L.E.A.D. Academy Trust
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WINDMILL L.E.A.D. ACADEMY

Safeguarding and Child Protection Policy

Policy/Procedure management log

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Katy Aggus	0115 915 0195
Deputy DSL	Mel Jago, Vicky O'Brien, Hazel Vaughan, Holly Elliott, Rosa Trevini, Megan Ritchie, Ruth Pickering	0115 915 0195
Local authority designated officer (LADO)		0115 876 5166
Trust Safeguarding Lead	Becky Hyder	07935 219250
Chair of governors	Rosie Grant	0115 915 0195
Channel helpline		020 7340 7264

Introduction

L.E.A.D. Academy Trust fully recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. The Trust endeavours to provide a safe and welcoming environment in all its academies, where children are respected and valued.
Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2003 require proprietors of independent schools (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children. In line with this requirement, L.E.A.D. Academy Trust has systems in place which are designed to:

- Prevent unsuitable people working, or coming into contact, with children within its academies.
- Promote safe practice and challenge poor or unsafe practice.
- Identify children who are suffering or likely to suffer significant harm and take appropriate action at the earliest opportunity, with the aim of making sure they are kept safe both at home and at school.
- Identify children who may be susceptible to messages of violence and radicalisation and take appropriate action to ensure early intervention to challenge extreme ideologies.
- Contribute to effective partnership working between all those involved with providing services for children.

There are three main elements to the Safeguarding and Child Protection policy:

- Prevention – a commitment to early help, identification of unmet needs and vulnerabilities, and partnerships with agencies to promote the welfare of children and keep children safe.
- Protection - all staff and volunteers are trained to recognise and respond to abuse, neglect and exploitation and are expected to be vigilant and act quickly when they suspect a child is suffering, or is likely to suffer, harm (in line with local safeguarding partnership procedures).
- Support – recognition of the sensitivity and complex nature of safeguarding and child protection, ensuring that children, staff, and families are supported appropriately.

Aims

- To ensure that all practices of each academy and its stakeholders contribute towards the safeguarding and promoting of the welfare of all young people – child's welfare is of paramount importance.
- To emphasise how safeguarding and promoting the welfare of all young people is the primary responsibility of all staff, governors, and volunteers.
- To detail the procedures to follow to ensure the safe recruitment of staff, governors, and volunteers to an academy.
- To outline the safe working practices that all staff, governors, and volunteers should undertake when working with young people.
- To communicate clear procedures for identifying, reporting, and recording suspected cases of abuse, extremism, and radicalisation.
- To support the mission, vision and values of the Trust and its member academies.

Who is responsible for the policy?

- The Trust has overall responsibility for the development and effective operation of this policy. The Trust's Governance Team will ensure AGBs meet the Trust's expectations in relation to policy, governance and compliance. The Trust has delegated day-to-day responsibility for

operating the policy to each individual Trust academy, the academy governing body (AGB) and the Headteacher.

- The AGB and senior leadership team at each Trust academy have specific responsibilities to ensure the fair application of this policy and all are responsible for supporting colleagues and ensuring its success.
- This policy must be implemented alongside the procedural guidance set out by the local authority in which the academy is located.

The Trust's commitment

- Everyone who comes into contact with children and their families has a role to play in safeguarding children. Academy staff are particularly important as they are in a position to identify concerns early and provide help for children, and to prevent concerns from escalating.
- The Trust is committed to providing safe, caring, and welcoming environments where every child is able to reach their full potential free from harm, abuse, exploitation and discrimination. All staff and volunteers are expected to discharge their safeguarding responsibilities effectively and recognise that high self-esteem, confidence, peer support and clear lines of communication with trusted adults helps all children, especially those at risk of or suffering abuse, to thrive.
- All academies will be alert to the signs of abuse, neglect, exploitation and radicalisation and follow procedures to ensure that children receive effective support, protection, and justice.
- Academies will work with social care, the police, health services and other services (such as Channel co-ordinators/police practitioners where appropriate) to promote the welfare of children and protect them from harm.

Policy Scope and Aims

This policy applies to anyone working in Windmill L.E.A.D. Academy including senior managers and governors, volunteers, staff, contractors, agency staff and children.

The policy aims to meet the requirements as outlined in (Keeping Children Safe in Education) KCSIE and Part 3 of Early Years foundation stage statutory framework.

Our academy ensures that all children regardless of age, gender, ability, culture, race, language, religion or sexual identity or orientation are treated equally and have equal rights to protection.

Windmill L.E.A.D. Academy aims to ensure that :

- An environment is promoted where all children feel safe, supported and protected from all types of abuse, neglect, harm or exploitation
- Appropriate action is taken to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly recruited and are trained in recognising and reporting safeguarding issues
- Children are educated to stay safe from harm

1. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance keeping children safe in education 2026, EYFS Statutory Framework (2026) and working together to safeguard children 2026, and the Maintained schools governance guide . We comply with this and all other government legislation and guidance alongside arrangements agreed and published by our Local Safeguarding Children Partnership.

2. Definitions

Safeguarding and promoting the welfare of children 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

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.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18.

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.

3. Roles and responsibilities

Safeguarding and promoting the welfare of children is **everyone's** responsibility. This policy applies to all staff, volunteers, visitors and governors in our academy and is consistent with the procedures of the Nottingham City Safeguarding Children Partnership. Our policy and procedures also apply to extended school and off-site activities.

We understand that we play a crucial role in preventative education. This is in the context of a whole-school approach to preparing children for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - 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, honor-based abuse and 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

3.1 All staff

Staff at Windmill L.E.A.D. Academy who work directly with children must read at least part 1 of Keeping Children Safe in Education (KCSIE) and sign a declaration at the beginning of each academic

year to say that they have reviewed the guidance. Additionally, staff will adhere to supporting the aims of the policy as identified on page 5.

All staff will:

- 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 (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for all children, to speak out and share their concerns
- Follow our systems that support safeguarding, including relevant policies and procedures.
- Be aware of the Family Help processes 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
- Know the process for making referrals to Nottingham City children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- 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
- Know the signs of different types of abuse, neglect and exploitation, including but not limited, to 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 (including violence and harrassment), 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)
- Be aware of new and emerging threats (national and local), including online harm, grooming, sexual exploitation, criminal exploitation (including modern slavery), radicalisation, and the role of technology and social media in presenting harm
- Understand the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- Have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below). The following behaviours and indicators can be signs that children are at risk:
  - drug taking and/or alcohol misuse
  - unexplainable and/or persistent absences from education
  - serious violence, criminal exploitation (including that linked to county lines), radicalisation, and consensual and non-consensual making or sharing of nudes or semi-nudes.
- Know that children can be at risk of harm inside and outside of their home, at school and online
- Know that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- Understand that a child and their family may be experiencing multiple needs at the same time
- Know what to look for to identify children who need help or protection

3.2 The designated safeguarding lead (DSL)

Our DSL is a member of the senior leadership team. Our DSL is Katy Aggus (Assistant Headteacher).DDSLs are: Hazel Vaughan/Ruth Pickering (Head of School), Mel Jago (Attendance Officer), Vicky O'Brien (Deputy SENCO), Rosa Trevini (Assistant Headteacher), Holly Elliott (Assistant Headteacher), Megan Ritchie (Assistant Headteacher).

