locality working** – stronger emphasis in policy on local multi agency working to include detailed knowledge of Local Safeguarding Children's Board priorities and including them in academy safeguarding work **Special Educational Needs and Disabilities, Medical Conditions and Allergies** Addition of safeguarding response to medical conditions and allergies **Gender questioning children** Update to comply with KCSIE 2026 **Appendices** Addition of glossary of terms Addition of summary of how to respond to AI generated child sexual abuse material (CSAM) Key contacts table moved to appendices HSB Flow chart removed from body of policy and put in appendices Responding to nudes/semi nudes moved from body of policy to appendices

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1. Introduction and context

1.1. Our Principles

1.1.1. Ormiston Academies Trust is committed to safeguarding children and expects everyone who works for the Trust or comes into contact with children who attend an Ormiston academy to share this commitment.

1.1.2. Safeguarding is everyone's responsibility: all adults, governors, volunteers, and visitors are expected to play their full part in keeping children safe; and maintain an attitude of 'it could happen here'.

1.1.3. The welfare and safeguarding needs of children are put first.

1.1.4. Everyone has a part to play in ensuring there is a strong safeguarding culture, which is deeply embedded in the ethos, values and everyday practices of the academy.

1.1.5. This policy sets out how Ormiston Sudbury Academy will deliver these responsibilities.

1.1.6. This policy **must** be read in conjunction with the key statutory guidance documents:

- 'Keeping children safe in education' (KCSIE)
- 'Working together to safeguard children, a guide to multi- inter-agency working to help, protect and promote the welfare of children (WTTSC)

1.1.7. All references to 'Keeping children safe in education' (KCSIE) and 'Working together to safeguard children (WTTSC) are from the latest iterations of those documents which can be found on the GOV.UK website.

1.1.8. In addition, the academy will at all times adhere fully to the statutory guidance in place from the Department for Education issued under Section 157 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Education (Non-Maintained Special Schools) (England) Regulations 2011.

1.1.9. Nothing written in this policy overrides the academy's duties under such legislation or in statutory guidance.

1.1.10. Furthermore, we will follow the procedures set out by the Suffolk Safeguarding Partnership.

1.1.11. The locality LSCP priorities are www.suffolksp.org.uk

1.2. Oversight

1.2.1. The governing body will oversee the policy, ensure its implementation, and review its content and effectiveness on an annual basis.

1.2.2. The principal will report termly to the governing body on the academy's safeguarding culture, implementation of this policy and the efficacy of the arrangements in place to keep children safe and promote their welfare.

1.3. Local governing bodies and academy leadership responsibilities

1.3.1. The trust board has overall accountability and ultimate decision-making authority for all the work of the trust. The trust board ensures that the trust complies with all legal and statutory requirements. The responsibilities of the trustees and the local governing body are outlined in the trust's scheme of delegation.

1.3.2. Whilst the trust is responsible for the overarching policy and for holding academies to account for the safeguarding and protection of children, it is the responsibility of each principal and academy governing body to ensure the policy is followed and implemented within their own academy.

1.4. The academy

1.4.1. provides a caring, positive, safe, and stimulating environment that promotes the emotional, social, physical, and moral development of the individual child.

1.4.2. provides an environment which helps children feel safe and respected.

1.4.3. enables children to talk openly about anything that worries them and to feel confident that they will be listened to, kept safe and never be made to feel that they are creating a problem for reporting abuse, particularly sexual violence, or sexual harassment.

1.4.4. recognises that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected and may not recognise their experiences as harmful.

1.4.5. recognises that children with additional needs or vulnerabilities including disability and/or sexual orientation or language barriers may require additional support to enable them to tell someone they are being abused.

1.4.6. ensures that children are taught about safeguarding, including online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum in line with the DfE's 'Teaching online safety in school (updated January 2023) and UKCIS (UK Council for Internet Safety) 'Education for a connected world' (June 2020).

1.4.7. works with parents to build an understanding of the academy's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situations, is understood.

1.4.8. works constructively with safeguarding partners and agencies to ensure children receive the support they need, professionally challenging decisions where required and appropriate.

1.5. Scope

1.5.1. In line with the law, this policy defines a child as anyone under the age of 18 years. It also includes those 18 or over on roll at this academy.

1.5.2. This policy applies to all members of Ormiston Academies Trust Central Team employees and employees in our academies, including all permanent, temporary and supply/agency staff, governors, volunteers, contractors and external service or activity providers.

1.6. Terms

1.6.1. Parents also refers to carers.

1.6.2. Adults refers to all employees, supply/agency staff, governors, volunteers, contractors, visitors and external service or activity providers.

2. Locality working

2.1. Contextual Safeguarding

2.1.1. We recognise that as children grow and develop, they are influenced by a range of environments and people outside of their family, both in the real world and in the online world and may encounter risks in any of these environments. Sometimes these different contexts are inter-related and may mean that children may encounter multiple risks.

2.1.2. Through our day-to-day work and our safeguarding self-evaluation and review process, we identify contextual and extra-familial safeguarding concerns and risks.

2.1.3. We work to understand and respond to children's experiences of harm beyond their families and recognise that the different relationships that children form in their neighbourhoods, school and online can feature harm, violence and abuse.

2.2. Local Safeguarding Children's Partnership (LSCP) processes and procedures

2.2.1. The academy will deliver its responsibilities for identifying and acting on early help/Family Help needs, safeguarding and child protection in line with the policies and procedures identified in the Suffolk Safeguarding Partnership safeguarding partners policies and procedure guidance, available at www.suffolksp.org.uk

3. Safeguarding roles and responsibilities

Employees, volunteers and governors will:

3.1. Child - voice

3.1.1. listen to and actively seek out, the views, wishes and feelings of children, ensuring safeguarding practice takes account of children's lived experiences

3.2. Identifying concerns

3.2.1. identify children who may be in need of early help or who are suffering, or are likely to suffer, significant harm

3.2.2. be alert to the signs of abuse, including child on child abuse and the need to refer any concerns to the DSL/DDSL

3.2.3. maintain an attitude of 'it could happen here' and always act in the best interests of the child

3.3. Responding to safeguarding concerns

3.3.1. ensure that safeguarding concerns are reported immediately, and always on the same day

3.3.2. take appropriate action, working with other services as needed

3.3.3. support social workers and other statutory safeguarding partners to take decisions about individual children when required seek early help where a child and family would benefit from coordinated support from more than one agency via www.suffolksp.org.uk

3.3.4. Multi Agency Safeguarding Hub (MASH)

3.3.5. ask for feedback and raise any concerns about actions taken with the DSL/DDSL

3.3.6. be professionally curious

3.3.7. professionally challenge when necessary

3.4. Ongoing vigilance

3.4.1. refer to the principal any concerns about another adult immediately, or if the concerns are about the principal, refer them to the academy's education director who will inform the OAT Head of Safeguarding, National Director of People

3.4.2. raise concerns about poor or unsafe practice and potential failures in the academy's safeguarding arrangements through the academy's Whistleblowing Policy

3.5. Recording and information sharing

3.5.1. share information and work together to provide children with the help they need

3.5.2. make comprehensive, clear, factually accurate and professionally written accounts with defensible decision making rationale that will stand up to scrutiny

3.5.3. use CPOMS (or an alternative as directed by the DSL) to record concerns

3.6. Knowledge and training

3.6.1. know who the academy's designated safeguarding lead (DSL) and deputy (DDSL) are

3.6.2. ensure they receive appropriate safeguarding and child protection training (including digital safeguarding/online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring) which is regularly updated

3.6.3. know the academy's procedures for dealing with child-on-child abuse, including sexual harassment and sexual violence between children

3.6.4. know the academy's procedures for dealing with children who go missing from education, particularly on repeat occasions, and reporting any such concerns to the DSL/DDSL

3.6.5. read KCSIE part 1

3.6.6. keep themselves updated with the systems within the academy which support safeguarding that were explained to them as part of their induction (including the Staff Code of Conduct)

3.6.7. be aware of Suffolk Safeguarding Partnership safeguarding procedures, www.suffolksp.org.uk and ensure these procedures are followed

3.7. The Principal is responsible for

Policy and statutory guidance implementation

3.7.1. reading, understanding and applying 'Keeping children safe in education' KCSIE) and 'Working together to safeguard children' (WTTSC) statutory guidance

3.7.2. ensuring that there is an effective safeguarding and child protection policy in place together with a staff code of conduct, which are provided to all adults

3.7.3. ensuring that all safeguarding and child protection policies and procedures adopted by the Governing Body, particularly concerning referrals of cases of suspected abuse and neglect, are understood, and followed by all adults

3.7.4. ensuring that they 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

Resourcing

3.7.5. ensuring that the academy has an appropriate senior member of staff from the academy leadership team, with appropriate status and authority, funding, resources and support to take the lead in responsibility for safeguarding and child protection- the Designated Safeguarding Lead (including online safety and understanding the filtering and monitoring systems and processes in place and that they receive DSL /level 3 training which is updated every two years

3.7.6. ensuring those in EYFS have access to reflective practice supervision

Multi- agency working

3.7.7. ensure they are aware of and follow local procedures related to safeguarding

3.7.8. ensure they are aware of Local Safeguarding Children's Partnerships (LSCP) priorities and that they are reflected in the safeguarding work of the academy

Training

3.7.9. ensuring all directly employed and regularly engaged adults are given a mandatory induction, which includes clear guidance on their safeguarding and child protection responsibilities, including online safety, and procedures to follow if anyone has any concerns about a child's safety or welfare. Contractors and activity providers are given a short safeguarding briefing on arrival covering how to raise a concern and who the DSL is, in addition to the assurance obtained through the process at 19.16

3.7.10. ensuring all governors receive appropriate safeguarding and child protection training (including online safety which includes an understanding of filtering, monitoring systems and cyber security) at induction which is updated regularly and at least annually to keep pace with KCSIE updates. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the academy are effective and support the delivery of a robust whole school approach to safeguarding and child protection

3.7.11. ensuring that all adults undergo safeguarding and child protection training (including online safety, which includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring), which is updated regularly and at least annually to keep pace with KCSIE updates

3.7.12. ensuring the academy has a comprehensive, bespoke to role safeguarding training plan in place

Safer recruitment and ongoing vigilance

3.7.13. ensuring procedures are in place to manage allegations against staff and volunteers and maintaining a secure record of all low level concerns and allegations which is accessible by the academy HR lead should the principal be unavailable

3.7.14. ensuring at least one person on any appointment panel has undertaken safer recruitment training which is renewed every two years

3.7.15. ensuring the adherence to statutory responsibilities to check adults working with children, taking proportionate decisions on whether to ask for checks beyond what is required

3.7.16. ensuring that anyone in regulated activity regardless of supervision arrangements has an Enhanced DBS with barred list check

Online safety, cyber security

3.7.17. ensuring that they are doing all they reasonably can to limit children's exposure to online harms from the academy's IT system, but that 'over-blocking' does not lead to unreasonable restrictions

3.7.18. ensuring that the academy has in place filtering and monitoring, the efficacy of which is regularly monitored and reported on, and which complies with current filtering and monitoring standards

3.7.19. ensuring they have appropriate level of security protection procedures in place in order to safeguard children, which meet the standards in 'Cyber security standards for schools and colleges' guidance. (updated March 2025)

Site security

3.7.20. ensuring that the obligations under section 26 of the Counterterrorism and Security Act 2015 are met and that the Prevent Duty guidance for England and Wales is followed including the production of an annual written risk assessment

3.7.21. ensuring that the obligations under (The Terrorism (Protection of Premises) Act 2025 commonly known a Martyn's Law, are met including procedures for evacuation, invacuation, lock down and communication

3.7.22. ensuring that the obligations under Children's Wellbeing and Schools Act 2026 including written allergy management training and procedures are met

3.8. The designated safeguarding lead is responsible for

Leading

3.8.1. taking lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place)

Managing

3.8.2. managing internal and external safeguarding referrals

3.8.3. ensuring, during term-time school hours, that clear, reliable and known cover arrangements are in place for periods when the designated safeguarding lead is unavailable (for example a trained deputy DSL and/or confidential shared safeguarding mailbox or equivalent system). The designated safeguarding lead will arrange adequate and appropriate cover arrangements for any out-of-hour/out of term activities (i.e. school trips)

3.8.4. liaising with the principal to inform them of issues – especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations This should include being aware of the requirement for children to have an Appropriate Adult (PACE code C 2019)

3.8.5. working with external agencies and professionals on matters of safety and safeguarding

3.8.6. raising awareness of safeguarding and child protection amongst adults and parents

3.8.7. ensuring that child protection information is transferred to the child's new school/academy within statutory time frames

3.8.8. notifying children's social care if there are concerns over unexplained absences of a child

3.8.9. informing the local authority when a private fostering arrangement is in place

3.8.10. managing security within the academy and reviewing it annually

3.8.11. ensuring that important safeguarding policies, such as those for behaviour and anti-bullying, are kept up to date

3.8.12. keeping all child protection records up to date on CPOMS (Child Protection Online Management System); including a clear summary of the concern, decisions reached and the rationale behind the decision, including details of how the concern was resolved/outcomes

3.8.13. following the Ormiston Academies Trust CPOMS Toolkit

3.8.14. having an overview of the numbers of safeguarding and child protection referrals made and the success rate of any such referrals, and provide an anonymised report to the principal, and governing body termly

3.8.15. having in place effective ways to identify emerging problems and potential unmet needs for individual children and families

3.8.16. ensuring that there is a planned programme of evidence based, inclusive, age and stage appropriate, RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum and which complies with statutory guidance

3.8.17. ensuring, through the safeguarding curriculum, that children know the process of raising a concern (about themselves or a friend/other), can identify at least one trusted adult within the academy, know who the academy's Designated Safeguarding Lead (and deputy) are, and are aware of other support mechanisms such as Child Line etc.

