HERITAGE ACADEMY

Child Protection and Safeguarding Policy

Allah's Messenger (ﷺ) said, "Surely! Every one of you is a guardian and is responsible for his charges." (Bukhari)

Written: September 2026 Updated: October 2026	Next review: September 2027 (or sooner if required)
Person Responsible	Headteacher
Approval authority	Proprietor Body

This policy should be read in conjunction with our:
Recruitment Policy Health and Safety Policy Anti- Bullying Policy Attendance and Punctuality Policy Behaviour, Rewards & Sanctions Policy Equal Opportunities Policy Whistle Blowing Policy Data Protection Policy Staff Code of Conduct Policy The Staff Handbook Staff Discipline Policy Staff Grievance Policy

Contents

1. Aims 4
2. Legislation and statutory guidance 5
3. Definitions 6
4. Equality statement 8
5. Roles and responsibilities 8
6. Confidentiality 15
7. Recognising abuse and taking action 16
8. Online safety and the use of mobile technology 39
9. Notifying and working with parents or carers 41
10. Pupils with special educational needs, disabilities or health issues 42
11. Pupils with medical conditions 42
12. Young carers 43
13. Pupils with a social worker 43
14. Looked-after and previously looked-after children 43
15. Pupils who are lesbian, gay or bisexual 44
16. Pupils who are questioning their gender 44
17. Complaints and concerns about school safeguarding policies 46
18. Record-keeping 47
19. Training 48
20. Monitoring arrangements 50
21. Links with other policies 50
Appendix 1: types of abuse 51
Appendix 2: safer recruitment and DBS checks – policy and procedures ... **Error! Bookmark not defined.**
Appendix 3: allegations of abuse made against staff 62
Appendix 4: specific safeguarding issues 70
Appendix 5: safeguarding recording/reporting tools 82

Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	**Shakeel Akhtar**	01214402222 ht@heritage-academy.co.uk
Deputy DSL	**Sajjaad Hamid**	01214402222 sajjaad.hamid@heritage-academy.co.uk
DSL cover arrangements		DSL@heritage-academy.co.uk
Values Champion		husna.choudhury@heritage-academy.co.uk
Chair of proprietors	**Sahdia Akhtar**	01214402222 sahdia.akhtar@heritage-academy.co.uk
Link Safeguarding Proprietor	**Sahdia Akhtar**	01214402222 sahdia.akhtar@heritage-academy.co.uk
Designated Teacher for Children in Care (DT for Children in Care)	**Shakeel Akhtar**	01214402222 ht@heritage-academy.co.uk
Special Educational Needs Coordinator (SENCO)	**Shakeel Akhtar**	01214402222 ht@heritage-academy.co.uk
Mental Health Lead	**Shakeel Akhtar**	01214402222 ht@heritage-academy.co.uk
Prevent Lead	**Shakeel Akhtar**	01214402222 ht@heritage-academy.co.uk
Local authority designated officer (LADO)	Duty LADO	Tel: 0121 675 1669 ladoteam@birminghamchildrenstrust.co.uk
Birmingham Children's Trust	Children's Advice and Support Service (CASS)	**Monday to Thursday: 8:45am to 5:15pm:** Friday: 8:45am to 4:15pm Telephone: 0121 303 1888 **CASS emergency out-of-hours:** Telephone: 0121 675 4806
Solihull Safeguarding Children Partnership	Solihull Multi-Agency Safeguarding Hub	0121 788 4300 mashsupportofficers@solihull.gov.uk
Walsall Safeguarding Partnership	Multi-Agency Safeguarding Hub	Telephone: 0300 555 2866 MASH@walsall.gov.uk
Early Help		Early Help Support Team: Telephone: 0121 303 8117 or contact your Early Help District teams

ROLE/ORGANISATION	NAME	CONTACT DETAILS
NSPCC Helpline	N/A	Call: 0808 800 5000 Email help@NSPCC.org.uk.
DfE counter-extremism helpline (advice)		020 7340 7264
Police	N/A	Emergency 999. Non-emergency 101

1. Aims

The school aims to ensure that:

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

The proprietors will facilitate a whole-school, child-centred approach to safeguarding, with the child's welfare paramount in all decisions. At Heritage Academy, we strive to create an environment where children feel safe to learn and develop, express their wishes and feelings, and talk about anything important to them. Safeguarding and child protection underpin everyday practice and all relevant processes and policies. We work with children, families and other professionals to build confidence in our approach and keep the child's best interests at its heart.

Support may be provided through universal services and community-based Early Help, through Family Help encompassing targeted early help and section 17 child-in-need support, and through child protection enquiries and processes under section 47 of the Children Act 1989. Other statutory services or protective action may be required according to the child's circumstances.

This policy sets out our safeguarding duties, staff responsibilities and the specific responsibilities of the designated safeguarding lead (DSL), deputy DSL and proprietors.

1.1 Safeguarding in the context of Heritage Academy

Heritage Academy is an independent Islamic boys' secondary school in Birmingham for pupils aged 11–16. Our Islamic ethos places responsibility on adults to protect children, treat them with dignity and listen when they need help. Safeguarding applies throughout school life: lessons, Islamic Studies, Qur'an teaching, worship and daily prayer, as well as trips, work experience, travel and online activity. The status of an adult or their religious or community standing must never prevent a concern being reported or acted upon.

Boys' barriers to disclosure

Some boys may feel pressure to appear strong, cope alone or avoid being labelled weak, disloyal or a "snitch". Embarrassment, threats, shame, fear of disbelief or worries about family and community reactions may prevent disclosure, particularly about sexual abuse, exploitation, mental health or harm by another boy. Staff must not assume that boys are less vulnerable, that abuse by a male necessarily reflects a pupil's sexual orientation, or that silence means a child is safe. We will challenge victim-blaming and harmful ideas about masculinity, reassure pupils that seeking help is responsible, and provide opportunities to speak with a trusted adult.

SEND and communication

A boy with SEND may have difficulty recognising coercion, interpreting social situations, explaining an experience or judging the intentions of a peer, adult or online contact. Staff must consider changes from the pupil's usual presentation and avoid attributing distress, withdrawal, injury or behaviour automatically to SEND. The DSL and SENCO will agree accessible communication and support, including extra processing time, clear language and appropriate visual or specialist communication aids. A pupil's account must be taken seriously even where it is brief, inconsistent or difficult to express.

Racism and faith-targeted abuse

Pupils may experience anti-Muslim prejudice, racist abuse or harassment connected to ethnicity, appearance, religious dress, prayer or belief, including outside school and online. Staff will record the child's account and the nature of the harm, challenge discriminatory behaviour and assess its effect on safety, attendance and wellbeing. We will also challenge racism and hostility towards other faiths, beliefs or groups within our own community. Children must be able to question, disagree and seek help without fear. Faith or family reputation must never be used to justify abuse, silence a child or avoid an external referral.

Online influences and exploitation

Social media, gaming, private messaging and AI tools may expose boys to grooming, sexual extortion, misogynistic influencers, violent content, racist or extremist narratives, and promises of money, status or belonging. Exploiters may use gifts, "easy money", debts, threats, friendship or apparent romantic attention to secure compliance. Harm can occur during journeys, in neighbourhoods and peer groups, or through contact beyond the school community. Staff will consider these contexts alongside changes in attendance, friendships, possessions, online activity and wellbeing. A child who carries drugs, money or a weapon, or harms others, may also be a victim requiring protection.

Radicalisation and extremism

Our safeguarding response considers susceptibility to terrorism across ideologies, including Islamist, extreme right-wing and other violent extremist narratives. Religion, ethnicity, religious observance or lawful political views are not evidence of radicalisation. Staff will consider whether a pupil is being groomed, threatened or drawn towards support for terrorist violence, and refer concerns to the DSL through section 7.5. Racism, isolation, distress or a search for identity and belonging may be exploited, but none is a reliable indicator on its own. Teaching will support respectful debate, critical evaluation of sources and rejection of violence and hatred.

The DSL will use the school's Prevent risk assessment, attendance and safeguarding records, pupil and staff feedback, and advice from Birmingham safeguarding partners to keep this context under review. Assessments will consider each child's circumstances and protective relationships. Staff will act on emerging concerns without waiting for a direct disclosure or a pattern to become established. Sections 7, 8 and 10 and Appendix 4 set out the procedures that apply.

2. Legislation and statutory guidance

This policy has been prepared in accordance with the Department for Education's statutory guidance Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026 and the arrangements published by Birmingham Safeguarding Children Partnership. As an independent school, Heritage Academy's principal safeguarding requirements include paragraph 7 of Part 3 of Schedule 1 to the Education (Independent School Standards) Regulations 2014. References to legislation or guidance that applies only to maintained schools will be applied only where relevant to Heritage Academy.

This policy is also based on the following legislation:

- Paragraph 7 of Part 3 of Schedule 1 to the Education (Independent School Standards) Regulations 2014, which requires arrangements to safeguard and promote the welfare of pupils, having regard to guidance issued by the Secretary of State
- The Children Act 1989 and the Children Act 2004, as amended, which provide the framework for children's welfare, protection and multi-agency safeguarding arrangements
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regard to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, as amended, including by the Protection of Freedoms Act 2012 and the Crime and Policing Act 2026, which defines regulated activity in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, including the duties not to discriminate unlawfully and to make reasonable adjustments for disabled pupils. Relevant protected characteristics in the education context include disability, race, religion or belief, sex, sexual orientation, gender reassignment, and pregnancy and maternity. The school will consider proportionate positive action where evidence shows that pupils with a protected characteristic experience particular disadvantage or risk.
- Operation Encompass statutory guidance, under which the police notify a child's educational setting where they have reasonable grounds to believe that the child may be a victim of domestic abuse. This can include a child connected with the household even where the child was not physically present during the incident.

3. Definitions

All staff at Heritage Academy are expected to be familiar with the wide range of policies and procedures we have to keep children safe and promote their wellbeing at all times. Safeguarding and promoting the welfare of children, as defined in Keeping Children Safe in Education 2026, means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes
- Promoting children's upbringing with their birth parents or, where appropriate and in the child's best interests, within their wider family network through a kinship care arrangement

- Effective safeguarding practice at Heritage Academy will be anti-discriminatory and anti-racist. Staff will consider how social and economic circumstances, ethnicity, disability and other inequalities may affect children and families, without relying on stereotypes or assumptions.

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

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

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Making or sharing nudes or semi-nudes means creating, sending or posting nude or semi-nude images of children under 18, including photographs, videos and livestreams. Images may be taken or created by the child or another person, digitally altered or wholly AI-generated, including deepfakes or deep nudes. All such incidents require a safeguarding response, whether consensual or non-consensual.

A child is anyone under the age of 18.

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

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for an area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

Family Help brings together targeted early help and statutory support for children in need under section 17 of the Children Act 1989. It builds on universal services and community-based Early Help, with coordinated assessment and planning to meet the needs of children and their families. Heritage Academy will use Birmingham's published thresholds and referral pathways, including its Early Help Assessment and Our Family Plan arrangements where appropriate.

Birmingham's Right Help, Right Time guidance sets out the support available to children, young people and families and provides a framework for individuals, agencies and practitioners to work together to meet their needs. https://lscpbirmingham.org.uk/refreshed-right-help-right-time-guidance-now-live

Child Protection: under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, it must make enquiries. Such enquiries should be initiated where there are concerns about all forms of abuse,

neglect and exploitation, whether taking place in person or online, inside or outside the child's home.

4. Equality statement

Some children face increased risks of abuse, online and offline, and additional barriers to recognising or disclosing it. We are committed to anti-discriminatory and anti-racist practice and recognise children's diverse circumstances. Racism, faith-targeted abuse and other discriminatory behaviour can harm a child's welfare, wellbeing and sense of safety. Staff will recognise, challenge, record and address such behaviour, applying safeguarding procedures where appropriate. All children will receive the same protection, with support adjusted to overcome any barriers they face.

We recognise the particular safeguarding needs of children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 14)
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

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

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned, evidence-informed and age-appropriate relationships and sex education and PSHE, delivered in timetabled lessons and reinforced across the curriculum. Heritage Academy is an independent school: the statutory RSE guidance applies, while health education is provided through our PSHE arrangements under the Independent School Standards. Teaching is adapted for SEND and other vulnerabilities and tackles:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called

honour-based violence such as forced marriage and FGM and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff will:

- Read and understand Part One of Keeping Children Safe in Education 2026 in full, whether or not their role involves working directly with children, and review the guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have read and reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (for example, sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns
- All staff recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.

All staff will be aware of:

- Our systems that support safeguarding, including this safeguarding and child protection policy; the Staff Code of Conduct Policy 2026; the role and identity of the DSL and deputy; the behaviour policy; the online safety policy; and the safeguarding response to children who are absent from education

The Staff Code of Conduct and IT acceptable-use arrangements set professional boundaries for staff–pupil relationships, one-to-one work, photography, personal devices, online communication and social media. Staff must use authorised school channels and report departures from these boundaries through section 7.7. Under the Sexual Offences Act 2003, an adult in a position of trust must not have a sexual relationship with a child under 18 in their care, even where the child is over 16 or the relationship is described as consensual. This applies even where the adult does not teach that child.

- Be aware of the school's unauthorised absence procedures and children missing education procedures
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The local arrangements for universal services, community-based Early Help and Family Help. Family Help includes targeted early help and section 17 child-in-need support, coordinated by the local authority and/or its partners. Family Help support is voluntary and requires the family's agreement; this does not prevent safeguarding information being shared or statutory enquiries and protective action being taken where required.
- Family Help assessments and plans will be undertaken with the agreement of the child and parents or carers, take account of the child's wishes and feelings, consider the needs of all family members and relevant extra-familial contexts, and be co-produced with the family and appropriate practitioners.

- If consent is refused, the DSL will seek to understand the reasons, explain the available support and consider how the child's needs can otherwise be met. Previous refusal will not prevent a later offer of support. If the child may be suffering, or likely to suffer, significant harm, an immediate referral will be made to local authority children's social care regardless of consent.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The safeguarding issues that often overlap and can put children at risk of harm, including:
    - Drug taking and/or alcohol misuse
    - Unexplainable and/or persistent absences from education
    - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
    - Consensual and non-consensual making or sharing of nudes or semi-nudes
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- That children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying
- The potential vulnerabilities of children who are questioning their gender
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Appendix 4 of this policy outlines in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. The DSL is not a proprietor. The DSL takes lead responsibility for child protection and wider safeguarding, including online safety and understanding the filtering and monitoring systems on school devices and networks. The DSL should have appropriate status and authority to carry out the role, with arrangements ensuring sufficient independence to act on safeguarding concerns, including allegations involving the proprietor or members of the proprietor's family. At Heritage Academy, the DSL's written appointment confirms their responsibility to contact the Local Authority Designated Officer (LADO) directly about any matter they consider cannot be properly dealt with internally, without requiring prior approval from the proprietorial body. The DSL also has direct access to safeguarding advice from an independent advisor who reviews safeguarding arrangements and supports leaders and proprietors. Additionally, the school has appointed a Values Champion that staff would report low-level concerns to.

The direct LADO reporting arrangement concerns allegations about adults working or volunteering with children. Other concerns about a child or family must follow the children's social care and police referral routes in section 7, including where the DSL cannot safely manage the concern internally.

Any family relationship or other conflict of interest must be recognised and managed. An adult with a conflict must not assess, investigate or decide the concern. Concerns about a child, including concerns involving family members, must follow section 7 and be referred to children's social care and/or police where required. Where an allegation concerns an adult working or volunteering with children and reporting to the headteacher or proprietor would create a conflict of interest, staff must report directly to the LADO without delay. LADO contact must not replace or delay a necessary child-protection referral or emergency action.

During school hours a DSL or trained deputy will be available, normally in person; any exceptional remote arrangement must provide reliable and immediate access to safeguarding advice and action. When the DSL is absent, the deputy DSL, Sajjaad Hamid, will act as cover. The person assigned safeguarding cover will monitor DSL@heritage-academy.co.uk and have secure access to safeguarding records and referral information. Adequate cover must also be arranged for school-led activities outside normal hours or term time. Urgent concerns must be raised directly with the duty safeguarding lead; staff must not rely on an email awaiting a response. If neither DSL can be reached, staff must follow section 7.4 and must not delay a necessary referral.

