

Safeguarding and Child Protection Policy

Document Control

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Due to the evolving nature of DEMAT, local procedures behind this Policy will be reviewed and amended accordingly to reflect changes.

This policy will be reviewed annually.

*Love
Community
Respect
Trust*

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1. Aims and Purpose

The Diocese of Ely Multi Academy Trust (DEMAT) is committed to ensuring that every child who is a registered pupil at any DEMAT academy is safe and protected from harm. This policy sets out the Trust's safeguarding aims, ethos and expectations, and clarifies the roles and responsibilities of the Trust and of each academy within it.

Each academy adopts this Trust policy and supplements it with academy specific procedures. These procedures provide clear direction to staff, volunteers, visitors and parents/carers about expected conduct and the legal duty to safeguard and promote the welfare of all children to:

- Identify concerns early to prevent them from escalating.
- Provide a safe environment in which children can learn.
- Identify children who may benefit from early help.
- Know what to do if a child discloses abuse, neglect or exploitation.
- Follow referral processes without delay when there is a concern.

DEMAT recognises its responsibilities under Section 175 of the Education Act 2002 and the Education (Independent School Standards) Regulations 2014 to decide to safeguard and promote the welfare of children. Safeguarding and promoting the welfare of children is everyone's responsibility. For the purposes of this policy, 'children' means anyone under the age of 18.

This policy should be read alongside statutory guidance, in particular 'Keeping Children Safe in Education' (KCSIE) (September 2025). It is a fundamental duty for all school leaders, staff and Governors to read and be aware of their responsibilities under **Part One of KCSIE**, as this section lays out the core expectations for everyone. Furthermore, all staff who work directly with children and every governor must also read **Annex B**. This policy applies to all staff (paid and unpaid), trustees, governors, contractors and volunteers. Teaching assistants, midday supervisors, office staff and teachers may all be the first point of disclosure for a child. Parents/carers may also raise concerns directly with the academy or Local Governing Body (LGB).

There are four core elements to our safeguarding approach:

- Prevention – high quality teaching, pastoral care and a whole school protective ethos.
 - Procedures – clear processes for identifying and referring cases of abuse or exploitation.
 - Supporting Children – targeted support for those who have been abused or exposed to harm.
 - Preventing Unsuitable People from Working with Children – robust safer recruitment and conduct processes.

This policy is available on all Trust and academy websites and on request from each academy.

2. Prevention

We recognise that children with high self esteem, strong peer relationships and trusted adults to talk to are better protected. Accordingly, each academy will:

- Maintain environments—on site and online—where children feel safe, are encouraged to talk, and are listened to.

- Ensure children know who the trusted adults are and that concerns will be taken seriously and acted upon.
- Provide an age and stage appropriate curriculum, tailored to specific needs and vulnerabilities, including those of children with SEND and children who have experienced abuse.
 - Embed learning that challenges stereotyping, prejudice and inequality.
 - Challenge prejudice-related behaviour (e.g. sexism, misogyny/misandry, homophobia, biphobia, sexual harassment/violence).

Teach pupils how to stay safe from abuse and exploitation in all contexts, reflecting current RSE guidance.

During the 2025/26 academic year, academies will transition to the 2025 RSE guidance. Pupils will learn about:

- The importance of families in providing love, security and stability; recognising unsafe family relationships and how to seek help.
- Healthy, welcoming friendships; recognising when friendships are harmful and how to seek support.
- How and where to seek help, including when facing violence or harm or uncertainty about who to trust.
- Critical evaluation of online relationships and information; risks of interacting with unknown people online; recognising and reporting harmful content or contact.
- That each person's body belongs to them; appropriate vs. inappropriate/unsafe contact; responding safely to unknown adults (including online).
- How to report abuse or unsafe experiences and the vocabulary and confidence to do so; persistence in seeking help until heard.
- Where to get advice (e.g., family, school and other sources).

DEMAT academies use the Cambridgeshire PSHE Service Personal Development Programme (Personal Safety Units) and the Safer Spaces Toolkit which is intended to be used in addition to planned PSHE lessons to deepen children's understanding of sexist language, attitudes and behaviours and their consequences.

3. Procedures

All DEMAT academies follow their Local Authority Safeguarding Partnership procedures, as well as Trust-wide requirements set out in the Headteachers' Handbook and related policies. Each academy will:

- Appoint the Headteacher as Designated Safeguarding Lead (DSL) with lead responsibility for safeguarding and child protection. Appropriately trained Deputies (DDSLs) may be appointed; however, accountability remains with the DSL.