3.8.18. ensuring there are procedures in place to handle allegations against other children

3.8.19. ensuring that there is support available for adults involved in difficult child protection cases/incidents both at the academy and externally through counselling, and/or reflective supervision and/or other services

3.8.20. creating a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and in the academy's development

3.8.21. taking lead responsibility for promoting the educational outcomes for children who have or have had a social worker

3.8.22. making this policy available to parents and carers as necessary

3.8.23. ensuring that adults in the academy are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where they feel able to raise concerns and feel supported in their safeguarding role

3.8.24. ensuring all directly employed adults have regular reviews of their own safeguarding practice to ensure they improve over time. For contractors, agency staff and other third-party providers, this assurance is provided through the OAT Letter of Assurance process (see 18.16)

3.8.25. ensuring any paper records are secure and kept separately from the child's main file in a locked location

3.8.26. fulfilling their duties in line with KCSIE Annex B (role of the designated safeguarding lead)

3.8.27. reading and referring to all of KCSIE, WTTSC parts 2.4 and 5 and the Local Authority threshold information

Training

3.8.28. undertaking relevant training and attending update sessions

3.8.29. ensuring all adults receive the appropriate training, which is kept up to date

3.9. The Local Governing Body (LGB) is responsible for

In line with KCSIE, WTTSC and the OAT Scheme of Delegation the LGB is responsible for:

3.9.1. supporting and challenging the academy in relation to safeguarding practice

3.9.2. appointing a link safeguarding governor

3.9.3. monitoring compliance with statutory safeguarding requirements including training, online safety, filtering and monitoring, single central recording of pre-employment vetting checks

3.9.4. reviewing termly safeguarding updates

3.9.5. attending mandatory safeguarding training

3.9.6. ensuring child voice informs safeguarding practice

4. Reporting concerns

4.1 Clear procedures on the reporting of any concerns are given to all adults including visitors. For adults, this is done as part of the adults' induction training and adults are given a reminder of this annually in refresher training. These procedures can be found in posters, visitors' lanyards and leaflets, and in training.

4.2 For visitors this is done by visitors' lanyards and visitors safeguarding leaflets.

4.3 Employees must use CPOMS to report concerns in writing. Alternatives, such as paper proformas for those who do not have access to CPOMS or if CPOMS is temporarily unavailable, will be used. Concerns should always be completed as soon as possible, on the same day. Employees should never wait until the next day to complete a safeguarding concern report.

4.4 Concerns about a member of staff should be reported immediately to the Principal.

4.5 Concerns about the Principal should be reported to the academy's Education Director, the OAT Head of Safeguarding and The National Director of People.

4.6 All child protection and/or safeguarding concerns should be reported to Emma Price (Designated Safeguarding Lead). See Appendix 1 for a flow diagram which explains how all disclosures are dealt with at the academy.

4.7 Failure to follow these reporting procedures may result in disciplinary action.

4.8. Taking action

4.8.1 If at any time it is considered that a child has suffered significant harm or is likely to do so, a referral should be made to [insert Local Authority] children's social care 'front door 'service (e.g. MASH, IFD) 01473 263200 or 0808 800 4005] or Police Child Abuse Investigation Team on 101 or call 999 if you are concerned a child needs immediate protection.

4.8.2 Out of hours the Emergency Duty Team 0808 800 4005 should be contacted.

4.8.3 If the child has an injury which requires medical attention, the child protection process will not delay the administration of first aid or emergency medical assistance.

4.8.4 The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.

4.9. Children's disclosure of abuse

4.9.1 At Ormiston Sudbury Academy we have a clear procedure for reporting concerns. If a child talks to an adult about any risks to their safety or wellbeing, the adult will let the child know that they must pass the information on to the safeguarding team (DSL) to offer the proper support that the child requires. They cannot keep it secret.

4.9.2 Adults will allow them to speak freely and will not ask investigative questions.

4.9.3 Adults will be aware that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and /or they may not recognise their experiences as harmful. Adults will be aware this could be due to their vulnerability, disability and or sexual orientation or language barriers.

4.9.4 Adults will tell the child what will happen next. It is their duty to inform the Designated Safeguarding Lead of what has been discussed.

4.9.5 Information will be shared on a need-to-know basis only. Issues or concerns will not be discussed with colleagues, friends, or family unless necessary for the welfare of the child.

4.10. Suspecting that a child is at risk of harm

4.10.1 There will be occasions when adults may suspect that a child may be at risk but have no 'real' evidence. In these circumstances, they will try to give the child the opportunity to talk.

4.10.2 Following an initial conversation with the child, if the adult remains concerned, they should discuss their concerns with the Designated Safeguarding Lead Emma Price and record their concerns on CPOMS.

4.10.3 Adults will use the academy's Anti-Bullying Policy and/or Behaviour Policy where necessary and can be found via our Academy website. However, when considering a child's behaviour all adults must be professionally curious and make a judgement as to any possible underlying safeguarding concerns.

4.10.4 There will be occasions when a child's behaviour warrants a response under child protection rather than anti-bullying/behaviour procedures.

4.10.5 For all children displaying challenging behaviour and bullying, the DSL must be included in decisions about consequences to determine any safeguarding risks.

4.10.6 The academy acknowledges that some children can be particularly vulnerable or may have an increased risk of abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare. To ensure that all of our children receive equal protection, we will give special consideration to children that are considered to be vulnerable.

4.11. Notifying parents

4.11.1 The academy will normally seek to discuss any concerns about a child with their parents. The Designated Safeguarding Lead Emma Price, or a member of the safeguarding team, will make contact with the parent in the event of a concern, suspicion or disclosure.

4.11.2 However, if the academy believes that notifying parents could increase the risk to the child, exacerbate the problem or compromise the safety of the child, advice will first be sought from OAT Safeguarding Team and /or Children's Social Care.

4.12. Referral to children's social care

4.12.1 The Designated Safeguarding Lead Emma Price or deputy's Chris Hingston, Michelle Newell, Oliver King, Carly Bowyer, Caroline Barrett will make a referral to Children's Social Care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to

their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

4.13. Reporting directly to child protection agencies

4.13.1 Adults will follow the reporting procedures outlined in this policy. However, they may also share information directly with Children's Social Care, police, or the NSPCC if:

- The situation is an emergency and the Designated Safeguarding Lead Emma Price their deputy Chris Hingston, Michelle Newell, Oliver King, Carly Bowyer, Caroline Barrett the Principal or Vice Principal are all unavailable
- They are convinced that a direct report is the only way to ensure the child's safety

4.14. Early help

4.14.1 Adults and volunteers working within the academy should be alert to the potential need for early help for children. Adults and volunteers should be alert to children with additional vulnerabilities who may benefit from Early Help.

5. Types of safeguarding concerns

5.1. Abuse and neglect

5.1.1 **This section must be read in conjunction with 'Keeping children safe in education' (KCSIE) Part 1 and Annex A.**

5.1.2 Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults, or another child or children.

5.1.3 All adults must know what the different signs of abuse are and be alert to those signs.

5.1.4 All adults must maintain an attitude of 'it could happen here' and ensure any concern, no matter how small is reported. It could be the vital missing piece of the jigsaw that indicates a child is at risk of harm.

5.1.5 All adults will receive ongoing training regarding types of abuse including local and national context.

5.1.6 The DSL and/or deputy will respond to all concerns, following local authority procedures and where there is an immediate risk of serious harm to a child will inform the police.

5.1.7 Further information and resources can be found in the CPOMS library or via our Academy website.

5.2. Bruising in non-mobile children

5.2.1 Bruises or injuries in babies, infants or children who are not independently mobile are unusual and should always be explored. For the purposes of this policy, "not independently mobile" includes babies and children who are unable to move independently through rolling, crawling, cruising, bottom shuffling or walking.

5.2.2 Adults must inform the DSL immediately if there are any concerns about actual or suspected bruising, marks or injuries on a non-mobile child, and respond in line with the locality procedures.

5.2.3 These procedures state–make DSL aware and put on CPOMS, attending medical also (*e.g. if a child appears seriously ill or injured, emergency treatment should be sought through an emergency department, and MASH should be urgently notified of the concern and the child's location. In all other cases: CPOMS and make DSL and medical aware*)

5.2.4 Adults must inform the DSL immediately and describe and document accurately using the CPOMS body map, the size, shape, colour, and position of the mark/s on the head and/or body.

5.2.5 Any explanation of the history of the injury or comments by the parents/carers will be documented accurately (verbatim) in the child's record, along with the body map.

5.2.6 If there is a concern about parental response to the injury, no explanation, or an explanation that is inadequate, unlikely or does not rule out abuse or neglect, an immediate and urgent referral will be made via MASH 01473 263200.

5.2.7 If there are concerns regarding the immediate safety of the child or staff, the police will be called.

5.2.8 If the setting is in any doubt as to how to respond to bruising on a non-mobile child, advice may be sought from www.suffolksp.org.uk or MASH.

6. Specific safeguarding issues

6.1 All adults must have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and the making or sharing of nudes and semi-nudes can be signs that children are at risk.

6.2 Adults must be aware of the signs of a variety of specific safeguarding issues as outlined in KCSIE, e.g. Child Criminal Exploitation- CCE (including County Lines), Child Sexual Exploitation- CSE, serious violence, modern slavery, stalking, so called 'Honour' Based Abuse (HBA), Female Genital Mutilation - FGM, Forced Marriage, Breast Ironing and know what to do if they have a concern.

6.3 All adults should be aware that CCE and CSE can be committed or facilitated by an organised network or gang, and that victims may identify as part of that group.

6.4 Exploitation of a child may constitute modern slavery, and the academy will follow modern slavery statutory guidance, including making a referral to the National Referral Mechanism where appropriate. Most sexual abuse is committed by individuals known to the victim, and children who commit offences while being coerced or exploited may themselves be victims and should not be unnecessarily criminalised.

6.5. Child-on-child abuse (including harmful sexual behaviours, harassment, violence, bullying,)

6.5.1 All adults should be aware that children can abuse other children at any age and that it can happen both inside and outside of school and online.

6.5.2 It is also recognised that it is more likely that girls will be victims and boys perpetrators of child-on child abuse.

6.5.3 Child on child abuse is never acceptable, will be taken seriously, will not be tolerated and will never be passed off as 'banter' 'just having a laugh' part of growing up' or 'boys being boys'.

6.5.4 Child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator(s). It is preventable, and it can involve serious physical harm, including threats or violence involving weapons.

6.5.5 All adults must know the indicators and signs of child-on-child abuse, know how to identify it and respond to reports of it. This includes sexual violence and sexual harassment.

6.5.6 All adults must be aware that even if there are no reports it does not mean child on child abuse is not happening. It may be the case that it is just not being reported.

