Safeguarding & Child Protection Policy 2025/2026

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1. Introduction, ethos

At South Pennine Academies, we believe that:

- Safeguarding and promoting the welfare of children is everyone's responsibility.
- Schools play a key role in the prevention of abuse, and all our staff are trained to be vigilant and aware of the signs and indicators of abuse and safer working practices.
- All children have the right to be protected from harm.
- Children need support which matches their individual needs, including those who may have experienced abuse.

Our approach to safeguarding is child centered, always considering the best interest of the child.

South Pennine Academies staff, Trustees and Local Academy Board members recognise the contribution they make to safeguarding children. We believe that our academies should provide a caring, positive, safe and stimulating environment which promotes the social, physical, cultural and moral development of the individual child. The viewpoints and voices of children are of paramount importance to our Academy, and we will always listen to their wishes, thoughts and feelings, as well as identifying and supporting their needs. Our aim is to always create a culture of vigilance, recognising that all staff, including volunteers, have a full and active part to play in protecting our students from harm and should always work in the best interests of the child.

We will strive to identify any difficulties or concerns early to act preventatively. We will always provide support and advice for families and parents/carers, whilst always acting in the best interest of the child. Safeguarding also includes ensuring that we work in an open and honest way, enabling our children to feel safe by providing a secure learning environment, where they are equally protected regardless of any barriers they may face and are able to grow and develop in the same way as their peers.

South Pennine Academies safeguard students by:

- We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers that they may face.
- We support every child's development in ways that will foster security, confidence and independence.
- We maintain a secure site ensuring that all visitors to the academy are recorded, monitored and clear about how to raise a safeguarding concern should one arise.
- We ensure that safer recruitment practices are followed to prevent those who pose a risk to children gaining access to them. In line with this practice, we ensure that all staff employed by the academy have received all necessary pre-employment checks, which are recorded in the single central record (SCR).
- We filter and monitor all internet traffic into the academy to reduce the risk of children being exposed to harmful material and communication.
- We have developed a structured procedure to be followed by all members of the academy to raise awareness of the need to safeguard children and their responsibilities in identifying and reporting possible cases of abuse.

- We provide regular training and briefings for staff, and volunteers, in child protection, safeguarding and online risks and ensure that all staff, volunteers and visitors know who our Designated Safeguarding Officers and Designated Senior Leads are.
- We ensure that the academy contributes to inter-agency working, in line with statutory guidance "Working Together to safeguard children" in line with locally agreed multi-agency safeguarding arrangements.
- We ensure that we have robust admission and attendance procedures to ensure that children are safe and prevent them from going missing from education.
- We empower young people to identify risks both within the academy and in their community; ensuring that they have the skills and confidence to protect themselves and others.
- We ensure that children understand the importance of reporting concerns about themselves and their peers and encourage in them the confidence to discuss sensitive issues.
- We provide pastoral and inclusion support to ensure that children and families have access to guidance and advice, and when needed referrals for additional support to meet their needs.
- We will share information when appropriate with other agencies and services to ensure that children and families have support to meet their needs and prevent children from harm or further harm.
- We will take immediate action and contact the appropriate agencies when we believe a child is in danger or at risk of harm.
- We will endeavour wherever possible to obtain at least two emergency contacts for every child in case of an emergency, and in case there are welfare concerns at the home.

This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2025 (KCSIE) which requires individual schools and colleges to have an effective child protection policy and the Department for Education, 'Safeguarding and protecting people for charities and trustees' October 2019.

The procedures contained in this policy apply to all staff, (including Trustees, temporary or third-party staff and volunteers) and are consistent with those outlines in KCSIE 2025.

1.1 Policy context

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance.

This includes:

- Keeping Children Safe in Education 2025 (KCSIE)
- Working Together to Safeguard Children 2023 (WTSC)
- Working Together to improve school attendance 2024
- Ofsted: Education Inspection Framework
- Framework for the Assessment of Children in Need and their Families 2000
- Locally agreed multi-agency safeguarding arrangements put in place by the safeguarding partners
- Oldham Safeguarding Partnership
- Kirklees Safeguarding Partnership
- Calderdale Safeguarding Partnership

- Early Years and Foundation Stage Framework 2025 (EYFS)
- The Education Act 2002
- The Education (Independent School Standards) Regulations 2014

1.2 Definition of Safeguarding

In line with KCSIE 2025 (as detailed in Part One and Annex A), safeguarding and promoting the welfare of children is defined for the purpose of this policy as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children 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 prevent children suffering, or being likely to suffer, significant harm.

Safeguarding includes a wide range of specific issues including (but not limited to):

- Child abduction and community safety incidents
- Child Criminal Exploitation (CCE) - County Lines
- Child Sexual Exploitation (CSE)
- Children and the court system
- Children missing from education (CME)
- Children with family members in prison
- Online Safety and Cybercrime
- Domestic Abuse
- Homelessness
- Mental health
- Modern slavery
- Preventing radicalisation – The Prevent Duty and Channel
- Sexual violence and sexual harassment between children in schools and colleges
- Serious violence
- So-called 'honour'-based abuse – Female genital mutilation (FGM), Forced marriage

As a Trust we recognise that some children are at an increased risk of abuse and may face additional barriers in respect of recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We will strive to ensure that all children are afforded the same protection, regardless of any barriers they may face.

1.3 Related Safeguarding Policies

South Pennines Academies are committed to ensure that safeguarding and child protection is at the forefront and underpins all relevant aspects of process and policy development. This policy is part of the Trust and academy's safeguarding portfolio and should be read in conjunction with the following policies or procedures:

- Anti-Bullying Procedures
- Attendance and Children Missing in Education Policy
- Behaviour Policy

- First Aid Policy
- Curriculum Policy (including policies for PSHCE/SRE/RRS/British Values/SMSC/Sexual Violence & Sexual Harassment)
- Students with additional health needs who can't attend school
- Supporting students with medical needs
- Looked After and Recently Looked After Child Policy
- Intimate Care Policy
- Online Safety Policy including Cyber Bullying
- Social Media and Acceptable Use Policy
- Educational Visits Policy
- Safeguarding Induction Procedures
- Managing Allegations against staff Policy
- Low Level Concerns Policy
- Staff Code of Conduct (Safer Working Practices)
- Whistle Blowing Policy
- Supervision Policy
- Physical Intervention Policy and Procedures
- Intimate Care Policy
- Safe Recruitment and Selection Policy
- Mental Health and Well Being Policy
- Home Visits Policy
- Lettings Policy
- Risk Assessments
- Complaints Policy
- GDPR and Data Protection Policy
- SPA Alternative Provision Guidance

1.4 Policy Compliance, Monitoring and Review

All academies within South Pennines Academies Trust are expected to adopt this policy and to adapt it to reflect their individual academy, referring to the locally agreed multi-agency safeguarding arrangements put in place by the safeguarding partners.

The policy will be reviewed at least annually and will be revised following any national or local policy updates as safeguarding issues emerge and evolve, including lessons learnt.

All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One or Annex A of KCSIE 2025. Staff who work with children will also be provided with a copy of Annex B. Copies can be found on the academy website.

As part of the Trust commitment to providing a safe environment for children and young people all staff (including temporary staff and volunteers) have an obligation to act if they are concerned that this policy does not reflect practice in the academy. This should be done by notifying the DSL in the first instance and following escalation procedures if their concerns are not promptly acted upon.

Parents/carers can obtain a copy of the school's Safeguarding and Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via the academy website.

The Designated Safeguarding Lead and Principal will ensure regular reporting on safeguarding activity and systems to the Local Academy Board, including the annual safeguarding report and minutes from any Safeguarding Link Governor visits. The Trust Director with responsibility for Safeguarding will report to the Trustees.

The Trustees and governors will not receive details of individual children's situations or identifying features of families as part of their oversight responsibility.