The DSL takes lead responsibility for child protection and wider safeguarding in our academy. This includes online safety and understanding our filtering and monitoring processes on academy devices and networks to keep children safe online.

During term time, the DSL will be available during academy hours for staff to discuss any safeguarding concerns. Out of academy hours DSLs can be reached via senco@windmillacademy.co.uk or the 'Report a concern' on the school website.

When the DSL is absent, the deputies– will act as cover.

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 (Nottingham City 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 academy
- Make sure that staff have appropriate Prevent training and induction

The DSL will also:

- Keep the headteacher informed of any issues
- 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 Nottingham City children's social care colleagues to prepare our policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of our DSLs and DDSLs are set out in their job description.

3.3 The Academy Governing Body

The governing body 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
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our academy's local multi-agency safeguarding arrangements
- Appoint a senior link governor to monitor the effectiveness of this policy in conjunction with the full governing board. At Windmill L.E.A.D. academy this is Rosie Grant.
- Ensure 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
- Ensure that the academy has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
  - 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
  - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support our academy in meeting these standards

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The academy has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, trainee teachers, volunteers and contractors).
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the academy roll), for example Girl Guiding:
  - 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 academy about safeguarding arrangements, where appropriate
  - Make sure that safeguarding requirements are a condition of using the academy premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The Trust safeguarding lead or the academy's Director of Schools will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate.

All governors will read Keeping Children Safe in Education Part one and two

3.4 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 academy and via the academy 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
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL, Trust DSLs or the academy's Director of Schools on this
- Ensuring the relevant staffing ratios are met, where applicable
- Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting

3.5 Virtual school heads

Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of children 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, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others in order to support the achievement, progress and outcomes of children with a social worker, children-in-care, in kinship care or under SGOs.

4. Confidentiality and Information Sharing

At Windmill L.E.A.D. Academy we recognise that the effective safeguarding of children relies upon the appropriate sharing of information between professionals, agencies and organisations. All personal information relating to children and their families will be treated with the utmost respect and confidentiality by staff, volunteers and governors. Everyone working within the academy understands the sensitive nature of such information and is expected to maintain professional confidentiality at all times.

Confidentiality

All matters relating to child protection and safeguarding are confidential. However, no member of staff or volunteer should ever guarantee confidentiality to a child, nor promise that information disclosed to them will be kept secret. Children should be made aware that where a concern relates to their safety or welfare, information may need to be shared with relevant professionals in order to protect them.

Where there is a safeguarding or child protection concern, information will be shared promptly with our Designated Safeguarding Lead (DSL) or Deputy DSL. Where a child is believed to be at immediate risk of harm, a referral will be made without delay to Children's Social Care and/or the Police.

Our Headteacher and DSL will only share personal information about a child with members of staff, external agencies or professionals on a **'need to know' basis**, ensuring that information is shared only when necessary to safeguard and promote the welfare of the child.

All staff have a professional responsibility to share information with other agencies where it is necessary to protect children from harm. Data protection legislation, including the Data Protection Act 2018 and UK GDPR, does not prevent information sharing where there are concerns about a child's safety or welfare.

Further guidance can be found through:

- *Keeping Children Safe in Education (KCSIE) 2026*
- *Working Together to Safeguard Children* (2026 and subsequent updates)
- Information Sharing Duty 2026

Information Sharing

Effective information sharing between practitioners, schools, local authorities and partner agencies is essential for the early identification of need, assessment of risk, and the provision of appropriate support and services to safeguard and promote the welfare of children. Learning from Rapid Reviews and Child Safeguarding Practice Reviews consistently demonstrates that delays in sharing information, or failures to recognise and act upon its significance, can have serious consequences for children's safety, welfare and wellbeing.

In line with the **Information Sharing Duty** under Section 16LA of the Children Act 2004, as introduced by the **Children's Wellbeing and Schools Act 2026**, our academy recognises that relevant information must be shared with appropriate agencies and professionals where this will support the safeguarding or welfare of a child. Information sharing should be timely, necessary, proportionate, relevant, accurate, secure and lawful, with the presumption that information will be shared where it may assist in protecting a child or promoting their welfare.

We expect all staff to follow statutory guidance and the Government's Information Sharing Advice for Practitioners, ensuring that the best interests of the child remain at the centre of all information-sharing decisions.

Where a child transfers to another school or college, safeguarding records will be transferred securely and separately from the main childs file. Relevant information may also be shared in advance where this is necessary to enable the receiving setting to assess risk and put appropriate safety and support arrangements in place.

5. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, will be recorded on MyConcern. This will include instances where referrals were or were not made to another agency such as Nottingham City children's social care or the Prevent programme, etc. If a staff member is in any doubt about whether to record something, they will discuss it with the DSL. Records of any incident/disclosure must be acted on immediately and records updated as soon as possible within a 24 hour period.

Records will include:

- A clear and comprehensive summary of the concern- this must include the full name/s of pupils and staff, the precise location of the incident or disclosure, and any witnesses. The entry must be factual, rather than a view or interpretation, avoiding biased based language
- Details of how the concern was followed up and resolved
- The record must also have a clear decision rationale on any action taken/not taken and any follow up actions, detailing who and when it will be followed up.

Concerns and referrals will be kept on MyConcern.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professionals need to see them.

Safeguarding records relating to individual children who have attended any L.E.A.D. academy will be retained until the individual reaches the age of 25.

If a child for whom 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 will 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 academy's DSL must 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.

6. Recognising and responding to abuse, neglect and exploitation

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it.

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

- Has a disability
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)

- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home (including frequent school mobility)
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised, exploited or drawn into terrorism
- 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
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school
- Not in receipt of full-time education or attending an Alternative Provision
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded
- Is at risk of going electively home educated or returning from a period of electively home educated

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

Any concern should be discussed in the first instance with our Designated Safeguarding Lead or Deputy Designated Safeguarding Leads in their absence, as soon as possible. If at any point, there is a risk of immediate serious harm to a child, a referral should be made to Nottingham City MASH or the police immediately. Anybody can make such a referral.