6.5.7 Adults must be vigilant and if they have any concerns they should speak to the DSL or deputy.

6.5.8 We will minimise the risk of all types of child-on-child abuse by referring to the anti bullying policy, by implementing the behaviour curriculum, maintaining our focus on Protected Characteristics and British Values via assemblies, PSHE lessons and constant referral to these in conversations, recording all on CPOMS and Arbor if derogatory or bullying behaviour occurs. TAs are available in all sessions to ensure full understanding by those with SEN

6.5.9 All adults must challenge inappropriate behaviours between children including, but not limited to:

- Bullying (including online bullying, prejudiced based and discriminatory bullying, inappropriate touching).
- Abuse in intimate personal relationships between peers.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent which may also include an online element.
- Sexual harassment such as sexual comments, remarks, jokes, misogynistic or misandrist comments and behaviour, and online harassment, which may be standalone or part of a broader pattern of abuse.
- The making or sharing of nudes and semi-nudes, whether consensual or non-consensual.
- Up skirting – taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress, or alarm.
- Initiation/hazing type violence and rituals.

6.5.10 All adults, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

6.6 Anti-bullying

6.6.1 All adults must follow the anti-bullying policy which is published on the academy website.

6.6.2 If any child / adult / parent / carer has a concern about bullying, they should report it to the DSL or **any member of staff.**

6.6.3 The academy will take a zero – tolerance approach to sexism, racism, homophobia, biphobia, misogyny/misandry and derogatory behaviour.

6.7 Harmful sexual behaviour (HSB)

6.7.1 This section of the policy must be read in conjunction with KCSIE Part 5 and the guidance in that section followed when responding to harmful sexual behaviour incidents.

6.7.2 We recognise that sexual behaviours exist on a continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. It can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

6.7.3 It is also recognised that it is more likely that girls will be victims and boys perpetrators of harmful sexual behaviour

6.7.4 We also recognise that HSB can occur online, including the production of AI generated imagery, and face to face (both physically and verbally) and is never acceptable. We will ensure that all children are taught, in an age-appropriate way, about sex, relationships and consent and understand that the law is in place to protect children rather than criminalise them.

6.7.5 Children who display HSB will be assessed using a recognised assessment tool (e.g. Hackett Continuum or Brook Traffic Light Tool)

6.8 Sexual violence and sexual harassment

6.8.1 The academy has a zero-tolerance approach to sexual violence and sexual harassment. It is never acceptable, will not be tolerated and will never be passed off as ‘banter’ ‘just having a laugh’ ‘part of growing up’ or ‘boys being boys’.

6.8.2 The academy will maintain an approach of it is happening here and may be well hidden from adults.

6.9 Responding to reports of sexual violence and sexual harassment

6.9.1 Our approach will be to support and reassure the victims that they are being taken seriously and that they will be supported and kept safe. We will ensure that victims are never given the impression that they are creating a problem or made to feel ashamed by reporting sexual violence or sexual harassment.

6.9.2 We will ensure that we maintain an awareness of intra familial harms and support is provided for siblings following incidents where reported.

6.9.3 Abuse that occurs online or outside of the academy will not be downplayed and will be treated equally seriously.

6.9.4 All adults will be trained in how to manage a report.

6.9.5 The academy recognises that certain children may face additional barriers to disclosure because of their vulnerability, disability, sex, ethnicity and/or sexual orientation and that procedures will ensure that all children are able to report easily.

6.10 Risk assessments

6.10.1 Where there has been a report of sexual violence the DSL or deputy will make an immediate written risk and needs assessment which will be kept under review and will work to engage with children's social care and specialist services as required.

6.10.2 Action will be taken immediately to protect the victim, alleged perpetrator(s) and other children in the academy. The academy will not wait for the outcome or even the start of any police investigation before taking action to protect the children involved.

6.10.3 Any relevant action under the academy behaviour policy will be considered.

6.10.4 Where there has been a report of sexual harassment the need for a risk assessment will be considered on a case-by-case basis.

6.10.5 The risk and needs assessment will consider:

- The victim, especially their protection and support
- Whether there may have been other victims
- The alleged perpetrator(s)
- All the other children and adults at the academy, especially any actions that are appropriate to protect them from the alleged perpetrator(s) or from future harms

6.11 Action following a report of sexual violence and/or sexual harassment

6.11.1 When a report has been received the DSL or deputy will consider the following:

- The wishes of the victim
- The nature of the alleged incident (s) including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed
- The ages of the children involved
- The developmental stages of the children involved
- Any power imbalance between the children
- If the alleged incident is a one off or a sustained pattern of abuse
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers
- If there are any ongoing risks to the victim, other children, or adults

- Intra familial harms
- Support for siblings at the academy
- Other related issues and the wider context including links to CSE and CCE
- Making an assessment of the behaviours using the Brook Traffic Light Tool (or equivalent HSB assessment tool e.g. Hackett Continuum)

6.11.2 Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator(s), and any other children involved or impacted.

6.11.3 The DSL will consider 4 options when managing a report:

- Manage the report internally
- Provide support through universal services, community-based early help, or a referral to Family Help
- Make a referral to Children's Social Care
- Report to the police

6.11.4 All concerns, discussions, decisions, and rationale for decisions will be recorded on CPOMS.

6.11.5 The academy will ensure that if a child is convicted or receives a caution for a sexual offence the risk assessment will be updated to ensure relevant protections are in place and needs are being met.

6.11.6 If a report is assessed as being unsubstantiated, unfounded, false, or malicious the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been harmed by someone else and that this is a cry for help. In such circumstances the DSL may make a referral to children's social care. An Early Help process may be initiated.

6.11.7 If a report is deliberately invented or malicious, the academy will consider what disciplinary action is appropriate as outlined in the behaviour policy.

6.12 Ongoing response – safeguarding and supporting the victim

6.12.1 The following principles will help shape and decisions regarding safeguarding and supporting the victim:

- The needs and wishes of the victim will be paramount. Where a victim does not want a report to be progressed or does not want their parents/carers informed, the DSL will still consider whether the academy's duty to protect the victim or other children requires action to be taken, and will make that judgement in line with KCSIE and the DfE's guidance on sexual violence and sexual harassment between children
- Consideration of the age and development stage of the victim, nature of the allegations and the potential risk of further abuse
- The victim will never be made to feel they are the problem or made to feel ashamed
- Proportionality of response. Support will be tailored on a case-by-case basis
- A holistic approach with an awareness of health needs associated with sexual assault including physical, mental, and sexual health problems and unwanted pregnancy

6.13 Academy procedures

The victim will be listened to, with two staff present, at least one of the same gender. Information will be recorded on CPOMS. DSLs will consult Brooke Traffic Light Tool and discuss best course of action. We will consider power imbalance, age difference, age appropriate behavjour, consent, nature of abuse (online, physical, verbal). If online, devices will be confiscated and no images shared or forwarded. Other local schools will be informed if involved or students implicated. Parents/carers will be contacted. A MARF will be completed, reporting the incident to children's social care. Police will also be informed of the incident and dependent on the individual case, may insist we cease our investigation and they take over. Students will be supported throughout and will be offered academy counselling and or other in-academy support available. Students may wish to avoid lessons together, in which case the victim can choose how this will move forward. Adjustments can be made to social areas and times leaving/arriving to the academy daily.

6.14 Making or sharing of consensual and non-consensual nudes and semi-nudes

6.14.1 All incidents involving the making or sharing of nudes or semi-nudes requires a safeguarding response and must be reported to the DSL, whether the imagery was made or shared consensually or non-consensually.

6.14.2 Terms such as ‘revenge porn’ and ‘upskirting’ are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

6.14.3 In dealing with cases of sending of nudes, semi-nudes etc. the response to these incidents will be guided by the principle of proportionality and the primary concern at all times will be the welfare and protection of any children involved.

6.14.4 To reduce the likelihood of the sharing of nudes/semi nudes we will:

- outline our expectations and explain the rules of having a mobile, tablet or smartphone
- expect all adults and children to sign an acceptable use policy
- educate, in an age and stage appropriate way, about how to stay safe and the law in relation to sending and receiving of nudes/semi-nudes
- encourage children to report concerns to an adult
- ensure adults share concerns with the DSL

7. Preventing radicalisation

7.1 The Counter-Terrorism and Security Act, 2015, places a duty on and childcare, education and other children’s services providers, to have due regard to the need to prevent people from being drawn into terrorism “the Prevent duty”.

7.2 The academy has a Prevent risk assessment in place, updated annually which has been ratified by the LGB.

7.3 Where adults are concerned that children are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead and be recorded on CPOMS. This can include extreme views on the role of women and girls.

7.4 The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support adults with any concerns they may have.

7.5 Channel

7.5.1 When it is appropriate, the DSL will make a referral to the Channel programme.

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

7.5.3 We are committed to ensuring that our children are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the academy's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just, and civil society.

8. Domestic abuse and children

8.1 This form of abuse can encompass, but is not limited to, psychological, physical, sexual, financial or economic, and emotional abuse, coercive or controlling behaviour, and stalking. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Children can be recognised as victims of domestic abuse in their own right, even where they have not directly witnessed a specific incident and as victims have protection and rights under the law.

8.2 They may also experience abuse in their own intimate relationships (teenage relationship abuse).

8.3 We encourage children to come forward by raising awareness of the issue and teaching the children about healthy relationships through RSHE, the wider curriculum and modelling behaviour in the academy.

8.4 Where the academy receives notification of a domestic abuse incident, for example through Operation Encompass, the DSL will ensure that appropriate and timely support is in place for the child.

8.5 Adolescent to parent violent abuse (APVA)

8.5.1 APVA is a hidden form of domestic violence and abuse that is often not spoken about. By raising awareness around this issue, we can provide better protection to victims and apply an appropriate safeguarding approach.

9. Private fostering

9.1 The academy will notify the local authority where we are aware or suspect that a child is subject to a private fostering arrangement.

9.2 Schools have a mandatory duty to notify the local authority if we are involved directly or indirectly in arranging for a child to be fostered privately. Notifications must contain the information specified in Schedule 1 of The Children (private Arrangements for Fostering Regulations 2005 and must be made in writing.

9.3 Adults should notify the designated safeguarding lead or deputy when they become aware of private fostering arrangements.

9.4 On admission to the academy, we will take steps to verify the relationship of the adults to the child who is being registered.

10. Online safety (also known as digital safeguarding/E-safety)

10.1 We will ensure digital safeguarding is a running and interrelated theme when devising and implementing policies and procedures. This will include considering how digital safeguarding is reflected, as required, in all relevant polices. In addition, we will consider digital safeguarding whilst planning the curriculum, training, the role of the DSL and parental engagement.

10.2 Whilst the DSL has lead responsibility for digital safeguarding, we will ensure there is support, if required, for operational digital safeguarding and the appropriate technical and safeguarding knowledge, skills and understanding to be able to quality assure systems, policies and processes, train adults and contribute to the safeguarding curriculum is available.

10.3 We will keep our digital safeguarding processes and procedures under review using an independent tool such as the SWgFL 360 safe process.

10.4 Our Technology Acceptable Use policy is signed up to by all children and adults annually.

10.5 If a child, parent/carer, or adult has a concern relating to online safety they are encouraged to report it. They can report it directly to the DSL/DDSL at the academy.

10.6 Through our regular communication with parents, we will reinforce the importance of children being safe online, explain what systems we use to filter and monitor online use, explain what children are being asked to do online including sites they will be asked to access and who from the academy (if anyone) their child is going to be interacting with online.

10.7 We will conduct an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks our children face.

10.8 In line with KCSIE and DfE guidance ‘Mobile phones in schools’, the academy is a mobile phone-free environment by default: children do not have access to their mobile phones during the school day, including lessons, the time between lessons, breaktimes and lunchtime. Our arrangements are set out via our Academy website behaviour policy. All students have their phones locked in a pouch during school hours.

10.9 We follow DfE guidance on the safe and effective use of generative AI in education, including in relation to filtering and monitoring, data protection, and teaching children to use AI safely and responsibly.

10.10 Filtering, monitoring and cyber security

10.10.1 The academy will limit children's exposure to risks from the academy's IT system.

10.10.2 The academy has in place appropriate filtering and monitoring systems that are in line with the recommendations in the UK Internet Centre document Appropriate Filtering for Education Settings and are informed by the academy's risk assessment required by the Prevent Duty.

10.10.3 The academy will ensure that 'over blocking' does not lead to unreasonable restriction as to what children can be taught with regard to online teaching and safeguarding.