2. Key personnel

- Our DSL is: Aamna Ali
- Our DDSL is: Richard Coates; Sarah Bevan; Jessica Oyston; Jemma Muncaster; Helen Lumb and Jenni McBride
- Our designated teacher for children looked after and previously is: Sarah Bevan
- Our Trust Director with responsibility overall for safeguarding is Alison Black (CEO) (ABlack@spacademies.org)
- Our Trust Director of Inclusion is Debbie Kelly (DKelly@spacademies.org)
- Our Trust safeguarding and child protection lead is Lindsey Curry (LCurry@spacademies.org)
- Our link Governor for safeguarding is:

Our nominated safeguarding Trustee is Claire Hewitt

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3. Key roles & responsibilities

3.1 Overview

The Trustees, the Local Academy Boards, Principal, Executive Leadership Team, Senior Leadership Team and Trust Safeguarding Lead have read and will follow KCSIE 2025.

Kirkheaton Primary School has nominated a link governor for Safeguarding and Child Protection. This is Rachel Hemmingway. The nominated governor will support the DSL and have oversight in ensuring that the academy is operating in line with the Trust Safeguarding Policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required.

The Local Academy Board, Principal, Senior Leadership Team and Trust's Head of Safeguarding and Child Protection Lead will ensure that the DSL is supported in their role.

3.2 All staff

Safeguarding and promoting the welfare of children is the responsibility of everyone and anyone, everyone who comes in contact with children and their families has a role to play as they are able to identify concerns early. Provide help for children, promote children's welfare and prevent concerns from escalating.

All staff will undergo safeguarding and child protection training (including online safety) at induction. This training will be updated regularly, at least annually, and will

be provided with regular updates to continue to provide them with relevant skills and knowledge to safeguard children effectively.

All members of staff have a responsibility to:

- Provide a safe environment in which children can learn.
- Reassure a victim that they are being taken seriously, they will be supported and kept safe.
- Be prepared to identify children who may benefit from early help and may warrant early help intervention, reporting problems as soon as they emerge.
- Understand the early help process and their role in it.
- Understand their academy safeguarding policies and systems.
- Undertake regular and appropriate training which is regularly updated (including online safety and understanding the roles and responsibilities in relation to filtering and monitoring).
- Know what to do if a child tells them that he or she is being abused, neglected or exploited and understand the impact abuse, neglect and exploitation can have upon a child.
- Understand that children may not feel ready or know how to tell someone that they are being abused, exploited, neglected, and/or they may not recognise their experience as harmful.
- Understand the academy's procedures for recording cause for concerns and passing information on to DSLs in accordance with the academy's recording systems.
- Be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
- Know how to maintain an appropriate level of confidentiality, never promising a child that they will not pass on a concern of abuse.
- Be aware of the indicators of abuse, neglect and exploitation so that they can identify cases of children who may need help or protection.
- Understand the process for making referrals to local authority children's social work service (CSWS) and for statutory assessments that may follow a referral, including the role they might be expected to play in such assessments.
- Understand the risk associated with children who are absent from education, particularly on repeat occasions and/or prolonged occasions.
- Carry out relevant staff responsibilities outlined in the Academy Online Safety Policy.
- Develop a professional curiosity and speak to the DSL if they have any concerns about a child.

Teachers, including the Principal, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

3.3 The Designated Safeguarding lead (DSL)

The academy has appointed a member of the leadership team, Aamna Ali, as the Designated Safeguarding Lead (DSL). Additionally, the academy has appointed Deputy DSL's (Richard Coates; Sarah Bevan; Jessica Oyston; Jemma Muncaster; Helen Lumb and Jenni McBride)who will have delegated responsibilities and act in

the DSL's absence. During term time the DSL or a DDSL will be available to staff to discuss any safeguarding concerns.

The DSL has lead responsibility for the day-to-day oversight of safeguarding and child protection systems in the academy (including online safety and understanding the filtering and monitoring systems and processes in place). Whilst the activities of the DSL may be delegated to deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs are trained to the same standard as the DSL. The DSL and any deputy DSLs training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

- The Principal will be kept informed of any significant issues by the DSL.
- The DSL will act as the central point of contact for all staff to discuss any safeguarding concerns.

The DSL will be given the time, training, resources and support to:

- Maintain a confidential recording system for safeguarding and child protection concerns.
- Make appropriate referrals to external agencies including Children's Social Care, the Channel programme and the Police.
- Coordinate safeguarding actions for individual children. When supporting children with a social worker or children who are looked after the DSL should have the details of the child's social worker and the name of the virtual school head in the local authority that looks after the child (with the DSL liaising closely with the designated teacher).
- Liaise with other agencies and professionals in line with KCSIE 2025 and WTSC 2023.
- Ensure that locally established procedures as put in place by the Local Safeguarding Partnership, including referrals, are followed, as necessary.
- Represent, or ensure that the school is appropriately represented at multi-agency safeguarding meetings (including Child Protection conferences and core group meetings), and act as a point of contact for safeguarding partners.
- Manage and monitor the school role in any multi-agency plan for a child.
- Promote supportive engagement with parents/carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Where a trained DSL (or deputy) is not on site and cannot be contacted by phone or online video, for example working from home, a senior leader will assume responsibility for coordinating safeguarding on site.
- Be responsible for responding to domestic abuse notifications from the local authority and providing support to children and their families as appropriate.
- Ensure adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or term activities.
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations with KCSIE 2025.
- Carry out the DSL responsibilities outlined in the Trust's Online Safety Policy.

The full responsibilities of the DSL are set out in Annex C of KCSIE 2025 – Role of the designated safeguarding lead. All designated safeguarding leads and deputy safeguarding leads must read and comply with this.

3.4 Principals

The Principal is responsible for the implementation of this policy, Including:

- Ensuring that staff (including temporary and supply staff), volunteers and third-party contractors are informed of this policy as part of their induction.
- Communicating this policy to parents when their child joins the academy and via the academy website.
- Ensuring that the roles and responsibilities of the DSL/DDSL as referenced in Annex C of KCSIE (2025) are reflected in their job descriptions.
- Ensuring that the DSL has appropriate time, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring all staff undertake regular safeguarding and child protection training.
- Acting as 'case manager' in the event of an allegation of abuse made against another member of staff (including supply staff) or volunteer where appropriate.
- Ensuring that all recommendations made by our Trust in relation to strengthening the academy's safeguarding arrangements are carried out within agreed deadlines.
- Carrying out Principal responsibilities outlined in the Trust's Online Safety Policy, including ensuring staff implement appropriate filtering and monitoring of online material.
- Ensuring that the academy practices safer recruitment principles in the recruitment of staff, including carrying out checks on the suitability of members of the LAB.

3.5 The Local Academy Boards (LABs)

- The Local Academy Board (LAB) will hold the Principal to account for the implementation of this policy any actions/recommendations made by our Trust and the local multi-agency partnership arrangements in respect of strengthening the academy's safeguarding arrangements.
- The LAB will create a strong culture of safeguarding in the academy in order to ensure that safeguarding and child protection are at the forefront and underpin all aspects of policy and procedure development and monitor the effectiveness of this and other related safeguarding policies.
- All LAB members will attend the Trust's safeguarding and child protection training to develop their understanding of their strategic roles and responsibilities including online safety on appointment and then at least once every three years.
- The LAB will appoint a link governor for safeguarding. The link governor is Rachel Hemmingway. They will monitor the effectiveness of this policy in conjunction with the LAB.
- The LAB will ensure that the academy has appropriate IT filtering and monitoring systems in place and should be informed in part, by the risk assessment required by the Prevent Duty in order to limit children's exposure to online risks.
  - The LAB will seek assurance that the filtering and monitoring standards are being met and that they are regularly reviewed.
- The LAB, along with the senior leadership team, are responsible for satisfying themselves and obtaining written assurances from any relevant academy lettings and alternative/off site providers and provisions that their safeguarding

arrangements are secure, that they have effective child protection and safeguarding policies in place and that the appropriate DBS checks have been completed for any individual working with children, in keeping with the expectations of the Trust and the requirements set out in KCSIE (2025).