All concerns / decisions / actions / outcomes are recorded as per academy procedures on MyConcern

Multi Agency Safeguarding Children Hub (MASH) - Nottingham City Council

6.2 If a child makes a disclosure

If a child discloses a safeguarding issue, our staff will:

- Listen to and believe them. Allow them time to talk freely and not ask leading questions
- Stay calm and do not show that they are shocked or upset

- Tell the child they have done the right thing in telling them. Do not tell them they should have told a staff member sooner
- Explain what will happen next and that staff will have to pass this information on. Not promise to keep it a secret
- Record the conversation as soon as possible in the child's own words on MyConcern. Stick to the facts, do not put judgements in or use emotive language
- If appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

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 staff from having a 'professional curiosity' and speaking to the DSL if they have concerns about a child.

Where there is a safeguarding concern/disclosure, 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 children feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for children to confidently report abuse (report a concern tab on academy websites, worry boxes)
- Ensure our reporting systems are well promoted, easily understood and easily accessible for children
- Make it clear to children that their concerns will be taken seriously, and that they can safely express their views and give feedback

6.3 If staff discover that FGM has taken place or a child is at risk of FGM

Keeping Children Safe in Education 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 child has already been subjected to FGM, and factors that suggest that they may be at risk, are set out in appendix 2 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 Nottingham City 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 **child under 18** must speak to our DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a child is at risk of FGM or FGM is suspected but is not known to have been carried out. Our staff will not examine children.

Any member of staff who suspects a child is at risk of FGM or suspects that FGM has been carried out, or discovers that a person **aged 18 or over** appears to have been a victim of FGM should speak to our DSL and follow the local safeguarding procedures.

6.4 If there are concerns about a child's welfare

Our staff will always maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.

If staff have any concerns about a child's welfare, they should act on them immediately and report via Myconcern.

If in exceptional circumstances where a DSL is not available, this should not delay appropriate action being taken. The staff member will speak to a member of the senior leadership team and/or take advice from Nottingham City children's social care.

They can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

KCSIE Part 1 'Figure 1' sets out the actions taken if you have any concerns about a child's welfare.

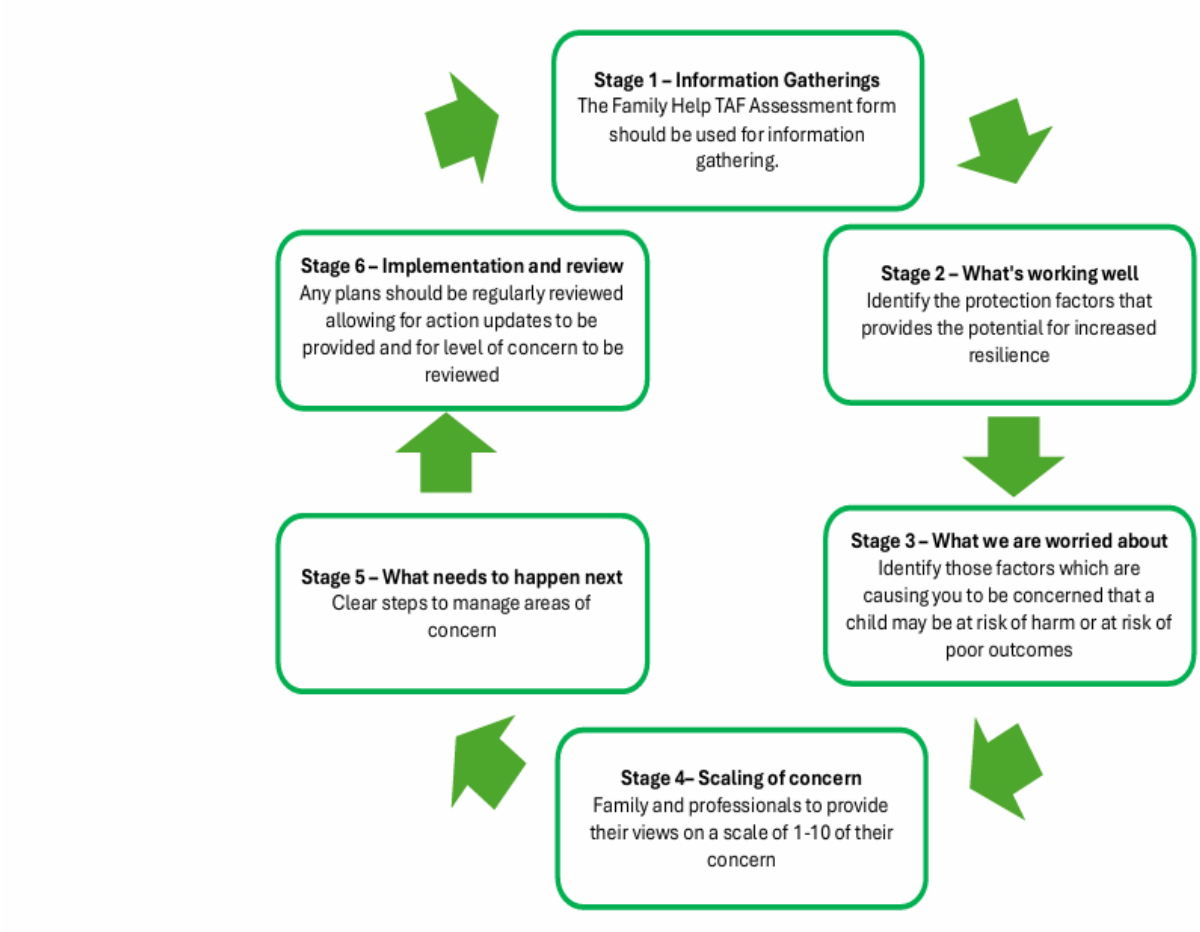
Assessments

If further assessment/intervention is appropriate, our DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Other staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

Our DSL will keep the case under constant review and will consider a referral to Nottingham City children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed through MyConcern.

Nottingham City Assessment Diagram



Referral

If it is appropriate to refer the case to Nottingham City children's social care or the police, the DSL will make the referral or support a member of staff to do so.

If a staff member makes a referral directly, they will inform 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 a child's circumstances do not appear to be improving following a referral, or if the referrer believes that the response is inadequate, the DSL or referring professional will challenge and escalate their concerns in accordance with Nottingham City safeguarding partnership escalation procedures. This is to ensure that the child's needs are appropriately assessed and that suitable support, intervention and protection are provided.

Welcome to the Interagency Safeguarding Children Procedures

6.5 If you have concerns about extremism, radicalisation or terrorism

Where there is a concern, our DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or Nottingham City children's social care team.