10.10.4 The academy will:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems
- Review the effectiveness of filtering and monitoring provision at least once every academic year; reviews are carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT support, include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record is kept of these checks
- Block harmful and inappropriate content without unreasonably impacting teaching and learning
- Have effective monitoring strategies in place to meet safeguarding needs
- Follow the DfE guidance on filtering and monitoring requirements as they apply to generative AI
- Follow DfE guidance on the Prevent Duty, cyber security standards and filtering and monitoring standards for schools

10.10.5 The academy will conduct regular tests of the filtering and monitoring provision in the academy and report on findings to the governing body. Testing will be recorded on OATnet.

10.10.6 All adults will be trained in digital safeguarding and will have a role in educating and protecting children about online harms.

10.10.7 We will seek to prevent children from online harms through educating them about the laws and potential consequences of activity online.

10.10.8 Digital safeguarding may be addressed through, during lessons, specialised digital safeguarding sessions, PSHE, flexi-learning weeks and assemblies and use of the INEQ Safer Schools app.

10.10.9 There are appropriate levels of security protection procedures in place in order to safeguard children, systems and adults.

11. Generative Artificial Intelligence (AI)

11.1 Ormiston Sudbury Academy recognises that generative artificial intelligence tools may provide benefits when used safely and appropriately, but can also create safeguarding, privacy, data protection, misinformation, bias, professional conduct and child protection risks.

11.2 Ormiston Sudbury Academy will not permit the use of generative AI tools for safeguarding or child protection work, administration, or communication unless they have been approved by the DSL/Principal and are in line with Ormiston Academies Trust AI guidance and policy.

11.3 Ormiston Sudbury Academy will ensure expectations about the safe and appropriate use of AI are set out in our acceptable use arrangements, staff behaviour/code of conduct, data protection and online safety procedures.

11.4 AI tools must not be used with children's personal information, safeguarding information, child protection records, images, audio, video, health information, SEND information, family information or confidential setting information unless this has been explicitly approved in line with setting procedures.

11.5 Staff must not use personal, unapproved or publicly available AI tools to record, summarise, translate or process safeguarding concerns, child protection records, meeting notes, supervision records, observations, images of children or confidential information.

11.6 AI tools that record, transcribe, summarise or generate notes from meetings, supervision discussions, training, calls or online discussions must only be used where approved by the DSL/Principal and in line with safeguarding, confidentiality, transparency, data protection and acceptable use arrangements. All participants will be made aware where such tools are being used and how any information will be captured, used, stored and shared.

11.7 Ormiston Sudbury Academy recognises that the use of images online, including through AI tools, can create safeguarding, privacy and data protection risks for children and staff. Images of children or staff must not be uploaded to, generated by, edited in, or shared through AI tools unless this has been risk assessed and approved by the DSL/Principal.

11.8 Any taking, editing, publishing or sharing of images will always be in line with our image use, consent, acceptable use, data protection and safeguarding arrangements.

11.9 AI tools must support, and not replace, professional judgement, accurate recording, child-centered decision-making and the DSL's safeguarding oversight.

11.10 Any misuse of AI will be responded to in line with relevant policies, including staff behaviour/code of conduct, data protection, online safety, complaints, allegations against staff and child protection procedure.

12. Photography and images

12.1 To protect children, we will:

- Seek consent to use children's images in line with our Photography and Video policy
- A parent/carer or child aged 12 or over can give, review, and update consent at any time
- Seek parental consent
- Use only the child's first name with an image
- Ensure children are appropriately dressed
- Encourage children to tell us if they are worried about any photographs that are taken of them

- Remove photographs where requested
- Only use equipment and devices approved by the Principal when taking photographs of children.
- Comply with GDPR

12.2 Parents, carers, or relatives may only take still or video photographic images of children in the academy or on academy-organised activities with the prior consent of the academy and then only in designated areas. If parents do not wish their children to be photographed or filmed and express this view in writing, the academy, will make all reasonable attempts to observe their wishes. Annual permissions information, write to the Principal

12.3 Mobile phones, cameras, images and electronic devices

12.3.1 Ormiston Sudbury Academy has appropriate policies and procedures for the use of mobile phones, cameras and other electronic devices within the setting.

12.3.2 These policies explain how setting-provided and personal devices may and may not be used by adults parents and children, where relevant.

12.3.3 These policies will be shared with adults and can be found via our Academy website.

12.3.4 Images or recordings of children will only be taken, stored, used and shared in line with our Photography and Video Policy, consent arrangements, privacy notices and data protection procedures.

12.3.5 Any concern about the misuse of devices, images, recordings or technology will be reported to the DSL and responded to in line with relevant safeguarding, staff conduct, allegations and data protection procedures.

12.4 Upskirting

12.4.1 Under the Voyeurism (Offences) Act 2019, upskirting is a criminal offence punishable by up to two years in prison. Upskirting is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

12.4.2 Any concerns related to upskirting must be reported to the DSL in line with the reporting process outlines within this policy and where appropriate adults will also consult the behaviour policy.

13. Housing and Homelessness

13.1 Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead is aware of routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

13.2 It is recognised in some cases 16 and 17-year-olds could be living independently from their parents/guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.

13.3 Children's services will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

13.4 DSLs should be aware that Section 11 of the Children's Wellbeing and Schools Act 2026 places a duty on local housing authorities in England to notify a child's school, when the child is placed in temporary accommodation, so that support can be offered.

14. Children with additional vulnerabilities

14.1 Special Educational Needs and Disabilities, Medical Conditions and Allergies

14.1.1 Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions or allergies can face additional safeguarding challenges, both online and offline. Additional barriers can exist when recognising abuse, neglect and exploitation in this group of children, including: assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration; greater risk of peer group isolation and of being disproportionately impacted by bullying (including prejudice-based bullying) without outwardly showing signs; communication barriers and difficulties in managing or reporting abuse; the need for intimate care; greater dependence on adults; and difficulties understanding the difference between fact and fiction in online content.

14.1.2 All adults must therefore be aware of and extra vigilant to the possible indicators of abuse and/or neglect for disabled children. The designated safeguarding lead should liaise regularly with the special educational needs co-ordinator, the behaviour lead, the mental health lead and the attendance lead, maintaining a culture of vigilance and being alert to any relevant new information or concerns.

14.1.3 If adults have a concern for a disabled child, they must consider: The child's communication needs and how they can communicate effectively with them.

14.1.4 What information in relation to the child disability and special needs adults need to be aware of in order to assess risk of abuse.

14.1.5 What resources adults require in order to undertake an informed assessment of safeguarding risk.

14.1.6 Where child protection issues are considered regarding a child with disabilities, there must be involvement by key professionals who know the child well, including those who have a comprehensive understanding of the child's disability, method of communication, and any associated medical condition.

14.1.7 Schools should consider what specialist advice, guidance and training may be required in order for adults to understand why children with SEND can be more vulnerable to abuse and how to recognise signs of abuse and/or neglect of disabled children.

14.1.8 An incident relating to the management of a child's medical condition (including allergies) will prompt a safeguarding referral where it indicates that the child may be at increased risk of neglect, abuse or exploitation – for example where relevant information about a child's medical condition is withheld from the academy, or a child is repeatedly sent to school without essential medication.

14.2 Mental ill-health

14.2.1 All adults should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

14.2.2 Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Adults, however, 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.

14.2.3 Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. We will ensure that adults are aware of how these children's experiences can impact on their mental health, behaviour, and education.

14.2.4 We will ensure that we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. Information on these systems can be found in Appendix 7

14.2.5 We seek to embed positive mental health and mental health awareness through our academy to create a culture where children can self-identify, signpost peers and seek support themselves. We undertake training and promote mental health awareness through the PSHE schemes, assemblies and focus and awareness week activities, constant messaging to seek support and regular check ins with key staff.

14.2.6 If adults have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the referral mechanisms listed within this policy and speaking to the designated safeguarding lead or a deputy.

14.3 Young Carers

14.3.1 The academy recognises that some children provide regular care or emotional support to a family member, and that caring responsibilities can affect attendance, punctuality, engagement and attainment, and may indicate that a child is in need of support or at risk of harm.

14.3.2 In line with Keeping Children Safe in Education and Working Together to Safeguard Children, all adults will be alert to the indicators of a young carer and report any concern to the DSL, who will consider whether early help or a referral to children's social care is required.

14.3.3 Young carers are entitled to a young carer's needs assessment under section 17ZA of the Children Act 1989, which the local authority must carry out where it appears a child is a young carer, whether or not an assessment has been requested; the DSL will ensure that families are supported to request one and will contribute where asked. Identified young carers are recorded on Arbor and their support reviewed by the DSL.

14.4 Children with family members in prison

14.4.1 Approximately 193,000 children in England and Wales have a parent in prison each year. They are at risk of poor outcomes as a result of poverty, stigma, isolation and poor mental health. The DSL will ensure that all adults are aware that these children are more likely to be absent (or excluded) than their peers, to experience mental ill health and drug and alcohol misuse; they are also less likely to be in education, training or employment in later life. The DSL will work with agencies to support access to tailored, trauma informed and sensitive support, where available, that can help mitigate potential harm and help encourage stability.

14.5 Communication difficulties

14.5.1 Legal duties under the Equality Act 2010 require special provision to be put in place to support dialogue with children who may not be able to convey their wishes and feelings as they may want to. Language and cultural differences can also make it harder for children to communicate concerns or seek help, potentially delaying the identification of safeguarding issues.

14.5.2 This group might include, for example, unaccompanied children, refugees, those children who are victims of modern slavery and/or human trafficking and those who do not speak English or for whom English is not their first language. They may also be more vulnerable to social isolation, discrimination, exploitation, and having their needs misunderstood, particularly when professional interpreters are not available or when family members are relied upon to translate sensitive information. These children can face heightened safeguarding risks due to experiences of trauma, conflict, persecution, displacement, family separation, and uncertainty about their immigration status. These experiences may increase their vulnerability to mental health difficulties, trafficking, abuse, and neglect.

14.5.3 The DSL will ensure all adults are alert to these vulnerabilities and the potential safeguarding risks they present. The DSL will ensure that support to communicate with a trusted adult is in place for these children and that any changes in behaviours is viewed through a safeguarding lens.

14.6 Children affected by parental separation, court orders or family disputes

14.6.1 Ormiston Sudbury Academy recognises that children may be affected by the court system in different ways, including where they are required to give evidence in criminal proceedings or where they are affected by private or public family law proceedings, child arrangements or parental disputes.

14.6.2 Ormiston Sudbury Academy recognises that parental separation, child arrangements and family court processes can be stressful for children and may contribute to conflict, anxiety or safeguarding concerns. The welfare and best interests of the child will remain central to the setting's decision-making. Adults will remain neutral in family disputes and will not become involved in arrangements beyond the setting's role, responsibilities and safeguarding duties.

14.6.3 Where parents disagree about arrangements, decisions or the exercise of parental responsibility, the academy will act in line with statutory guidance, relevant court orders, education law, safeguarding duties and data protection requirements. Where necessary, parents/carers may be advised to seek independent legal advice or resolve disputes through the appropriate legal route.

14.6.4 Ormiston Sudbury Academy will consider any court orders or legal restrictions that are shared with the setting and relevant to the child's education, welfare or safety. Parents may be asked to provide the most recent court order where this is appropriate and/or necessary to help the setting understand arrangements or restrictions.

14.6.5 Adults will remain alert to any safeguarding concerns arising from parental disputes, child arrangements or court proceedings. Concerns will be reported to the DSL and responded to in line with this policy.

14.7 Children who are lesbian, gay, bisexual or gender questioning

14.7.1 Children who are lesbian, gay, bisexual or gender questioning can be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, bisexual or gender questioning (whether they are or not) can be just as vulnerable as children who identify as lesbian, gay, bisexual or gender questioning.

14.7.2 Adults will endeavour to reduce the additional barriers lesbian, gay, bisexual or gender questioning children face and provide a safe space for them to speak out or share their concern with a trusted adult.

14.7.3 The academy will actively encourage lesbian, gay, bisexual or gender questioning children to share their lived experience and views in order to inform practice.

14.7.4 A child being lesbian, gay or bisexual is not in itself a risk factor for harm; however, such children can be vulnerable to discriminatory bullying, which will never be tolerated.

14.7.5 In line with KCSIE 2026, the academy will not initiate any action in relation to social transition. Where a child, or their parents, requests support with social transition, we will follow the principles in KCSIE: we will consider the best interests of the child and of other children; engage parents and carers as a matter of priority (unless involving them would place the child at greater risk, in which case the DSL will first determine what action is needed to safeguard the child); take a very careful and cautious approach, exercising particular caution for primary-aged children; involve the DSL; consider any clinical or other professional advice; and document our decision-making and keep records.