The full responsibilities of the Trust Board are set out in Part 2 of KCSIE (2025) – The management of safeguarding. The LAB, as delegated by the Trust Board, will ensure that the academy is fully compliant with our statutory safeguarding responsibilities.

All members of the LAB must sign the Trust code of conduct for governors and must not behave in a way that puts the safety or wellbeing of children and young people at risk. Any breach of the code of conduct may lead to their removal from the LAB.

3.6 Trust Safeguarding Lead

The Trust Safeguarding Lead has oversight of safeguarding and child protection across the Trust.

- The Trust Safeguarding Lead will support the academies when dealing with safeguarding and child protection incidents.
- The Trust Safeguarding Lead will conduct quality assurance reviews on behalf of the Trust and the LAB's.
- The Trust Safeguarding Lead will provide continuous professional development and training for DSL's, LAB members and Trustees on behalf of the Trust.
- The Trust Safeguarding lead will support DSLs in their role, providing supervision, case discussion and advice.
- The Trust Safeguarding Lead will support the Trust by providing safeguarding advice in relation to policy.

3.7 Trustees

In addition to the responsibilities set out in KCSIE (2025), South Pennine Academies Trust has charitable status and therefore implements the DfE guidance on Safeguarding and protecting people for charities and trustees.

All Trustees will have a clear oversight of how safeguarding and protecting people from harm is managed within the Trust.

The Trustees will take all reasonable steps to protect people who come into contact with the Trust from harm. This includes:

- Children
- Staff
- Volunteers
- Other people who come into contact with the Trust

The Trustees and senior managers are responsible for ensuring the Trust:

- Has appropriate policies and procedures in place, which are followed by all trustees, staff, volunteers, supply staff and third-party contractors.
- Checks that people are suitable to act in their roles.
- Knows how to spot and handle concerns in a full and open manner.

- Has a clear system of referring to or reporting to relevant organisations as soon as concerns are suspected.
- Sets out risks and how they will be managed in a risk register which is regularly reviewed.
- Follows statutory guidance, good practice guidance and legislation.
- Is quick to respond to concerns and carry out appropriate investigations.
- Does not ignore harm or downplay failures.
- Has a balanced Trust board and does not let one Trustee dominate its work – Trustees should work together.
- Makes sure protecting people from harm is central to its culture.
- Has enough resources, including trained staff/volunteers/Trustees for safeguarding and protecting people.
- Conducts periodic reviews of safeguarding policies, procedures and practices.

The Trustees and senior managers will ensure that a Serious Incident Notification is made to the Department for Education where required. A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- Harm to our students, staff, volunteers or others who come into contact with through its work
- Loss of our money or assets
- Damage to our property
- Harm to our work or reputation

The Named Trustee for safeguarding is James Annetts. For information on how to contact our Trust board, please email office@spacademies.org

All Trustees must sign the Trust's code of conduct for Trustees and must not behave in any way that puts the safety or wellbeing of children and young people at risk. Any breach of the code of conduct may lead to their removal from the board.

3.8 Students

Children and Young People (students) have a right to:

- Feel safe, be listened to, and have their wishes taken into account.
- Contribute to the development of academy safeguarding policies.
- Receive help from a trusted adult.
- Learn how to keep themselves safe, including online.

3.9 Parents & carers

Parents/carers have a responsibility to:

- Understand and adhere to the relevant school policies and procedures.
- Talk to their children about safeguarding issues and support the school in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm including online and seek help and support from the academy or other agencies.
- Carry out parental responsibilities outlined in the Trust's Online Safety Policy
- Provide at least two emergency contacts for students/students and update the academy of any change. Where reasonably possible, the academy should hold more than one emergency contact number for each student/student. It is good practice to give the academy additional options to contact a responsible adult when a child absent from education is also identified as a welfare and/or safeguarding concern.

4. Recognising indicators of abuse & neglect

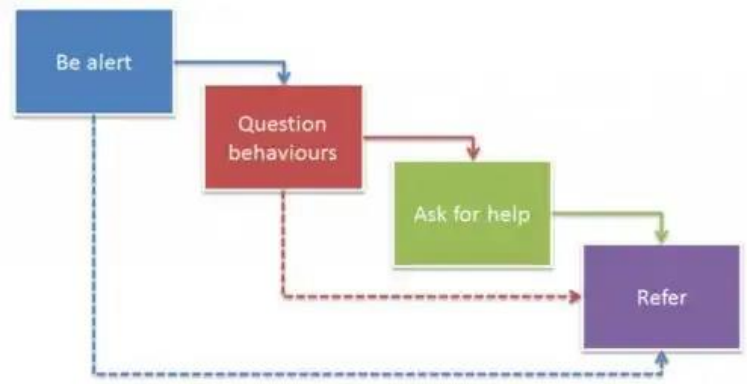
All staff within the academy are made aware of the definitions and indicators of abuse and neglect and exploitation and will understand that children can be at risk of harm inside and outside of the school, at home or in a community setting. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.

Staff will recognize that abuse or neglect of a child may occur through the infliction of harm or through the failure to prevent harm. Staff will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others.

South Pennine Academies recognise that when a child may be suffering actual or potential harm there are four categories of abuse:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

All members of staff are expected to be aware of and follow this approach if they are concerned about a child:



Academy staff recognise that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. They are aware that indicators of child abuse, neglect and exploitation can vary from child to child and they do not automatically mean that a child is being abused. However, all concerns should be taken seriously and explored by the DSL on a case-by-case basis.

Parental behaviours may also indicate concern, so staff should also be alert to parent-child interactions or concerning parental behaviours: this could include parents who appear to be under the influence of drugs or alcohol or if there is a sudden change in their mental health.

Safeguarding incidents and/or behaviours can be associated with factors outside of the school and/or can occur between children offsite. Children can be/are at risk of abuse or exploitation in situations outside their families. This can take a variety of forms and children can be vulnerable to multiple harms including (but is not limited to) sexual exploitation (including online), criminal exploitation, and serious youth violence.

By understanding the indicators of abuse, neglect and exploitation, we can respond to problems as early as possible and provide the right support and services for the child and their family.

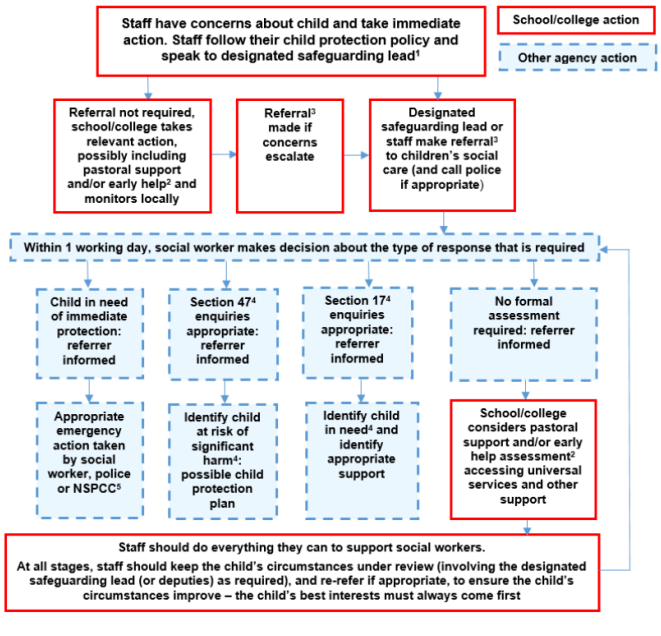
5. Child protection procedures

South Pennine Academy Trust recognises that some children have additional and complex needs and may require access to intensive or specialist services to support them.