Additionally, Nottingham City Local Authority have a Prevent Education Officer who should be contacted for advice and support- Louise.Cox@nottinghamcity.gov.uk 0115 8765864

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

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 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
- (See appendix 2)

6.6 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.

At Windmill L.E.A.D. Academy our staff are alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. We use a Thrive approach to all SEMH needs. We have active partnerships with MHST.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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

6.7 Allegations of abuse made against other children (including harmful sexual behaviour)

We recognise that children are capable of abusing their peers (child-on-child abuse). Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

All child-on-child abuse (including violence and harassment) is unacceptable and will be taken seriously. We also know that even if there are no reports it does not mean it is not happening. It may be the case that it is just not being reported.

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage. Harmful sexualised behaviour can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children towards a single child or towards another group of children. HSB exists on a continuum and may escalate into sexual

harassment or sexual violence, it can occur online or face-to-face (both physically and verbally) and is never acceptable.

Most cases of children hurting other children will be dealt with under our academy's behaviour policy in conjunction with our anti-bullying policy, but this safeguarding and child protection policy will apply to any allegations that raise safeguarding concerns. We will also consider the use of safeguarding separation in line with DfE Suspension and Permanent Exclusion guidance. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put children in the academy at risk
- Is violent
- Involves children being forced or coerced into using 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 sharing of nudes and semi-nudes)

See appendix 2 for more information about child-on-child abuse and sexual violence and sexual harassment to ensure that our guidance is followed as per section 7.4.

If the incident is potentially a criminal offence, the DSL will work closely with the police and other agencies as required whilst protecting children and taking any disciplinary measures against the alleged perpetrator.

Creating a supportive environment in our academy and minimising the risk of child-on-child abuse (including violence and harassment)

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse (including violence and harassment), 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 or sending sexual images
- Be vigilant to issues that may affect different genders – for example, sexualised or aggressive touching or grabbing towards female children, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate children about appropriate behaviour and consent
- Ensure children are able to easily and confidently report abuse using our reporting systems (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
- 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 (including violence and harassment), and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse (including violence and harrassment) in our academy, 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
- Ensure staff understand 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 child 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 (including violence and harrassment) 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
- Take a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual. All such incidents require a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability

Appropriate action, in line with other relevant policies for example anti-bullying/ behaviour, can be taken while other investigations are going on, e.g. by the police. The fact that another agency is investigating or has investigated an incident doesn't (in itself) prevent our academy 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 Nottingham City 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

6.8 Online safety (read alongside online safety policy)

At Windmill L.E.A.D. Academy we are aware that technology offers many opportunities but is a significant component in many safeguarding and wellbeing issues. We recognise that online harm is

an evolving area of potential risk and therefore our culture of vigilance around emerging themes, trends and data is imperative and regularly reviewed.

Children are at risk of abuse online as well as face to face. Children can also abuse their peers online. This can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images (including AI generated images), especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

We are also aware of the risks to children of misinformation, disinformation (including fake news) and conspiracy theories. All our staff have an understanding of the expectations applicable to their roles and responsibilities in relation to filtering and monitoring of ICT systems and regular monitoring of our academy's equipment and networks.

Our academy's approach to online safety, including appropriate filtering and monitoring on academy devices and networks is reflected in our online safety policy.

This will include:

- review filtering and monitoring provision at least annually, identifying any risks and including checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record will be kept of these checks.
- blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- having effective monitoring strategies in place that meet the academy's safeguarding need.
- reviewing and discussing the standards with the leadership team, IT staff and service providers to ensure the academy meets the Department for Education filtering and monitoring standards.

Our academy uses Senso to monitor and filter in order to limit exposure to safeguarding risks. DSL's and those with responsibility for safeguarding receive weekly automated reports, alongside daily monitoring. DSL's at Windmill L.E.A.D. academy are fully trained and understand how Senso works to protect children. L.E.A.D. IT perform full annual audits, documenting the filtering systems, testing blocking and key word detection. These are aligned to the DfE filtering framework.

The Governing Body alongside the designated member of SLT will ensure a review is maintained at least annually to ensure the standards are met and will discuss with LEAD IT whether more needs to be done to support in meeting and maintaining the required standards. This will be communicated to staff, children, parents, carers and visitors to the academy who provide teaching to children as part of the learning and educational opportunities we provide.
Our Senior DSL and the DSL team will always act in the 'best interest of the child' and will promote the importance of safeguarding concerns for children, and in particular children's access to online sites when away from Windmill L.E.A.D. academy, with parents and carers.

We will support understanding of harmful online challenges and hoaxes and share information with parents and carers, outlining where they can get help and support.

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.

To address this, Windmill L.E.A.D. Academy aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of children, staff, volunteers and governors
- Protect and educate the whole community in its safe and responsible use of technology, including mobile and smart technology
- Ensure our environment is mobile free by default in line with Government guidance. (please see separate mobile phone policy)
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to our academy for their own use, but will limit such use to non-contact time when children are not present
  - Staff will not take pictures or recordings of children on their personal phones or cameras
- Make all children, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in our academy, of the academy's ICT systems, and use of their mobile and smart technology
- Make sure all staff, children and parents/carers are aware that staff have the power to search childrens' phones, as set out in the DfE's guidance on searching, screening and confiscation

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, for example: 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; for example: 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; for example, 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. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/)

6.9 Artificial intelligence (AI) - https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education

Generative artificial intelligence (AI) tools are now widespread and easy to access. Our staff, children and parents/carers may be familiar with generative chatbots.

Windmill L.E.A.D. Academy recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard children. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose children to harmful content. For example, where AI is used to create images, audio or video hoaxes that look real.

We will treat any use of AI to access harmful content or bully children in line with this policy and our behaviour, anti-bullying and AI policies.

Our staff are aware of the risks of using AI tools while they are still being developed and will carry out risk assessments for any new AI tool being used by our academy. Our academy's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

6.10 Consensual and non consensual intimate images (including AI)

Our academy's approach is based on the guidance Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK . It applies to all staff

Staff responsibilities when responding to an incident

If staff at our academy are made aware of an incident involving the consensual or non-consensual sharing of intimate images/videos, including those generated using AI, for example, deep fakes. It must be reported to the DSL immediately.

Staff **must not**:

- View, copy, print, share, store or save the imagery, or ask a child / parent/ carer to share or download it (if the staff member has already viewed the imagery by accident, it must be report to the DSL)
- Delete the imagery or ask the child / parent/ carer to delete it.
- Ask the child(ren) 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 child(ren) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any child(ren) involved

We will explain that the incident needs reporting, and reassure the child(ren) that they will receive support and help from the DSL.