For planned periods when both named DSLs will be unavailable, the headteacher and proprietors will confirm and record the named, appropriately trained safeguarding cover, mailbox-monitoring responsibility, direct contact details and secure access arrangements. Staff must be told these arrangements before the absence or activity begins. If both named DSLs become unexpectedly unavailable, the senior leader on duty will ensure urgent concerns are acted on, seek advice from children's social care as necessary and arrange safeguarding cover promptly. Staff must follow section 7.4 and must not wait for cover or an email reply before taking necessary protective action. The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Where agreed under Birmingham's local protocol, and where the DSL has the necessary capacity, capability and support, act as lead practitioner for a community-based Early Help or Family Help assessment and, where specifically agreed by the local authority, work led under section 17 of the Children Act 1989. A social worker will lead section 47 enquiries and any child protection plan
- Make sure that staff have appropriate Prevent training and induction

The DSL will also:

- Keep the headteacher informed of safeguarding issues where the roles are held by separate members of staff

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Know what local specialist support is available for all children involved in sexual violence or sexual harassment, including victims and alleged perpetrators, and how to access it
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Ensure that child protection files are kept up to date
- Ensure that child protection files are transferred when children leave the school, in accordance with section 18

For children joining Heritage Academy, the DSL will obtain, review and act on safeguarding information from the previous setting, seek clarification of incomplete or unclear records and brief the SENCO and other staff who need to know. The DSL will coordinate pastoral and academic support for children who have or have had a social worker, recognising that trauma and disadvantage may continue after statutory involvement ends. Safeguarding information will be used to support the child and their educational outcomes.

- The full responsibilities of the DSL and deputy are set out in their job descriptions, reflecting Annex B of KCSIE 2026. Ultimate lead responsibility remains with the DSL; deputies support the role and provide trained cover.

5.3 The Proprietors

The proprietors will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Ensure all staff, including those who do not work directly with children, read and understand Part One of KCSIE 2026 in full. School leaders and staff who work directly with children will also read Annex A on specific safeguarding issues. The DSL and deputy will understand Annex B and all other parts relevant to their responsibilities. Mechanisms will be in place to check understanding and support staff in applying the guidance
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Understand the school's applicable obligations under equality and human rights law and Birmingham's multi-agency safeguarding arrangements. The Equality Act 2010 duties concerning discrimination and reasonable adjustments apply to Heritage Academy. The Public Sector Equality Duty applies to public bodies or the exercise of public functions where applicable; it must not be assumed to apply to all independent-school activities
- Ensure Heritage Academy is fully engaged in Birmingham's multi-agency safeguarding arrangements; understands and applies the local threshold document, referral pathways and protocol for assessment; contributes to multi-agency assessments and plans; and allows children's social care from the host or placing local authority access to pupils where required to carry out, or consider carrying out, its statutory functions
- Appoint a senior proprietor-body lead, separate from the DSL, to monitor safeguarding effectiveness and provide challenge, while the full proprietor body retains responsibility for the school's safeguarding arrangements

- Ensure the school has a policy on restrictive interventions, including reasonable force, which recognises that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils

The proprietors will ensure that the DSL:

- Responds to safeguarding-partner requests for information and audits of safeguarding quality and compliance. Findings will be reported to the proprietors and shared with the partnership as requested. The school will contribute attendance, exclusion, safeguarding and relevant contextual information, engage in local safeguarding networks and training, and implement learning from local and national reviews.
- Monitors safeguarding, bullying and harassment records for patterns or disproportionate impact relating to sex, disability, race, faith, sexual orientation, gender reassignment or other relevant characteristics, and ensures that findings inform safeguarding, behaviour, curriculum and staff-training decisions
- Ensures all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners

Restrictive interventions must follow the Behaviour Policy, Care, Control, Restraint and Searching Policy and current DfE guidance. These procedures cover reasonable force, seclusion and restraint, including restraint without physical contact. Each significant use-of-force incident and every incident of seclusion or restraint must be recorded in writing as soon as practicable, preferably the same day. Records will identify those involved, relevant pupil needs, the date, time, location, duration, circumstances, de-escalation attempted, intervention used, reasons, injuries and subsequent support.

Parents will receive written information about the incident as soon as practicable, preferably the same day, including where the intervention forms part of an agreed support plan. Where informing a parent would be likely to result in serious harm to the pupil, the incident must be reported to any other parent who can safely be informed. If no parent can safely be informed, it must be reported to the local authority where the pupil ordinarily lives. The decision and reasons must be recorded.

The DSL and headteacher will review incidents, arrange appropriate support and address any safeguarding concerns. Suspected inappropriate or excessive intervention must follow the allegations or low-level concerns procedures, including consultation with the LADO where appropriate. Any force must be no more than necessary and used for the shortest necessary time. Staff will consider SEND, medical and mental health needs, reasonable adjustments and proactive support to reduce the need for restraint.

The proprietors will also ensure that:

- The school has appropriate cyber security systems in place

Appropriate filtering and monitoring systems cover both staff and pupil accounts, with their effectiveness reviewed at least once each academic year. Online safety remains an integral part of the whole-school approach to safeguarding and related policies. These arrangements include:

  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  - Ensuring that the review is led by the designated senior leadership team member responsible for filtering and monitoring, supported by the DSL and the school's IT staff or provider. The review will assess the DfE filtering and monitoring standards, the school's safeguarding and Prevent risk

assessments, the effectiveness of monitoring strategies and the operation of filtering on all relevant devices, networks and locations. Findings, actions and subsequent checks will be recorded and reported to the proprietors

- The DSL has the status, authority, time, funding, training, resources and support needed to fulfil the responsibilities in section 5.2
- Procedures cover safeguarding concerns about staff, including supply staff, trainee teachers, volunteers and contractors, whether they meet the harm threshold or are low-level concerns (see appendix 3)
- This policy recognises the additional barriers to identifying abuse or neglect faced by children with SEND or certain medical or physical health conditions (see sections 10 and 11)

Where another body provides services or activities, whether or not the children attending are on the school roll, the proprietors will:

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of proprietors may act as case manager for an allegation about the headteacher only where there is no conflict of interest. At Heritage Academy, the chair is a family member of the headteacher, so concerns about the headteacher must follow the direct LADO and independent-handling arrangements in section 7.7 and Appendix 3.

All proprietors will read Keeping Children Safe in Education (KCSIE) in its entirety.

Section 19.3 of this policy has information on how proprietors are supported to fulfil their role.

5.4 The headteacher

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems that support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions about ordinary low-level concerns, taking safeguarding advice where appropriate. Concerns about the headteacher or a family member must follow section 7.7; no conflicted person may assess, investigate or decide the concern.

5.5 Virtual school heads

Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

They should also identify and engage with key professionals, for example DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

6. Confidentiality

Trusted relationships are central to our work with children and families. Timely information sharing is essential to identifying and tackling abuse, neglect and exploitation and promoting children's welfare, including educational outcomes. The following principles apply:

- Arrangements should be in place setting out the processes and principles for sharing information within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required
- The Data Protection Act (DPA) 2018, Data (Use and Access) Act 2025, and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

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

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system

- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved

- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).

Consent is not required to share personal information for the purposes of safeguarding and promoting a child's welfare where an appropriate lawful basis applies. Fears about sharing information must not stand in the way of safeguarding a child.

The school will be open with children and families about information sharing where it is safe and appropriate to do so. Staff must not seek consent or provide advance notice where this could increase risk, prejudice an investigation or delay necessary safeguarding action.

Any decision to share or withhold information, the lawful basis relied upon and the reasons for the decision must be recorded. Information must be shared in a lawful, necessary, proportionate, relevant, adequate, accurate, timely and secure way. Contextual or historical information must not be omitted where it is needed to understand or manage safeguarding risk.

A request for access to safeguarding records, including a subject access request from a pupil or parent, will be handled under the Data Protection Policy with DSL involvement. The school must withhold pupils' personal data where the applicable serious-harm test is met; records must not be released automatically to a parent. The school will assess third-party information, confidentiality, the child's rights and applicable exemptions, record its decision and obtain independent data-protection or legal advice where needed.

- The DSL will consider sharing relevant safeguarding information before a child leaves so that support is ready on arrival. Secure file-transfer requirements and timescales are set out in section 18.
- Confidentiality is also addressed in this policy with respect to record-keeping in section 18, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect, exploitation and modern slavery and shall be alert to the potential need for early help for a child who:

- Has a disability or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is bereaved
- Is showing early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, care or home
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation

- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child

Staff, volunteers and proprietors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL (or deputy DSL)'.

Staff will, wherever possible, see and speak with the child, listen to and take seriously what the child communicates, observe their presentation and behaviour and involve them in decisions. Appropriate communication support, reasonable adjustments or advocacy will be arranged where required. Professional interpreters, including British Sign Language interpreters, will be used where needed; children, relatives or partners will not be relied upon to interpret safeguarding discussions.

Staff must consider cumulative harm as well as individual incidents, review relevant history and remain professionally curious when accounts conflict or reassurance is unsupported. Poverty or disability must not be equated with neglect; assess the child's actual needs, experiences and safety, and whether practical help is required. Apparent parental cooperation or a child's quiet presentation is not evidence that risk has ended.

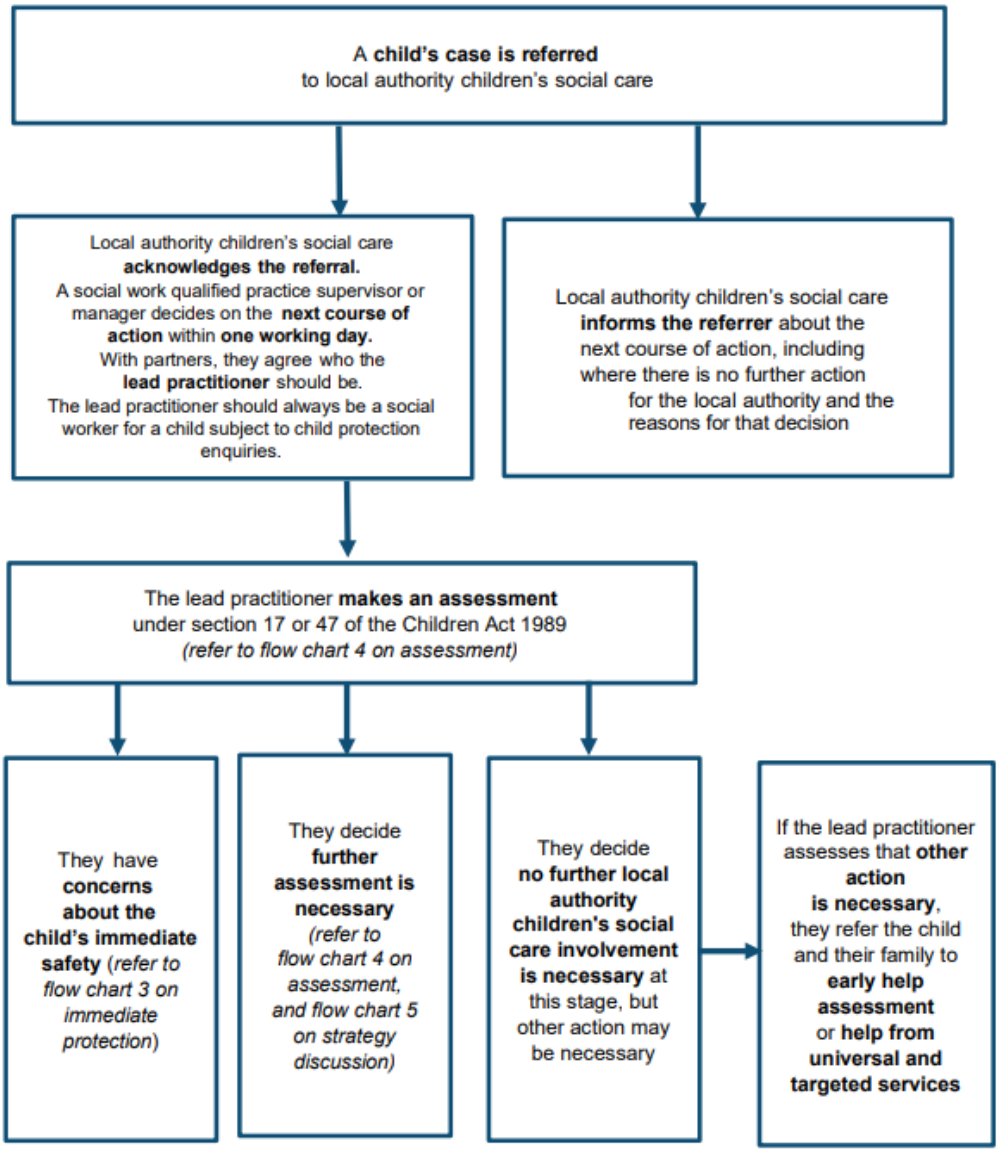
7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

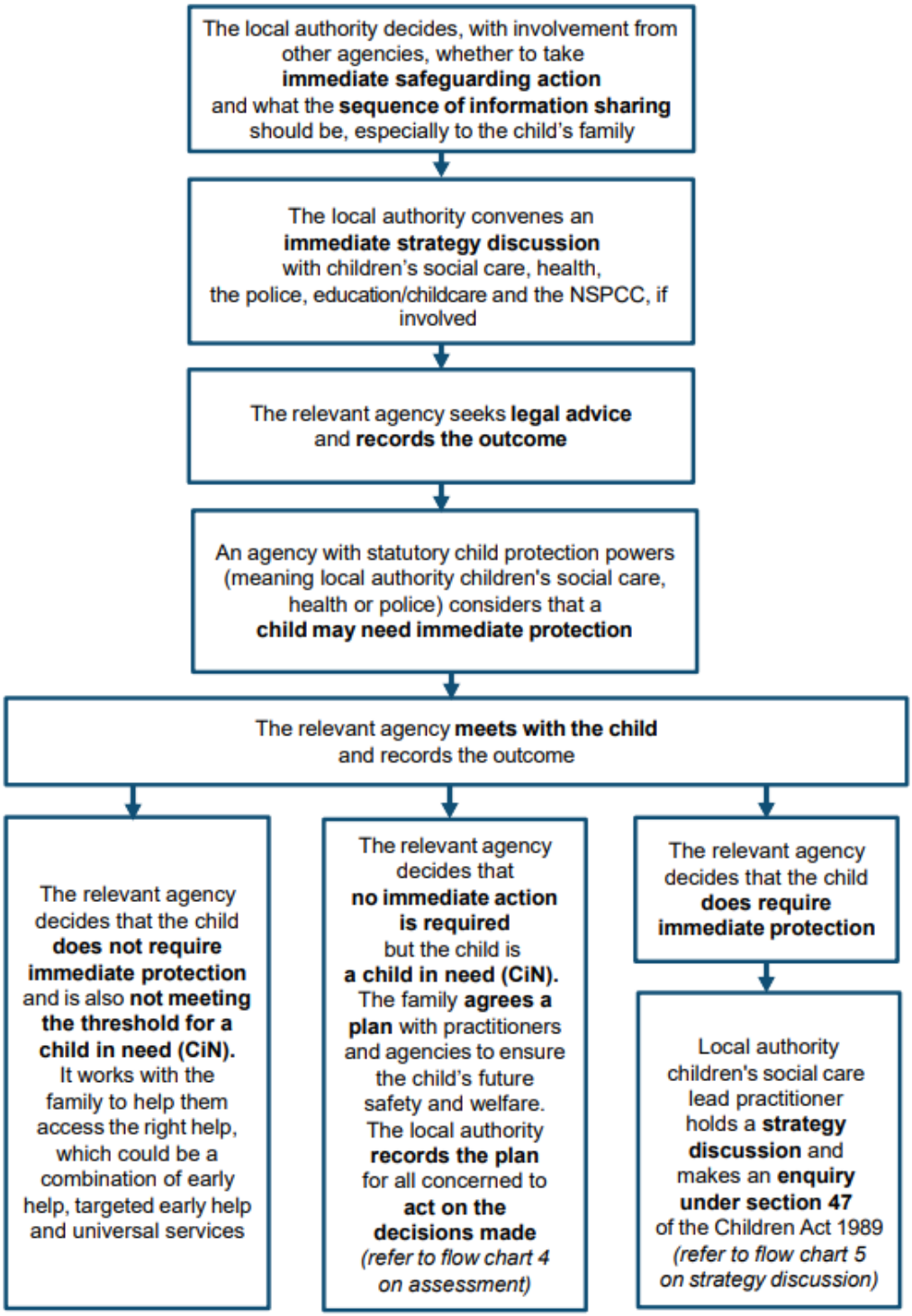
Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

For a child living in Birmingham, contact the Children's Advice and Support Service (CASS) on 0121 303 1888, or the emergency out-of-hours service on 0121 675 4806. Follow the service's advice on written referral and further information. Where another local authority is responsible, use its children's social care referral route. Call 999 where immediate police protection is required. Record the referral, advice and follow-up. The following charts illustrate the statutory assessment and protection processes described in Working Together 2026; the school's staff action flowchart is Figure 1 in section 7.6.