- Ensure the DSL/DDSL roles are explicit in job descriptions (KCSIE 2025 Annex C).
- Provide the DSL with sufficient status, authority, time, funding, training and resources to fulfil the role; ensure completion of the Local Authority two day DSL training (refreshed at least every two years).
- Provide at least annual updates for DSLs/DDSLs (e.g., DEMAT DSL Network meetings or bespoke training).
- Ensure all staff and governors know who the DSL/DDSLs are and how to pass on concerns from induction onwards. Staff must alert the DSL/DDSL verbally and immediately log concerns on CPOMS.
- Ensure the DSL or a DDSL is available during school hours, term time. If exceptionally unavailable, the academy's contingency arrangements will apply: (Appendix B)
- Liaise with the three safeguarding partners (Local Authority, Integrated Care Board and Police) and other agencies in line with 'Working Together to Safeguard Children' (2023).
- Nominate a trained safeguarding governor.

All trustees, staff, and governors must know:

- The names and roles of the DSL/DDSLs.
- Signs of abuse, neglect and exploitation, recognising risks inside and outside school and online.
- That children may not be ready or able to disclose abuse or recognise it as harmful.
- How to pass on and record concerns, and their individual responsibility to refer to the DSL/DDSL.
- The importance of professional curiosity.
- Their duty to provide a safe learning environment.
- Where to find Multi Agency Procedures on the local Safeguarding Partnership website.
 - Their role in early help/targeted support and referral routes to children's social care.
 - The safeguarding response to children absent from education (including repeat/prolonged absence).
 - Expectations for filtering and monitoring and how to report issues.

All staff receive safeguarding and child protection training at induction (including online safety and filtering/monitoring roles and responsibilities) and at least annually thereafter.

Staff must feel able to raise concerns about poor or unsafe practice (including low level concerns and allegations) in accordance with whistleblowing policies.

Parents/carers are informed of Trust/academy safeguarding responsibilities via academy publications and websites.

To promote educational outcomes, information about welfare/safeguarding issues for children with a social worker will be shared with relevant staff.

Where pupils are educated off site/alternative provision, the academy will obtain written assurance that appropriate safeguarding checks have been completed (using the DEMAT AP checklist) and agree procedures for managing safeguarding concerns between agencies. The placing academy retains responsibility for the pupil's safeguarding.

3.1 Multi Agency Working

The Headteacher is responsible for the following commitments:

- Develop effective links with relevant services to promote pupil safety and welfare.
- Co-operate with key agencies in line with 'Working Together to Safeguard Children' (2023), including attendance at and reporting to child protection conferences/core groups.
- Notify Social Care immediately if a pupil subject to a Child Protection Plan is suspended/excluded, is absent without explanation, or if there is any change in circumstances.
- Transfer information promptly when such a pupil leaves the academy and informs the Child Protection Chair and Social Care Team.

3.2 Record Keeping

All DEMAT academies use CPOMS to record safeguarding information quickly and securely, including agency contact, parental contact and actions relating to attendance. Behaviour concerns and sanctions are recorded on Bromcom. CPOMS is for recording, not reporting: all safeguarding concerns must be reported to DSLs in person without relying solely on CPOMS alerts.

Academy leaders will quality assure DSL responses and analyse CPOMS data regularly. Trust safeguarding staff monitor CPOMS at academy and Trust level. Historic paper records are stored securely.

Academies will keep clear, detailed, accurate written records even when a referral to Social Care is not made. Records should include:

- A clear and comprehensive summary of the concern.
- The child's wishes and feelings.
- How the concern was followed up and resolved.
- Actions taken, decisions reached and outcomes.
- Any discussions/communications with parents and other agencies.

Where a child moves schools, relevant safeguarding records will be transferred to the receiving school within five days in accordance with KCSIE 2025 and local guidance. The DSL will consider whether information should be shared in advance of the child's move. Parents are made aware that such records

exist unless doing so would place the child at risk. All decisions are made in the best interests of the child and rationales are recorded.

3.3 Confidentiality and Information Sharing

Information about children and families constitutes ‘special category data’ for the purposes of the UK GDPR and the Data Protection Act 2018, which govern its collection, storage and sharing. Staff and volunteers adhere to confidentiality protocols and share information appropriately, in line with DfE ‘Information Sharing’ (May 2024).