In addition to our own safeguarding protocol, we adhere to the relevant Local Safeguarding Children Partnership procedures which can be found on their website:

- Oldham Safeguarding Partnership
- Kirklees Safeguarding Partnership
- Calderdale Safeguarding Partnership

All staff are aware of the process for making requests for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.



South Pennine Academies recognises, and is committed to, its responsibility to work within local Safeguarding Children Partnership multi-agency safeguarding arrangements and in line with statutory guidance the SLT and DSL will work to establish strong and cooperative relationships with professionals in other agencies.

South Pennine Academies support the Operation Encompass Scheme working in partnership with the Local Safeguarding Partnership and Police (West Yorkshire/Greater Manchester) to provide support to children experiencing domestic abuse:

- DSLs within the academy should consider any appropriate accommodation within the education day to lessen the impact and to support the child if they need it.
- Consideration should be given to making contact with the parent (identified victim) to offer support or signpost to other services.

If a child is in immediate danger or is at risk of harm, a request for support should be made immediately to the Duty and Advice team/Front Door Safeguarding Hub and/or the police in line with local agreed procedures. We recognise that in such situations our role is NOT to investigate as a single agency but to act in line with the guidance set out by our local multi-agency safeguarding arrangements. The DSL may seek advice or guidance from the Trust Safeguarding Lead before deciding next steps or seek advice/guidance from a social worker at the Front Door service who are the first point of contact for Integrated Children's Services (ICS) if this is applicable.

In the event of a request for support to the Duty and Advice team/Front Door Safeguarding Hub being necessary, parents/carers will be informed and consent to this will be sought by the DSL unless there is a valid reason not to do so or if doing so would put a child at risk of harm or would undermine a criminal investigation.

If the DSL is not immediately available to discuss an urgent concern, staff can seek advice from the Deputy DSL. They may also seek advice from the Trust Safeguarding Lead or via consultation with a social worker from the Front Door. If anyone other than the DSL makes a referral to an external service, they will inform the DSL as soon as possible.

The DSL will keep all Early Help cases under constant review and consideration will be given to a request for further support from the Front Door if the situation does not appear to be improving or getting worse.

If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, the DSL will consider following escalation procedures as published by the Local Safeguarding Children Partnership to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the Trust Safeguarding Lead.

Any teacher who discovers that an act of FGM appears to have been carried out on a student under 18 MUST immediately (in consultation with the DSL) report this to the police personally. This is a statutory duty, and teachers will face investigation under the Trust's Disciplinary Procedure for failing to do so.

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

Any member of staff who suspects a student is at risk of FGM must speak to the DSL and follow the local safeguarding procedures.

Concerns that staff must verbally report to a DSL within 10 minutes:

- Any suspicion that a child is injured, marked or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play.
- Any explanation given which appears inconsistent or suspicious.
- Any behaviours which give rise to suspicions that a child may have suffered harm (e.g. worrying drawings or play)
- Any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment.
- Any concerns that a child is presenting signs or symptoms of abuse, neglect or exploitation.
- Any significant change in a child's presentation, including non-attendance.
- Any hint or disclosure of abuse from any person.
- Any concerns regarding person(s) who may pose a risk to children (e.g. living in a household with children present).
- Any potential indicators of Child Exploitation.
- Any potential indicators of FGM.
- Any potential indicators of Radicalisation.
- Any potential indicators of exposure to Domestic Abuse.
- Any concerns arising in the local community.

6. Record keeping

All safeguarding concerns, discussions and decisions, including the rationale for the decision, will be recorded on CPOMS without delay. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of any action taken, decisions reached and the outcome. The records should include instances in which referrals were or were not made to another agency.

The system will alert the DSL and DDSL as required by our Trust. This should be as soon as possible after the incident/event, recording the child's words verbatim. If there is an immediate concern a member of staff should consult with the DSL before adding the concern to CPOMS. Reporting urgent concerns takes priority, however, there remains a requirement for the member of staff to record the concern on CPOMS.

Visitors to the academy or staff who do not have access to CPOMS will be asked to complete a cause for concern' form and pass it on to the DSL without delay. This form, and/or any other notes relating to the concern, will be scanned onto CPOMS, referenced and actioned with the originals retained and stored in a secure format accessible only to the Principal, DSL and DDSLs.

Staff will record information about any injuries observed using the body map tool on CPOMS. Staff should not take photographs for this purpose. If staff are in any doubt about recording requirements this should be discussed with the DSL.

Safeguarding records are kept for individual children and are maintained using CPOMS. Any paper files must be stored securely and separately from all other records relating to the child in school. Safeguarding records are kept in accordance with data protection legislation and are retained securely by the DSL, they should be shared with staff on a 'need to know' basis only. Any access to these records by other people (e.g. class teacher, Ofsted inspector, auditor) should be recorded on the chronology with an explanation of why this was justified/appropriate.

Other safeguarding information that will be recorded on CPOMS:

- Any child protection information received from the child's previous educational establishment, records of discussions, telephone calls and meetings with colleagues and other agencies or services.
- Any relevant discussions with parents/carers or extended family members.
- Professional consultations.
- Letters and emails sent and received relating to Child Protection matters.
- Referral forms sent to the CSWS, other external agencies or education-based services.
- Minutes or notes of meetings, e.g. CP Conferences, core group meetings, etc., copied to the file of each child in the family, as appropriate.
- Formal plans for, or linked to, the child e.g. CP Plans, Early Help, risk assessments etc.

When the child leaves the academy (including in-year transfers) the DSL will ensure the child protection file (Paper file and/or CPOMS) is transferred to the new school or college as soon as possible. Paper records will be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the DSL at the new school/college in advance of a child leaving. For example, information that would allow the new school/college to continue to provide support or have support in place for when the child arrives.

7. Confidentiality & information sharing

South Pennine Academies Trust recognises that information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation. We understand our duty to share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2025.

All members of staff are aware of their professional responsibility to share information with other agencies to safeguard children, they cannot promise confidentiality in situations which might compromise a child's safety or wellbeing. The Head Teacher/Principal or DSL will disclose information about a student/student to other

professionals on a 'need to know' basis, and in line with Trust Policy and Data Protection Legislation. (Data Protection Act 2018 and UK GDPR).

If staff are in any doubt about sharing information, they must speak to the DSL or Principal. Fear about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. (KCSIE 2025).

The Data Protection Officer for South Pennine Academies Trust is GDPR Sentry.

DfE Guidance on Information Sharing (May 2024) provides further details.

Under Data Protection legislation (the UK General Data Protection Regulation & Data Protection Act 2018) a student or their nominated representative has several legal rights in respect of information relating to them. These rights include the right to access and the right to rectify inaccurate data. Therefore, all information must be accurately recorded, objective in nature and expressed in a professional manner.

Any child who has a child protection file has a right to request access to it. However, there is no automatic right to see all the information held in child protection records. Information can be withheld if disclosure:

- Could cause serious harm or is likely to cause serious harm to the physical or mental health or condition of the child or another person; or
- Could reveal that the child or another person has been a subject of or may be at risk of child abuse, and the disclosure is not in the best interest of the child; or
- Is likely to prejudice an on-going criminal investigation; or
- if information about the child also relates to another person who could be identified from it or the information has been given by another person who could be identified as the source, unless the person has consented to the disclosure or, in some circumstances, where the person providing the information is an employee of the Trust or the Local Authority.

It is best practice to make reports available to the child or their parents, however advice should always be sought from the academy GDPR Ambassador in the first instance, prior to releasing any part of a child protection file.