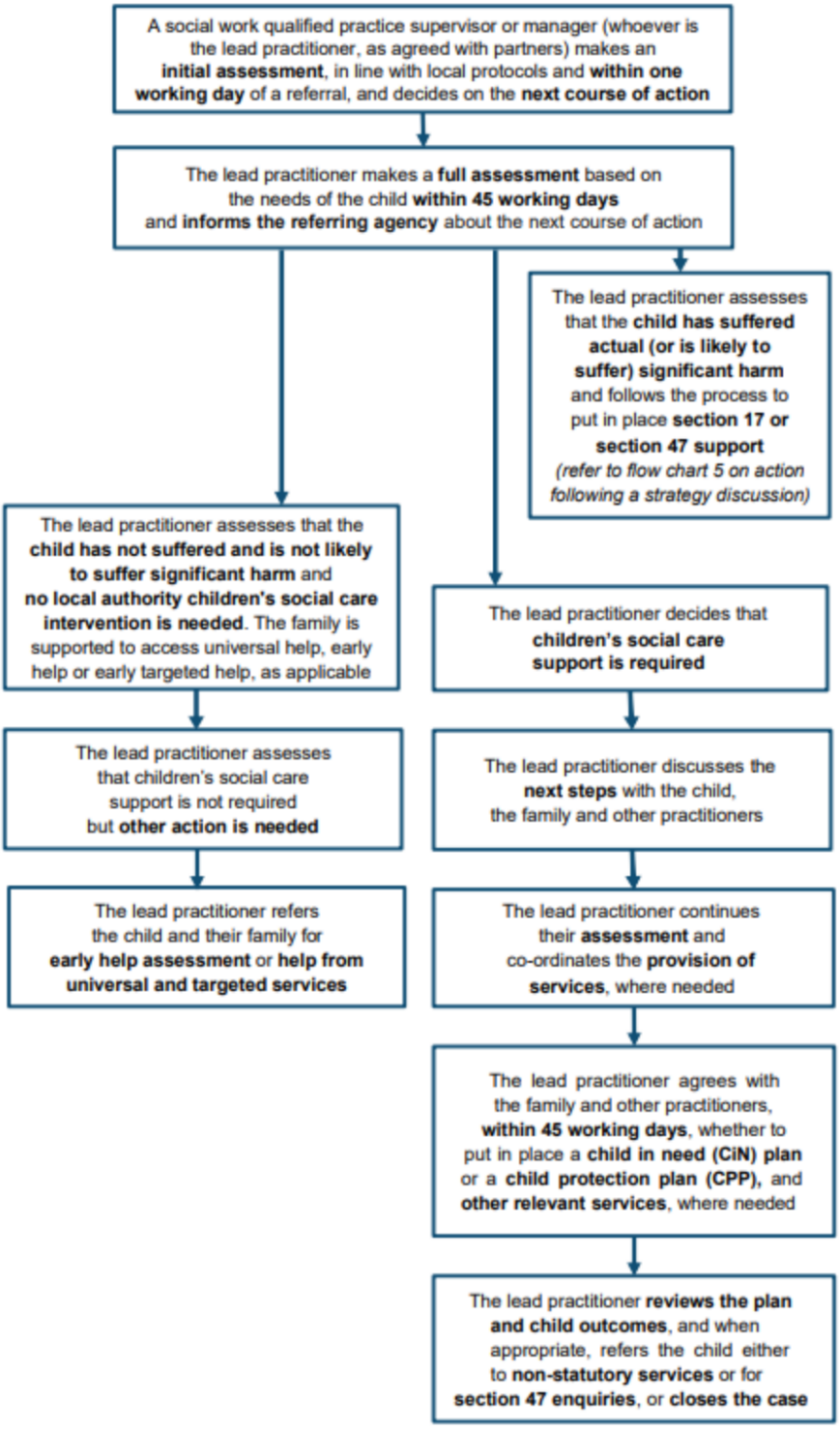
Flow chart 1: Action taken when a child is referred to local authority children's social care



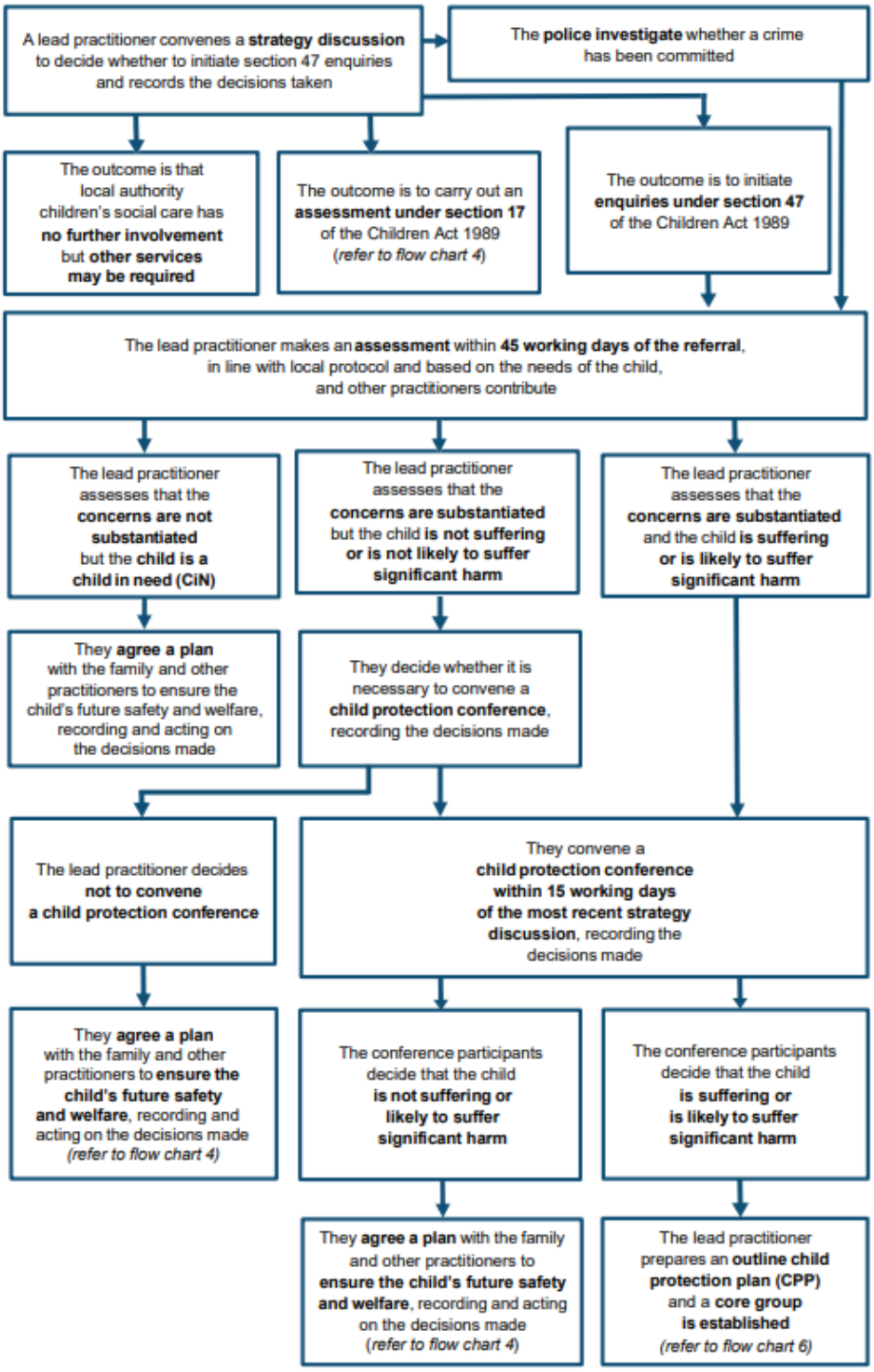
Flow chart 3: Immediate protection



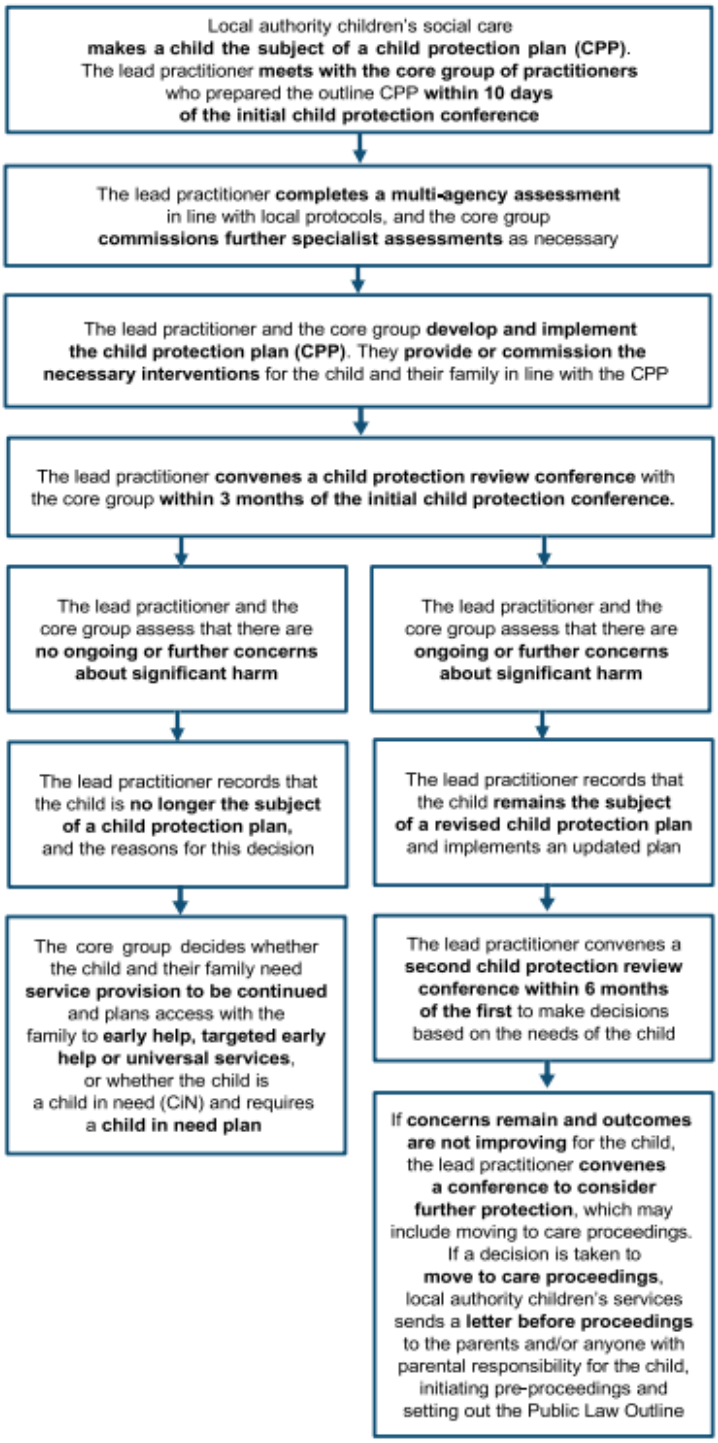
Flow chart 4: Action taken for an assessment of a child under the Children Act 1989



Flow chart 5: Action following a strategy meeting



Flow chart 6: What happens after the child protection conference, including review?



7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the record, including the time of the disclosure, and pass it to the DSL without delay. If necessary, make a referral to children's social care and/or the police directly and tell the DSL as soon as possible. Share information only with those who need it to safeguard the child, in accordance with section 6; do not discuss it informally with colleagues or other families.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

At Heritage Academy, a boy may describe abuse indirectly, joke about it, minimise what happened or disclose through a friend, behaviour or an online concern report. Staff must listen without ridicule or assumptions about masculinity, sexuality, faith or family expectations. Do not require him to repeat his account to several adults or confront the person involved. Explain confidentiality and next steps in language he understands, check immediate safety, and tell him how he can obtain further support or an update.

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education (KCSIE) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

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

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

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

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

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures. Mandatory Reporting does not replace safeguarding children actions; if a professional has concerns that FGM has taken place, they should share this information with the DSL and make a referral to Children's Social Care.

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

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Community-based Early Help and Family Help assessment

If a community-based Early Help or Family Help assessment is appropriate, the DSL will generally lead liaison with other agencies and support the establishment of an inter-agency assessment. Staff may support other professionals and, where agreed under local arrangements and within their capability and capacity, may act as lead practitioner.

The school will apply Birmingham's published local threshold criteria, referral pathways and protocol for assessment. Assessments and plans will be co-produced with the child and family, consider the needs of all family members and relevant extra-familial contexts, identify actions, services, outcomes and review dates, and minimise the need for families to repeat their story.

The DSL will keep the case under constant review, monitor the impact and timescales of interventions and consider referral to local authority children's social care if the child's situation does not improve or gets worse.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. See the flow chart below.

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

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

If the child's situation is not improving, the referral is not accepted despite continuing concerns, or the school disagrees with another agency's response, the DSL or referrer will use Birmingham's professional challenge and escalation procedures. They will record the concern, advice, decisions,

reasons and follow-up actions. A new or escalating risk requires prompt reconsideration and, where necessary, a further referral; professional disagreement must not delay protection of the child.

School contribution to assessments and child protection plans

Following a referral, the DSL will maintain contact with the allocated practitioner, provide a factual chronology and relevant school information, and attend strategy discussions, child-in-need meetings, initial and review child protection conferences and core groups when requested. The school's representative must have sufficient information and authority to agree and carry out school actions. If attendance is impossible, provide a written contribution and agree how decisions and actions will be communicated.

The school's contribution will include the child's wishes and daily experience, attendance, progress, behaviour, SEND or health needs, family and peer contexts, protective factors and evidence of abuse, neglect or exploitation. The DSL will agree named school actions and review dates, brief relevant staff, monitor outcomes and alert the lead practitioner promptly to new harm, absence, failed actions or deterioration. Staff must not assume that another agency is taking protective action.

Where the child is subject to a child protection plan, the school will contribute to the core group and implement agreed tasks. Working Together provides for the first core-group meeting within 10 working days of the initial conference, the first review conference within three months and subsequent reviews at no more than six-month intervals. These are multi-agency milestones: the school must act earlier whenever protection is needed. The local authority retains responsibility for statutory decisions; section 47 enquiries and child protection plans require social-work leadership.

Assessment must lead to timely help and protection. The maximum 45 working days for a statutory assessment is not a waiting period for school action. Follow up missing decisions or drift and use section 7.4 escalation procedures if the response does not meet the child's needs.

A community-based Early Help or Family Help assessment is not a prerequisite for a children's social care referral. The referral should include the school's available information about the child's developmental needs, parental or family capacity, protective relationships and relevant environmental or extra-familial factors. Submit information already available and provide further detail afterwards; do not delay an urgent referral to complete an assessment.

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where a child may be susceptible to becoming a terrorist or supporting terrorism, the DSL will follow the local Prevent referral route to the police. Police assess Prevent referrals and may refer suitable cases to the multi-agency Channel panel. Relevant new information must also be shared with police while a referral is being assessed. Channel support is voluntary and requires consent before it is provided; making a safeguarding or Prevent referral is distinct from agreeing to Channel support. Children's social care referrals and other safeguarding support will run alongside Prevent where needed. The school may be asked to contribute to a Channel panel and will cooperate with agreed support and reviews.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and proprietors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

Call 999 in an emergency or where someone is in immediate danger. For a non-emergency concern about possible terrorist activity, contact police through the local Prevent route or the confidential anti-terrorist hotline on 0800 789 321. Take action promptly if you:

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

7.6 If you have a concern about mental health

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.

Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- Significant changes in behaviour,
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

If a mental health concern is also a safeguarding concern, act immediately under sections 7.1 and 7.4. Where there is immediate danger, serious injury, an overdose or a risk of suicide requiring emergency help, call 999. Keep the pupil safely supervised while help is arranged and do not leave him alone or send him home without a safe handover and agreed plan. Inform the DSL and parents or carers unless doing so would increase risk; seek safeguarding-agency advice where necessary.