The Internet Watch Foundation's 'Report Remove' is installed on all academy websites and can be used to report images that have been shared online: Report Remove from Childline and IWF

In some instances it may be more appropriate to confiscate a device to preserve any evidence.

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 2 for more information on assessing adult-involved incidents
- There is reason to believe that a child 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 child's developmental stage, or are violent
- The imagery involves sexual acts and any child in the images or videos is under 13

- The DSL has reason to believe a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the child 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 and rationale will be made and recorded in line with our safeguarding procedures.

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 child at risk of harm.

Curriculum coverage

Children are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education, personal development and computing curriculum. 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
- Issues of legality
- The risk of damage to people's feelings and reputation
- Children also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with children so they are aware of the processes Windmill L.E.A.D. Academy 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
- Delivered in an age-appropriate way

6.11 Private Fostering

Definition of private fostering:

A private fostering arrangement is a private arrangement for a child under the age of 16 (or 18 if they are disabled) to be cared for by someone who is not a parent or close relative for more than 28 days. The Local Authority is not involved in placing the child or young person in this private arrangement.

A child or young person is privately fostered if they are living with extended family members such as cousins, great aunts, great uncles or a family friend. They may be living outside of their parents' care due to;

Child or young person being asked to leave the family home.

- Parent being in prison / hospital / homeless.
- Avoiding becoming a looked after child.
- Parent has leaving the local area and child remaining to complete academic studies.
- Child leaving the family home due to family dysfunction or because they have been living with parents who have substance misuse problems or other difficulties.
- Parent deciding to place child with extended family member.
- Child being placed with extended family for religious or economic reasons.

Responsibilities

Private foster carers are responsible for providing the day-to-day care of the child in a way which will promote and safeguard the child's welfare. However, the overarching responsibility remains with the person who has parental responsibility for the child.

The Local Authority has legal duties towards private fostered children and must satisfy itself that the welfare of children who are, or will be, privately fostered within their area ensures they are satisfactorily safeguarded.

If our Academy becomes aware of a child or young person living in a private fostering arrangement Children's Social Care must be notified within one working day.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.

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

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or become involved in trafficking, child sexual exploitation or modern-day slavery.

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

Our academy staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the LA. Windmill L.E.A.D. Academy, itself has a duty to inform the local authority of the private fostering arrangements within one working day.

On admission to Windmill L.E.A.D. Academy, we will take steps to verify the relationship of the adults to the child who is being registered.

7. Notifying parents or carers of safeguarding concerns

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 concern 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 Nottingham City children's social care 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 Nottingham City 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, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

8. Children with vulnerabilities

We recognise that all children are vulnerable, however some children are more vulnerable for a variety of reasons. At Windmill L.E.A.D. Academy we aim to ensure that we are proactive in terms of identification and support, and ensuring those with vulnerabilities are not disadvantaged.

8.1 Children with special educational needs, disabilities or health issues

We recognise that children 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
- Children being more prone to peer group isolation or bullying (including prejudice-based bullying) than their peers
- The potential for children with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- The need for intimate care and that these children are more likely to be dependent on adults for care, and/or communication.
- 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 offer extra support for these children. This includes:

- Thrive Assessment
- ELSA support
- The SEMH space- The Snug
- SEMH interventions such as Theraplay, Brick Therapy
- Emotion Coaching
- MHST referrals- 1:1 work, small group, whole class interventions

Any abuse involving children with SEND will require close liaison with the DSL (or deputy) and the SENCO/Deputy SENCO.

8.2 Children with a social worker (including Looked-after and previously looked-after children)

Children 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.

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

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

- Responding to unauthorised absence or episodes of missing education
- Any suspensions and exclusions
- The provision of pastoral and/or academic support

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
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Katy Aggus, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. They are appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL 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, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

9. Alternative Provision

Where our academy places a child with an alternative provision provider, Windmill L.E.A.D. Academy continues to be responsible for the safeguarding of that child and should be satisfied that the provider can meet the needs of the child. We will follow at all times the national guidance.

We recognise that children who attend alternative education often have complex needs. It is important governing bodies/trusts and DSLs ensure children are fully supported at all times, and the alternative setting is aware of any additional risks of harm that children may be vulnerable to. Information sharing for children who receive education provision outside of a mainstream setting is vital to support the child and ensure the learning environment where they are placed has all necessary information for the child before they access the provision. The Working Together principles are key to keep the child safe and understanding the vulnerabilities needing to be supported. This should include up to date contact details for the professionals working with the child and family.

Wherever a child from Windmill L.E.A.D. Academy attends alternative provision, a meeting will be held prior to the child attending to ascertain the safeguarding procedures such as full safer recruitment checks have been conducted and procedures that the provider has in place. Timetables and provision will also be discussed. This will all be recorded on a written form. The child will be visited, and a telephone call will be made at least once each week to ensure attendance. The headteacher, who is familiar with national and local guidance, will share concerns, where appropriate, with the relevant agencies. We will always obtain written confirmation from the alternative provision provider that all appropriate safeguarding checks have been conducted on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff. Placements will be reviewed at least half termly to ensure that their attendance is good, their needs are being met and the setting is safe. Our academy will not hesitate to consider ending a placement if any concerns are raised

10. Teaching opportunities

Children are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum.

Children are taught to recognise when they are at risk, how to get help when they need it and they are encouraged to report concerns they may have about their peers.

We teach children to keep safe in a range of ways:

- PSHE curriculum
- Computing curriculum
- Swimming
- PE
- Incidental teaching moments through the curriculum

10. Training

10.1 All staff

All staff members at Windmill L.E.A.D. Academy will undertake safeguarding and child protection training on induction and annually, including on whistleblowing procedures and online safety (including filtering and monitoring) to ensure they understand our safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will also be regularly updated at intervals during the year and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Include processes for family help assessments including criteria for different levels of involvement
- Be in line with advice from our safeguarding partnership, the LA and government guidance
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring

All staff will have training on 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 online safety, as required (for example, through emails, e-bulletins and staff meetings).

Volunteers will receive appropriate training, if applicable.

10.2 The DSL and DDSLs

The DSL and DDSLs will undertake child protection and safeguarding 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.

10.3 Governors

All governors 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 us to deliver a robust whole-school approach to safeguarding

10.4 Safer Recruitment – (please read alongside our Safer Recruitment Policy)

The leadership team, academy governing body (AGB) and L.E.A.D. Academy Trust will ensure that all safer working practices and recruitment procedures are followed in accordance with the guidance set out in KCSiE Part Three and our academy Safer Recruitment policy.