8. Staff induction, awareness & training

All members of staff are provided with a copy of Part 1 of Keeping Children Safe in Education (2025) which covers safeguarding information for all staff:

- School Leaders, including the DSL, will read the entire document.
- School Leaders and all members of staff who work directly with children will access annex B KCSIE 2025.
- All members of staff will sign to confirm that they have read and understood KCSIE 2025.

The DSL (and DDSL) will be Level 3 safeguarding trained and will undertake refresher training at 2 yearly intervals, provided by the Local Authority Safeguarding Advisor or other qualified advisors. The DSL will also attend other training opportunities such as DSL Network events within the Local Authority, across the Trust and Multi-Agency Training to ensure they are up to date with current practices and procedures and in order to further their continuous professional development.

All academy staff, including support staff and volunteers, undertake appropriate induction training to ensure they are aware of the academy's internal safeguarding procedures and a range of safeguarding issues to enable them to carry out their responsibilities for child protection effectively. They will have refresher training in Basic Safeguarding Awareness and online safety at least annually.

In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, via email, ebulletins and staff meetings throughout the year to ensure they are kept up to date on current issues.

All staff (including agency and third-party staff) will be made aware of the academy's expectations regarding safe and professional practice via the Staff Code of Conduct Policy and the Guidance for Safer Working Practices for those working with children and young people in education settings (2022).

The DSL and Principal will maintain records of training and induction for all staff on CPOMS or Staff Safe which will be available to the Local Academy Board and Trust Safeguarding Lead for inspection. No data will be shared identifying individual children.

All governors will access appropriate safeguarding training which covers their specific strategic responsibilities.

9. Safer working practices

All members of staff are required to work within our clear guidelines on safer working practices as outlined in our Trust Staff Code of Conduct Policy. Staff will also be made aware of our academy's Confidentiality policies (Student and staff), Behaviour Policy, Intimate Care Policy and Positive Handling Policy. Any physical interventions/use of reasonable force must be in line with the agreed policy and procedures, the child's positive handling plan and national guidance.

All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as emails, mobile phones, texting, social networking).

10. Staff supervision & support

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

Additional support is available from the Mental Health first aider, School Wellbeing Lead, Supervision (in line with Trust Supervision Policy) or other Pastoral Staff.

The academy will provide appropriate supervision and support for all members of staff to ensure that:

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
- All staff are supported by DSL in their safeguarding role.

- All staff have regular reviews of their own practice to ensure they improve over time.
- All staff should be familiar with the Employee Assistance service provided by SmartClinic.

South Pennine Academies Trust recognises the stressful and traumatic nature of child protection work. Support is available for any member of staff from the DSL. The DSL can sign post staff to outside agencies for professional support if they wish. Staff may also approach their Union or other similar organisations directly. The DSL can access support that they require via the Trust Safeguarding Lead.

11. Safer recruitment

South Pennine Academies are committed to developing and providing a safe culture and that all steps are taken to recruit staff who are safe to work with our students/students and staff.
The Local Academy Board and SLT are responsible for ensuring that the academy follows safe recruitment processes and will follow relevant guidance from the Trust Safer Recruitment Policy, Keeping Children Safe in Education 20254 (Part 3 'Safer Recruitment') and Disclosure and Barring Service (DBS) in order to do so.

The academy maintains an accurate Single Central Record (SCR) in line with the Trust expectations and statutory guidance.

The Local Academy Board will ensure that those engaged in the recruitment and employment of staff to work with children have received appropriate safer recruitment training, the substance of which should at a minimum cover the content of KCSIE 2025 (Part 3). The Trust expectation is that there must be at least one interview panel member who has completed safer recruitment training within the last 5 years. Principals should be aware of this requirement and should be able to provide proof of the relevant staff members' training if requested.

South Pennine Academies are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools and will ask all staff and regular volunteers that fall within the scope of this guidance to complete our Trust Disqualification form.

We expect all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, or refused or cancelled registration of childcare of children's homes or been disqualified from private fostering.

All staff will be reminded of the Staff Code of Conduct Policy and understand that their behaviour and practice must be in line with it. They must sign to confirm that they have read and understood the policy.

12. Concerns/allegations in relation to a member of staff, volunteer, supply or contractor

In line with KCSIE (2025) South Pennine Academies have processes and procedures in place for managing concerns or allegations against staff members (including supply staff, volunteers, and contractors).

All staff should feel able to raise concerns about poor or unsafe practice and potential failures in the school safeguarding regime. All concerns or allegations will be taken seriously.

The DfE statutory guidance identified two levels of allegations/concerns:

Allegations that may meet the harms threshold:

- Indicates they have harmed a child, or may have harmed a child
- Means they have committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. (*This includes any behaviour that may have happened outside of the school that might make the individual unsuitable to work with children. This is known as transferable risk*)

Allegations/concerns that do not meet the harm threshold – referred to for the purposes of this guidance as 'low level concerns':

- Are inconsistent with the Staff code of conduct, including inappropriate conduct outside of work;
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Concerns and/or allegations should be referred immediately to the Principal who should conduct basic enquiries following the Trust Managing Allegations of Abuse against Staff guidance and in line with local procedures to establish the facts to help them determine whether there is any foundation to the concern/allegation, being careful not to jeopardise any potential future police investigation.

All parties should be aware of the requirement to maintain confidentiality and avoid unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress or being considered (Education Act 2002/2011).

The information collected will help to determine what further action may need to be taken. As part of this assessment, the Principal may contact HR, Trust Safeguarding Lead and/or CEO for support and advice. Once the decision is made that the allegation may meet the harm threshold, and if not done so already, the Principal should make contact with the Trust Safeguarding Lead who will notify the HR Manager. This should not delay the referral to the Local Authority Designated Officer (LADO).

The Principal or DSL on their behalf will contact the LADO in line with the local Safeguarding Children's Partnership agreed procedures to agree further action to be taken in respect of the child and staff member.

In the event of a concern/allegation being made against the Principal, or where there is a conflict of interest in reporting the matter to the Principal, this should be reported

to the Trust Chief Executive Officer and the Local Authority Designated Officer (LADO). Where possible, the CEO or Trust Safeguarding Lead will then attend LADO strategy meetings alongside the HR Director. If required, the Chair of the Trust Board will commission an Investigating Officer.

All members of staff are made aware of the Trust's Whistleblowing Policy. Not reporting concerns about the conduct of a colleague that could place a child at risk will be investigated under the Trust's Disciplinary Policy.

Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.

Staff can call 0800 028 0285 (8:00 am to 8:00 pm Monday to Friday) or email help@nspcc.org.uk

South Pennine Academies have a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is a reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. They are also required to report teachers to the Teaching Regulation Agency (TRA).

South Pennine Academies will make the referral as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

When in doubt – consult!

13. Children potentially at greater risk

Whilst all children should be protected, South Pennine Academies recognise that some groups of children can face additional safeguarding challenges, both online and offline, and understand that further barriers may exist when determining abuse and neglect in these groups of students.

13.1 Children who need a social worker (Child in Need / Child Protection)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse and/or neglect and/or exploitation and/or complex family circumstances. The academy recognises that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Where children have been identified as having a social worker, the DSL will hold and use this information, including sharing it with relevant staff, so that decisions can be made in the best interest of the child's safety, welfare and educational outcomes. This should inform decisions about safeguarding, welfare and educational outcomes.

Where a student needs a social worker, this will inform safeguarding decisions, e.g. responding to unauthorized absences, and, promoting welfare, e.g. considering the provision of pastoral or academic support.

13.2 Children absent from education

We recognise that a child absent from education is a potential indicator of abuse, neglect or exploitation. Where a child is reported to be absent from education we will comply with our statutory duty to inform the local authority.

Children who are absent, abscond or go missing during the school day are vulnerable and at potential risk of abuse, neglect, CSE, or CCE including involvement in County Lines. Academy staff must follow the academy's procedures for children who are absent/go missing, particularly on repeat occasions, to help to identify the risk of abuse and neglect and help to prevent the risk of them becoming a child missing education in the future.