14.7.6 Where a child confides in an adult about their feelings but does not ask for changes to how they are treated, there is no reason to break that confidence unless there is a related safeguarding risk, in which case usual safeguarding procedures will be followed.

15. Attendance

15.1 This section must be read in conjunction with the academy attendance policy.

15.2 Lack of or erratic attendance, persistent or severe absence is a serious safeguarding issue and must act as a warning sign to a range of concerns including neglect, sexual abuse, and child sexual and child criminal exploitation particularly county lines. It may also be an indication of child-on-child abuse including bullying and sexual harassment, significant mental ill health concerns, caring responsibilities and/or other familial concerns. It must not be seen as an isolated concern.

15.3 Absence from education may increase known safeguarding risks.

15.4 We have a separate attendance policy (which includes protocols for children missing education and elective home education) in place which references statutory guidance Working together to improve school attendance (WTTISA) and other guidance including Children Missing Education (CME).

15.5 Further information and support for academies can also be found in the Government's 'Missing Children and Adults - A cross government strategy' (publishing.service.gov.uk)

15.6 We have a named senior leader with strategic responsibility for attendance. Emma Price whose responsibility it is to ensure they work closely with the DSL to identify any safeguarding concerns.

15.7 Academy attendance operational leads, in addition to the general safeguarding training that all adults receive are given access to role specific safeguarding training and ensure they understand the safeguarding implications behind poor or non-attendance.

15.8 Academy leaders and governors ensure that attendance data, particularly for identified vulnerable groups is closely and regularly monitored identifying trends or patterns which may indicate safeguarding concerns.

15.9 Where appropriate, social workers will be involved, informed, and updated about attendance issues.

15.10 We will work with the local authority Virtual School Head to promote and improve the attendance of children with a social worker and children in care.

15.11 Safe and well checks are carried out on children who are absent, based on a vulnerability risk assessment.

15.12 The academy remains responsible for the safeguarding of children placed at any alternative provision.

15.13 Children missing education (CME)

15.13.1 Children who go missing from education are at significant risk. Children who are already known to children's social care, who are on a child in need or child protection plan or in the care of the local authority children in care (CiC) are additionally vulnerable and in need of additional protection.

15.13.2 The DSL will ensure the academy response to identifying children missing from education supports identifying potential abuse or exploitation and prevents them going missing in the future.

15.13.3 The academy will ensure compliance with the guidance and regulations contained in the appropriate sections KCSIE and Working Together to Improve School Attendance (WTTISA) (19th Aug 2024).

15.14 Elective home education (EHE)

15.14.1 We will follow the protocols laid out our attendance policy.

15.15 Children with medical conditions who cannot attend school

15.15.1 We will follow the DfE statutory guidance for Alternative Provision and for Education where children with health needs who cannot attend school and the protocols laid out our attendance policy.

15.16 Alternative Provision

15.16.1 Where the academy places a child with an alternative provision provider, we continue to be responsible for their safeguarding.

15.16.2 We will ensure that a robust and continuing due diligence and review process is in place which includes:

- Ensuring the placement meets the child's needs
- Ensuring children at alternative provision are given ways in which to raise concerns about their safety and well-being through a named trusted adult based at this academy who will stay in regular contact with the child
- Assessing any additional risks of harm that the child may be vulnerable to due to any complexity of need
- Obtaining written information from the alternative provider that appropriate safeguarding checks have been carried out on all individuals working at their establishment and assurance that the provider will notify the academy of any staffing changes
- Obtaining written information from the provider of any arrangements which may put a child at risk
- Obtaining records of the address of the provider and any subcontracted provision or satellite sites the child may attend and ensure that we know where the child is based during the school day
- At least half termly review the provision, including obtaining the child's authentic voice to ensure the placement continues to meet needs
- Obtaining daily attendance information from the provider
- Ensuring that when safeguarding concerns arise the placement is immediately reviewed and terminated, if necessary, unless or until concerns have been satisfactorily resolved

16. Children in care and previously in care

16.1 The academy has a separate policy for children in care and previously in care, which can be located via our Academy website.

16.2 The Designated Safeguarding Lead (DSL) will ensure that details of the child's social worker are known and kept up to date and that appropriate staff have access to the information they need in relation to a child's legal status and also about their care arrangements and the levels of authority delegated to the carer.

16.3 The academy recognises that a previously looked after child potentially remains vulnerable. The DSL will ensure all staff have the skills, knowledge and understanding to keep previously looked after children safe.

16.4 The academy will appoint a suitably qualified, trained and experienced designated teacher for children in care. They are responsible for promoting the educational achievement of children in care, of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

16.5 The designated teacher will work with the Virtual School Head to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. They will also work with the Virtual School Head to promote the educational achievement of previously looked after children.

17. Recruitment of adults and volunteers

17.1 The academy will ensure that safer recruitment practices always follow 'Keeping children safe in education' (KCSIE) and will be adhered to by adults.

17.2 Every interview panel will have at least one member who has a current certificate in safer recruitment. These certificates will be updated every two years.

17.3 The academy will check on the identity of candidates, follow up references with referees and scrutinise applications for gaps in employment.

17.4 The academy will record the answers to safeguarding questions asked during the interview process on adults personnel files.

17.5 The academy will ensure that safeguarding considerations are at the centre of each stage of the recruitment process including carrying out an online search as part of due diligence on shortlisted candidates.

17.6 As part of our due diligence, we will carry out an online search on shortlisted candidates to help identify, through publicly available information, any incidents or issues which can be explored at interview.

17.7 We will ensure that agencies and third parties supplying adults provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our academy.

17.8 We will ensure that any alternative provision facility, contractor, or agency working with the academy provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in their provision.

17.9 Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.

17.10 We will ensure that all adults involved in recruitment are aware of government guidance on safer recruitment and that its recommendations are followed.

17.11 The academy will ensure the correct level of DBS certificate is sought and ensure a prohibition check is undertaken.

17.12 Most adults will be in regulated activity and will require an enhanced DBS check with children's barred list information.

17.13 The Crime and Policing Act 2026 removed the 'supervision exemption' from regulated activity: any volunteer whose role involves teaching, training, instructing or supervising children on more than 3 days in a 30-day period, or overnight, is in regulated activity and requires an enhanced DBS check with children's barred list information. For any existing volunteer who is brought into regulated activity by this change from 1 September 2026, we will check their children's barred list status.

17.14 For volunteers who are not in regulated activity, we will complete and record a written risk assessment to decide which checks, if any, are required. Under no circumstances will a volunteer on whom no checks have been obtained be left unsupervised or allowed to engage in regulated activity.

17.15 There is currently a review of the DBS update service underway. Until such time as the review reports its finding academies WILL NOT USE the DBS update service. When it is back in use and academies have been informed it is clear to use by the Trust National Director of People, the academy will, where a candidate has subscribed to the DBS Update Service, (which individuals may join when applying for a check or within 30 calendar days of the issue date on the certificate), we will verify their identity, check the original certificate and carry out a status check before they take up post*.

17.16 The types of checks undertaken will be in accordance with the guidance given KCSIE.

17.17 Any offer of appointment made to a successful candidate (including one who has lived or worked abroad) will be conditional on satisfactory completion of the necessary pre-employment checks as required in the guidance given in KCSIE.

17.18 Where an enhanced DBS Certificate is required, it will be obtained from the candidate before or as soon as is practicable after the person is appointed.

17.19 The academy will always ask for written information about previous employment history and check that information is not contradictory or incomplete.

17.20 References will be sought on all shortlisted candidates, including internal ones, before interview (unless the candidate has expressly denied permission for the employer to approach their referees). Where references have been sought, any issues or concerns they raise can be explored further with the referee and taken up with the candidate at interview.

17.21 The academy will keep a single central record in accordance with the regulations given in KCSIE.

17.22 Recruitment and/or deployment checks will be undertaken as stated in KCSIE.

17.23 The academy will carry out all relevant checks if there are concerns about an existing employee and refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

18. Dealing with allegations against adults and volunteers which meet the harms threshold

18.1 We will prevent people who pose risks to children from working in our academy by ensuring that all individuals working in any capacity at our academy have been subjected to safeguarding checks in line with Keeping children safe in education' (KCSIE) The academy will maintain ongoing vigilance of all adults working in or visiting the academy.

18.2 The academy holds a comprehensive 'Allegations of abuse against staff and low level concerns policy and a staff code of conduct which can be found via our Academy website and which outline in detail expected standards of adult behaviour and procedures to take where there are concerns.

18.3 Where a child makes an allegation against an adult, the allegation will be taken seriously and acted upon immediately.

18.4 Where a concern or allegation relates to a supply teacher, trainee teacher or contractor, the academy will not decide on the individual's suitability alone: we will lead the response in partnership with the relevant agency, training provider or employer, share safeguarding responsibilities with those third-party organisations, and consider a referral to the LADO.

18.5 Parents will be contacted as soon as reasonably possible. The child will be offered support, and their wishes will be carefully considered before any actions are carried out.

18.6 Where any adult has concerns that the conduct of an adult engaging in regulated activity has met the harm threshold, they must report those concerns immediately to the principal.

18.7 Any concerns about the principal should go to the academy Education Director Ciara Emmerson, OAT Head of Safeguarding Nikki Cameron and the Director of People Sarah Lewis who can be contacted by emailing complaints@ormistonacademies.co.uk. The Education Director will ensure that both the Trust CEO and the chair of governors is informed as appropriate.

18.8 If for any reason a referral is unable to be made through these routes adults have a duty to refer directly to the Local Authority Designated Officer (LADO) whom you can contact here:

0300 123 2044 or via email at LADO@suffolk.gov.uk.

18.9 Under its duty of care, the academy will ensure they provide effective support for anyone facing an allegation and provide the adult with a named contact if they are suspended. The academy will ensure its obligations for confidentiality when an allegation has been made.

18.10 Concerns or allegations that do not meet the harm threshold/low level concerns

18.10.1 All adults will be made aware what constitutes a low level concern and that all low-level concerns must be shared responsibly with the principal.

19. Safeguarding training

19.1 Every year all adults (including non-teaching and volunteers) must undertake a variety of child protection and safeguarding training including on Keeping children safe in education' (KCSIE). This training will be informed by national and local context as well as identified gaps in knowledge and understanding.

19.2 Training is recorded and logged. All adults are informed clearly as to how to report anything of concern to the DSL immediately. See Appendix 1 for a flow diagram of how concerns are dealt with at the academy

19.3 All new members of staff, including newly-qualified teachers and teaching assistants, volunteers and governors will be given induction that includes basic child protection training on how to recognise signs of abuse, how to respond to any concerns, online safety, including filtering and monitoring and familiarisation with the safeguarding and child protection policy, KCSIE , 'Working together to safeguard Children' (WTTSC), whistleblowing policy, behaviour policy, anti-bullying policy adults code of conduct, systems and processes for CME and other related policies.

19.4 The designated safeguarding lead will undergo updated level 3/DSL level child protection training every two years and in addition to formal training, their knowledge and skills will be refreshed at least annually.

19.5 All adults in the academy will undergo safeguarding and child protection training (whole-academy training) which is regularly updated.

19.6 All governors must undergo governor specific online awareness training at least every two years.

19.7 Adults who miss the whole-academy training should notify the DSL and will be required to undertake other relevant training to make up for. It is the responsibility of each adult to ensure they have completed all mandatory safeguarding training.

19.8 We will ensure that adults provided by other agencies and third parties, e.g., supply teachers and contractors, have received appropriate child protection training commensurate with their roles before starting work. The OAT Letter of Assurance template will be used and updated annually. They will be given the opportunity to take part in whole-academy training if it takes place during their period of work for the academy.

19.9 The designated safeguarding lead will provide an annual briefing to the academy on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews. As well as formal annual safeguarding training (every three years and refresher every year) there are monthly drip-feed training modules and formal annual Online Safety for staff training.

19.10 The DSL will ensure the academy maintains accurate records of safeguarding induction and training.

20. Learning from serious safeguarding incidents

20.1 The Trust is committed to learning from serious safeguarding incidents and promoting a culture of continuous improvement in safeguarding practice.

20.2 Designated Safeguarding Leads (DSLs) will keep abreast of the findings and recommendations arising from Child Safeguarding Practice Reviews, Local Child Safeguarding Practice Reviews, Domestic Homicide Reviews and other relevant safeguarding learning reviews.