- Subject Access Requests are referred to the DSL and Headteacher.
- Staff are clear with children that they cannot promise confidentiality.

The DSL/DDSLs will share information on a ‘need to know’ basis (seeking consent where appropriate), record decisions to share or withhold data and, where the ‘serious hard threshold’ is met, withhold data in line with the Data Protection Act 2018/UK GDPR. External advice may be sought where required.

3.4 Communication with Parents/Carers

The Headteacher will ensure that:

- Academies set out safeguarding duties on their websites/prospectuses.
- Appropriate discussions will be held with parents/carers prior to agency involvement unless this could place a child/another at immediate risk or prejudice crime prevention/detection.
- All rationales for discussing/not discussing concerns with parents will be recorded and may be shared with partner agencies as required.

3.5 Child on Child Abuse

Child on child abuse can occur inside and outside school and online. It includes (but is not limited to) bullying (including cyber, prejudice based and discriminatory), abuse within intimate peer relationships, physical abuse, harmful sexual behaviour, sexual violence and harassment (including upskirting and online harassment), child sexual exploitation, child criminal exploitation, hate incidents/crime, racism and initiation/hazing. All forms are unacceptable and will be taken seriously.

- Foster a whole school protective ethos with zero tolerance of sexual violence/harassment.
- Train staff to recognise and respond appropriately; do not dismiss incidents as ‘banter’ or inevitable.
- Include curriculum content to help children keep themselves safe from peer abuse, including online.
- Deliver high quality RSE with a focus on consent.
- Follow this policy’s procedures; refer concerns to the DSL/DDSL.
- Be alert to elevated risks for girls, SEND and LGBT pupils; ensure these pupils have a trusted adult.
- Recognise intra-familial harms and support siblings where necessary.
- Refer to Local Authority tools if sexually harmful behaviour is suspected.

3.6 Dealing with Sexual Violence and Sexual Harassment Between Children

Such behaviours can occur between any children and may take place online and/or face-to-face, including group contexts. They are never acceptable. The Headteacher will ensure that all staff and governors:

- Follow KCSIE 2025 Part Five; and 'Sharing nudes and semi-nudes: advice for education settings' (UKCIS, March 2024).
- Operate a zero-tolerance approach.
- Manage reports appropriately and decide actions case-by-case.
- Reassure and support victims, taking their wishes into account.
- Implement and review risk assessments for victims, alleged perpetrators and others as needed.
- Liaise closely with police and social care where required.

4. Supporting Children

Any child may be subject to abuse. Mental health issues can be indicators of actual or potential abuse, neglect or exploitation. The Headteacher ensures that children are supported by:

- Providing curriculum opportunities that build self-esteem and motivation.
- Creating a positive, supportive and safe ethos for the whole community.
- Applying the behaviour policy consistently separating behaviour from self-worth.
- Consulting the academy's Senior Mental Health Lead where safeguarding concerns intersect with mental health.
- Working with external agencies (e.g., Social Care, CAMHS, Emotional Health and Wellbeing, Sexual Behaviour Services, Early Help).
- Engaging parents/carers supportively, including in challenging circumstances.
- Considering wider environmental factors (risks outside the home) and the potential need for early help.

4.1 Children with Disabilities, Health Conditions or SEND

Children with additional needs, SEND, emotional/behavioural difficulties or disabilities may face increased risks. Staff will be vigilant to indicators of abuse both online and offline. Personal safety skills are taught through PSHE, including recognising unsafe feelings in relationships (family and peer), secrets, safe/unsafe contact and online risk. Lesson content is shared with parents/carers.

Where pupils have communication difficulties (e.g., requiring Makaton/PECS), additional staff training may be provided. Reasonable adjustments will be made under the Equality Act 2010.

4.2 Young Carers

Young carers can be at increased vulnerability. The Headteacher will put in place procedures which will identify and support young carers, signpost to external agencies, remain vigilant and refer to Early Help or Social Care where appropriate.

4.3 Children at Risk of Criminal Exploitation

Criminal exploitation, including county lines, often involves children transporting drugs or money. Exploitation may appear consensual but is abuse. Staff consider extra-familial harms and follow procedures where indicators arise. The DSL will use Local Authority screening tools and refer to Social Care where appropriate. Repeated missing episodes increase risk; procedures address this.