If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

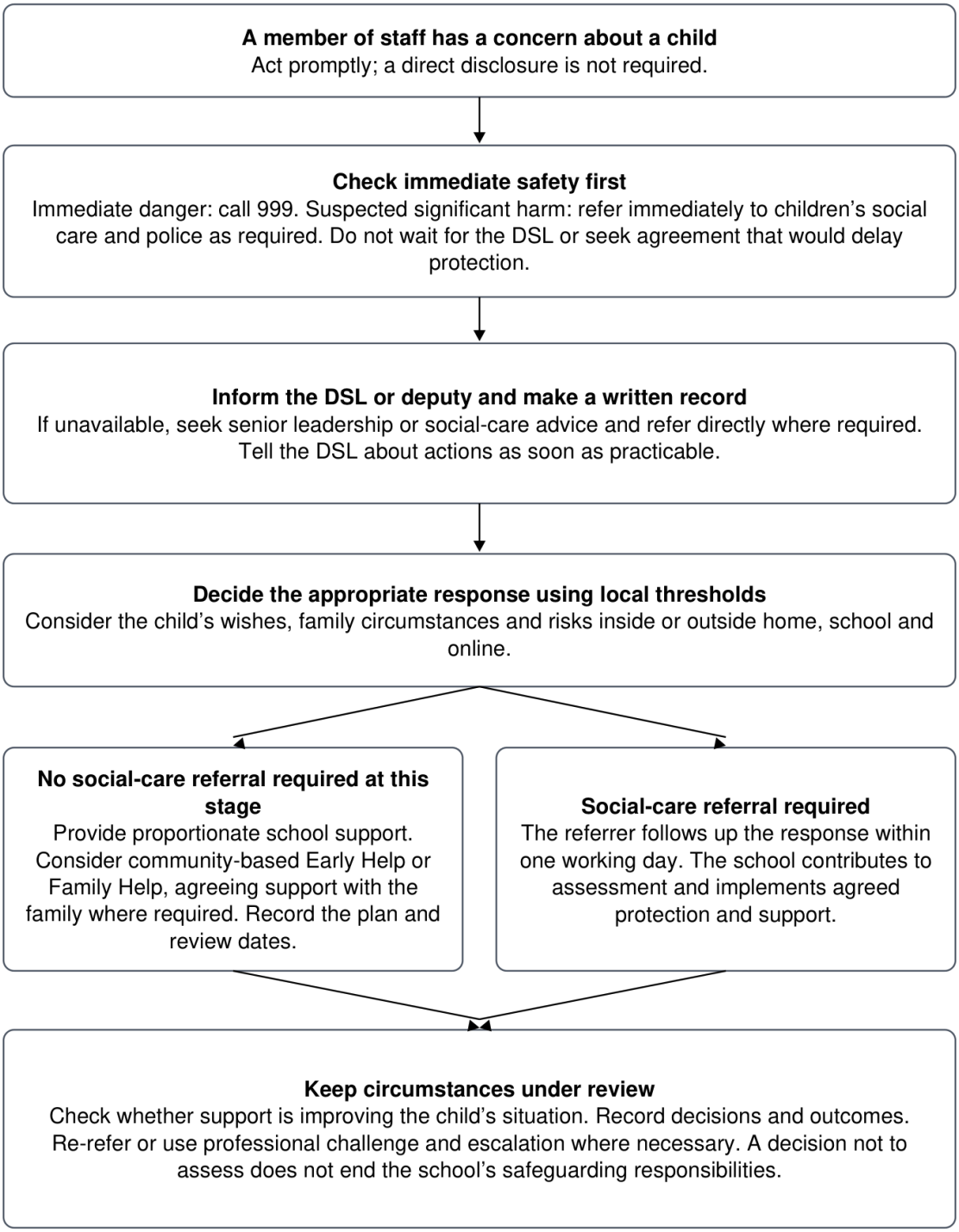
The DSL and Mental Health Lead will agree appropriate pastoral support, specialist referral and follow-up, considering the child’s wishes, attendance, trauma, SEND and any abuse or exploitation concerns. Staff must not use a mental health explanation to overlook a safeguarding risk, or wait for a diagnosis before referring. Where available, advice from the mental health support team or children and young people’s mental health services will inform support.

Where the school becomes aware that a pupil has been admitted to a mental health facility, the DSL will make a referral to local authority children’s social care, as set out in Working Together 2026, and coordinate with the treating service, family and relevant practitioners. Agree educational contact and reintegration support through the Attendance, SEND and medical arrangements, with safeguarding review throughout.

Figure 1: actions when staff have concerns about a child's welfare

Immediate danger or suspected significant harm requires an immediate referral. The flowchart must be read with sections 7.1 and 7.4; staff must not wait for the DSL, parental agreement or a form to be completed before taking urgent protective action.

Figure 1 Actions when staff are concerned



DSL: Shakeel Akhtar | Deputy DSL: Sajjaad Hamid | School: 0121 440 2222
CASS: 0121 303 1888 | Out of hours: 0121 675 4806 | Emergency police: 999

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

Any concern or allegation about a member of staff, supply teacher, trainee teacher, volunteer or contractor that meets, or may meet, the harm threshold must be reported to the headteacher without delay. Where reporting to the headteacher creates a family or other conflict of interest, staff must contact the LADO directly instead.

Low-level concerns should be reported to the Values Champion, who will inform the headteacher promptly where there is no conflict of interest. The headteacher remains the ultimate decision-maker for ordinary low-level concerns. If a concern involves the headteacher, a family member of the headteacher or another conflict of interest, staff or the Values Champion must contact the LADO directly to agree appropriate independent handling. Where the threshold is uncertain, seek LADO advice.

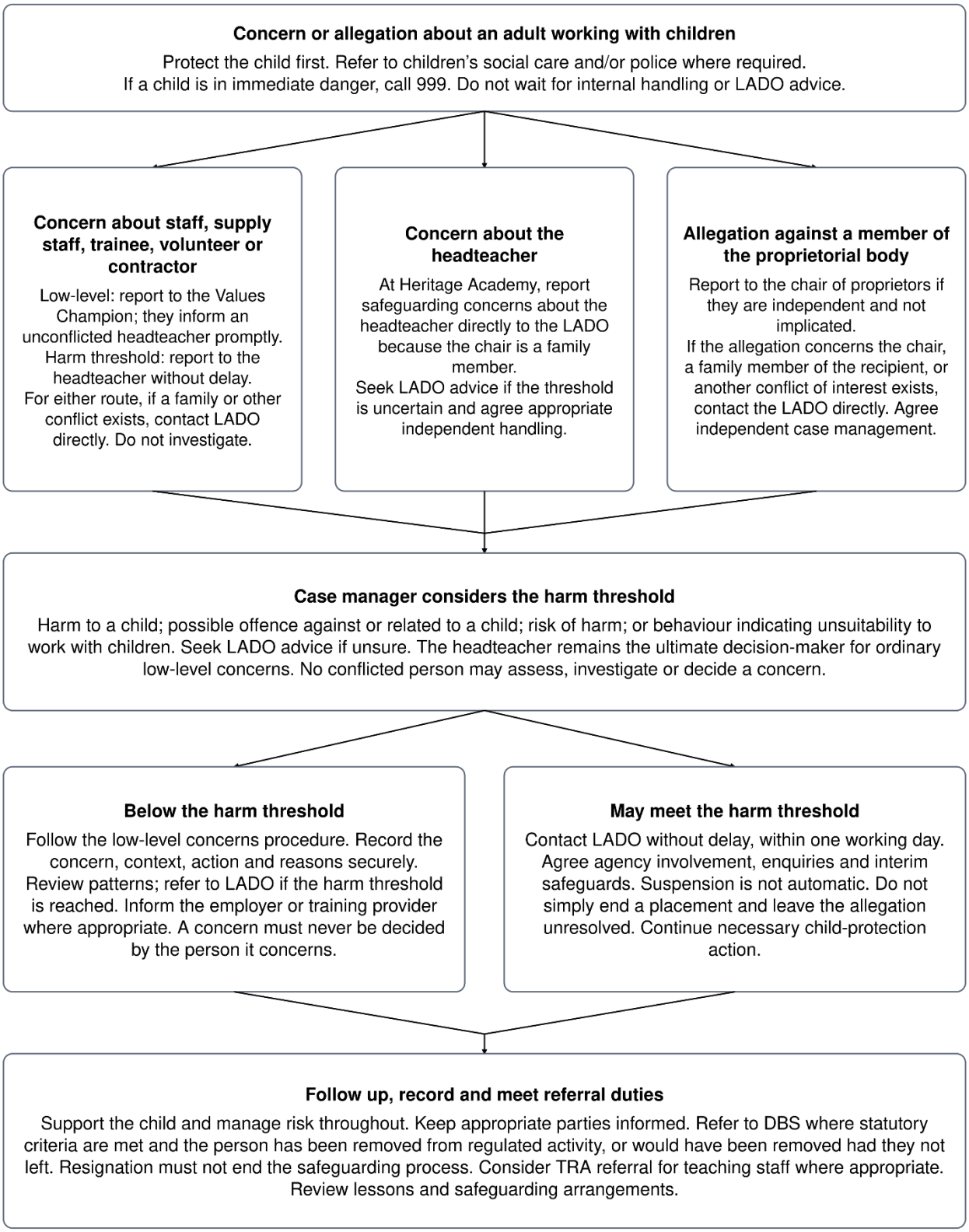
At Heritage Academy, safeguarding concerns or allegations about the headteacher must be reported directly to the LADO because the chair of proprietors is a family member. This includes seeking LADO advice about concerns whose threshold is uncertain and agreeing appropriate independent handling.

Safeguarding concerns or allegations about another member of the proprietorial body must be reported to the chair where the chair is impartial and not implicated. Where the concern involves the chair, a family member of the intended recipient, or another conflict of interest, staff must contact the LADO directly to agree appropriate independent handling.

No conflicted person may assess, investigate or decide a concern. Staff must not investigate concerns themselves. Allegations that meet, or may meet, the harm threshold must be referred to the LADO without delay and within one working day. Internal reporting or LADO consultation must not delay a necessary referral to children’s social care or police. If a child is in immediate danger, call 999.

An allegation concerning an individual or organisation running activities for children on school premises must follow the same safeguarding and allegations procedures, including informing the LADO as appropriate. Staff must not simply redirect the concern to the external provider. See Appendix 3 for the detailed procedures.

Concerns and allegations about adults



Values Champion: husna.choudhury@heritage-academy.co.uk
LADO: 0121 675 1669 | ladoteam@birminghamchildrenstrust.co.uk
Read with Appendix 3 of the Safeguarding and Child Protection Policy.

7.8 Allegations of abuse made against other pupils

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

For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys’ perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously.

Incidents between pupils will be considered for safeguarding concerns as well as any behaviour response. Staff must not assume an incident is only a behaviour matter because it appears minor, no disclosure has been made, or it is described as banter. Report suspected abuse, harassment, violence, coercion or exploitation to the DSL immediately. Indicators requiring a safeguarding response may include behaviour that:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the making or sharing of nudes and semi-nudes, including where generated by AI), which may include or be driven by misogyny/misandry

See appendix 4 for more information about child-on-child abuse.

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

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will assess the concern promptly and decide, using local thresholds and specialist advice where necessary, whether an internal safeguarding and pastoral response, community-based Early Help, Family Help, children’s social care and/or police referral is required. Any report of rape, assault by penetration or sexual assault should be reported to police. A child who has been harmed, is at risk of harm or is in immediate danger requires children’s social care referral. Follow the detailed response below; internal management must not replace a necessary external referral.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, making or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment
- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report
        - A member of staff may overhear a conversation
        - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

The DSL will lead the safeguarding response, risk assessment and support planning. The headteacher or appropriately delegated senior leader will determine any disciplinary response, taking safeguarding advice from the DSL and liaising with the police or local authority children's social care where required.

Disciplinary action can be taken while other investigations are going on, such as by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

Responding to harmful sexual behaviour and sexual violence

The DSL will lead a response to every concern, whether in school, on journeys, elsewhere or online. Assess the wishes and needs of the child reporting harm, the nature of the behaviour, ages and developmental stages, power imbalance, disability, coercion, frequency, any previous concerns, risks to siblings or other children, and possible sexual or criminal exploitation. Where possible, two staff should support the initial report, preferably including the DSL or deputy, while preserving the child's trust and avoiding repeated questioning. An initial account may be incomplete; trauma can affect recall.

For sexual violence, carry out and record an immediate risk and needs assessment; for sexual harassment, decide case by case whether one is needed. Consider the victim, potential other victims, the alleged perpetrator, witnesses, staff and the wider community, and the location and timing of harm. Assess contact in lessons, prayer and worship, breaks, toilets or changing areas, trips, before- and after-school activities, journeys and online. Record safeguards, responsible adults and review dates. Seek professional assessments where needed; the school's assessment does not replace specialist assessment.

Routes for help and referral

Internal response: a one-off incident of inappropriate behaviour or harassment may be managed through safeguarding, pastoral support and the Behaviour Policy where assessment establishes that statutory referral is not needed. Record why this is appropriate and keep the situation under review.

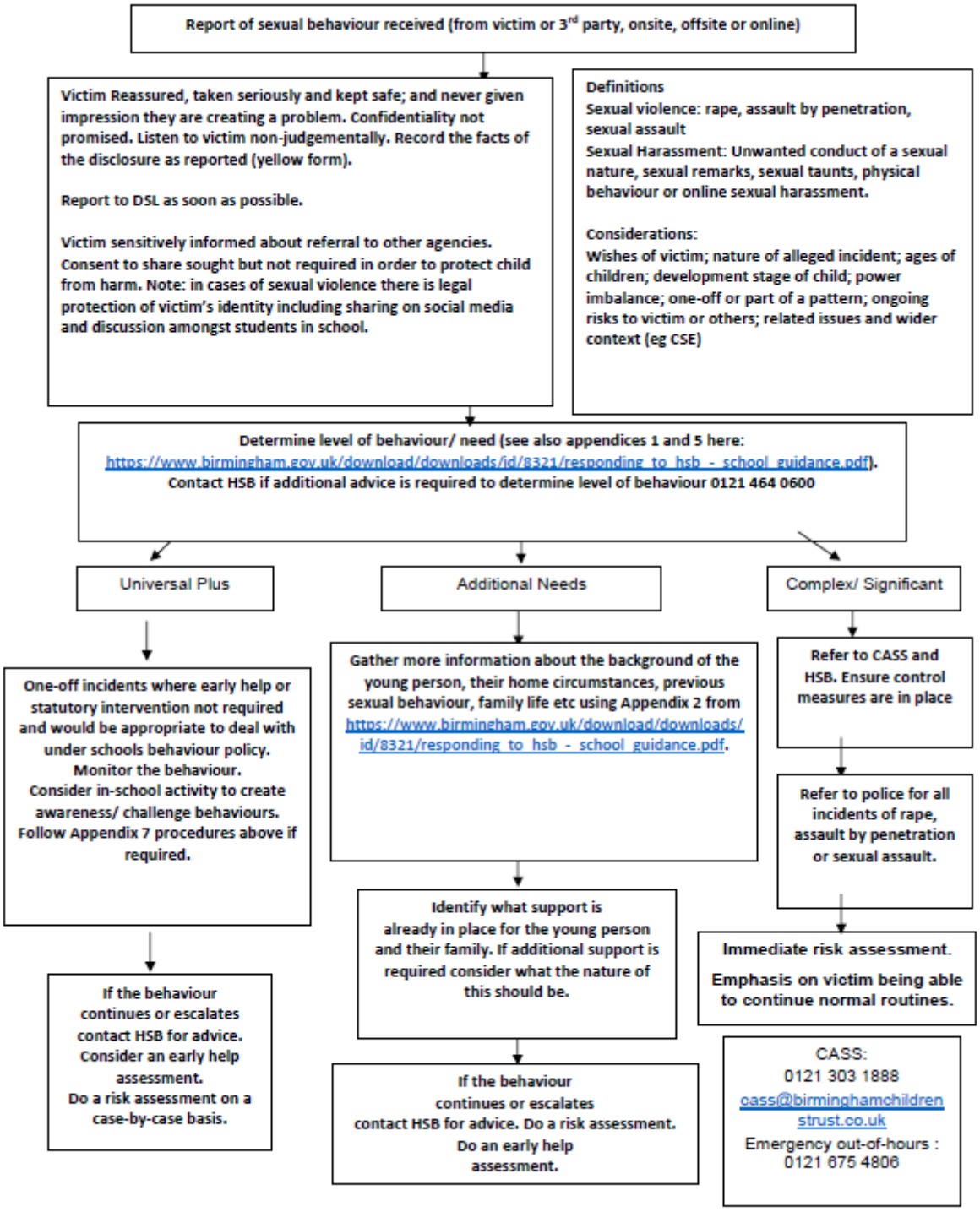
Community-based Early Help: access universal or community support when emerging needs can be met at this level. This may run alongside an internal response for any child involved.

Family Help and children's social care: use local pathways for targeted early help and section 17 support. Refer immediately where a child has been harmed, is at risk of harm or is in immediate danger. Cooperate with statutory assessments, review support if a referral is not accepted and refer again or escalate where concern persists or increases.

Police: reports of rape, assault by penetration or sexual assault should be reported to police, generally alongside children's social care referral. This starting principle applies even where the alleged perpetrator is under 10. For other suspected crimes seek police advice in accordance with the circumstances. Agree with police and social care how and when to inform the alleged

perpetrator and parents, what information may be shared and how evidence will be preserved. Urgent protection must not wait for these discussions.

Read the following chart with section 7.8. All sexual-violence reports require an immediate recorded risk and needs assessment. Reports of rape, assault by penetration or sexual assault should be reported to police, generally alongside children's social care. Take protective action immediately; do not wait for behaviour to continue or escalate, a threshold discussion or an HSB consultation. Use current local referral and specialist-advice routes through the DSL.