13.3 Elective Home Education (EHE)

Parents may choose EHE for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

The academy will inform the LA of all deletions from their admission register when a child is taken off roll, in line with the Student Attendance (Pupil Registration) Regulations 2024.

Where a parent/carer has expressed their intention to remove a child from the academy with a view to educating at home, the academy will work with the Local Authority and other key professionals to coordinate a meeting with parents/carers where possible. Ideally, before a final decision is made, to ensure that the best interests of each child have been considered. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker, or has an Education, Health and Care Plan.

13.4 Children requiring Mental Health Support

All staff are made aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Children's experiences can impact on their mental health, behaviour and education.

Staff are well placed to observe children day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern, they should refer to the academy guidance (SPA Mental Health and Wellbeing Policy) when responding or seeking advice from the senior mental health lead. If the concern also relates to a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy and making a record on CPOMS.

13.5 Children Looked After, Previously Looked After and Care Leavers

South Pennine Academies understand that the most common reason for children becoming looked after is because of abuse and/or neglect. Staff will be provided

with information to understand what this means for children so that they have the skills, knowledge and understanding to keep looked after children safe.

The appropriate staff will have the relevant information they need in relation to a child's looked-after legal status and the contact arrangements with the birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

The DSL should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. This information should be held on CPOMS.

A previously looked after child potentially remains vulnerable and staff have the skills, knowledge and understanding to keep such children safe. Staff recognise the importance of working together with other agencies to safeguard these children.

The DSL will add details of the local authority Personal Advisor appointed to guide and support any care leaver on CPOMS and should liaise with them as necessary regarding any issues of concern affecting the care leaver.

13.6 Children with Special Educational Needs, Disabilities, or Health Needs

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. The DSL will work closely with the SENDCo to plan appropriate support as required.

South Pennine Academies will ensure that children with SEN and disabilities, specifically those with communication difficulties, will be supported to ensure that their voice is heard and acted upon.

All staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume they are related to a child's disability and be aware that children with SEN and disabilities may not outwardly display indicators of abuse. Considering the fact that children with SEN and disabilities can be disproportionately impacted by behaviours such as bullying and exploitation.

13.7 Children who attend Alternative Provision

South Pennine Academies recognise that children in Alternative Provision often have complex needs and may be at risk of additional harm, appropriate risk assessments/support plans must be in place when students access provision offsite.

When the academy places a student with an alternative provision provider, the academy will continue to be responsible for the safeguarding of the student and should be satisfied that the provider meets the needs of the student.

The academy is committed to safeguarding our children and will therefore seek written assurance that any Alternative Provision/provider has acceptable safeguarding practices in place including; their response to concerns about a child; safer recruitment processes, including conducting the relevant checks on staff; attendance and child missing education procedures; and appropriate information

sharing procedures. Arrangements will be made to ensure that staff are aware of the location of any pupils placed in Alternative Provision throughout the school day.

14. Specific safeguarding issues

14.1 Preventing Radicalisation

All members of staff recognise that children may be susceptible to radicalisation into terrorism therefore protecting children from this risk forms part of the safeguarding approach.

South Pennine Academies will ensure that, as far as possible, all frontline staff will undertake Prevent awareness training to support the identification of children at risk and be aware of behaviour that may indicate the need for help or protection.

The DSL is aware of the local procedures for making a Prevent referral and has links to the local Prevent Coordinator for any advice or support if concerns are raised.

- Calderdale – prevent@calderdale.gov.uk
- Kirklees – prevent@kirklees.gov.uk
- Oldham – Oldham Prevent online referral form - 0161 770 4196

The academy incorporates the promotion of fundamental British Values into the Safeguarding Curriculum in order to help build students' resilience and enable them to challenge extremist views.

14.2 Child on Child abuse including our response to sexual violence and sexual harassment

All members of staff at South Pennine Academies recognise that children can abuse their peers inside and outside of the setting and online.

All staff are given training to help them recognise the indicators and signs of child-on -child abuse, including sexual violence and sexual harassment, and know how to identify it and respond to reports. All staff are aware that this type of abuse may go unreported and are vigilant to recognise the signs, if they have any concerns they will speak to their DSL/DDSL.

Most cases of children hurting other students will be dealt with under the academy's behaviour policy, but this Child Protection and Safeguarding Policy will apply to allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the academy at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, such as indecent exposure, sexual assault, up skirting, or consensual and non-consensual sharing of nudes and semi-nude images and/or videos.

All staff are expected to challenge inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of

unacceptable behaviours, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. The starting point regarding any report will always be that there is a zero-tolerance approach to child-on-child abuse and it is never acceptable, and it will not be tolerated.

South Pennine Academies recognise that child on child abuse can take many forms, including but not limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory)
- Abuse in intimate personal relationships between peers
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand alone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi-nudes, images and/or videos (also known as sexting or youth produced sexual imagery)
- Up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing the image to obtain sexual gratification, or cause the victim humiliation, alarm or distress
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may include an online element)

South Pennine Academies is aware that some children may be particularly vulnerable and have an increased risk of abuse. Staff will recognize that children with SEND, or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The school will consider extra pastoral support for those children.

South Pennine Academies understands that all pupils have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality or disability and will ensure that special consideration is given to, amongst others, children who:

- Have SEND.
- Are vulnerable to being bullied.
- Are looked after or living in unsupported home situations.

The DSL will ensure that all instances of child-on-child abuse are appropriately assessed, including in cases of image-based abuse, to determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child and take appropriate action.

All allegations of child-on-child abuse will be recorded on CPOMS, investigated, and dealt with in line with this and other associated academy policies, anti-bullying, online safety, exclusions and behaviour.

Alleged victims, perpetrators and any other child affected by child-on-child abuse will be supported by the school appropriately (e.g. providing therapeutic/pastoral support, working with parents/carers, and in cases of sexual assault informing the police and/or Front Door/Children's Services.

Whilst a zero-tolerance approach will be taken towards this kind of behaviour, South Pennine Academies recognise that perpetrators can also be victims of abuse and will consider this in their response, recognising that a child harming another child may be a sign that they are being abused themselves.

We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory behaviour or sexualised language or behaviour, including requesting or sending sexual images.
- Ensuring our curriculum helps to educate students about appropriate behaviour and consent.

South Pennine Academies have implemented the guidance/advice outlined in Part five of KCSIE 2025.

We recognise that sexual violence and sexual harassment can occur between children of any age and sex, in a group or between individuals, it can occur online and face to face (both physically and verbally) and is never acceptable. Staff will be vigilant and will always address inappropriate behaviour or language even if it appears to be relatively innocuous, recognising that this is an important intervention that my help to prevent problematic, abusive and/or violent behaviour in the future.

If a student makes an allegation of abuse against another student, the academy staff will follow the procedures set out in Figure 2 - Process for Responding to sexual violence, sexual harassment and harmful sexual behaviour (above). The DSL is responsible for responding to such concerns in line with KCSIE 2025 and the Trust expectations. The DSL must also consider locally agreed procedures set out by the multi-agency safeguarding arrangements - West Yorkshire Consortium Inter Agency Safeguarding and Child Protection Procedures, Greater Manchester Safeguarding Children Procedures Manual.

Where incidents of child-on-child abuse involve children attending another school setting we will liaise with the relevant DSL/DO at the setting to ensure appropriate information is shared.
Where a student(s) has exhibited inappropriate/harmful sexualised behaviour a risk assessment must be completed and saved on CPOMS. If appropriate, contact should be made with Duty and Advice (as per the flow chart). Advice and support can also be obtained from the Trust Safeguarding Lead.