4.4 Children at Risk of Sexual Exploitation (CSE)

CSE is a form of sexual abuse involving power imbalance and can occur without physical contact. Indicators are covered in staff training. Repeated missing episodes increase risk. All DEMAT academies participate in Operation Encompass, an early information safeguarding partnership, with local authorities and police to support pupils who go missing.

4.5 Children Persistently Absent from Education

Persistent/unexplained absence may signal safeguarding concerns (e.g., abuse, exploitation, modern slavery, mental health, substance abuse, travel to conflict zones, FGM or forced marriage). Attendance is monitored in line with the DEMAT Attendance Policy; patterns are analysed. Academies aim to hold multiple emergency contacts. Local Children Missing Education procedures are followed and Social Care informed where required.

4.6 Children Misusing Drugs or Alcohol

Substance misuse may necessitate referral to whom it creates vulnerability to other abuse, impacts health and wellbeing, links to parental misuse, requires intensive specialist support, or is associated with criminality.

4.7 Children Living with Substance-Misusing Parents/Carers

Parental substance misuse is associated with significant harm. The Headteacher will ensure staff follow procedures where concerns arise, including where the home is used for illegal activities or drugs/paraphernalia are present, or misuse during pregnancy is evident.

4.8 Children Living with Domestic Abuse

Under the Domestic Abuse Act 2021, children are victims when affected by domestic abuse. Domestic abuse can also occur within peer intimate relationships. Staff follow this policy where concerns arise and contribute to Multi-Agency Risk Assessment Conference (MARAC) safety plans as required. All DEMAT academies participate in Operation Encompass; police information about incidents is shared with the DSL/DA Lead who determines appropriate support.

4.9 Children at Risk of Honour-Based Abuse (including Female Genital Mutilation (FGM) and Forced Marriage)

HBA includes patterns of coercion, control and abuse linked to perceived 'honour'. Staff treat all HBA as abuse and follow procedures. The Marriage and Civil Partnership (Minimum Age) Act 2022 raises the legal age for marriage to 18; arranging child marriage is illegal. FGM is illegal in the UK. Any risk/suspicion involving a girl under 18 is referred to Social Care via the DSL without prior parental notification. Teachers have a statutory duty to report known cases of FGM in under-18s to the police via the DSL.

4.10 Previously Looked-After Children (PLAC) and Children Returned Home from Care

PLAC may remain vulnerable. The Headteacher will monitor welfare closely and notify Social Care if concerns recur.

4.11 Children Showing Signs of Abuse, Neglect and/or Exploitation

Experiences of abuse can have lasting impacts. Staff—especially the DSL team—consider risks outside the home, including sexual abuse/harassment, domestic abuse in peer relationships, criminal exploitation, serious youth violence, county lines and radicalisation. Training ensures staff can identify and report concerns promptly.

4.12 Children at Risk of Radicalisation (Prevent Duty)

Children can be susceptible to extremist ideologies. A DSL will hold Prevent Lead training (updated at least biennially), and all staff receive Prevent training. Concerns are referred to the DSL who follows local procedures and the National Prevent Referral Form. See ‘Prevent Duty Guidance: for England and Wales’ (HM Government, March 2024).

4.13 Privately Fostered Children

Private fostering occurs when a child under 16 (under 18 if disabled) is cared for by someone who is not a parent, person with parental responsibility or a close relative for 28 days or more. The Headteacher will notify the local authority of any private fostering arrangements.

4.14 Children with Family Members in Prison

These children can face poverty, stigma, isolation, poor mental health and attendance. Information shared by families is treated confidentially and, on a need-to-know basis. The Headteacher will work with families, specialist organisations and the child to minimise risks and support achievement.

5. Preventing Unsuitable People from Working with Children

The academy operates safer recruitment in accordance with KCSIE 2025 Part Three and the Trust’s Recruitment and Selection Policy. At least one panel member will have current safer recruitment training.