Separation and ongoing protection

While establishing the facts of a report of rape or assault by penetration and consulting agencies, remove the alleged perpetrator from shared classes with the victim and consider reasonable separation across the site and journeys. During a criminal investigation into rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from shared classes. For other reports consider proximity and shared activities immediately according to risk. These protective steps do not determine guilt. Liaise with police about bail or release conditions and decide what additional school safeguards are needed, including protection against intimidation, retaliation, rumours and online harassment.

Do not wait for the start or outcome of a police or social-care investigation before protecting children. Review measures throughout any delay and at each change in circumstances. A caution or conviction requires an updated assessment and appropriate action under the Behaviour Policy. Where a criminal investigation into rape or assault by penetration results in a conviction or caution, the school will consider suitable action under the Behaviour Policy. In all but the most exceptional circumstances, allowing the perpetrator to remain in the same school is likely to seriously harm the education or welfare of the victim and potentially other pupils. For sexual assault consider appropriate sanctions, including permanent exclusion; if the pupil remains, continue separation and risk management as required.

Police no further action, a not-guilty verdict, withdrawal of a report or an unsubstantiated allegation does not establish that the child lied. Continue appropriate support and review risk on the available evidence. Where a report is proved deliberately false or malicious, consider a proportionate behaviour response alongside whether the reporting child needs help or has experienced other abuse. Record all decisions and reasons.

Support for each child

Offer the victim a trusted adult of his choice where reasonably possible, regular private welfare checks, a safe place if needed and support to maintain learning and supportive friendships. Changes to his timetable must reflect his needs and wishes rather than the convenience of managing the allegation. Explain referrals and decisions sensitively, especially where they differ from his wishes. Consider physical, sexual and mental health needs and prompt specialist help through an NHS Sexual Assault Referral Centre, children's mental health services, a Children and Young People's Independent Sexual Violence Adviser or other appropriate service. The Male Survivors Partnership can help identify support for boys and men. Safeguarding referrals must not be delayed while support is arranged.

Provide the alleged perpetrator with proportionate educational and safeguarding support, considering unmet needs, SEND, trauma or their own experience of abuse, and specialist harmful-sexual-behaviour assessment where needed. Support and disciplinary action may take place together. Safeguard witnesses, siblings and other affected pupils. Keep separate records and individual support arrangements for each child, protect anonymity and share only what is needed. Continue support for as long as necessary and transfer relevant information if a child moves setting.

Review whether incidents reveal unsafe locations, peer-group dynamics, discriminatory attitudes, harmful online influences or weaknesses in reporting, supervision or teaching. Update safeguarding measures, curriculum and training and share relevant emerging patterns with local safeguarding partners.

7.9 Making or sharing of nudes and semi-nudes

Your responsibilities when responding to an incident

If you become aware of any incident involving the making or sharing of nudes or semi-nudes, including AI-generated imagery, report it to the DSL immediately. A safeguarding response is required whether the incident is consensual or non-consensual.

You must **not**:

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

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

Initial review meeting

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

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

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to their SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the making or sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

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

Exceptional viewing and securing devices

Staff must not investigate imagery themselves. Wherever possible, the DSL will assess the incident using the accounts of those involved without viewing it. Any exceptional viewing decision must follow the current UKCIS guidance, Sharing nudes and semi-nudes: advice for education settings working with children and young people, section 2.10. Viewing must not take place where it would cause significant distress or harm to a child.

The DSL must establish why viewing is necessary, consult another senior leader where available and ensure that only the DSL or an appropriately authorised safeguarding-team member views the imagery. Another member of staff must be present in the room but need not view it. Wherever possible, viewing should take place on school premises and be undertaken by a staff member of the same sex as the child depicted. The justification, authorisation, people present and subsequent actions must be signed, dated and recorded. Imagery must never be copied, printed, forwarded or saved to the safeguarding record.

Where a device must be secured for police, staff will contact police promptly, prevent further access or sharing and secure it in a locked place. Disconnection from Wi-Fi and mobile data and switching off the device will follow UKCIS guidance and any police instructions. Record who secured and handled the device and when it was passed to police. Staff who have inadvertently or necessarily seen distressing imagery will be offered appropriate support.

Removal of imagery and support

The DSL will help the child access IWF/Childline's Report Remove service at https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image-online/ and appropriate platform reporting routes. Where suitable, NCMEC's Take It Down service at https://takeitdown.ncmec.org/ may help prevent or limit further sharing. Staff must not download, copy or forward imagery to use these services. Explain the process sensitively, avoid blaming or alarming the child and support parents or carers where safe to involve them.

Preserve potential evidence where police or children's social care are involved or their involvement is being considered; obtain their advice before deletion. Where the DSL has assessed that other agencies do not need to be involved, they will decide and record an appropriate deletion and removal plan under UKCIS guidance, including confirmation of deletion where appropriate and parental involvement unless unsafe. This is a DSL-led process and does not alter the instruction above that other staff must not delete imagery or ask a pupil to do so.

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialling 101.

Recording incidents

All incidents of making or sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 18 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the making or sharing of nudes and semi-nudes as part of our PSHE RSE and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment. This also includes making such images, including where generated by AI
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
- Specific requests or pressure to make, provide (or forward) such images
- The receipt of such images

This policy on the making or sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

7.10 Reporting systems for our pupils

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

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

All children can speak to the DSL, DDSL or any trusted adult (member of staff) in person at any time. We also have an electronic 'Report a concern' feature on pupil computers. Students are also informed of other means of reporting via posters in classrooms and around the premises such as Childline.

Where reasonably possible, the school will hold more than one emergency contact number for each pupil and check details regularly. Families must notify changes promptly. An inability to reach a parent or carer must not delay protective action, police contact or a children's social care referral.

Staff will regularly remind pupils of these routes through age-appropriate pastoral discussions, PSHE, assemblies and safeguarding teaching. Pupils may choose a trusted adult and ask to speak privately; they do not have to disclose publicly, approach a particular member of staff or first report

to their family. The DSL will use pupil feedback to check that boys, including pupils with SEND, know how to seek help and feel able to do so. No pupil will be blamed for making a genuine report or reporting a concern about an adult with religious or community authority.

7.11 Safeguarding pupils who are not physically attending school

Heritage Academy retains safeguarding oversight of its registered pupils when they are not physically attending school. This includes pupils absent through illness or hospital admission, receiving remote education or alternative provision, suspended from school, or attending on an agreed part-time timetable. An authorised absence or an explanation from a parent does not, by itself, establish that a pupil is safe. These arrangements must be read with our Attendance Policy, SEND Policy, Medical Conditions Policy and Remote Learning Policy, together with the alternative provision procedures in Appendix 2.

The DSL or deputy will assess the pupil's circumstances and known risks and ensure there is a named member of staff responsible for welfare contact. For planned or prolonged absence, the school will agree and record a proportionate contact and support plan with the pupil and parents/carers, unless involving them would increase risk. The plan will specify who contacts the family and pupil, the method and frequency of contact, the agencies involved, review dates and arrangements for return. Contact frequency will reflect safeguarding risk and be increased if circumstances change; welfare checks must not depend solely on completion of schoolwork.

Where appropriate and safe, staff will hear directly from the pupil, provide an opportunity to speak privately and explain how he can report a concern to the DSL or another trusted adult. Communication will be accessible to pupils with SEND, disabilities or medical needs, using appropriate adjustments and specialist advice. Staff will remain alert to boys' reluctance to disclose, family or peer pressure, racism and faith-targeted abuse, harmful online contact, exploitation, radicalisation, deteriorating mental health and unmet care needs.

The named staff member will liaise with parents/carers and, where appropriate, hospital education staff, healthcare professionals, the local authority, social workers and other education providers. Information will be shared lawfully, securely and only as needed to protect the pupil and coordinate support. For alternative provision, the school will agree attendance reporting and immediate notification of safeguarding incidents, monitor the pupil's whereabouts and welfare, and review the placement under Appendix 2. For part-time timetables or suspension, the school will establish who is responsible for the pupil during the time away and consider any additional safeguarding risks.

Staff must report a disclosure, missed agreed welfare contact, unexplained change in circumstances, inability to establish the pupil's welfare or whereabouts, or any other safeguarding concern to the DSL or deputy without delay. The DSL will reassess risk, make further enquiries and arrange safe direct contact or a home visit where appropriate, following school procedures. Staff must not assume that another provider or agency has acted. A home visit or planned review must not delay a necessary referral. Where a pupil is suffering or likely to suffer harm, refer promptly to children's social care and involve police as appropriate; call 999 in an emergency. If neither safeguarding lead can be reached, staff must follow section 7.4 and make any necessary referral themselves.

Record contact attempts, the pupil's views, information received, risk assessments, decisions, actions, referrals and reasons for escalation or non-escalation in the appropriate secure records. The DSL or deputy will review the plan and follow up agency responses, using the escalation arrangements in section 7 where concerns remain. Before return, agree necessary safeguarding, pastoral, SEND, medical and learning support and review it after the pupil resumes attendance. These arrangements supplement the daily absence response in Appendix 4 and do not postpone same-day action on an unexplained absence.

8. Online safety and the use of mobile technology

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

For Heritage Academy pupils, staff will be alert to online content that equates masculinity with domination, promotes misogyny or sexual entitlement, glorifies weapons or criminal lifestyles, targets Muslims or other groups, or encourages extremist violence. Exposure does not by itself establish abuse or radicalisation, but distress, coercion, threatening behaviour or signs of grooming require prompt consideration by the DSL. Teaching will help boys question influencers and algorithms, recognise manipulation and report harmful contact, including AI-generated impersonation and sexual imagery.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and proprietors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community, including the expectation that our school is a mobile phone-free environment by default
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated using AI and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

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

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyberbullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year

- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regard to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and proprietors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Ensure staff understand the school's lawful search and confiscation arrangements, including the safeguards and limitations that apply to searching devices. Staff must not search for, view, copy or forward suspected child sexual abuse imagery; the procedures in sections 7.9 and 8.1 take priority
- Maintain filtering and monitoring arrangements which address the four categories of online risk and the use of generative AI. The Online Safety Policy sets out operational responsibilities, reporting routes and responses to alerts; governance and review arrangements are in section 5.3

Staff must report suspected filtering failures, inappropriate access, monitoring alerts and attempts to bypass controls promptly to the DSL and the responsible IT lead. Safeguarding assessment takes priority over a purely technical or disciplinary response. Filtering must block harmful material without unreasonably restricting safeguarding teaching. Monitoring arrangements must provide a clear route for timely review and action, including when the DSL is absent.

- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

Heritage Academy operates as a mobile phone-free environment. Mobile phones and similar devices are prohibited throughout the school day, including during lessons, break times and lunchtimes. Pupils are not permitted to bring mobile phones onto the school premises. This policy supports our safeguarding responsibilities by reducing risks associated with online content, cyberbullying, and inappropriate image sharing. Exceptions may be made for pupils with disabilities where a mobile phone is necessary due to the nature of their disability (as a reasonable adjustment), or for pupils with medical conditions where a phone helps them manage their condition (for example, monitoring blood sugar levels). Any such exceptions must be agreed in advance with the headteacher. Parents/carers requiring urgent contact with their child during the school day should contact the school office.

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Heritage Academy recognises that AI can enhance teaching, learning and safeguarding. It can also facilitate abuse, including bullying and grooming, or expose pupils to harmful content. This includes deepfakes: images, audio or videos manipulated or generated to appear real.

Heritage Academy will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying and behaviour policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements

for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education (KCSIE).

AI can be misused to create child sexual abuse material (CSAM), including manipulated images of a child. Staff do not need to establish how suspected CSAM was created before acting.

AI-generated CSAM requires the same urgent safeguarding response as other child sexual abuse material:

1. Report the concern immediately to the DSL or deputy.
2. Follow the child protection and safeguarding policies and procedures.
3. Do not view, copy, print, share, download, store or save suspected CSAM, including for reporting purposes. Any exceptional decision about viewing imagery must be made by the DSL in accordance with current safeguarding guidance and police advice, as appropriate; staff must not investigate the imagery themselves
4. Encourage the young person not to delete anything that could be used as evidence, such as messages, images, videos, usernames and URL links.
5. Report to the police. Call 101, or 999 if you believe the child or young person is in immediate danger.
6. Report it to the site, app or network hosting it.
7. Consider wellbeing support. As with any form of CSA, victims may need support to manage the emotional and psychological impact.

For remote learning, use authorised school accounts and platforms, maintain professional boundaries and assess the safety of live sessions, messaging and any one-to-one contact. Pupils and parents will be told what activities and sites are required, who will communicate with the pupil, and how to report a concern. Absence from remote contact or a disclosure online must follow the same safeguarding procedures as face-to-face learning. Staff must not upload identifiable safeguarding records or sensitive pupil information to unapproved AI or other online services.

9. Notifying and working with parents or carers

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

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, for example, moving them out of classes with the victim, and the reason(s) behind any decision(s)

Where safe and appropriate, we will work openly with parents, carers and wider family networks to support a child's welfare. The DSL or deputy will consider whether to inform parents or carers when additional pastoral or wellbeing support is provided, following the safeguards above.

The school will seek to understand the child's family circumstances, identity, culture, faith, lived experiences and any barriers that may affect access to support or services. Staff will remain professionally curious and alert to situations where children may be experiencing abuse, neglect, exploitation or other forms of harm, including circumstances where a parent, carer or other adult may not be acting in the child's best interests.

Staff will explain concerns, meetings, expectations and decisions clearly and respectfully, adapting communication and using professional interpreters where needed. We will work with protective parents, carers and safe family networks to identify strengths and practical help, including where harm occurs outside the home. Parents must not be blamed for exploitation by others. Cooperation with families must never displace the child's wishes, welfare or a necessary protective referral.

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges both online and offline. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers, difficulties reporting concerns and a risk that the child does not recognise what is happening as abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

We provide additional pastoral and communication support for these pupils.

This includes regular welfare checks and mentoring from staff who build positive relationships with pupils. Staff will allow extra processing time and work with external specialists, such as speech and language therapists, to implement evidence-based strategies. Where safe, we will work closely with parents and carers to maintain a consistent approach between home and school.

Any abuse involving pupils with SEND requires close liaison between the DSL or deputy and the SENCO to agree appropriate pastoral and communication support.

The DSL and SENCO will consider whether a pupil needs support to recognise unsafe requests, sexual harassment, coercion or exploitation, including online. Support will be adapted to his understanding without lowering safeguarding expectations. Where involving parents may increase risk, staff will follow sections 6 and 9. Communication assistance must not rely on a person implicated in the concern; staff will record the pupil's own words or means of communication and distinguish these from an adult's interpretation.

11. Pupils with medical conditions

An incident in the management of a child's medical condition, including an allergy, does not automatically require a safeguarding referral. Staff must assess the circumstances and report any concern about neglect, abuse, exploitation or unsafe adult practice to the DSL or, where the concern is about a member of staff, follow section 7.7

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

Support for pupils with medical conditions or allergies, including individual healthcare plans, access to emergency medication and emergency responses, is set out in the school's Medical Conditions arrangements and First Aid Policy. Staff must follow these alongside this policy and report any related safeguarding concerns without delay.

12. Young carers

Caring responsibilities can affect a child's attendance, attainment, behaviour, health and wellbeing. Staff will report indications that a pupil is a young carer to the DSL, who will listen to the pupil, consider their needs and liaise with the family where safe and appropriate. The school will support access to a local authority young carer's needs assessment and suitable services, and agree proportionate pastoral and educational support. Caring responsibilities must not prevent a pupil receiving a suitable education or being kept safe.

13. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

14. Looked-after and previously looked-after children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- Appropriate staff understand the levels of authority delegated to the child's carer by the local authority, including who may make relevant decisions and give consent.
- The DSL has details of children's social workers and relevant virtual school heads

The designated teacher for children in care, currently also the DSL, will take the lead on promoting the educational achievement of looked-after and previously looked-after children and will have appropriate training for that responsibility.

As part of their role, they will:

- Work closely with the children's services to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

15. Pupils who are lesbian, gay or bisexual

The school recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. See our behaviour policy for more detail on how we prevent bullying based on sexuality.

Any concerns should be reported to the DSL.

16. Pupils who are questioning their gender

16.1 Supporting pupils who are questioning their gender

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour policy for more detail. The school will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.

When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach. We recognise that pupils may be targeted with homophobic, biphobic or transphobic bullying regardless of their actual or perceived sexual orientation or gender identity. All incidents are taken seriously and recorded as a safeguarding concern in line with KCSIE guidance on child-on-child abuse. Victims receive immediate pastoral support through regular welfare checks and mentoring from a designated member of staff, who will work with the pupil to ensure they feel safe and supported. We maintain close communication with parents/carers (unless doing so would put the pupil at greater risk), involve our DSL where appropriate, and monitor the situation closely to ensure the bullying stops and the pupil's wellbeing improves. Where incidents constitute a child protection concern or criminal offence, we report them to the relevant agencies without delay.