20.3 DSLs will consider the relevance of such learning to their setting and ensure that lessons learned are reflected in safeguarding policies, procedures, staff training and day-to-day practice to strengthen the protection and welfare of children.

21. Sport and physical activity

21.1 Safeguarding arrangements apply to all sport and physical activity, whether organised by the academy or by external providers using our facilities. We are informed by guidance from national governing bodies on the safe and fair operation of individual sports. Some sports may need to be played in single-sex groups from a certain age to ensure children's safety, and where this is the case there will be no exceptions; any request from a child relating to how they participate will be considered in line with KCSIE guidance on considering requests for support with social transition.

22. Premises

22.1 The academy ensures that its premises, including toilet, washing and changing facilities, meet the safeguarding-related requirements of the relevant premises regulations and standards.

22.2 Use of academy premises for non-academy activities

22.2.1 Where the academy premises are hired or rented out the academy leadership will ensure that appropriate arrangements are in place to keep children safe.

22.2.2 The academy policies will apply where the services or activities are provided by the academy and are under the direct supervision or management of academy employees.

22.2.3 Where services or activities are provided separately by another body, the governors and academy leadership will seek written assurance that the body concerned has appropriate child protection and safeguarding policies in place (including inspecting these as needed) and ensure that there are arrangements in place to liaise with the academy on these matters where appropriate.

22.2.4 This applies whether or not the children who attend any of these services or activities are children on the academy roll.

22.2.5 The academy leadership and governors should also ensure safeguarding arrangements are included in any transfer of control agreement (i.e. lease or hire agreement) as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

22.2.6 The guidance found in 'Keeping children safe in out-of-school settings' details the safeguarding arrangements that the academy should expect these providers to have in place.

23. Use of reasonable force

23.1 Any use of reasonable force or restrictive intervention will be a last resort, in line with current DfE guidance and the academy Restrictive Intervention and The Use of Reasonable Force Policy and will always use the minimum force needed for the minimum time. Additional considerations apply for children with SEND or medical conditions. Incidents will be recorded and parents informed.

24. Separation for safeguarding purposes

24.1 In exceptional circumstances, where there are safeguarding concerns (for example, following an allegation of harm by one child against another), the academy may temporarily prevent a child from attending the academy site where this is necessary to safeguard children and allow appropriate investigations to take place.

24.2 This is a safeguarding measure and not a suspension or disciplinary sanction. Such action will only be used where separating the children while they remain on site is not reasonably practicable.

24.3 Parents will be informed without delay, the governing board notified as appropriate, and where required the local authority will be engaged to ensure suitable education is arranged.

24.4 All decisions will be made in accordance with Keeping Children Safe in Education, the Equality Act 2010, the Human Rights Act 1998 and the academy's wider safeguarding responsibilities.

25. Confidentiality and sharing information

25.1 Adults should only discuss concerns with the designated safeguarding lead, principal, education director or Trust Head of Safeguarding (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a need-to-know basis.

25.2 Data protection laws – the Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025 – do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information will not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

25.3 The Academy will use the DfE Information Sharing: Advice for practitioners providing safeguarding services for children, young people, parents, and carers May 2024 to inform and support their approach to information sharing.

25.4 All adults will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and adults involved but also to ensure that anything being released into the public domain does not compromise evidence.

25.5 Child protection files must be transferred to a new school within 5 days for in year transfers or within the first 5 days of the start of a new term.

26. Storage and handling of records

26.1 Child protection information will be stored and handled in line with the principles set out in the Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025 and the academy's Data Protection Policy.

26.2 The Academy will use the DfE 'Data Protection in Schools' April 2024 to inform and support their approach to information sharing.

26.3 Any paper 'record of concern forms' and other written information will be stored in a locked facility accessed only by the principal and designated safeguarding lead. The Designated Safeguarding Lead is responsible for ensuring that all paper records are digitised, uploaded to CPOMS and checked, with originals securely destroyed in a reasonable timeframe, and no more than six weeks after receipt or creation.

26.4 Records will be held on approved, access-controlled and encrypted systems (e.g. CPOMS), with device security managed via the data protection/acceptable use arrangements. Safeguarding information will not be stored locally on laptop computers, which, by the nature of their portability, could be lost or stolen.

26.5 Child protection information will be stored separately from the child's academy file and the academy file will be 'tagged' to indicate that separate information is held. If such records need to be sent to a new school/college they will be sent separately from the child's file and under a confidential cover or in an encrypted electronic file requiring acknowledgement of receipt by the receiving school/college.

26.6 Child protection records may be exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. Access to child protection records will be considered on a case-by-case basis. If any member of staff receives a request from a child or parent to see child protection records, they will refer the request to the principal or Designated Safeguarding Lead. The Data Protection Act does not prevent the academy from sharing information with relevant agencies, where that information may help to protect a child.

26.7 We will ensure that relevant adults have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025.

26.8 Further details on information sharing can be found via our Data protection policy on the Academy website).

26.9 When unsure, we will contact the OAT Data Protection Officer and/or OAT Head of Safeguarding.

27. Safeguarding relating to school premises

27.1 Toilets

27.1.1 The academy will provide separate toilets for boys and girls aged 8 and over (apart from where individual toilets are in a room that can be locked from the inside, intended for use by one child at a time). This is required by the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014.

27.1.2 The academy will not allow children into toilets designated for the opposite biological sex. This includes where schools are responding to a request to support any degree of social transition for children who are questioning their gender. If a gender-questioning child does not want to use the toilet designated for their biological sex, the academy will provide an alternative toilet facility.

27.1.3 Where the academy provides mixed-sex toilets in addition to single sex toilets, the academy will assess any safeguarding risks and plan accordingly, for example, mixed-sex toilets should be in individual, lockable rooms and open directly onto public areas (e.g. a corridor).

27.2 Changing rooms and showers

27.2.1 Children aged 11 years and older at the start of the school year will not be permitted to undress in front of a child of the opposite biological sex This is required by the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, which require maintained schools, academies and independent schools to provide suitable changing accommodation and showers for children who are aged 11 years or over at the start of the school year.

27.2.2 When responding to a request to support any degree of social transition, the academy will not allow a child access to changing rooms designated for the opposite sex.

27.2.3 If a gender-questioning child does not want to use the changing rooms and showers designated for their sex, the academy will consider whether they can provide an alternative changing or washing facility without compromising the provision of single-sex facilities.

27.3 Boarding and residential accommodation

27.3.1 To comply with their safeguarding duties, the academy will not allow a child to share overnight accommodation with a child of the opposite biological sex.

27.3.2 Responding to a request to support any degree of social transition will not include allowing access to boarding or residential accommodation designated for the opposite sex.

27.3.3 In allocating sleeping arrangements such as dormitories, tents or shared rooms for school for trips/visits the academy must have regard to its duties under the Equality Act, its safeguarding obligations, and other relevant regulations and standards, including those relating to boarding and residential accommodation.

27.3.4 If, however, a child does not want to share a room with another child of the same biological sex, alternative arrangements will be sought where possible. Alternative arrangements will not compromise the safety, comfort, privacy or dignity of any child. Where a child's concern reflects a request for support with social transition, the academy will consider KCSIE paragraphs 258-

282, the section on "considering requests for support with social transition" before making any decisions.

27.4 Recording of concerns

27.4.1 The academy will keep a clear record of these situations, ensure they are communicated appropriately, and review them regularly.

28. Early Years Settings (EYFS)

28.1 Staff awareness, induction, training

28.1.1 All staff will receive appropriate safeguarding and child protection training, including online safety, in line with the criteria set out in Annex C of the EYFS.

28.2 Supervision and support

28.2.1 Ormiston Sudbury Academy will ensure staff receive appropriate supervision in line with the safeguarding and welfare requirements of the EYFS.

28.2.2 Supervision will be a regular, planned and accountable two-way process which provides support, coaching, reflection and constructive challenge. It will help staff develop their knowledge, skills and confidence, promote children's interests, and support safe and effective safeguarding practice.

28.2.3 Supervision will provide opportunities for staff to discuss children's development, wellbeing, behaviour, care needs and any safeguarding or child protection concerns. It will also enable staff to discuss concerns about professional practice, including their own practice, the setting's practice or a colleague's practice.

28.2.4 Supervision will support a culture of openness, mutual support, teamwork and continuous improvement, and will provide a confidential space to discuss sensitive issues, including the emotional impact of safeguarding work.

28.2.5 Supervision arrangements will be clear, consistent and recorded. [OSA] will agree how supervision will take place, including the frequency, format, record-keeping arrangements, confidentiality expectations and how actions will be followed up.

28.2.6 Supervision may take place through one-to-one or group supervision arrangements, according to staff role, need, setting context and any safeguarding concerns.

28.3 Child abduction, collection arrangements and community safety incidents

28.3.1 Ormiston Sudbury Academy recognises that child abduction is the unauthorised removal or retention of a child from a parent/carer or anyone with legal responsibility for the child. This may involve parents, family members, people known to the child or strangers.

28.3.2 Ormiston Sudbury Academy will maintain clear procedures for arrivals, departures, collection arrangements, password systems where used, late or uncollected children, visitors and site security. Staff will follow these procedures to help keep children safe.

28.3.3 Adults will be alert to concerns linked to parental disputes, unauthorised collection attempts, unknown adults, changes to collection arrangements, court orders or community safety incidents near the setting.

28.3.4 Any concerns about child abduction, unsafe collection arrangements or community safety incidents will be reported to the DSL and/or manager immediately. Where there is an immediate risk to a child, emergency services will be contacted using 999.

29. Compliance and quality assurance

29.1 Ormiston Sudbury Academy will maintain high standards of safeguarding through clear processes for quality assurance, compliance reporting, and continuous improvement.

29.2 We will use data, intelligence, and feedback, especially the voice of the child, to ensure children receive effective support, to assess and reduce risks, to provide assurance to governance bodies, and improve safeguarding practice.

29.3 Quality assurance will include self-evaluation, section 157 audits, reviews, and ongoing monitoring, training and guidance.

29.4 Non-compliance will be managed in line with Trust procedures, with referral to external agencies where appropriate.

Signed by

Chair of Governors:

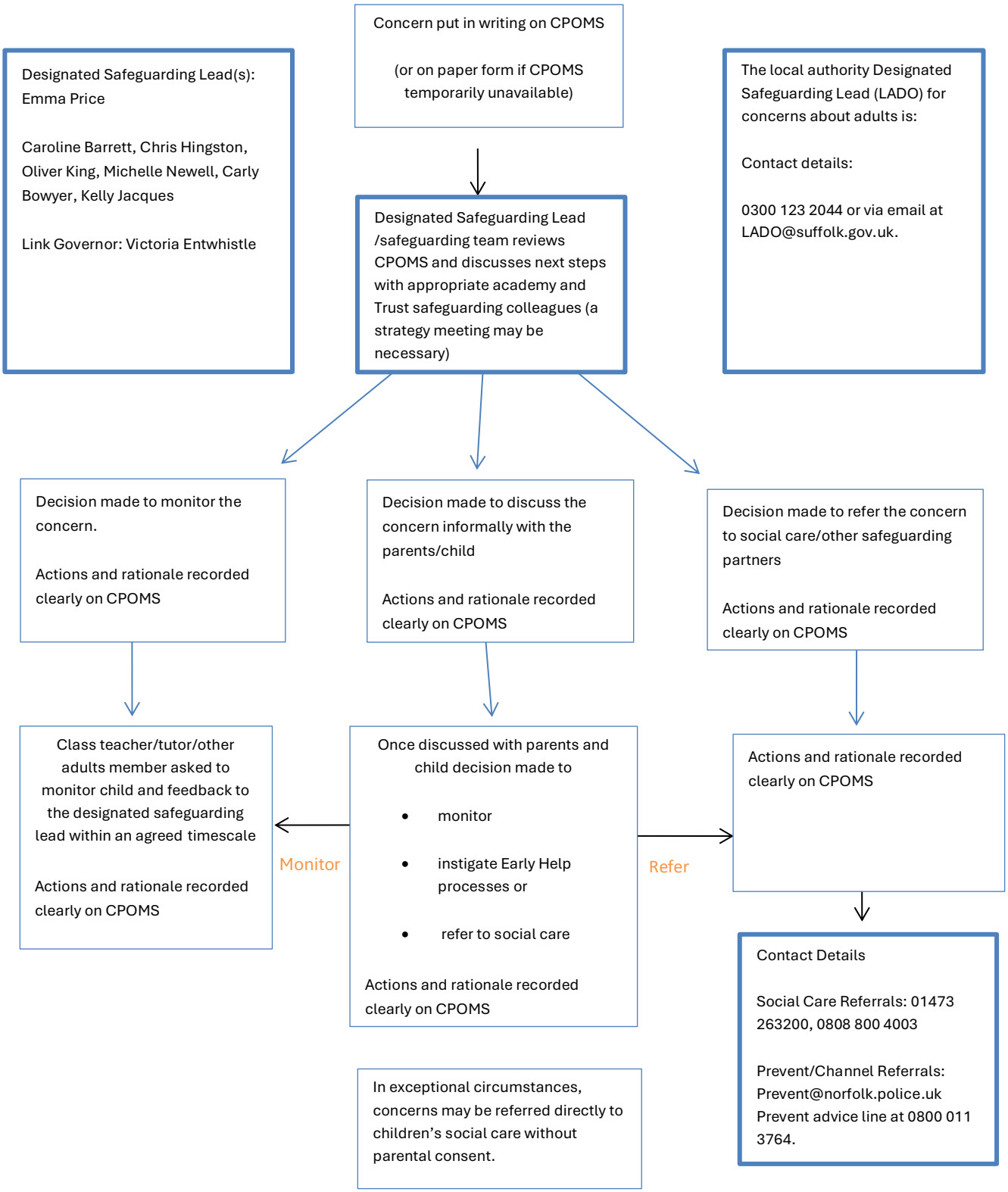
Date:

Principal:

Date:

Appendix 1 - Raising safeguarding concerns about a child

(this outline cannot cover every eventuality – all cases will keep the best interests of the child at the heart of any decision)



Appendix 2 – Glossary of terms

This appendix explains the abbreviations and key terms used in this policy and in the statutory guidance it draws on, principally Keeping Children Safe in Education (KCSIE) 2026, which applies from 1 September 2026, and Working Together to Safeguard Children 2026. It is intended to help all staff, volunteers, trustees, governors and parents/carers read the policy with a shared understanding. Where terminology has changed in KCSIE 2026 (for example, 'honour-based abuse' and the CEOP Education Programme), this glossary uses the current terms.

1. Abbreviations and acronyms

Abbreviation	Meaning
AP	Alternative Provision — education arranged for children outside mainstream school; the commissioning academy retains safeguarding responsibility.
CAMHS	Child and Adolescent Mental Health Services — NHS services supporting children's mental health.
CCE	Child Criminal Exploitation — children coerced or manipulated into criminal activity, including county lines.
CEOP	Child Exploitation and Online Protection command (National Crime Agency). The CEOP Safety Centre handles online abuse reports; the CEOP Education Programme (formerly Thinkuknow) provides teaching resources.
CiC	Child in Care (previously LAC- Looked-After Child / Child Looked After) — a child in the care of the local authority.
CIN	Child in Need — a child assessed under Section 17 of the Children Act 1989 as needing services to achieve a reasonable standard of health or development.
CME	Children Missing Education — children of compulsory school age not registered at a school and not receiving suitable education otherwise.
CP / CPP	Child Protection / Child Protection Plan — a multi-agency plan for a child at continuing risk of significant harm, made following a child protection conference.
CPOMS	Child Protection Online Management System - Secure electronic system used by academies to record, monitor and manage safeguarding concerns.
CSE	Child Sexual Exploitation — a form of child sexual abuse involving an exchange (e.g. gifts, money, status, affection) for sexual activity.
DBS	Disclosure and Barring Service — provides criminal record checks (basic, standard, enhanced, enhanced with barred list) for safer recruitment.
DDSL	Deputy Designated Safeguarding Lead — trained to the same standard as the DSL and able to deputise in their absence.
DfE	Department for Education — the government department that publishes Keeping Children Safe in Education (KCSIE).
DSL	Designated Safeguarding Lead — the senior member of staff with lead responsibility for safeguarding and child protection (including online safety) in the academy.

Abbreviation	Meaning
DUAA	Data (Use and Access) Act 2025 — referenced in KCSIE 2026 alongside UK GDPR and the Data Protection Act 2018, collectively 'data protection laws'.
EHA	Early Help Assessment — an assessment used to identify and coordinate early, non-statutory support for a child and family (see also 'family help').
EHCP	Education, Health and Care Plan — a statutory plan for children and young people with special educational needs and disabilities (SEND).
EHE	Elective Home Education — where parents choose to educate their child at home rather than at school.
FGM	Female Genital Mutilation — illegal procedures involving partial or total removal of external female genitalia. Teachers have a mandatory duty to report known cases in under-18s to the police.
HBA	Honour-Based Abuse — crimes or incidents committed to protect or defend the perceived 'honour' of a family or community, including forced marriage and FGM. (KCSIE 2026 no longer uses the prefix 'so-called'.)
HSB	Harmful Sexual Behaviour — sexual behaviours by children that are developmentally inappropriate and may be harmful to themselves or others; treated in KCSIE 2026 as a spectrum that can escalate to sexual harassment or violence.
IRO	Independent Reviewing Officer — oversees the care plan of a looked-after child.
KCSIE	Keeping Children Safe in Education — the DfE's statutory safeguarding guidance for schools and colleges in England. The 2026 edition applies from 1 September 2026.
LADO	Local Authority Designated Officer — manages allegations against adults who work with children (staff, supply staff, volunteers, contractors, governors).
LGBT	Lesbian, Gay, Bisexual and Transgender.
LSP / SP	Local Safeguarding Partnership / Safeguarding Partners — the local authority, integrated care board and police, who lead multi-agency safeguarding arrangements in each area.
MAPPA	Multi-Agency Public Protection Arrangements — manage violent and sexual offenders in the community.
MARAC	Multi-Agency Risk Assessment Conference — meeting to safeguard adult victims of domestic abuse at high risk, and their children.
MASH	Multi-Agency Safeguarding Hub — the 'front door' through which safeguarding referrals to the local authority are received and triaged (local names vary).
MAT	Multi-Academy Trust — a group of academies governed by a single trust board; Ormiston Academies Trust (OAT) is a MAT.
MHST	Mental Health Support Team — NHS-funded teams working with schools to provide early mental health support.

Abbreviation	Meaning
NSPCC	National Society for the Prevention of Cruelty to Children — national children's charity; runs the whistleblowing advice line (0800 028 0285) and NSPCC Learning.
OAT	Ormiston Academies Trust — the multi-academy trust of which this academy is part.
PSHE / RSHE	Personal, Social, Health and Economic education / Relationships, Sex and Health Education — curriculum through which preventative safeguarding education is delivered.
SCR	Single Central Record — the statutory register of pre-appointment checks for all staff, supply staff, volunteers in regulated activity, governors/trustees and relevant contractors.
SEND	Special Educational Needs and Disabilities. Children with SEND can face additional safeguarding barriers and vulnerabilities.
SMHL	Senior Mental Health Lead — the member of staff leading the whole-school approach to mental health and wellbeing.
SPOC	Single Point of Contact — e.g. the academy's Prevent SPOC.
S17 / S47	Sections of the Children Act 1989: S17 (child in need enquiries/services) and S47 (enquiries where a child is suspected to be suffering, or likely to suffer, significant harm).
TAF	Team Around the Family — multi-agency early/family help meeting coordinating support for a child and family.
UKCIS	UK Council for Internet Safety — publishes guidance including 'Sharing nudes and semi-nudes', which now covers AI-generated imagery.
VSH	Virtual School Head — local authority officer promoting the education of looked-after and previously looked-after children (with non-statutory duties for children in kinship care).
WTTSC	Working Together to Safeguard Children
WTTISA	Working Together to Improve School Attendance

2. Key safeguarding terms

Term	Definition
Allegation	A concern that an adult who works with children may have behaved in a way that has harmed, or may have harmed, a child; may have committed a criminal offence against a child; behaved towards a child in a way that indicates they may pose a risk of harm; or behaved in a way that indicates they may not be suitable to work with children. Managed with the LADO under Part 4 of KCSIE.
Barred list	Lists held by the DBS of people barred from working with children (or vulnerable adults). A barred list check is required for anyone in regulated activity with children.
Child	Anyone under the age of 18.

Term	Definition
Child-on-child abuse	Abuse of a child by another child, including physical abuse, bullying (including cyberbullying and prejudice-based bullying), sexual violence and harassment, sharing of nudes/semi-nudes, upskirting, and initiation/hazing. Never dismissed as 'banter' or 'part of growing up'.
Contextual safeguarding	An approach recognising that risks to children arise outside the family and school — in peer groups, the community and online — and that assessments and plans should address these wider contexts.
County lines	Criminal exploitation in which gangs move drugs and money across areas using dedicated phone lines, often coercing children to transport, store or sell drugs.
Deepfake / AI-generated imagery	Images, video or audio created or altered using artificial intelligence. KCSIE 2026 makes explicit that nude and semi-nude images include AI-generated or AI-altered content ('deepfakes' / 'deep nudes'), which is treated with the same seriousness as real imagery.
Designated teacher	The staff member responsible for promoting the educational achievement of looked-after and previously looked-after children.
Early help / Family help	Support provided as soon as a problem emerges, at any point in a child's life, to prevent escalation. 'Family help' reflects the **developing national model** of integrated early support referenced in Working Together and KCSIE 2026. **Schools may be asked to lead Early Help Plans** as some early help is provided through universal services and community-based early help, such as education and health services, which are available to all families regardless of their needs. Other early help is coordinated by the local authority and/or its partners to address specific concerns within a family; this targeted early help is delivered through Family Help.
Gender questioning children	Children exploring or questioning their gender identity. KCSIE 2026 introduces new sections, including on single-sex spaces and single-sex sport; decisions are made case by case, and it is not the role of schools to initiate action. Staff follow the policy and the DfE guidance.
Grooming	The process by which an abuser builds trust and emotional connection with a child (and sometimes their family or community) in order to manipulate, exploit or abuse them, on or offline.
Kinship care	A child being raised by a relative or family friend rather than a parent, under a variety of formal and informal arrangements.
Low-level concern	Any concern about an adult's behaviour towards children that does not meet the allegations threshold — including behaviour that feels 'nagging doubt' inappropriate. Reported, recorded and reviewed for patterns under the trust's low-level concerns policy.
Mandatory reporting duty	The duty has been legislated for but is not yet in force; the academy will comply from commencement. The Crime and Policing Act 2026 places a statutory duty on those in regulated activity with children to report child sexual abuse to the police or local authority where a child or perpetrator discloses it, or where they witness it; suspicion alone does not engage the duty. Staff discharge it by reporting to the DSL. It operates alongside, not instead of, normal referral routes.

Term	Definition
Misogyny	Hatred of, contempt for, or prejudice against women and girls. KCSIE 2026 strengthens expectations that schools recognise and address misogynistic attitudes, content and behaviour, including online influencer-driven content, as safeguarding issues.
Neglect	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.
Online safety	Protecting children from harmful and inappropriate online content, contact, conduct and commerce ('the 4 Cs'), supported by appropriate filtering and monitoring of the academy's IT systems.
Position of trust	It is a criminal offence for a person in a position of trust (including teachers, and extended to sports coaches and faith leaders) to engage in sexual activity with a 16- or 17-year-old in their care.
Prevent duty / Channel	The statutory duty to have due regard to the need to prevent people being drawn into terrorism. Channel is the voluntary, multi-agency programme supporting people at risk of radicalisation.
Private fostering	An arrangement where a child under 16 (18 if disabled) is cared for 28 days or more by someone who is not a parent, guardian or close relative. The local authority must be notified.
Reasonable force	Physical intervention used by staff, as a last resort, to prevent a child harming themselves or others or damaging property, in line with DfE guidance; every use is recorded and reviewed.
Regulated activity	Work (paid or voluntary) involving close, regular contact with children, e.g. teaching, training, supervising or caring. From September 2026 the 'supervision exemption' is removed: volunteers teaching, training or supervising children more than three days in a 30-day period, or overnight, are in regulated activity and require full checks including a barred list check.
Safeguarding	Protecting children from maltreatment (including by known and unknown people, online and offline); preventing impairment of health, development or wellbeing; ensuring children grow up with safe and effective care; and acting to enable all children to have the best outcomes.
Safer recruitment	The set of pre-employment checks, safeguards and interview practices (including online searches for shortlisted candidates) designed to deter, reject and identify people who might abuse children.
Sharing nudes and semi-nudes	The sending or posting of nude or semi-nude images or videos by or of under-18s (sometimes called 'sexting'), including AI-generated content. Managed under UKCIS guidance; devices are not searched beyond what the guidance permits, and incidents are referred to the DSL.
Significant harm	The threshold (Children Act 1989) that justifies compulsory intervention in family life in the best interests of the child.
Single-sex spaces / sport	Areas of school life (e.g. toilets, changing rooms, boarding, certain sports) covered by new KCSIE 2026 sections regarding gender questioning children; managed in line with statutory guidance and relevant legislation.