5.1 Allegations that Meet the Harms Threshold (KCSIE 2025 Part Four, Section One)

- Allegations against staff (including supply, volunteers and contractors) meeting the harms threshold are reported immediately to the Headteacher.
- If the disclosure or information relates to the Headteacher or CEO, it must be referred to the Head of HR via hrteam@demat.org.uk, who will inform the CEO when the allegation is made against a Headteacher or inform the Chair of Trustees if the allegation is made against the CEO.
- If the disclosure or information relates to a governor or trustee, it must be referred to the Head of HR via hrteam@demat.org.uk, who will inform the CEO.
- The Headteacher/Head of HR will consult the Local Authority Designated Officer (LADO) within one working day, copying the relevant academy Hub Director, HR Adviser (HRA), and the Trust Safeguarding Lead. The LADO advises next steps. Hub Director will act on this if the concern is about the Headteacher.

- Complete basic fact-finding enquiries (in line with local procedures) without jeopardising potential police investigations.
- Where a child is harmed/at immediate risk, contact children's social care and/or the police without delay.
- Safeguard the child (DSL/DDSL) and support the person subject to the allegation (case manager to agree actions with the LADO).
- Conclude disciplinary processes even if the person leaves employment; notify relevant authorities/professional bodies and reflect outcomes in references where applicable.
- Ensure fair, timely and consistent handling; suspension is not automatic but may be necessary to protect children.

5.2 Concerns that Do Not Meet the Harms Threshold (Low-Level Concerns) (KCSIE 2025 Part Four, Section Two)

- Low-level concerns are to be handled in line with the Trust Low-Level Concerns Policy. 'Low-level' does not mean insignificant.
- Low-level concerns about the Headteacher are reported to the Hub Director and notified to hr@demat.org.uk.
- Concerns include conduct inconsistent with the Code of Conduct (including outside work) that does not meet the harms threshold.
- Records include details, context and actions; anonymity of reporters should be respected where reasonably possible.
- Records are shared with the academy's HRA, kept confidential and secure, and comply with the Data Protection Act 2018/UK GDPR.
- Promote an open, transparent culture where concerns are raised early; ensure all staff understand professional boundaries on- and offline.
- As part of induction, staff (including supply, volunteers and contractors) receive guidance on professional boundaries and are encouraged to self-refer if a situation could be misinterpreted.
- All staff confirm they have read 'Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings' (February 2022).
- Staff are reminded that sexual relationships with pupils under 18 are unlawful (Sexual Offences Act 2003—Abuse of Position of Trust).

6. Other Related Policies and Procedures

This policy should be read alongside, and is supported by, the following Trust/academy policies and procedures:

- Attendance (including Children Absent from Education).
- Behaviour.
- Complaints.
- Low Level concerns.
- Critical Incident Plan.
- Equality.
- Health and Safety.
- Online Safety and Acceptable Use.
- Recruitment and Selection.
- Code of Conduct.
- Discipline
- Grievance.
- Supporting Pupils with Medical Conditions.
- Use of Mobile Phones and Other Smart Devices.
- Whistleblowing.
- Responding to prejudice-related incidents policy.

6.1 Use of Mobile Phones and Other Smart Devices

All primary settings with EYFS must follow the policy on mobile smart phones, smart devices, cameras and image-sharing, recognising the potential for misuse of such devices. See Section 3 of the EYFS Safeguarding and Welfare Requirements.

7. Trustees' Responsibilities for Safeguarding

The Trust Board holds overall accountability for safeguarding and child protection across the Trust. Trustees will ensure that safeguarding is embedded within the culture, strategic priorities, and governance of the Diocese of Ely Multi Academy Trust. In particular, the Board will:

- **Approve and review** the Trust-wide Safeguarding and Child Protection Policy.
- **Ensure training:** All Trustees and Local Governors receive safeguarding (including online safety) training at induction and regular updates thereafter.
- **Publish policy:** Ensure the Trust Safeguarding Policy is available on every academy website.
- **Oversee filtering/monitoring:** Confirm age-appropriate systems are in place and reviewed regularly.
- **Appoint Lead Trustee:** Nominate a Lead Safeguarding Trustee to meet termly with the Safeguarding Team and report to the Board.

- **Ensure** all governors receive safeguarding and child protection (including online safety) training at induction and regular updates thereafter.

8. Local Governing Body (LGB) Safeguarding Responsibilities

LGBs facilitate a whole-Trust approach to safeguarding so that it underpins process and policy development. All systems must operate in the best interests of the child. Through termly monitoring, LGBs assure themselves that academy procedures and training are effective and compliant.