The DSL will lead in these cases.

16.2 Involving parents/carers in cases of pupils questioning their gender

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

16.3 Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex (“social transition”), we will work together with parents/carers to determine what is in the best interests of the child and other children.

Staff will not make changes relating to social transition independently. Any request will be considered through the school’s documented decision-making process, led by the DSL and

involving parents or carers as a priority, except where doing so would create a greater safeguarding risk as described in section 16.2.

When considering a request, the school will consider relevant clinical evidence or advice and seek additional professional advice where appropriate, including from the SENCO. The assessment will consider the child's wider circumstances, health needs and neurodiversity, alongside their wishes and the impact on other children. Support will remain flexible and subject to review as the child's needs or circumstances change.

In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children. The school will make decisions in line with the following principles:

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition
- When considering a request, the school will identify the legitimate aim of the relevant rule or policy, consider whether the approach is proportionate, consider whether the same aim could be achieved in another way, and balance the impact on the pupil against the impact on other pupils. The child and family will be sensitively informed of the constraints that apply.

The school will ensure that the decision-making process is documented and records are kept.

The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

16.4 Rules on single-sex spaces

Pupils are not allowed into toilets, changing rooms or showers designated for the opposite biological sex, with no exceptions. Where a pupil does not wish to use facilities designated for their biological sex, the school will consider whether it can provide an alternative self-contained toilet, changing or washing facility intended for use by one person at a time and capable of being secured from the inside, or access to facilities at an alternative time. Arrangements must not compromise the safety, privacy, comfort or dignity of that pupil or other pupils. The decision, its reasons and agreed arrangements will be recorded, communicated to relevant staff on a need-to-know basis and regularly reviewed.

16.5 Rules on single-sex sports

Heritage Academy is a boys' school. When organising PE, sport or inter-school activities, the school will consider safety and fairness, including the Equality Act 2010 exception for competitive activities where differences in average strength, stamina or physique would place one sex at a disadvantage. Single-sex participation arrangements will be based on biological sex where the exception applies or separation is necessary for safety.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and pupils must not be allowed to participate in sports designed for the opposite sex.

16.6 Residential visits and overnight accommodation

The school will not allow a pupil to share overnight accommodation, including a tent or shared room, with a pupil of the opposite biological sex. In allocating accommodation, the school will have regard to safeguarding, equality, privacy and dignity. Where a pupil does not wish to share with pupils of the same sex, suitable separate accommodation will be considered where reasonably possible, without compromising the safety, privacy, comfort or dignity of any pupil.

16.7 Accurate information and ongoing support

The school will record a child's biological sex accurately wherever it is recorded and ensure relevant staff are aware of it for safeguarding purposes. Information will be held securely and shared only with those who need it to safeguard the child or fulfil their responsibilities; this does not justify unnecessary disclosure to other pupils or families.

Where a child has socially transitioned from an early age and others may be unaware of their biological sex (described in KCSIE as "living in stealth"), the DSL must be involved in assessing vulnerabilities and planning support, including concerns around puberty. Previous decisions, including those made before the current guidance, will be reviewed where appropriate using the principles in section 16.3 and involving parents or carers subject to the safeguarding exception in section 16.2.

Where a child wishes to reverse all or part of an earlier social transition, the school will respond sensitively, maintain flexibility and work closely with parents or carers and relevant experts to provide appropriate support. The child's wishes, welfare, support arrangements and reasons for decisions will be recorded and kept under review. Any risk associated with parental involvement must be managed under section 16.2.

17. Complaints and concerns about school safeguarding policies

17.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

Complaints about the handling, sharing or disclosure of safeguarding information will be considered under the school's data protection complaints procedure, which identifies the person responsible for receiving complaints and the applicable response timescales. This process must not delay any safeguarding action or necessary referral.

17.2 Other complaints

Immediate safeguarding concerns and allegations about adults must be acted on through the procedures in this policy, including external referral where required; they must not await the

outcome of a complaint. Parents and carers should contact the DSL about concerns for a pupil, and contact the LADO directly where the safeguarding concern is about the DSL/headteacher, in accordance with section 7.7. Where an allegation concerns an adult working or volunteering with children and there is a conflict of interest in internal reporting, contact the LADO directly. Concerns about a child must also be referred to children's social care and/or police where required. Complaints about the school's safeguarding arrangements or its handling of a concern may also be considered through the Complaints Policy, subject to any restrictions needed to protect a child or avoid prejudicing an external investigation. The school will keep the complainant informed where lawful, appropriate and safe.

For complaints about safeguarding practices or premises safety that relate to the school not meeting DfE standards in pupil welfare, health and safety, or school premises, complainants can refer their complaint to the DfE if they are unsatisfied with the outcome of the school's internal processes. The DfE will consider reports of a major failure to meet the standards and, where appropriate, can arrange an emergency inspection to look at pupil welfare and health and safety. All safeguarding-related complaints will be recorded securely and confidentially, and reviewed by the proprietor board and headteacher to identify any improvements needed to our safeguarding procedures or practices.

17.3 Whistleblowing

Staff must raise concerns about unsafe safeguarding practice and must not allow professional loyalty or fear of repercussions to prevent action. Follow the Whistleblowing Policy. Where a concern cannot safely be raised internally or the response is inadequate, staff may seek advice from the NSPCC whistleblowing helpline on 0800 028 0285 or help@nspcc.org.uk. This does not replace immediate referral to children's social care or police where a child is at risk, or direct contact with the LADO about allegations concerning adults working with children.

18. Record-keeping

All safeguarding concerns, discussions, decisions made and the rationale for those decisions must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records should distinguish clearly between fact, direct observation, the child's own words, professional opinion and information received from another person. Where a decision differs from the child's expressed wishes, the reasons must be recorded and, where appropriate, explained to the child.

Safeguarding records are maintained in paper and electronic formats, with access restricted to authorised staff according to safeguarding need. Electronic records must be protected through appropriate access controls, secure storage and backup arrangements; paper files must be stored securely. The DSL will maintain a clear chronology and ensure that information held across both formats is linked and complete so relevant concerns and actions are not overlooked.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Recording tools are provided in appendix 5; staff must follow section 7 for immediate reporting and must not delay action while completing a form.

Concerns and referrals will be kept in a separate child protection file for each child and should only be accessed by those who need to see it.

Safeguarding records will be retained and securely destroyed in accordance with the school's approved records-retention schedule and Data Protection Policy. Destruction must be authorised and recorded.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

The DSL will include a clear, structured summary of current concerns, relevant history and ongoing support needs, obtain written confirmation of receipt and retain a record of the transfer. Historic information will be contextualised without omitting information relevant to current risk. The receiving DSL and relevant staff should be able to act on the information when the pupil arrives.
On admission or an in-year transfer, the DSL or trained deputy will actively obtain and review the child protection file and summary, confirm receipt, seek clarification from the previous DSL where needed and ensure identified risks and support needs are acted on promptly. Relevant teachers, the SENCO and pastoral staff will be briefed on a need-to-know basis. A risk to the pupil or others, including past weapon-related concerns, requires an appropriate safety and support plan when the child arrives. Lack of a transferred file must not delay action on known concerns.

Where a pupil leaves for elective home education or no receiving school is identified, the DSL will retain the safeguarding file securely in accordance with the retention schedule, notify the local authority as required and share relevant safeguarding information with children's social care and other appropriate services. Records must not be destroyed simply because the child is no longer on roll.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

19. Training

19.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

At induction, all staff will be provided with Part One of KCSIE 2026, this policy, the Behaviour Policy, the Staff Code of Conduct and the school's safeguarding response to children who are absent from education, together with the role and identity of the DSL and deputy.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

The school will provide staff with regular opportunities to contribute to and shape safeguarding arrangements and this policy, drawing on the expertise they develop through training and day-to-day safeguarding work. Feedback and lessons from cases, complaints, audits and local or national reviews will inform policy and training updates.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive safeguarding induction and information appropriate to their role, including how to recognise and report concerns and the expected standards of behaviour. Their understanding and any further training needs will be reviewed.

19.2 The DSL and deputy

The DSL and deputy will undertake child protection and safeguarding refresher training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

DSL and deputy training will cover local Family Help and statutory assessment pathways, child protection conferences and reviews, information sharing and secure records, trauma and educational outcomes, harmful sexual behaviour, SEND and medical needs, online risks and filtering and monitoring, Prevent and how to support staff through referrals. Deputies must be trained to the same standard as the DSL.

19.3 Proprietors

All proprietors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

The chair of proprietors receives training in managing allegations for any case-management responsibilities that may properly fall to them. Where a family relationship or another conflict exists, the direct LADO and independent-handling arrangements in section 7.7 and Appendix 3 apply.

19.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

19.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervision, which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

20. Monitoring arrangements

This policy will be reviewed at least annually by Shakeel Akhtar and sooner where legislation, statutory guidance, local arrangements, emerging safeguarding risks, complaints, incidents, audits or learning reviews indicate that an amendment is required. At every review, it will be approved by the proprietors.

The DSL will provide the proprietors with a written safeguarding report at least annually. It will summarise training and checks of staff understanding, safeguarding themes and responses, attendance-related risks, online safety and filtering and monitoring, audits, complaints and progress with improvement actions. Reporting will protect confidentiality and provide the information needed for effective scrutiny without unnecessary personal detail.
The proprietor safeguarding lead will undertake and record safeguarding monitoring activity during the year, including visits or discussions with staff and pupils as appropriate. Findings will be considered by the proprietors. Identified weaknesses must be addressed without delay; an action record will identify the person responsible, the deadline and evidence that the action has been completed and its effectiveness checked. Conflicts of interest will be managed in accordance with sections 5.2, 5.3 and appendix 3.
The proprietors and DSL will review the effectiveness of responses to boys' barriers to disclosure, SEND, racist and faith-targeted incidents, harmful online influences, exploitation and Prevent concerns. They will consider pupil feedback, recurring locations or peer-group issues, outcomes of support and referrals, staff training and actions from audits. Reviews must protect confidentiality and test whether pupils experience help as accessible and effective, rather than relying only on low incident numbers.

Where a child dies or is seriously harmed and abuse or neglect is known or suspected, the DSL or headteacher will inform the local safeguarding partners promptly through local procedures, preserve relevant records and cooperate with requests for chronologies, information and review participation. The local authority makes the statutory serious-incident notification; the school must not assume another agency has notified the partnership. The school will also cooperate with child death review arrangements where it has relevant involvement, support pupils and staff, and implement and monitor resulting learning.

21. Links with other policies

This policy links to the following policies and procedures:

- Behaviour, Rewards & Sanctions Policy
- Anti-bullying Policy
- Staff Code of Conduct Policy
- Staff Discipline Policy
- Staff Grievance Policy
- Complaints Policy
- Health and safety Policy
- Attendance and Punctuality Policy
- SEND Policy
- Supporting Pupils with Medical Conditions Policy
- Remote Learning Policy
- Data Protection Policy and data protection complaints procedure
- Care, Control, Restraint and Searching Policy
- Online safety Policy
- Equality Policy
- Relationships and sex education Policy
- First aid Policy
- Curriculum Policy
- Privacy notices
- IT acceptable use
- Whistleblowing Policy

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education (KCSIE) 2026.

Appendix 1: types of abuse

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as

overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Verbal abuse such as criticism, belittling, or name-calling

Sexual abuse involves forcing, causing or inciting a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse

Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

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

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

Once a child is born, neglect may involve a parent or carer failing to:

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

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

Appendix 2: safer recruitment and DBS checks – policy and procedures

Safer recruitment policy

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

The headteacher oversees implementation of safer recruitment procedures. Appropriately trained staff may complete checks, but the recruitment record must identify who undertook and verified each check. Before the individual starts, the headteacher will confirm that all applicable checks and suitability enquiries have been satisfactorily completed, or that a legally permitted exceptional start has been authorised and documented.

Where the appointment concerns the headteacher, or the headteacher has a family or other conflict of interest, an appropriately authorised, unconflicted member of the proprietorial body will oversee the process and final authorisation, obtaining independent support where necessary. A conflicted person must not make the suitability decision. The final decision, reasons, authorising person and date will be recorded.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

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

Application forms

Applicants must complete the school's application form. A curriculum vitae may accompany the form but will not be accepted on its own. The application form will require:

- Personal details, including current and former names, current address and National Insurance number.
- Details of present or most recent employment and the reason for leaving.
- A full history since leaving school, including education, employment and voluntary work, with explanations for all gaps.
- Relevant qualifications, including awarding bodies and dates of award.
- Details of referees.
- A statement explaining the applicant's relevant personal qualities, experience and suitability against the person specification.

Where the role involves regulated activity with children, the application information will state that it is an offence for a barred person to apply. Applicants will receive a copy of, or link to, the school's Safeguarding and Child Protection Policy and policy on recruiting ex-offenders.

Shortlisting

At least two people will carry out shortlisting against the published person specification. Wherever practicable, the same people will conduct the interviews. They will identify inconsistencies, examine employment history and explanations for gaps, and ensure that potential safeguarding concerns are explored. Shortlisting assessments and decisions will be recorded.

Once we have shortlisted candidates, candidates should:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we may ask for includes:
    - If they have a criminal history
    - Whether they are included on the barred list
    - Whether they are prohibited from teaching
    - Whether they are prohibited from taking part in the management of an independent school (section 128), where relevant to the role
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
    - Any relevant overseas information
    - Any relevant information about being known to the police or local authority children's social care that may affect suitability to work with children
    - Whether they are disqualified from providing childcare, where the role involves provision to which the Childcare Disqualification Regulations apply. These are not routine checks for Heritage Academy's provision for pupils aged 11–16.
- Sign a declaration confirming the information they have provided is true. Where an electronic signature is used, the shortlisted candidate will physically sign a hard copy of the application at interview.

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

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

When seeking references we will:

- Not accept open references (for example, "To whom it may concern")
- Not rely on applicants to obtain their reference
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children. If the applicant has never worked with children, then ensure a reference is from their current employer
- Ensure electronic references originate from a legitimate source

- Contact referees to clarify where information is vague or insufficient information is provided
- Establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

The interview panel will agree structured questions and use selection activities appropriate to the role. These will explore the applicant's motivation for working with children, relevant skills and experience, understanding of professional boundaries and ability to recognise and respond to safeguarding concerns. Interviewers will probe employment gaps, frequent changes of employment or location, discrepancies and other concerns identified through the application, references, online searches or self-declaration. Relevant past disciplinary action and substantiated allegations will be considered in the circumstances of the individual case.

Pupils will be involved meaningfully where appropriate to the appointment, through activities such as an observed lesson or an appropriately supervised discussion. Candidates must not be left unsupervised with pupils.

A recruitment decision record will document the evidence considered, interview and selection assessments, concerns and discrepancies, enquiries undertaken, explanations received and the reasons for the final decision. Relevant information will be assessed together; a clear DBS certificate alone does not establish suitability. Records will identify the decision-makers and date and will be stored securely.

Pre-appointment vetting checks

The school will maintain a single central record (SCR) covering all staff, including trainee teachers on salaried routes, agency and third-party supply staff, and all members of the proprietorial body. For fee-funded trainees, written assurance from their training provider will be retained securely.

The SCR will identify the applicable checks, whether they have been completed or certificates obtained, the relevant dates and the person responsible for checking. These include identity, enhanced DBS and eligible children's barred-list checks, teaching prohibition, section 128 restrictions for management roles, required qualifications, right to work and appropriate overseas checks.

For agency and third-party supply staff, it will record receipt of the agency's written confirmation, the date received and the required DBS certificate information and dates, including whether the school received a certificate copy. Supporting evidence will be retained securely in the relevant personnel or recruitment records.

The SCR must include agency and third-party staff even where they work for only one day. When an individual no longer works at the school their entry will be removed from the current SCR, while underlying recruitment and personnel evidence will be retained under the appropriate retention schedule. Identity, right-to-work and required qualification evidence will be kept securely in the personnel file.

New staff

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

- Verify their identity

- Obtain the appropriate enhanced DBS certificate, subject to any lawful previous-employment exception described below. Include children's barred-list information where the role involves regulated activity; barred-list information must not be requested where the individual is not eligible. The original paper certificate must be examined, including when using the DBS Update Service. Exceptionally, where a start before the certificate is available is legally permitted, all other required checks, including references and a separate children's barred-list check, must be satisfactorily completed. Before starting, there must be a recorded risk assessment, written authorisation, a named supervisor, appropriate supervision arrangements and a review date. The certificate must be obtained and assessed as soon as practicable. These arrangements do not permit an unchecked agency worker to begin work.
- Obtain a separate barred list check:
    - For newly appointed staff or volunteers if they will start work in regulated activity before the DBS certificate is available
    - Where an individual's previous school or college post involving regular contact with children ended no more than three months before appointment, and the circumstances permit the school to rely on that exception, all other relevant checks must still be completed and a separate children's barred-list check obtained where the role involves regulated activity. Eligibility must be confirmed; barred-list information must not be requested for a role outside regulated activity. Before relying on the previous-employment exception, the school will verify and record that the conditions in KCSIE paragraphs 314 and 316 are met, including the qualifying employment in England. Previous employment involving children does not, by itself, establish eligibility.
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Before appointing anyone to undertake teaching work, as defined by the Teachers' Disciplinary (England) Regulations 2012, check through the DfE's Check a teacher's record service that they are not subject to a prohibition order, interim prohibition order or relevant continuing GTCE sanction or restriction. This applies according to the work undertaken, including teaching by individuals without QTS, rather than the job title alone.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:

- For all staff, including teaching positions: criminal records checks for overseas applicants
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

Where an overseas criminal record or regulatory check is unavailable, seek alternative evidence and complete a documented suitability risk assessment before deciding whether to appoint. An overseas teaching qualification alone does not provide safeguarding assurance.

- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

Management roles requiring a section 128 check include proprietor-body members and staff who take part in management, including the headteacher, deputy/assistant headteachers and relevant heads of department. Eligibility will be assessed for the actual role, rather than the job title alone.

Regulated activity is defined by Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, as amended. In applying that definition, the school will consider the actual duties, frequency and opportunity for contact with children. It includes:

Teaching, training, instructing, caring for or supervising children; advice or guidance on their physical, emotional or educational wellbeing; and driving a vehicle only for children, whether undertaken by paid staff or volunteers

Other paid work in a specified establishment such as a school, where there is an opportunity for contact with children, subject to the statutory exceptions for occasional and temporary work

The relevant activities are regulated where the statutory frequency or period conditions are met, including work on more than 3 days in a 30-day period. For the relevant activities other than driving, work between 2am and 6am which provides an opportunity for face-to-face contact with children also meets the period condition. Relevant personal care and healthcare are regulated regardless of frequency. The school will not treat supervision as an exemption for a volunteer undertaking regulated activity under the amended legislation.

Relevant personal care includes assistance with eating or drinking for reasons of illness or disability, or with toileting, washing, bathing or dressing for reasons of age, illness or disability. Relevant healthcare is care provided by, or under the direction or supervision of, a regulated healthcare professional. Where eligibility for a check is uncertain, the school will obtain appropriate advice before engagement.

DBS Update Service and disclosed information

Before using the DBS Update Service, obtain the individual's consent, verify identity against the original certificate, examine that certificate and confirm that it covers the children's workforce and the correct level of check, including barred-list information where required. Record the status-check result and date. Obtain a new certificate where the status check or eligibility requires it; a subscription alone is not evidence that checks are complete.

Any criminal information will be assessed fairly against the role, the seriousness and circumstances of the offence, time elapsed, whether behaviour is repeated, the applicant's explanation and acceptance of responsibility, and professional standards where applicable. Record the suitability decision. Protected cautions and convictions must not be taken into account. A barred person must never be employed or permitted to volunteer in regulated activity.

DBS certificates and criminal-record information disclosed by applicants will be handled securely, with access restricted to those who need the information for their responsibilities. Copies will be retained only where there is a valid reason and for no longer than six months. Following secure destruction, the school may retain a record of the check undertaken, its date and result, and the recruitment decision, without retaining unnecessary criminal-record details. Identity, right-to-work and required qualification evidence will be retained separately under the school's records-retention arrangements.

Existing staff and volunteers

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

- There are concerns about an existing member of staff's or the volunteer's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or

- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

This duty applies equally to paid staff and volunteers engaged in regulated activity. Where the referral criteria are met, the school will refer to the DBS as soon as possible and provide the relevant evidence available. Resignation, cessation of volunteering or the conclusion of employment must not prevent a required referral. Police, LADO or disciplinary involvement does not replace the school's DBS referral duty. Appendix 3 sets out the associated allegations-management and Teaching Regulation Agency referral procedures.

Removal from regulated activity can include suspension or redeployment to duties outside regulated activity. The school will assess the DBS referral criteria promptly in those circumstances and refer as soon as possible where they are met; it will not automatically wait for dismissal or the conclusion of every other process. Suspension alone does not establish that the referral criteria are met.

Agency and third-party staff

Before an agency or third-party member of staff begins work, including remote teaching, the school will obtain written confirmation that all applicable checks have been completed and that the required enhanced DBS certificate has been obtained, including children's barred-list information where the role involves regulated activity.

As an independent school, Heritage Academy will also obtain a copy of any enhanced DBS certificate obtained by the employment business before the individual is due to begin work, in accordance with paragraph 19 of the Independent School Standards. Any disclosed information or other suitability concern must be assessed before engagement. The school's arrangements with the employment business will require notification and provision of subsequent certificates as required by those Standards.

The school will verify the individual's identity on arrival, update the SCR with the required confirmation and certificate information and retain supporting evidence securely. The agency remains responsible for obtaining the required certificate and barred-list check. The exceptional arrangements for directly employed staff awaiting a certificate must not be used to permit an unchecked agency worker to start.

Contractors

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

When assessing whether a contractor has an opportunity for regular contact with children, the school will consider their work across relevant sites, rather than looking only at the frequency of attendance at Heritage Academy.

We will obtain the DBS check for self-employed contractors, or request to see the certificate if the self-employed person has obtained their own check and ensure that it is at the level required by the school.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Contracts will specify safeguarding expectations, reporting routes, checks and supervision. Where a contractor has no opportunity for regular contact with children, consider whether a basic DBS check is appropriate and record the supervision arrangements. DBS eligibility depends on the actual activity; barred-list checks must only be requested for regulated activity.

Trainee/student teachers

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

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

Volunteers

We will:

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

Review existing volunteers whose roles became regulated activity from 1 September 2026 following removal of the supervision exemption. Their children's barred-list status must be checked, normally through an enhanced DBS certificate including barred-list information. A standalone barred-list check may be used pending that certificate, or where a recent enhanced certificate without barred-list information has already been obtained with no break in service. Record the basis, checks and any permitted interim safeguards. Supervision alone does not remove the requirement.

Assess frequency across settings where a volunteer works in several schools or colleges and coordinate the required check and evidence with those settings. For roles outside regulated activity, the written risk assessment will consider duties, contact with children, known suitability information, references, other work and the appropriate level of check. No unchecked volunteer may be left unsupervised.

Proprietors

Proprietor checks will meet Part 4 of the Independent School Standards. Before an individual becomes the proprietor, or chair of a body which is the proprietor, the Secretary of State undertakes the required enhanced DBS, identity and relevant overseas checks. The chair must ensure that the required checks for other members of the proprietor body are completed and recorded. The checks include:

- An enhanced DBS check and certificate, with children's barred-list information where the individual's role requires it
- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity
- Any additional employment-related checks, including right to work, where the individual is also employed by the school

- Other checks deemed necessary if they have lived or worked outside the UK
- The school will record proprietor-body members on the SCR and retain evidence of the applicable checks. A proprietor's appointment or change of chair must not be treated as complete without following the relevant DfE requirements.

Staff working in alternative provision settings

Where Heritage Academy commissions alternative provision, the school remains responsible for safeguarding the pupil and for ensuring the placement is suitable. Before placement, the school will complete and record appropriate due diligence and obtain written confirmation of relevant safeguarding checks. The provider must notify the school of staff or other changes that may affect risk.

The school will retain the addresses of all sites and subcontracted provision attended, know where the pupil is during school hours and monitor attendance. Every placement will be formally reviewed at least half termly. A placement will be reviewed immediately, and suspended or terminated where necessary, if a safeguarding concern arises.

Adults who supervise pupils on work experience

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

For work experience involving pupils under 16, the school will assess whether the supervision amounts to regulated activity, taking account of the actual duties, frequency and overnight contact. Where it does, appropriate enhanced DBS and children's barred-list checks must be arranged before the placement. The school will agree safeguarding contacts, reporting routes and supervision arrangements with the employer and ensure the pupil knows how to raise a concern. See the Careers Programme and work-experience procedures for placement arrangements.

For pupils aged 16 or 17, the school cannot request an enhanced DBS check with children's barred-list information on an adult solely because they supervise that work-experience placement. Continue placement due diligence and safeguarding arrangements. Other employees who do not teach, train, instruct, care for or supervise the pupil are not in regulated activity merely because they share the workplace. If a pupil aged 16 or over undertakes regulated activity with children in a school or other specified place, the placement provider should consider whether an enhanced DBS check on that pupil is appropriate. DBS checks cannot be requested on children under 16.

Pupils staying with host families

For school-arranged UK homestays, we will obtain the required enhanced DBS and barred-list checks for responsible adults providing care and accommodation, assess the suitability of the household and consider whether enhanced checks on other household members aged 16 or over are appropriate. Distinguish school-arranged from private parent-arranged stays. For overseas homestays, we will agree safeguarding assurances with the partner setting before the visit and explain arrangements to parents. Every pupil must know a direct emergency and concern-reporting contact during the stay. Consider private-fostering notification requirements where the duration and circumstances meet the definition.

Private fostering

Staff must inform the DSL where a child under 16, or under 18 if disabled, is cared for and accommodated in the home of someone who is not a parent, a person with parental responsibility or a close relative for 28 days or more, or where that duration is intended. The DSL will notify the relevant local authority promptly so it can assess the arrangement. Where the school is involved in making the arrangement, the required notification will be made in writing as soon as possible after it is arranged. Any concern about immediate harm must also follow the child-protection referral procedure. For this purpose, a close relative is a grandparent, brother, sister, uncle or aunt (including relationships of full or half blood or by marriage or civil partnership), or a step-parent. A cousin or family friend is not a close relative for this definition. Staff should seek DSL advice if unsure whether an arrangement requires notification.

Appendix 3: allegations of abuse made against staff

Allegations against staff (including low-level concerns) policy

Section 1: allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, trainee teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

The case manager will normally be the headteacher for concerns about other staff, unless a family or other conflict of interest exists. At Heritage Academy, concerns about the headteacher must be reported directly to the LADO because the chair is a family member. Concerns about another proprietor must be reported to the chair only where the chair is impartial and not implicated; concerns about the chair, a family member of the intended recipient, or another conflict must be reported directly to the LADO. Independent handling and case management will be agreed as appropriate. The case manager will be identified promptly and will coordinate action agreed with the LADO and relevant agencies. Allegations concerning activities run by another organisation on school premises will be handled under the same reporting procedures.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, only where this is in the child's best interests and takes account of their views, making clear that this is not a punishment and consulting parents/carers
- Temporarily redeploying the individual to another role in a different location

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis that supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the LADO without delay and within one working day, in line with Birmingham procedures. Agree the nature, content and context of the concern and the next steps, including whether police or children's social care must be involved. Immediate protection or a suspected criminal offence may require police contact first; notify the LADO as soon as practicable afterwards. Initial fact-finding must not become an internal investigation that delays LADO contact or prejudices agency enquiries
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer

who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Assess and meet the statutory DBS referral duty in accordance with Appendix 2, including where an individual has been removed from regulated activity, or would have been removed had they not left, and the relevant conduct, harm-test or offence criteria are met. Referral must not depend solely on a criminal conviction or the individual remaining employed

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Pay arrangements during suspension or an interim prohibition order will be managed under the Staff Discipline Policy and applicable employment terms, taking appropriate HR or legal advice.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers, trainee teachers, and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher, trainee teacher, or contracted staff member provided by an agency, the school shares safeguarding responsibilities with the employment agency or business. We will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The proprietor body and case manager will discuss with the agency whether it is appropriate to suspend the individual or arrange other safeguards while enquiries take place, taking advice from the LADO
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate. Teacher training providers are expected to follow the same procedures as supply agencies.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

The case manager will monitor progress with the LADO. Wherever possible, the first case review should take place no later than four weeks after the initial assessment. If the investigation continues, subsequent review dates will be agreed, ideally at fortnightly intervals and no longer than monthly. Reviews will record progress, outstanding action, safeguarding and welfare arrangements, and the reasons for any delay.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services.

Conclusion of a case where the allegation is substantiated

Where a substantiated allegation results in dismissal or the school ceasing to use the individual's services, or the individual leaves and would otherwise have been removed from regulated activity, the school will make a DBS referral where the statutory criteria in Appendix 2 are met. Resignation, dismissal or an agreement must not prevent completion of the safeguarding process or a required referral.

Safeguarding enquiries and any required referral must continue if an individual resigns, refuses to cooperate or seeks a settlement agreement. The school must not agree a settlement that prevents a DBS or TRA referral, or use an agreed reference to conceal substantiated safeguarding concerns. DBS and professional-regulator referrals are separate from police or LADO involvement; one does not replace another. Settlement or compromise agreements must not be used where allegations indicate that an individual poses a risk of harm to children or may be unsuitable to work with children. Every effort must be made to reach and record a conclusion even if the individual leaves or refuses to cooperate; they should have an opportunity to respond and be notified of the outcome. Any settlement used in other, permissible circumstances must not obstruct required referrals, a proper investigation or an accurate reference.

Where a substantiated allegation concerns a member of teaching staff, the school must consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Whenever the school dismisses or ceases to use a teacher's services because of serious misconduct, or would have done so had the teacher not left first, it must consider a referral to the Secretary of State through the Teaching Regulation Agency. This consideration is not restricted to allegations of child abuse or to cases ending in a criminal conviction. Record the decision and rationale and make any required referral promptly.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Confirm whether we are satisfied with the individual's suitability to work with children.
- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified

- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

A non-recent allegation made by a child must be reported to the LADO in line with local procedures for non-recent allegations. The LADO will coordinate with children's social care and police. This reporting route is not limited to allegations about a person currently working or volunteering with children. Staff must also make any necessary immediate referral to children's social care and/or police and must not delay protection while awaiting LADO coordination.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to concerns about staff, including supply teachers, trainee teachers, volunteers and contractors, which do not meet the harm threshold in section 1. If the threshold is uncertain, the case manager will seek LADO advice.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct Policy, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority
- Examples of such behaviour could include, but are not limited to:
    - Being overly friendly with children
    - Having favourites
    - Taking photographs of children on their mobile phone
    - Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
    - Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised

Responding to low-level concerns

The school's values and expected behaviours must be lived, monitored and reinforced through the Staff Code of Conduct, Staff Handbook and Teachers' Standards, alongside KCSIE and Working Together to Safeguard Children. The reporting, self-referral, early correction and proportionate-response principles above apply to every low-level concern.

These arrangements also protect staff from false allegations or misunderstandings and help identify weaknesses in the school's safeguarding culture.

If a concern is raised via a third party, the headteacher, or an appropriately authorised unconflicted person under section 7.7, will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

For ordinary low-level concerns, the headteacher will assess the concern alongside the Values Champion and determine action under the Staff Code of Conduct, Staff Discipline Policy or Staff Grievance Policy, taking LADO advice where appropriate.

Concerns about the headteacher or proprietors must follow the reporting routes in section 7.7. At Heritage Academy, concerns about the headteacher go directly to the LADO because the chair is a family member; concerns about other proprietors go to an impartial chair or directly to the LADO where the chair is implicated or another conflict exists. Seek LADO advice where the threshold is uncertain and agree appropriate independent handling. No person may assess, investigate or decide a concern about their own conduct or that of a family member. Any concern or pattern meeting, or potentially meeting, the harm threshold must be referred to the LADO without delay.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken. The record will also identify its author, the date and time, and the person raising the concern where known. Requests for anonymity will be respected as far as reasonably possible, while explaining that information may need to be shared to protect a child or meet safeguarding responsibilities.

Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018, Data (Use and Access) Act 2025, and the UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher, trainee teacher or contractor, the school will notify the employer or training provider as appropriate so patterns can be identified and safeguarding responsibilities coordinated.

The low-level concern policy and reporting form can be found in the Staff Code of Conduct Policy and is available to staff in printed version in the school staff rooms.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 4: specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort ‘real’ images

Financially motivated incidents

Financially motivated sexual extortion (often known as ‘sextortion’) is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person’s account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them

- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education for prolonged periods and/or on repeat occasions can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

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

The school will:

- monitor attendance and admissions information daily and follow up unexplained absence promptly using more than one contact method where necessary;
- consider the child's known vulnerabilities, family circumstances, social care involvement, SEND, health needs, transport arrangements, patterns of absence and any previous safeguarding concerns when deciding the level and urgency of response;
- ensure attendance staff alert the DSL or deputy without delay where absence is unexplained, repeated, prolonged, linked to a known risk, or where attempts to establish the child's welfare and whereabouts are unsuccessful;
- make reasonable enquiries, record each contact attempt, information obtained, decisions, actions and reasons for escalation or non-escalation, and keep the situation under review;
- work with parents or carers, the child, the local authority and relevant agencies to understand and address barriers to attendance, unless doing so would increase risk to the child;

- refer concerns to local authority children's social care and/or the police immediately where there is reason to believe a child is suffering or likely to suffer harm, is in immediate danger, or their whereabouts cannot be established and risk is significant;
- comply with the School Attendance (Pupil Registration) (England) Regulations 2024 and statutory guidance before adding or deleting a pupil from the admission register, including making required returns and notifications to the local authority; and
- notify and work with the local authority Children Missing Education service where a child of compulsory school age is not registered at a school and is not receiving suitable education otherwise than at school, or where the school's enquiries indicate that a pupil may become missing education.