Academy leaders, staff and members of the Trust will be appropriately trained in safer working practices and access the safer recruitment training advised by the Trust. This will include as a minimum the headteacher, DSL and school business manager.

Statutory pre-employment checks and references from previous employers are an essential part of the recruitment process. We will ensure we adopt the appropriate procedures to carry out the checks required and where any concerns arise, we will seek advice and act accordingly. The academy has in place recruitment, selection, and vetting procedures in accordance with KCSiE Part Three, and maintains a Single Central Record (SCR), which is reviewed regularly and updated in accordance with KCSiE Part Three

Staff will have access to advice on the boundaries of appropriate behaviour and will be aware of the Academy Code of Conduct, which includes contact between staff and children outside the work context. Concerns regarding low-level concerns are included in our Code of Conduct and Allegations Management policy in line with KCSiE Part Four Section two. Staff can access a copy of this through Sharepoint.

In the event of any complaint or allegation against a member of staff, the headteacher (or the DSL if the headteacher is not present), will be notified immediately. If it relates to the headteacher or where there is a conflict of interest in reporting to the headteacher, the chair of governors / Trust safeguarding team (Neil Spencelayh, Helen Tunney, Rebecca Hyder) must be informed without delay. We will respond to all allegations robustly and appropriately in collaboration with the Local Authority Designated Officer (LADO) and Trust HR Business Partner.

Staff may find some of the issues relating to child protection and the broader areas of safeguarding upsetting and may need support which should be provided by the academy and the Trust's human resources (HR) team.

Advice and support will be made available by the Safeguarding Children in Education Officer (SCiEO), LADO and HR where appropriate to the leadership team.

All new employees will be appropriately inducted to their role and a link to the Induction Checklist for Safer Recruitment can be accessed from HR's guidance section of the HR portal.

At Windmill L.E.A.D. Academy at least 2 people who are part of an interview process for any post at the academy 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 Trust and local safeguarding procedures.

11. Concerns about staff behaviour (read alongside the Managing Allegations Policy)

Allegations or concerns about an adult working in the academy whether as a teacher, trainee teacher, supply teacher, other staff, volunteers or contractors

At Windmill L.E.A.D. Academy we recognise the possibility that adults working in the academy may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the academy should be taken to the headteacher without delay and logged onto Confide; any concerns about the headteacher or where there is a conflict of interest in reporting to the headteacher, should go to the Chair of Governors and Trust DSL team who can be contacted by email or telephone.

Any concerns about the conduct of members of staff, supply teachers, volunteers or contractors should be reported to the headteacher unless there is a conflict of interest in doing so.

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

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

Allegations

A concern is an allegation if the person* 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 he or she may pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicated they may not be suitable to work with children (including outside of the academy)

Allegations should be reported to the LADO 'without delay' by the headteacher. Where the allegation is about the headteacher, a Trust DSL or Director of Schools will contact the LADO.

Before contacting the LADO, the headteacher or the Senior DSL will conduct basic enquiries ('fact finding') in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. Where the allegation is against the headteacher, a Trust DSL or Director of School will conduct basic enquiries.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, our academy, or a combination of these.

Low-level Concerns

Concerns may be graded low-level if the concern does not meet the criteria for an allegation; but the person* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- Being over friendly with children.
- Having favourites.
- Taking photographs of children on their mobile phone.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- Using inappropriate sexualised, intimidating or offensive language.

At Windmill L.E.A.D. Academy we:

- Ensure 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.
- Empower staff to share any low-level safeguarding concerns with the headteacher via Confide.
- Address unprofessional behaviour and support the individual to correct it at an early stage.

Provide a responsive, sensitive and proportionate handling of such concerns when they are raised

If the concern has been raised via a third party, the headteacher will collect as much evidence as possible by speaking:

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

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

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

Low-level concerns must be recorded in writing and recorded on 'Confide'. This should include:

- Name* of individual sharing their concerns
- Details of the concern
- Context in which the concern arose
- Action taken

(* if the individual remains anonymous then that should be respected as far as reasonably possible and acted upon accordingly)

Records will be kept confidential, held securely and comply with the Data Protection Act 2018. The academy follows the Trust Records Retention policy to decide how long they retain such information, but it is at least until the individual leaves our employment.

Records will be reviewed regularly so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

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

12. Monitoring arrangements

This policy will be reviewed at least **annually** by the DSL. At every review, it will be approved by the full governing board.

13. Links with other policies

This policy links to the following policies and procedures:

● Behaviour

● Staff [behaviour/code of conduct]

● Complaints

● Health and safety

- Attendance
- Online safety
- AI guidance
- Mobile phone use
- Equality
- Relationships and sex education
- First aid [Early years providers should note the first aid requirements set out in the EYFS statutory framework]
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices

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

Appendix 1: types of abuse

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

Appendix 2: specific safeguarding issues

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. All schools are required to teach about personal safety through the RSHE curriculum. Many schools provide outdoor-safety lessons run by teachers orby local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at:
www.actionagainstabduction.org and www.clevernevergoes.org.

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

The National Referral Mechanism (NRM) is the UK's framework for identifying and supporting victims of exploitation and modern slavery. Whatever form it takes, exploitation and modern slavery is child abuse and relevant child protection procedures must be followed if modern slavery or trafficking is suspected, as per the Modern Slavery:statutory guidance for England and Wales (under s49 of the Modern Slavery Act 2015)
and non-statutory guidance for Scotland and Northern Ireland (accessible version) -GOV.UK

Some children will also have access to an Independent Child Trafficking Guardian.

Independent child trafficking guardians provide advocacy for children and help to promote and support their recovery.

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as avictim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, having a physical or learning disability, or being neurodivergent, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitationwhere children:

• appear with unexplained gifts, money or new possessions which could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal andsexual exploitation,
• associate with other children involved in exploitation,
• suffer from changes in emotional well-being,
• misuse alcohol and other drugs,
• go missing for periods of time or regularly come home late, and
• regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompaniedby violence or threats of violence.
Some additional specific indicators that may be present in CSE are children who:
• have older boyfriends or girlfriends; and
• suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.
Further information on signs of a child's involvement in sexual exploitation is available in the DfE guidance: Child sexual exploitation: guide for practitioners.

County lines
As county lines is a form of criminal exploitation, a First Responder who identifies any potential victim of county lines exploitation should complete the relevant child protection and modern slavery referrals as detailed in the Modern Slavery statutory guidance.
County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line".
This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes.
Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:
• go missing (from school or home) and are subsequently found in areas away from their home,
• have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime),
• are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs,
• are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection,
• are found in accommodation that they have no connection with, often called a 'trap house' or 'cuckooing' or hotel room where there is drug activity,
• owe a 'debt bond' to their exploiters, and
• have their bank accounts used to facilitate drug dealing.
Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office Child exploitation disruption toolkit (accessible) - GOV.UK and The Children's Society County Lines Toolkit For Professionals | The Children's Society.