Staff will reassure all victims that they are being taken seriously and that they will be supported and kept safe. A safeguarding and support plan will be instigated to ensure that their education is not disrupted.

Staff have a duty also to manage any identified risks and support the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. The academy will take disciplinary action and provide appropriate support. These are not mutually exclusive actions which can and should take place at the same time if necessary.

In cases where allegations of sexual violence and/or harassment are found to be unsubstantiated, unfounded, false or malicious the DSL will consider whether the child or person making the allegation needs support or may have been abused by someone else. In cases where the allegation is found to be deliberately invented or malicious, the school will consider whether it is appropriate to take any disciplinary action in keeping with the school's behaviour management policy.

14.3 Gangs, County Lines, Serious Violence, Crime and Exploitation

South Pennine Academies recognise the impact of gangs, county lines, serious violence, crime and exploitation. It is recognised that the initial response to child victims is important, and staff will take any allegation seriously and work in ways that support children and keep them safe.

All staff have been trained and recognise the need to be vigilant for the signs that may include, but not exclusively:

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs.
- Children who go missing for periods of time or regularly come home late.
- Children who regularly miss or do not take part in education.
- Change in friendships/relationships with others/groups.
- Children who associated with other young people involved in exploitation.
- Children who suffer from changes in emotional well-being.
- Significant decline in performance.
- Signs of self-harm.
- Signs of assault/unexplained injuries.

14.4 Online Safety

The use of technology presents challenges and risks to children and adults both inside and outside of the school environment. At South Pennine Academies we strive to empower, protect and educate in the use of technology and establish mechanisms to identify, intervene in and escalate any incident where appropriate.

We recognise that the breadth of online safety is considerable, but can be categorised into four areas of risk:

- **Content**: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, misogyny, self-harm, suicide, misinformation, disinformation, conspiracy theories, racist or radical and extremist views
- **Contact**: being subjected to harmful online interaction with other users; for example, adults posing as children or young adults or commercial advertising
- **Conduct:** personal online behaviour that increases the likelihood of, or causes harm; for example, for example, making, sending and receiving explicit images, or online bullying

- **Commerce**: risks such as online gambling, inappropriate advertising, phishing or financial scams.

Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach. The Online Safety Policy is written in line with KCSIE 2025), DfE Meeting digital and technology standards in schools and colleges 2023, Teaching Online Safety in Schools 2023 and statutory RSHE guidance. It is designed to sit alongside this Safeguarding and Child Protection Policy, the Behaviour Policy, Staff Code of Conduct and the Trust GDPR Policy. Any issues and concerns with online safety must follow the safeguarding and child protection procedures.

The DSL has overall responsibility for online safeguarding (including Filtering and Monitoring systems) within the school but will liaise, as necessary, with other members of staff.

South Pennine Academies works hard to ensure that appropriate filtering and monitoring systems are in place having reference to the age range of the students and ensuring that "over-blocking" does not impede access to relevant educational material, in accordance with the filtering and monitoring standards published by the DfE.

Where for whatever reason children are asked to undertake remote learning academies will follow Trust guidance to support this learning in a safe manner. If a child is considered to be vulnerable in any way the DSL will ensure that there is a robust communication plan in place which will be recorded alongside a record of any contact made.

14.5 Curriculum and Staying Safe

South Pennine Academies will ensure that children are taught about safeguarding, including online safety as per the Online Safety Policy, as part of providing a broad and balanced curriculum.

We recognise that the academy plays an essential role in preventing abuse and helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they or others close to them are not safe; and how to seek advice and support when they are concerned.

Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that children have the capability and confidence to recognise risk and protect themselves or others. Children will be taught about power, relationship and sex education, online safety, online bullying, sexting, child exploitation (CSE/CCE), youth generated images, female genital mutilation (FGM), preventing radicalisation, child-on-child abuse, consent, unhealthy and abusive relationships in an age- appropriate way.

Our school systems support children to talk to a range of staff. Children will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

14.6 Use of Premises by Other Organisations

Where services or activities are provided separately by another body using the school premises, the Head Teacher/Principal and Governors will seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers and inspect these as needed.

These policies and procedures should be in line with the DfE's guidance for out-of-school settings. It will be made clear to the organisation that in the event of an allegation being made against a member of their staff the academy will follow their own safeguarding policy and make the necessary referrals, including to LADO if deemed necessary.

This safeguarding requirement will form part of the lease/hire agreement as a condition of use/occupation of the premises.

14.7 Security

All members of staff have a responsibility for maintaining awareness of buildings and grounds and for reporting any concerns that come to light.

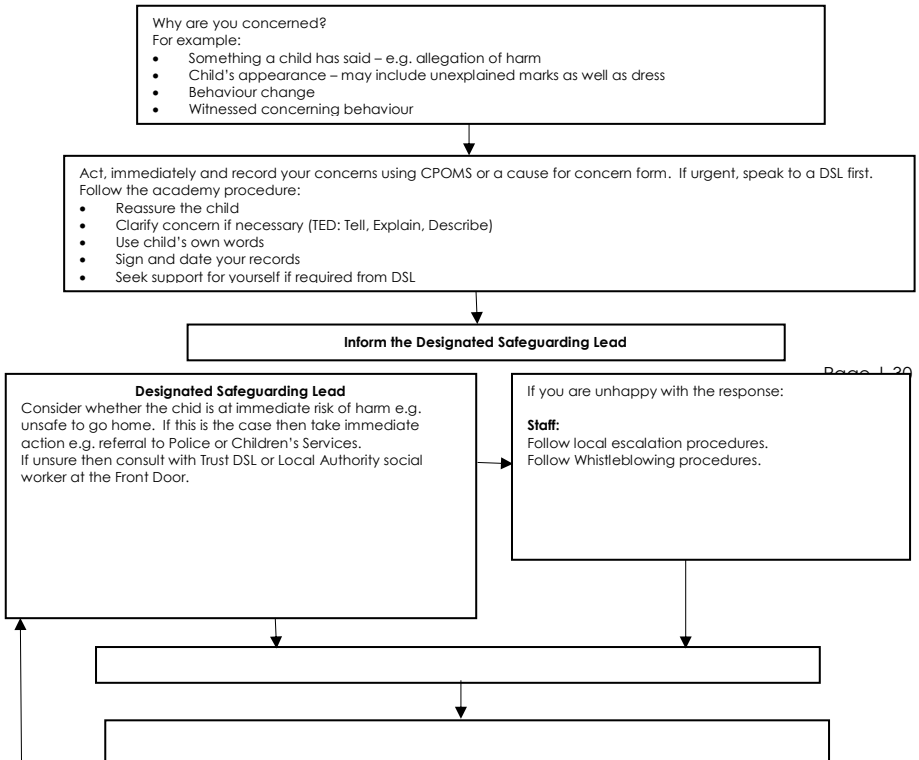
Appropriate checks will be undertaken in respect of visitors (including volunteers and contractors) coming into the school. Visitors will be expected to sign in and out via the school office and to display a visitor's badge whilst on site.

Principals should use their professional judgement about the need to escort or supervise such visitors.

Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

The academy will not accept the behaviour of an individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the site.