A pupil who remains registered at the school is not, solely because of persistent or severe absence, a Child Missing Education. However, their absence may still present a serious safeguarding risk and must be addressed through the school's attendance and safeguarding procedures. The school must not remove a pupil from roll unless a lawful ground is met and the required enquiries and notifications have been completed.

These arrangements should be read alongside the school's Attendance Policy, Children Missing Education procedures and Birmingham local processes.

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

Elective home education and family circumstances

Where a parent proposes elective home education, the DSL will consider the pupil's wishes, SEND, social-care involvement and other vulnerabilities and work with the local authority and relevant professionals to seek a meeting with the parent before a final decision where possible. Explain available support and consider the best interests of the individual child. Make required register notifications and share safeguarding information with appropriate agencies. EHE is not, by itself, evidence of abuse, but a child becoming less visible must not lead to known risks being overlooked.

Children affected by parental imprisonment, family-court proceedings, bereavement or family conflict may need confidential pastoral and educational support. The DSL will consider the effect on attendance, wellbeing and safety, avoid assumptions or stigma, and signpost specialist help where appropriate. A need for support must be distinguished from evidence of abuse, while any safeguarding concern is referred through section 7.

Child criminal exploitation

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

Staff must not treat apparent agreement, offending, aggression or loyalty to a group as proof that a boy is freely choosing the situation. The DSL will explore coercion, threats, debt, grooming and the safety of siblings or peers, and coordinate protective support and referrals alongside any behaviour response. Concerns about exploitation outside school will be assessed using information about the child's journeys, locations, associates and online contacts, without staff undertaking their own criminal investigation.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education

County-lines exploitation can involve children transporting or storing drugs, money or weapons, debt bondage, threats to family members, use of bank accounts, recruitment through social media or gaming, and exploitation at hotels, stations or other locations. Missing episodes and school absence can be associated with this harm. Staff must consider immediate retaliation or threats after money or drugs are lost or seized, share relevant information with police and children's social care and support protective planning.

- Not taking part in education

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

Modern slavery and trafficking

Suspected trafficking, forced labour, servitude or exploitation will be reported to the DSL and referred to children's social care and police as required. The DSL will work with an authorised first-responder organisation, such as the local authority or police, to consider a National Referral Mechanism referral and access to specialist support. A child's consent is not required for an NRM referral. This process must not delay immediate protection or replace ordinary safeguarding referrals.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

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

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

for example through others copying videos or images. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

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

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

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

Child-on-child abuse (including harassment and violence)

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

Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

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

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI
- Upskirting, which is a criminal offence, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- Prejudice-based and discriminatory abuse, including racism and faith-targeted abuse, which can significantly affect a child's welfare, wellbeing and sense of safety

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of nude or semi-nude images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

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

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

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children including physical, sexual, emotional abuse, and stalking) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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

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

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

Operation Encompass enables police to notify education settings when they have reasonable grounds to believe a child may be a victim of domestic abuse, including children connected to the household who were not present at the incident. The DSL or deputy will receive and review notifications, maintain confidential records and ensure timely support. Notifications do not replace safeguarding referrals: the DSL will check the information available, liaise with police or children's social care where appropriate, and make a referral where the child's welfare or safety requires it.

The DSL will provide support according to the child's needs and update records about their circumstances.

The school's safeguarding cover arrangements apply to Operation Encompass notifications so they are received and acted upon when the DSL is absent. Staff will share information only on a need-to-know basis and must not assume that a police notification means a social-care referral has already been made.

The DSL will check that notifications identify the child correctly and contain enough context to plan support, seek clarification where necessary, and ensure any staff receiving notifications have appropriate training and secure access. The school will agree the notification route with police and maintain cover so information can be acted upon promptly. Lack of visible distress or absence from the incident must not be taken to mean the child is unaffected.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputy will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care. Where children are living independently from their parent/carers

(e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

Temporary accommodation notifications

The DSL or deputy will receive and review notifications from a local housing authority that a child has been placed in temporary accommodation, record relevant information securely and assess effects on attendance, travel, learning, health, safety and support needs. Liaise with the family and relevant services and arrange timely pastoral and educational help. The consent conditions for the housing authority's notification do not replace the school's own safeguarding duties or require parental consent for a necessary safeguarding referral. A notification does not replace referral to children's social care where a child is harmed or at risk.

So-called honour or faith-based abuse including FGM and forced marriage

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

Staff must also recognise abuse justified through faith or belief, including threats, humiliation, coercive practices or physical harm presented as religious discipline or treatment. A child's faith and religious practice must be respected, while any harm is assessed and acted upon through the same child-protection procedures. The DSL must not seek resolution through an adult, family or community representative whose involvement could expose the pupil to further harm.

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

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

FGM

Although Heritage Academy is a boys' school, we are aware that our pupils have siblings and other females in their families that we may come into contact with. The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

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

Indicators that FGM has already occurred include:

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly absent from school
    - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

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

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Make a safeguarding referral to children's social care/CASS and contact the police where required. In immediate danger call 999. Contact the LADO additionally where the concern involves an adult working or volunteering with children
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fcdo.gov.uk
- Arrange appropriate support for the pupil alongside protective action. Do not approach family or community members, disclose the concern to them, or attempt mediation where this could increase risk. The school will agree any family contact with the safeguarding agencies involved

Preventing radicalisation

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

- Extremism, as described in KCSIE 2026, is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

Terrorism is an action that:

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

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

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

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

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and the NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- A change in beliefs or identity accompanied by other evidence of susceptibility to terrorist grooming or support for terrorist violence; conversion to a religion is not, by itself, an indicator of radicalisation
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Staff will consider indicators in context, avoiding stereotypes about faith, ethnicity or political views. Ordinary adolescent behaviour or lawful religious and political expression must not be treated as evidence of radicalisation by itself. Concerns about susceptibility to terrorism will be assessed through professional curiosity and advice from the DSL and relevant agencies.

The DSL will consider the content, context, intent and impact of the concern and seek specialist Prevent or safeguarding advice where needed. Racist, anti-Muslim, antisemitic or other hateful behaviour will be challenged and addressed through safeguarding and behaviour procedures even

where a Prevent referral is not appropriate. Staff must not investigate suspected terrorist activity themselves. Immediate danger requires police action; referral and support must follow section 7.5 and must not be delayed by family or community mediation.

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

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

Harmful sexual behaviour, sexual violence and sexual harassment between children in schools

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents
- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents
- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:

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

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It is never acceptable. Sexual violence and sexual harassment may overlap.

Assessment must distinguish developmentally expected behaviour from inappropriate, problematic, abusive or violent behaviour. Consider age and development, whether one child is pre-pubescent, differences in maturity or understanding and any power imbalance; a younger child may harm an older child. Seek specialist advice where needed. Unwanted sexual conduct includes sexual comments, jokes or taunts, sexualised names, interference with clothing, deliberately brushing against someone, displaying sexual material, unwanted explicit messages or images, sexualised online bullying, and coercion to share images or perform acts. Such behaviour may violate dignity or

create an intimidating, degrading, humiliating or hostile environment and can escalate if left unchallenged.

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

Staff must follow section 7.8 for responding to reports, reassuring and supporting children, risk and needs assessments, separation, referrals and ongoing review. Section 7.9 sets out the response to making or sharing nudes or semi-nudes, including AI-generated imagery. Staff will reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them.

Staff must remain alert to the challenges of detecting sexual violence and respond sensitively to children's needs.

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

Serious violence

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation

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

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

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

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Having been involved in offending, such as theft or robbery
- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

Child abduction and community safety incidents
Child abduction includes the unauthorised removal or retention of a child by a parent, family member, other known person or stranger. Staff must report concerns such as adults approaching pupils, suspicious vehicles, loitering near school or attempts to collect a child without authorisation to the DSL without delay. Call 999 where a child is in immediate danger or an abduction is suspected to be taking place. Record factual observations and follow police advice; do not investigate or circulate unverified allegations. The DSL will assess risks, liaise with police and children's social care as appropriate, and agree proportionate protective action and safe communication with families. Relevant parental-responsibility and collection restrictions must be checked. Through PSHE and pastoral work, pupils will receive practical advice about independent travel, seeking help and responding to unsafe approaches. Missing pupils must also be managed under the procedure at the end of this appendix.

Cybercrime and online exploitation

Staff must report concerns about unauthorised access to computers, attacks intended to disrupt a network or website, or making, supplying or obtaining malware for criminal purposes to the DSL. Children may experiment without understanding the law, or be groomed or coerced into offending. The DSL will consider safeguarding needs and police advice, including the Cyber Choices programme for children at risk of cyber-dependent offending, while supporting safe and lawful use of computing skills. Cyber Choices does not replace ordinary safeguarding or police referral for fraud, child sexual abuse, exploitation or other cyber-enabled crimes.

Checking the identity and suitability of visitors

Visitors will verify their identity, sign in and follow the school's visitor, safeguarding and mobile-device arrangements. Personal belongings must not create a safety risk; essential equipment needed for a professional visit will be managed appropriately.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors in a professional capacity, such as educational psychologists or social workers, must show appropriate identification. The school will satisfy itself that the appropriate checks for the activity have been completed, normally through confirmation from the visitor's employer. In these circumstances the school should not ask to see the DBS certificate. A professional visit is distinct from employment, supply work, contracting or a volunteer role, for which the relevant checks in Appendix 2 apply.

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

Before a visiting speaker or external organisation is invited, assess educational value, suitability, age appropriateness, proposed content and any checks required. The supervising member of staff remains responsible for safeguarding and will challenge or stop inappropriate content and report concerns to the DSL. Parents and relatives attending a school event do not automatically require a DBS check; supervision and access will be determined by risk. A recurring role with children must be assessed under Appendix 2 rather than treated as an ordinary visit.

Non-collection of children

Many of the pupils at Heritage Academy walk or travel home independently. However, this procedure will be enacted where a parent has previously informed us that the child is not to travel home alone and will be collected, but is not collected.

When a child is uncollected from school or from another activity, the safety and welfare of the child will be the paramount consideration in determining appropriate action.

Staff will keep the pupil safely supervised and contact parents/carers, authorised collectors and other emergency contacts promptly. The DSL/headteacher will assess the circumstances and known vulnerabilities and record all attempts, decisions and actions. If contact cannot be made or safe arrangements cannot be agreed, contact CASS or the emergency out-of-hours service for advice and an agreed plan. Contact police immediately where the circumstances indicate danger. Staff must not wait until a fixed time to escalate a safeguarding concern, leave the pupil unsupervised or assume social care will automatically collect the pupil.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

If a pupil is missing, inform the DSL/headteacher immediately, establish when and where the pupil was last seen and undertake a rapid, coordinated check of likely locations while ensuring other pupils remain supervised. Assess risk immediately, including age, SEND, health needs, known vulnerabilities, surroundings and indications of abduction or harm. Contact police immediately where the pupil may be in danger; do not wait for a fixed search period or for senior staff to become available. Notify parents/carers unless doing so would increase risk, and liaise with children's social care where appropriate. Record actions, times and decisions.

On an educational visit, the group leader will keep the remaining pupils safe, alert site staff and organise a rapid search without compromising supervision. Contact police immediately where danger is suspected and promptly where the pupil cannot be located; do not wait for a fixed period or for the school to make the call. Inform the DSL/headteacher and parents/carers as soon as practicable, unless parental contact would increase risk. Follow the visit emergency arrangements, record actions and review the incident after the pupil is found.

Appendix 5: safeguarding recording/reporting tools

CONCERNS about a Child's Safety and Welfare PINK FORM

Child's Full Name:		Year Group/ D.O.B:
Date of Concern/Incident:	Time of Concern/Incident:	Location concern arose:
Your Name:		Your signature:
Today's Date:	Time:	Your role:

Notes:
(Any questions asked? Why are you concerned? Use child's own words as much as possible. Describe concerns clearly and concisely in a factually accurate manner. Any others involved? Physical marks/injuries? If so, body map must be attached.. Note any involvement from other children/staff/parents/agencies. Use full CAPS.)

***PTO**

(Check to make sure your report is clear -and would also be clear to an outside agency)

Received by: _____DSL/ DDSL)

Signature:_____

Date: _____ Time: _____

Agreed Action, with reasons:

_____

_____

_____

_____

_____

Refer to LSCP Yes☐ No ☐

Parent Informed Yes☐ No ☐

DISCLOSURE about a Child's Safety and Welfare YELLOW FORM

Child's Full Name:		Year Group/ D.O.B:
Date of DISCLOSURE:	Time of DISCLOSURE:	Location of DISCLOSURE:
Your Full Name:		Your signature:
Today's Date:	Time:	Your role:

Notes:
(Any questions asked? What was disclosed? Use child's own words as much as possible. Describe disclosure clearly and concisely in a factually accurate manner. Any others involved? Physical marks/injuries? If so, body map must be attached. Note any involvement from other children/staff/parents/agencies. Use full CAPS.)

***PTO**

(Check to make sure your report is clear -and would also be clear to an outside agency)

Received by: _____DSL/ DDSL)

Signature:_____

Date: _____ Time: _____

Agreed Action, with reasons:

_____

_____

_____

_____

_____

Refer to LSCP Yes☐ No ☐

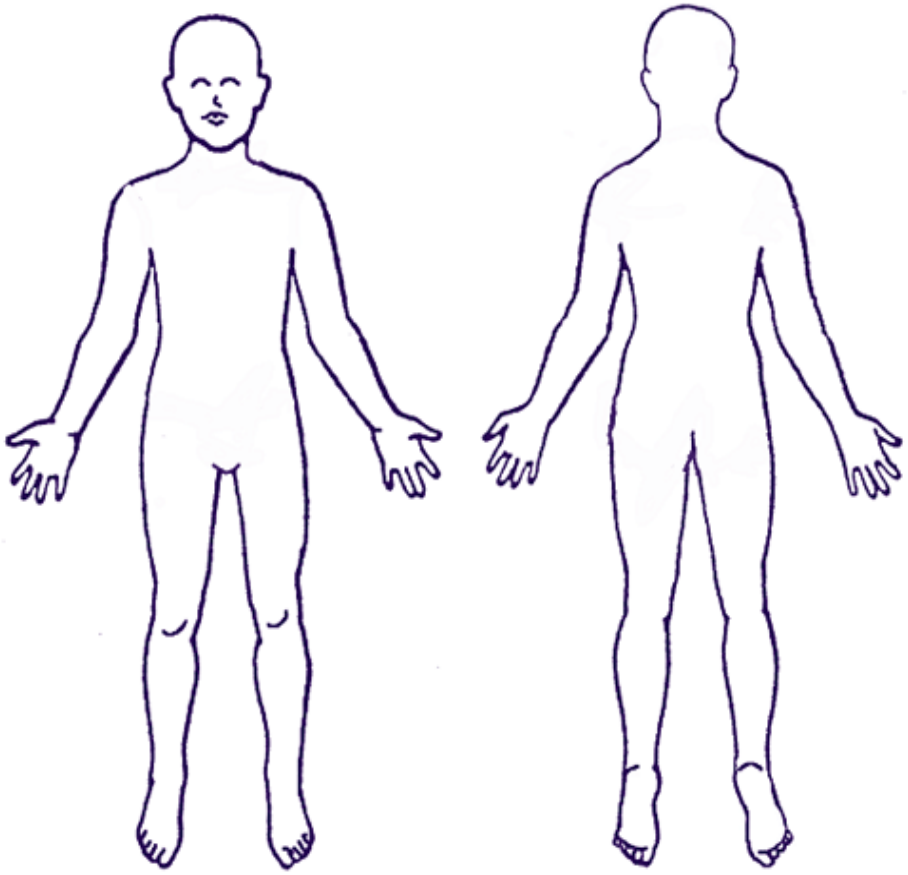
Parent Informed Yes☐ No ☐

Body Map

Child's name:	Year Group/ DOB:

This form must be completed each time an injury is noted on a child by marking the injured area on the body map. Any possible child protection or safeguarding concerns must be:

- **Reported immediately by the person noting the concern to the DSL.**
- **Recorded on a 'Concerns about a Child's Safety and Welfare PINK FORM' or**
- **Recorded on a DISCLOSURE about a Child's Safety and Welfare YELLOW FORM**



Record the facts and do not make judgements. Record dates, times, places, actual words, what was observed, who was present and questions asked:

Name of person completing this form:	Date: Time:
Signature:	Form handed to:

Name of person receiving this form:	Date: Time:
Signature:	
Action:	