- Nominate a safeguarding governor to monitor academy arrangements in line with the Trust Governance Handbook.
- Ensure awareness of obligations under the Human Rights Act 1998, Equality Act 2010, the Public Sector Equality Duty and local multi-agency arrangements.
- Receive termly Safeguarding Monitoring Forms, time reports, safeguarding reviews and relevant academy/LA safeguarding reports.
- Ensure this Trust policy is published on the academy website.
- Ensure age-appropriate filtering and monitoring systems are in place and regularly reviewed.

9. Use of Academy Premises for Non-School Activities

Where activities are directly supervised/managed by academy staff, this policy applies. Where activities are provided by external organisations, the DSL obtains assurance about safeguarding arrangements and establishes liaison protocols.

- The DSL uses 'Keeping children safe in out-of-school settings' (May 2025) to inform expectations of providers.
- Safeguarding requirements are included in transfer of control agreements (lease/hire); non-compliance may terminate use.

10. Preparing for Martyn's Law (Protect Duty)

As part of our safeguarding responsibilities, the Trust recognises the importance of Martyn's Law, which strengthens security and preparedness at public venues against the threat of terrorism. To ensure our academies are resilient and proportionately prepared, each Headteacher will:

- Complete a terrorism risk assessment tailored to the academy's context.
- Maintain a proportionate and practical security plan.
- Have clear procedures for evacuation, invacuation, and lockdown, **practiced and logged at least termly**.
- Ensure reliable emergency communication systems are in place.
- Provide staff training in threat awareness and incident response.

This approach extends safeguarding beyond child protection to the wider physical safety of pupils, staff, and visitors across all Trust sites.

Appendix A

Categories of abuse, neglect and exploitation

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

Physical Abuse - 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.

Neglect - 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.

It may occur during pregnancy because of maternal substance misuse.

It may involve the neglect of or lack of responsiveness to a child's basic emotional needs.

It also includes parents or carers failing to:

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

Emotional Abuse - Is the persistent emotional maltreatment to cause severe and adverse effects on a child's emotional development.

It may involve conveying to a child that they are:

- Worthless
- Unloved
- Inadequate
- Values only insofar as they meet another person's needs

It may include:

- not giving the child opportunities to express their views
- deliberately silencing them
- 'making fun' of what they say or how they communicate

It may also feature age or developmentally inappropriate expectations being imposed on children including:

- interactions that are beyond the child's developmental capability
- overprotection and limitation of exploration and learning
- preventing participation in normal social interaction.

It may involve:

- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying) causing children frequently to feel frightened or in danger
- The exploitation or corruption of children

Some level of emotional abuse is involved in all types of maltreatment although it may occur alone

Sexual Abuse – involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening.

This may involve:

- physical contact including assault by penetration (e.g. rape or oral sex)
- non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- non-contact activities involving:
 - children in looking at, or in the production of, sexual images.
 - children in watching sexual activities.
 - encouraging children to behave in sexually inappropriate way.
 - grooming a child in preparation for abuse (including via the internet).

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

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

Risks Outside the Home - is an approach that considers children and young people's experiences of significant harm beyond their families. The approach considers children and young people's experiences being not only influenced by their family, but also by their peer network, wider community and society in general. These threats can take a variety of different forms, including: Exploitation by criminal gangs and organised crime groups; Children who go missing and trafficking; Online abuse; Sexual exploitation; Influences of extremism leading to radicalisation

Appendix B

Academy specific arrangements

The Designated Safeguarding Lead is: Melanie Frost

The Deputy Designated Safeguarding Leads are: Megan Peate

The nominated governor for Safeguarding is: David Barrett

In addition, we have the following roles:

The Prevent Lead is: Melanie Frost

The Domestic Abuse Lead is: Melanie Frost

The Online Safety Lead is: Megan Peate

The Designated Teacher for looked after and previously looked after children is: Megan Peate

- If DSL, DDSL exceptionally unavailable, the academy's contingency arrangements in line with KCSIE 2025 Annex C are: Jacqui Hardie, Weeting Primary Academy (01842 810587), Damon Finney, Duchy of Lancaster Primary Academy, 01366 728280

Mr David Barrett, Hub Director, c/o DEMAT

Interview Panel members with Safer Recruitment training:

Melanie Frost, Megan Peate, David Barrett

Academy specific procedures managing safeguarding for pupils are educated off site/alternative provision:

Via the DSL – Melanie Frost

Useful LA Contacts

If no DSL's are contactable anyone with a safeguarding concern can contact: The Children's Advice and Duty Service (CADS). -A staff member or volunteer can call (0344 800 8021) -A member of the public or parent can call (0344 800 8020).