Children and the court system
Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.
The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice haslaunched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children who are absent from education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, honour or faith-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school or college's unauthorised absence procedures and children missing education procedures.

Children with family members in prison

Approximately 193,000 children in England and Wales have a parent in prison each year. They are at risk of poor outcomes as a result of poverty, stigma, isolation and poor mental health. The Prisoners' Families Helpline offers free, confidential support and advice for families in England and Wales who are in contact with the criminal justice system.

School and college staff should be aware that children who have experienced parental imprisonment are more likely to be absent (or excluded) than their peers, to experience mental ill health and drug and alcohol misuse; they are also less likely to be in education, training or employment in later life. Staff should understand the need for tailored, trauma informed and sensitive support that can help mitigate potential harm and help encourage stability.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crime continues to represent one of the most significant and rapidly evolving threats within the United Kingdom's (UK) crime landscape. Offences under the Computer Misuse Act 1990 (CMA) have risen substantially.

Young people across the UK experiment with illegal online activity, often without understanding the legal or ethical implications. The impact of cybercrime extends well beyond immediate financial losses, with scope to cause disruption to national infrastructure.

Cyber-dependent crimes include:

• unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded,

• 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,

• making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide preventative police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyberdependent

offences and divert them to a more positive use of their skills and interests.
Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.
Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK.

Domestic abuse
The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).
Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent or care giver abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.
Domestic abuse is one of the most prevalent forms of abuse, with Women's Aid estimating that 160,000 children are currently living in households where domestic abuse is taking place. This is likely to be an underestimate, however, with much abuse remaining hidden and not coming to the attention of services. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse (including violence and harrassment) is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures as set out in paragraphs 55-61 should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass
Operation Encompass is an information-sharing scheme between the police and relevant education settings operating in all police forces across England and Wales. In November 2025, a new statutory duty was placed on the police to notify a child's education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse. This includes all children connected to a household where they have attended a domestic abuse incident; children who are physically present at the incident, children not physically present during the incident, and situations where a child might reside in another household temporarily or permanently. Operation Encompass report over 2,000 notifications are made to settings every day. Educational settings are often the only consistent support available to some children, especially for those who live in isolated or rural communities. The aim of the duty is to support education settings to provide timely, informed support to children affected by domestic abuse, to ensure the school has up to date

information about the child's circumstances and enable immediate support to be put in place according to the child's needs. This places no new responsibilities on education settings.
Operation Encompass does not replace statutory safeguarding procedures or referrals and applies solely to domestic abuse incidents. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare.
Forces and educational settings should have an open communication process to determine where a safeguarding referral should be made in accordance with local thresholds. If an officer makes a referral alongside issuing an Operation Encompass notification, they should tell the child's education setting.
The duty applies to all children in education from reception (typically aged 4/5) up to the age of 17, and who are enrolled in registered primary and secondary schools, including independent schools, private schools, alternative provision settings (e.g., Pupil Referral Units), as well as further education colleges or 16 to 19 academies in England or Wales. Police forces must notify the local authority if the child is electively home educated or missing from education. Forces may also make notifications to other settings, for example early years settings or further education provision for young people with SEND, although these are not covered under the duty.
More information about the scheme can be found in the statutory guidance for police: Duty on police forces in England and Wales to notify education establishments of domestic abuse incidents: Operation Encompass..

Additional resources for education settings, including Online National Key Adult Training: Operation Encompass can be found on the charity's website Home: Operation Encompass.

Operation Encompass notifications
Operation Encompass involves the sharing of personal and sensitive information about children and families. It is vital that all participants comply with the data protection laws. Police forces and educational settings are responsible for deciding how and where information about incidents and notifications are made. They must ensure it remains confidential, is held securely, and adheres to the requirements of the data protection laws. The designated safeguarding lead is responsible for leading on all safeguarding and child protection matters within an educational setting. They are likely to be the Key Adult for Operation Encompass notifications and are responsible for making safeguarding referrals to appropriate agencies, maintaining up-to-date safeguarding policies and training, overseeing record-keeping, and liaising with families where appropriate. DSLs may wish to use a central safeguarding inbox to ensure they have oversight over all Operation Encompass notifications.
The notification should include:
• the name, date of birth and protected characteristics (e.g., disability, race, religion etc.) of any child from that education setting who is related to any adult involved in the incident, whether the adult is the alleged perpetrator or non-abusive relative
• the relationship of the child to the victim and to the perpetrator,
• the police reference number,
• the location, time and date of the incident,
• if the child was present, and if so, where they were (notifications should be shared even if the child was not present at the particular incident),
• the voice of the child, such as what they are saying and how they are behaving, and
• the context and the circumstances of the incident, including whether an arrest was made, whether the incident was attended in person or via Rapid Video Response, and where possible, information on previous domestic abuse incidents.
The notification should not include:
• information or reference to sexual offences disclosed at the domestic abuse incident. This must not be disclosed in the notification. Under the Sexual Offences (Amendment) Act 1992, anonymity for victims of sexual offences must be preserved.

The Operation Encompass charity provides an advice and helpline service for all staff members from education settings who may be concerned about children who have experienced domestic abuse. The helpline is available from 8:00 to 13:00, Monday to Friday on 0204 513 9990 (charged at local rate).

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safe Young Lives: Young people and domestic abuse | Safelives
- Domestic abuse: specialist sources of support (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Operation Encompass (includes information for schools on the impact of domestic abuse on children)
- The Home Office publish guidance on Controlling or coercive behaviour which provides clear information on what constitutes controlling or coercive behaviour and how to identify the offence.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk 152 Section 20 of the Victim and Prisoners Act 2024 introduced a new provision into Part 3 of the Domestic Abuse Act 2021 under Section 49A. [Victims and Prisoners Act 2024] of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into
local authority children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local
authority children's social care will be the lead agency for these children, and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16- and 17-year-olds who may be homeless and/or require accommodation: here.

Temporary accommodation notification duty

The Children's Wellbeing and Schools Act places a new duty on local housing authorities in England to notify educational institutions, health visiting services and general medical practices, when a child is placed in temporary accommodation. This notification should be made when consent has been given from the parent, those with parental responsibility or care of the child, or the child themselves in cases of 16–17-year-olds living
independently from their parents. The notification will enable school and college staff to safeguard and promote the welfare of these children at the earliest opportunity and support them to improve their outcomes.
Whilst any discussion with the local housing authority should be progressed as appropriate, this notification does not, and should not, replace existing safeguarding and welfare duties nor a referral into local authority children's social care where a child has been harmed or is at risk of harm.