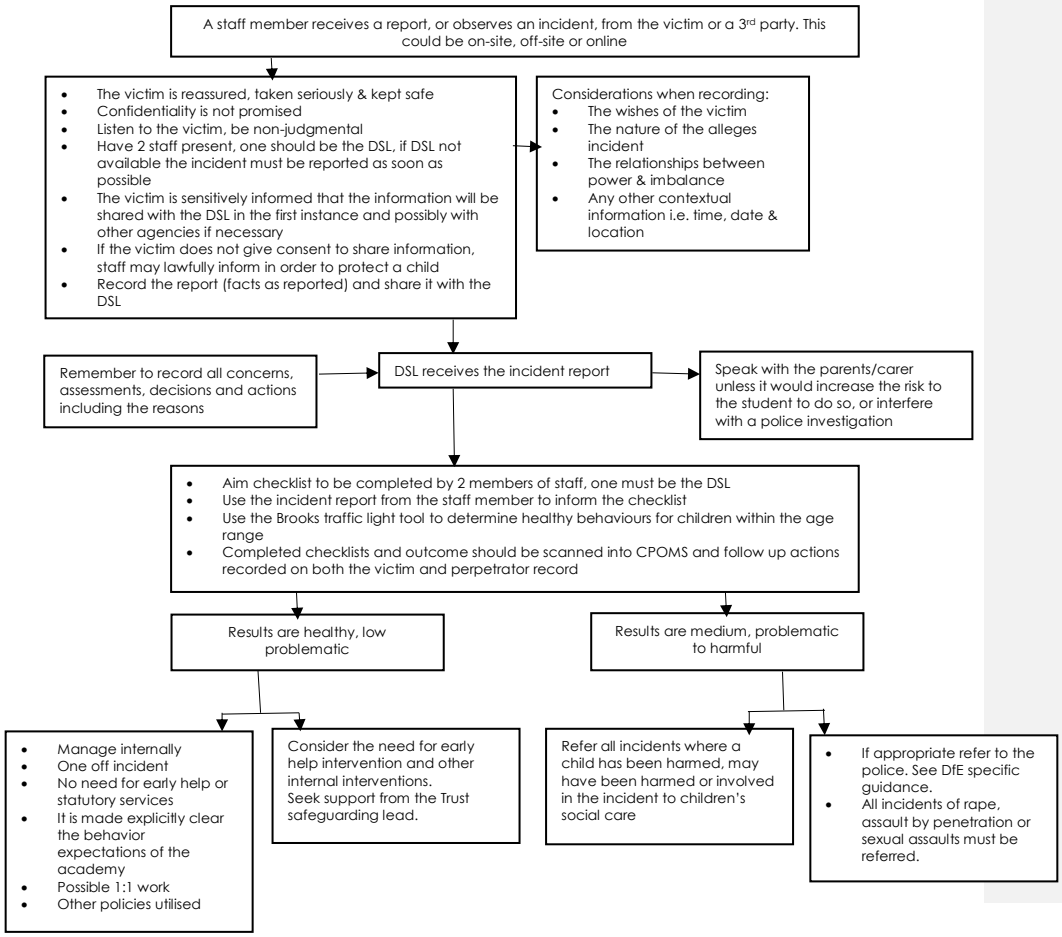
15. What to do if you have a safeguarding concern



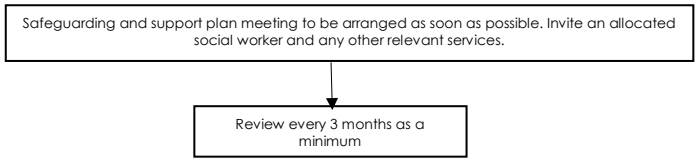
16. Processes for [illegible]nt & harmful sexual beha[illegible]

At all stages the child's circumstances will be kept under review. The DSL/Staff will request further support if required to ensure the child's safety is paramount.

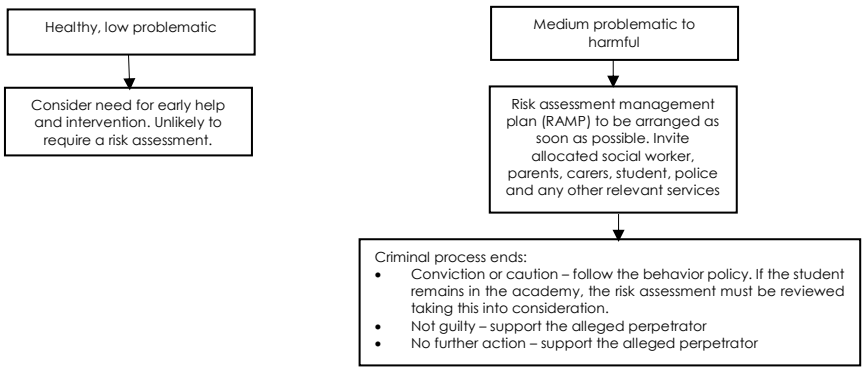
16.1 Victims & perpetrators



16.2 Victim process continued



16.3 Perpetrator/alleged perpetrator process continued



17. Local Support

- **Calderdale**

Education Welfare Service
duncan.thorpe@calderdale.gov.uk
01422 266125
Schools Safeguarding Advisor
steve.barnes@calderdale.gov.uk
01422 288326
Contact details for LADO
ladoadmin@calderdale.gov.uk
01422 394055
Children's Social Work Services
MASTadmin@calderdale.gov.uk
01422 393336
Out of hours 01422 288000
Early Help
earlyhelp@calderdale.gov.uk

- **Kirklees**

Education and Safeguarding Service
education.safeguardingservice@kirklees.gov.uk
Contact details for LADO
LADO.cases@kirklees.gov.uk
01484 221126
Children's Social Care
Duty and Advice 01484 414960 DutyAdvice.Admin@kirklees.gov.uk

- **Oldham**

Contact details for LADO
Colette.morris@oldham.gov.uk
0161 770 8870
Children's Social Care
Child MASH 0161 770 7777 child.mash@oldham.gov.uk
Out of Hours 0161 770 6936

18. National Support

Support for Staff

Education Support Service

Professionals Online Safety Helpline

Support for Students/Students
NSPCC
Childline
Papyrus
Young Minds
The Mix
Anti-Bullying Alliance

Support for Adults
Family lives
Crimestoppers
Victim Support
Kidscape
The Samaritans
Mind
NAPAC (National Association for People Abused in Childhood)
MOSAC
Action Fraud

Support for Learning Disabilities
Respond
Mencap

Domestic Abuse
Refuge
Women's Aid
Men's Advice Line
Mankind

Honour Based Violence
Karma Nirvana
Force Marriage Unit

Sexual Abuse and CSE
The Lucy Faithfull Foundation
Stop It Now
Parents Protect
Child Exploitation and Online Protection
Internet Watch Foundation
Rape crisis
The Survivors Trust

Online Safety
Childnet International
UK Safer Internet
Parent Zone
Internet Matters
NSPCC Internet Safety
Get Safe Online

Internet Watch Foundation
Childline/IWF Report/Remove
Gov.uk Advice for Education Settings: sharing nudes and semi nudes

Radicalisation and Hate
Educate Against Hate
Counter Terrorist Internet Referral Unit
True Vision
ACT

1. Annex – Low level concern reporting form

Thank you for reporting your concerns to the safeguarding team; we are grateful to you for taking the safety and welfare of our students seriously. Please fill in the below form, including as much detail as you can, and return it directly to the headteacher or DSL. Please refrain from discussing this concern with anyone other than the headteacher or DSL until the matter has been dealt with. We ask that you keep all details, including the name staff member to whom the concern pertains, confidential.

Your details	
Name (optional)	
Role	
Date and time of completing this form	
Details of individual whom the concern is about	
Name	
Role	
Relationship to the individual reporting the concern, e.g. manager, colleague	
Details of concern	
Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?	
Details of any children or young people involved	
Name(s)	
Do you believe there is a risk of harm to the above children or young people, either now or in the	

future, as a result of the individual's behaviour? Explain your answer.		
Next steps		
What would you like to see happen in response to your concern?		
[Updated] Are you willing to meet with the headteacher and DSL to discuss your concern? Please circle as appropriate.	Yes	No
Please state any other information that you believe is relevant to the processing of this concern.		
Signature		
For use by safeguarding team upon receipt of concern		
Date and time concern received		
Signature of DSL or deputy DSL		
Actions to be taken, e.g. no action, investigation, reclassification as allegation meeting the harms threshold.		