Other Useful contacts:

NSPCC Childline 0800 1111

NSPCC 0808 800 5000 (help@nspcc.org.uk)

Ofsted's Whistleblower Hotline 0300 123 3155

NSPCC FGM Helpline details: 0800 028 3550

NSPCC Gangs Help Line details: 0808 800 5000

NSPCC Whistleblowing advice line 0800 028 0285

Forced Marriage Unit: 020 7008 0151 fmu@fco.gov.uk Monday to Friday, 9am to 5pm Out of hours: 020 7008 1500 (ask for the Global Response Centre)

Safeguarding Advisor Lead for City, South, West Localities: Claire Farrelly – 01603 307767

LADO: 01603 307797

Appendix C

Relevant Documents

“Keeping Children Safe in Education: Statutory guidance for schools and colleges” (September 2025)

“Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings” (May 2025)

“Guidance for Safer Working Practice for those working with children and young people in education settings” (February 2022)

“Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers” (May 2024)

“Meeting digital and technology standards in schools and colleges, Filtering and monitoring standards for schools and colleges” (March 2025)

“The Prevent duty: an introduction for those with safeguarding responsibilities - GOV.UK (www.gov.uk) (Jun 2023)

“Prevent Duty Guidance: for England and Wales” (March 2024)

“Sharing nudes and semi-nudes: advice for education settings working with children and young people” (UKCIS, March 2024)

“What to do if you’re worried a child is being abused: Advice for practitioners” (March 2015)

“When to Call the Police: guidance for schools and colleges,” (National Police Chief Council)

“Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children” (December 2023)

Appendix D

Safeguarding & Child Protection Policy – One-Page Overview of Key Updates and next steps for academies (V3 2024 → V4 2025)

Headline changes for 2025

- **Headteacher mandated as DSL:** The 2025 policy requires the Headteacher to be the Designated Safeguarding Lead (DSL); deputies may be appointed, but accountability remains with the DSL. 2024 allowed a non-Headteacher DSL, with the Headteacher remaining ultimately responsible.
- **RSE content and timing updated:** Clear transition to DfE 2025 RSE guidance with explicit learning outcomes (consent, unsafe friendships/families, online risks, reporting harm). Replaces 2021 framing listed in 2024.
- **Filtering & monitoring standards refreshed (2025):** Strengthened expectations for age-appropriate systems and staff awareness, aligning to the 2025 DfE standards (was March 2023 in 2024 policy).
- **New section on Martyn's Law (Protect Duty):** Proportionate terrorism risk assessment, security plan, evacuation/evacuation/lockdown drills each term, staff awareness, and resilient communications—new in 2025 (not present in 2024).
- **Stronger availability/cover for DSLs:** 2025 formalises in-hours availability plus written contingency (Appendix B) if DSL/DDSL are exceptionally unavailable (previous policy required availability but without this explicit contingency template).
- **KCSIE & associated guidance updated:** All references move to KCSIE September 2025 (was 2024) and keep Working Together 2023, UKCIS 2024, Prevent Guidance 2024, etc. 2024 citations are updated accordingly. Out-of-school settings (lettings/hire) uplifted: Requirements align to May 2025 DfE guidance; safeguarding clauses must be explicit in transfer-of-control agreements (2024 referenced April 2022 guidance).

Procedure & practice – what to adjust in academies

- **Role profiles & job descriptions:** Edit Appendix B academy specific staff. Check and update if necessary, DSL/DDSL job descriptions (and Headteacher JD) to reflect Headteacher as DSL, deputies, status/authority/time, and bi-annual training cycles (Local Authority 2-day core; at least annual updates).
- **Contingency plan for DSL cover:** Edit Appendix B academy-specific cover arrangements (per KCSIE 2025 Annex C). Share with staff and place where staff can access quickly.
- **RSE curriculum map:** Ensure teaching from updated PSHE/RSE schemes of learning for 2025/26 to the new outcomes; continue using the Cambridgeshire PSHE Personal Safety Units and Safer Spaces Toolkit to match new DfE expectations.
- **Premises lettings & third-party providers:** Amend academy specific hire/lease policies and templates so safeguarding non-compliance is a termination ground and agree liaison/reporting protocols with providers (per 2025 guidance).
- **Martyn's Law readiness:** Add a terrorism risk assessment, practical security plan, termly drills (evacuation, evacuation, lockdown), and include staff training & comms checks in your safeguarding calendar—record all drills on Smartlog. (Terrorism Risk Assessment and Security Plan guidance, along with supporting documentation, will be issued by the central team later in the academic year. Academies will be required to adapt these centrally produced materials as appropriate. Schools should not produce their own versions in advance of this guidance.)