Modern slavery and the National Referral Mechanism
Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs. Further information and training for professionals on exploitation and modern slavery is available here - Modern slavery training: resource page - GOV.UK
The National Referral Mechanism is the system used within the UK to support potential victims of exploitation and modern slavery. Further information on the signs that someone may be a victim of exploitation and modern slavery, the support available to victims and how to refer them to the NRM is available in statutory guidance Modern slavery: how to identify and support victims - GOV.UK.
Children who are referred into the NRM in England and Wales may also have access to an Independent Child Trafficking Guardian (ICTG)1. ICTGs provide advocacy for children and help to promote and support their recovery.

Preventing radicalisation
Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.
Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.
Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. As defined in the Government's Prevent Duty Guidance for England and Wales. As defined in the Terrorism Act 2000 (TACT 2000)
It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn into terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) Making a Prevent referral.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard155 to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the Prevent duty.
The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in education settings should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 141-210, which are specifically concerned with education (and also covers childcare). The guidance is set out in terms of three general themes: leadership and partnership, capabilities and reducing permissive environments.
The school or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

Channel
Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are first assessed by police and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate
support required. Whilst the referral is being assessed, should any further or new information come to light, this should also be passed to police. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.
The designated safeguarding lead (or a deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting Counter-Terrorism and Security Act 2015 (legislation.gov.uk) "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act) victims of abuse, incidents that may indicate concerns about serious violence or harmful behaviours and/or details of those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.
Statutory guidance on Channel is available at: Channel guidance and Channel training from the Home Office.

Educate Against Hate is a government website designed to support school and college teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help staff identify and address the risks, as well as build resilience to radicalisation. These resources are regularly updated to ensure they remain relevant and practical. Resources have been developed working closely with education professionals and civil society groups to identify and produce high-quality materials that assist teachers in building childrens' critical thinking skills and resilience to extremist ideologies.
For advice specific to further education, Educate Against Hate hosts a suite of teaching packs and accompanying guidance to meet the specific needs of students and practitioners in further education and training settings. The Education and Training Foundation (ETF) hosts the Prevent for FE and Training. This hosts a range of free, sector specific resources to support further education settings to comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make
robust, informed and proportionate referrals. The Education and Training Foundation (ETF) provides online training modules for practitioners, leaders and managers, to support staff and governors/Board members in outlining their roles and responsibilities under the duty.

London Grid for Learning has also produced useful resources on Prevent (Online Safety Resource Centre - London Grid for Learning (lgfl.net).

Serious violence

There are a number of indicators, which may signal children are at risk from, or are involved in committing serious violence. These may include:

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

The likelihood of involvement in serious violence may be increased by factors such as:

- being male,
- having been suspended, spent time in Alternative Provision or permanently excluded from school,
- having experienced child maltreatment,
- having been involved in offending, such as theft or robbery,
- having used drugs or alcohol in early adolescence, and
- having previously been a victim or previously perpetrated violence

A fuller list of risk factors can be found in the Home Office's Serious Violence Strategy. Professionals should also be aware that violence can often peak in the hours just before or just after school, when children are travelling to and from school and can concentrate in particular places. These times can be particularly risky for young people involved in serious violence. It is important that schools and colleges try to understand where these places are, with a view to working with partners to promote safety for children. Listening to children and consulting with staff can help establish when and where they feel unsafe. Working with wider partners can also help build understanding of the local context beyond the school or college and help co-ordinate a collective safeguarding response around the school day.

Advice for schools and colleges is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance. The Youth Endowment Fund (YEF) (the "what works" centre for preventing violence) has produced practical guidance for schools and colleges and an accompanying self-assessment tool to help introduce evidenced practice for preventing children becoming involved in violence.

Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found here. As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core

Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain partnership working to tackle serious violence across local areas and ensure a joined-up approach to young people across the risk spectrum.

Police, Crime, Sentencing and Courts Act 2022 introduced a new Serious Violence Duty (Statutory Guidance) on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities are under a separate duty to co-operate with core duty holders when asked, and there is a requirement for the partnership to consult with all such institutions in their area.

The Duty **does not** replace or duplicate existing safeguarding duties.

Honour or faith-based abuse (including female genital mutilation and forced marriage)

Honour or faith-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers** that requires a different approach (see below).

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining children, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school or college's designated safeguarding lead (or a deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty:

FGM Fact Sheet.

Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack particularly section 13.

Forced marriage

Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a

person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England). Section 5B(6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case.

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other

form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.
The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (chapter 8 provides guidance on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.
In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

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 in and wear a visitor's badge/lanyard.

Visitors to the academy who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

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

Non-collection of children

If a child is not collected at the end of the session/day, we will:

If a child or children are not collected at 3:15pm Windmill L.E.A.D. Academy will:

1. Make contact with the first listed contact by phone to clarify that the child is not yet collected and to ensure the child will be collected by 3:35pm (or permitted to walk home alone in Years 5 – 6).

2. When the first contact is not contactable each of the remaining contacts listed will be contacted in order: contact two followed by contact three (and so on where more than three contacts are listed).

3. As per step one Windmill L.E.A.D. Academy will seek to make arrangements for the child to be collected (or permission granted for the child to walk home alone in Years 5 – 6) with the contact listed.

4. At 4:00pm if a child is not collected* (after Windmill L.E.A.D. Academy staff phoning all of the contacts listed) SLT will be informed and two members of staff will walk the child back to their address when this is feasible (e.g. the address is within the vicinity of the school and approximately no more than 15 minutes' walk). Children will only be left at home with a listed contact unless specific permission has been granted by a parent/carer. If no-one is home the child and staff will return to Windmill L.E.A.D. Academy.

*Please note this will be recorded as a safeguarding concern – as the child's basic care needs are not being met.

5. At 4:30pm if a child is not collected* Windmill L.E.A.D. Academy will have a duty of care to inform other agencies, including: Children and Families Direct (Social Services) and the Police.

*Please note this will be recorded as a safeguarding concern – as the child's basic care needs are not being met.

This timeframe is slightly longer (until 5pm) if children have been in after school clubs.

6. Thereafter Windmill L.E.A.D. Academy will work in liaison with these third parties to ensure the child's safety. The Academy will ultimately pass the duty of care and supervision of the child over to Children & Families Direct and/or to the Police.

Missing Children

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. Please see 'Missing Children Policy and Procedures' document for further detail.