Term	Definition
Temporary accommodation notification	The duty on local housing authorities to notify a child's school (and GP/health visitor) when the child is placed in temporary accommodation, so support can be offered.
Upskirting	Taking a photograph under a person's clothing without permission — a criminal offence under the Voyeurism (Offences) Act 2019.
Victim	A widely understood term for a person subjected to abuse. Staff recognise that not every child who has experienced abuse identifies with this term, and use the language the child prefers.
Whistleblowing	Raising concerns about poor or unsafe safeguarding practice, or failures to act, within the academy or trust. Staff may also contact the NSPCC whistleblowing advice line on 0800 028 0285.
Young carer	A child who provides regular care or emotional support to a family member who is ill, disabled, or affected by mental ill-health or substance misuse. KCSIE 2026 strengthens expectations on identifying and supporting young carers, who are entitled to a young carer's needs assessment.

Appendix 3 - Key Contacts

Ormiston Sudbury Academy

The Principal	**Mrs S Morris**	**Contact@ormistonsudbury.co.uk** **0r school switchboard** **01787 37513** **Individual staff e-mail addresses are all first** **initial and surname followed by** **@ormistonsudbury.co.uk**
The Designated Safeguarding Lead	**Mrs E Price**	
The Deputy Designated Safeguarding Lead (s)	**Mrs. C Barrett** **Mrs. C Hingston** **Mr. O King** **Mrs. M Newell** **Mrs C Bowyer**	
The Designated Lead for Looked after Children is:	**Mrs E Price**	
Safeguarding governor:	**Ms V Entwistle**	
The Special Educational Needs Coordinator is	**Mr D Howkins**	
The OAT Education Director	**Ciara Emmerson**	
OAT Head of Safeguarding	**Nikki Cameron**	

Appendix 4 - Responding to Sexualised / Harmful Sexual Behaviour (HSB)

This is an **exemplar only** and uses the Hackett Continuum. Academies using The Brook Traffic Light Tool edit the flow chart as necessary. If academies have their own process please use that instead.

1. Observe / Receive Report / Disclosure
Sexualised behaviour, online concern, child disclosure, parent report or staff concern.

↓

2. Immediate Safety Response by Staff
Stop behaviour if happening. Separate calmly. Reassure. Do not investigate, mediate or promise confidentiality. Inform DSL/DDSL immediately.

↓

3. CPOMS Record + DSL Triage
Staff record factual concern. DSL reviews context, chronology, developmental age, SEND, power imbalance, coercion, distress, repetition and wider safeguarding.

↓ **DSL classifies and follows one strand below** ↓

DEVELOPMENTALLY TYPICAL	PROBLEMATIC	HARMFUL
Expected / mutual / no distress	Unusual / repeated / unclear consent / distress	Coercive / intrusive / abusive / significant harm
Calmly Redirect and Educate Reinforce privacy, boundaries, consent and respect.	**Immediate Safety actions** Support affected children; adjust supervision, toilets, transitions, break-times if needed.	**Immediate Safeguarding Response** Separate safely, supervise each child, preserve evidence and seek urgent help if needed.
↓	↓	↓

Record on CPOMS Record rationale for typical response and any teaching or parental contact.	**DSL + SENCO/Context Review** Consider SEND, communication, trauma, online exposure, family context and chronology.	**Risk and Needs Assessment** Assess risk to child harmed, child causing concern, witnesses, siblings and locations.
↓	↓	↓
Usually Inform Parents Explain proportionate response and reinforcement at home; signpost NSPCC Talk PANTS if useful.	**Parents Usually Informed Separately** Do not share unnecessary information about other children. Delay if contact increases risk.	**Referral Decision** Refer to children's social care and/or police where harm, likely harm or criminal offence may be indicated.
↓	↓	↓
Universal Follow-Up PSHE/RSHE, online safety, trusted adults and respectful relationships.	**Safety/Support Plan** Set supervision, trusted adults, staff scripts, targeted work and review date.	**Formal Safety Plan + Multi-Agency Response** Set separation/supervision, agency advice, parent communication plan and support for all children.
↓	↓	↓
Monitor If repeated, distressing or escalating, move to problematic strand.	**Review** Review 1-2 weeks, then half-termly until closed. Escalate if risk increases.	**Longer-Term Review** Daily/regular check-ins initially; review after one week, 3-4 weeks and half-termly while risk remains.

Developmentally Typical Strand

Threshold
Use where behaviour is age/developmentally expected, mutual, non-coercive, not secretive, not distressing and without apparent power imbalance.

Flow steps

1. Calmly redirect and reinforce boundaries using age-appropriate language

↓

2. Check whether any child is upset, confused or worried

↓

3. Record factual details on CPOMS and note DSL rationale for a developmentally typical judgement

↓

4. Usually inform parents in an educative, proportionate way

↓

5. Use universal PSHE/RSHE or classroom input on privacy, consent, personal space, trusted adults and online safety

↓

6. Monitor for repetition, secrecy, distress, coercion or escalation
If present, reclassify as problematic.

Problematic Strand

Threshold

Use where behaviour is developmentally unusual, repeated, socially unexpected, distressing, contextually inappropriate or where consent/reciprocity is unclear, but without clear evidence of coercive or abusive intent.

Flow steps

1. Ensure immediate emotional and physical safety; consider break times, toilets, seating, transitions, clubs and transport

↓

2. DSL reviews CPOMS chronology and gathers relevant context without conducting an inappropriate investigation

↓

3. DSL and SENCO consider SEND, developmental age, communication needs, trauma, family context, online exposure and social care involvement

↓

4. Inform parents separately unless doing so may increase risk; record the decision and rationale

↓

5. Decide whether internal support, Early Help, social care advice or formal referral is required

↓

6. Create a proportionate safety/support plan with named trusted adults, staff scripts, supervision arrangements, targeted intervention and review date

↓

7. Review after 1-2 weeks and then at least half-termly until risk is reduced and support is embedded

Escalate if recurrence or new risk emerges.

Harmful Strand

Threshold

Use where behaviour is intrusive, coercive, forceful, abusive, involves significant power imbalance, causes significant distress/harm, involves threats/secrecy or suggests a child is suffering or likely to suffer significant harm.

Flow steps

1. Separate and supervise children safely and discreetly

Do not mediate or ask children to repeat accounts unnecessarily.

↓

2. Preserve evidence, including online evidence

Do not view, forward or share illegal or harmful imagery.

↓

3. DSL/DDSL leads; inform headteacher on a need-to-know basis; involve SENCO where relevant; notify Trust safeguarding route if required

↓

4. Complete immediate risk and needs assessment for the child harmed, child causing concern, witnesses/peers, siblings, locations and online spaces

↓

5. Refer to children's social care and/or police where harm, likely harm or a criminal offence may be indicated

If immediate danger, call 999.

↓

6. Plan parent communication carefully

Usually inform separately, but delay if it may increase risk, contaminate disclosure or conflict with agency advice.

↓

7. Create a formal written safety plan and review with social care/police/specialists as appropriate

↓

8. Provide tailored support for all children

Keep education in place wherever safe and avoid responses that punish the child who has been harmed.

↓

9. Review after one week, 3-4 weeks and half-termly while risk remains; update CPOMS chronology and safety plan after every significant development

Appendix 5 - Responding to the sending or receipt of a nude/semi-nude

When a child has been affected by the sending of an explicit image adults will:

- recognise that if the child has been sending explicit images or videos of themselves, the child may feel anxious talking about this
- recognise that they themselves may feel shocked, upset, angry, confused, or disappointed while listening to the child
- give themselves time to process the information, remembering that the child will be watching their reactions.
- reassure the child that they are not alone
- listen and offer support – they are probably upset and need help and advice, not criticism
- not shout or make them feel like it is their fault
- will not ask questions like "why have you done it?" as this may stop them from opening up;
- discuss the problem and the wider pressures that they may face, to help them to understand what has happened and understand any wider safeguarding concerns
- assure the child that they will do all they can to help and explain that they will seek the support of the DSL
- remind them that they can always talk to Childline or another trusted adult if they are not comfortable talking directly to an adult

If a child has shared an explicit image, the DSL or deputy will:

- ask them who they initially sent it to, their age, and if they know whether it's been shared with anyone else.
- support the victim to get the images removed by contacting the Internet Watch Foundation
- assess the situation for wider safeguarding concerns and agree who will be contacted and when then contact parents/police/CEOP/ as appropriate to the case
- contact the Child Exploitation and Online Protection Centre (CEOP) if the image was requested by an adult, as this is grooming which is illegal
- contact the DSL at the relevant school if the image was requested by a school aged child not from this academy, to raise awareness of potential wider safeguarding issues or circulation of the image in their school.
- all actions and information to be logged on CPOMS.
- parents to be contacted unless to do so would place a child at risk of further harm

If a child has been sent a sexually explicit image:

- the DSL or deputy should ask them if they know the person who sent it and their age.
- if the image was sent by another child, adults may want to help the child to speak to the sender in order to stop future messages. If the child agrees, adults can also help them to block the sender on social media.

- the DSL will consult the UKCIS sharing nudes and semi nudes advice “Sharing nudes and semi-nudes: how to respond to an incident” (publishing.service.gov.uk).
- if the image was sent by an adult, adults should also contact CEOP, the Child Exploitation and Online Protection Centre, as this may be part of the grooming process.
- all actions and information to be logged on CPOMS.
- parents to be contacted as appropriate.

Adults must not:

- View, copy, print, share, store or save images.
- Ask a child to share or download images (if you have already viewed the images by accident, you must report this to the DSL).
- Delete the images or ask the child to delete them
- Ask the child/children who are involved in the incident to disclose information regarding the image (this is the DSL’s responsibility)

Appendix 6 - Responding to AI generated child sexual abuse material (CSAM)

The rapid evolution of Artificial Intelligence (AI) brings numerous benefits, but also poses significant risks, particularly concerning the creation and sharing of child sexual abuse material (CSAM), also referred to as AI-CSAM.

Images or videos don't need to show sexual acts to be considered child sexual abuse material. This can also include nude or semi-nude images of someone under 18 years old.

Child sexual abuse images or videos (CSAM) created or altered using AI may include:

- Everyday images of a child that are manipulated into child sexual abuse imagery, including images taken from social media, websites or messaging apps, that are manipulated into sexualised or abusive imagery. These are sometimes known as 'deepfakes'.
- Images or videos that look like a real child but are completely artificial.
- AI technology that digitally removes clothing from existing images to create nude or semi-nude images, sometimes known as 'nudifying'.

AI generated CSAM can be used to 'sextort', blackmail, humiliate, bully, manipulate and groom children

If the academy becomes aware of AI produced CSAM they will report it to the police. They will inform parents unless to report would place a child at risk of further harm

They will support the child and the parents to

- report the incident directly to the National Crime Agency via CEOP Safety Centre
- report the incident directly to any platform website or app on which the incident has occurred using the advice on the Internet Matters website
- to report the imagery to Report Remove – a service run by the NSPCC
- access emotional and well-being support

Appendix 7 - Academy specific process for identifying possible mental health concerns, routes to escalation, roles and responsibilities.

Staff are trained to use professional curiosity to identify when a student might have a mental health concern. Any concerns are discussed with the DSL/DDSL and logged on CPOMS. An ongoing log of all actions is kept on CPOMS.

A DSL/DDSL will create opportunities to meet with the student to establish any concerns. Parental contact will be made where appropriate.

Potential referrals onward from this could be:

Regular check-ins with pastoral manager or other appropriate member of staff.

Referral to No72 Charity or KERNOS who visit weekly

Referral to Academy Counsellor.

Referral to Emotional Wellbeing Hub.

Staff will be updated and informed where a student needs special consideration

In-house appropriate adjustments will be made potentially, to classes and spaces used.