- **Records & information sharing:** Continue to use CPOMS as the single recording system and maintain the stance that CPOMS is “recording, not reporting”—staff must still verbally alert the DSL/DDSL for any concern. (Re-emphasised in 2025; already in 2024.)

Governance – what Trustees/LGBs should see this year

- **Policy publishing & approval:** V4 is a Trust policy adopted by academies; ensure academy-specific Appendix B is completed and website copies are updated post-September 2025 board approval.
- **Assurance focus for 2025/26:** Headteacher as DSL implemented and trained; DDSL capacity adequate.
- **Filtering/monitoring** 2025 compliance checks and incident escalation routes.
- Martyn’s Law preparedness evidenced (risk assessment, plan, drills, training in the latter half of the academic year).
- **RSE transition** evidenced in curriculum plans and parent comms.
- **CPOMS QA and attendance analytics** (persistent absence) feeding early help/escalation.

Appendix D – Safeguarding at Stay and Play

The Designated Safeguarding Lead at Stay and Play is

Amy Fowler
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Our DSLs participate in two day Designated Safeguarding Lead training through Norfolk County Council, this is refreshed every two years.

All our DSLs, including the Headteacher, are available should a parent/ carer wish to speak to someone different, and will carry out their duties in accordance with this policy.

The Safeguarding procedures are on display within Stay and Play sessions, a copy of our full safeguarding policy can be accessed via our website: <http://holycross.demat.org.uk> or in paper form on request to the office. This information is shared with parents through the code of conduct, along with a registration form when they first attend Stay and Play.

Any parent/ carer volunteers who support Stay and Play are expected to go through the school's safeguarding checks, this includes providing references, obtaining an enhanced DBS, and participating in Safeguarding Training.

Procedure for Managing Safeguarding Concerns at the Group

The categories of abuse can be found in Appendix 3 of our main safeguarding policy.

Procedure for dealing with a disclosure at our group:

- Listen and be supportive.
- Do not ask any leading questions, interrogate the child, or put ideas in the child's head, or jump to conclusions.
- Do not stop or interrupt a child who is recalling significant events.
- Never promise the child confidentiality— it must be explained that information will need to be passed on to help keep them safe.
- Record what was said immediately as close to what was said as possible. Also record what was happening immediately before the child disclosed.

The recording of safeguarding concerns procedure is set out on page 12 of our main policy.

If a volunteer or a parent has a concern about a child at the group this should be reported to The Designated Safeguarding Lead, who will then determine the next steps, which might include reporting the concern to The Children's Advice and Duty Service (CADS). The CADS Flowchart is on page 34 of the main policy.

Contacting the Children's Advice and Duty Service (CADS)

- If the Designated Safeguarding Person is concerned that a child or children is experiencing or likely to suffer significant harm they will telephone (CADS) immediately on 0344 800 8021
- When considering whether to contact CADS they will consult the CADS Flowchart.
- The DSL will gain consent from the parent to contact CADS, unless doing so would place the child at further risk of harm or undermine a criminal investigation.
- CADS will advise us of the action required to resolve the concerns either directly or with the support of partner agencies, not necessarily Children's Services. Or a formal referral, recording the level of need. Depending on the level, the referral will be processed into either a Family Support Team or Social Work Team.

- A consultation feedback letter will be provided as a record of all conversations and provide a clear audit trail of the outcome agreed.
- We will not investigate and will be led by the Local Authority and/or the Police.
- We will keep written dated records of all conversations with CADS.
- Members of the public or parents can contact CADS on 0344 800 8020

Managing Allegations Against Adults at the group

If a parent attending the group or a volunteer at the group makes an allegation about The DSL, they can directly report their concern to the Headteacher, who will refer this to the Local Authority Designated Officer (LADO). Refer to pages 28 in our main policy for more information on allegations.