



Safeguarding Policy 2026/27

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Contents

Intention	4
Aims.....	4
This includes, but is not limited to safeguarding children/young people in specific circumstances:.....	5
Neglect.....	5
Physical Abuse	5
Emotional abuse.....	5
Sexual Abuse.....	5
Bullying including online and prejudice-based bullying	5
Racist, disability and homophobic or transphobic abuse	5
Gender based violence/violence against women and girls.....	5
Radicalisation and/or extremist behaviour	5
Child Sexual Exploitation and trafficking	5
Honour Based abuse	5
Child on Child abuse.....	5
Teenage relationship abuse	5
Substance abuse.....	5
Gang/youth violence including initiation/hazing.....	5
Domestic abuse/violence	5
Female Genital Mutilation	5
Forced Marriage	5
Fabricated/induced illness	5
Poor parenting	5
Online including grooming via social networking, online gaming, video messaging	5
The impact of new technologies on sexual behaviour: e.g. Youth Produced Sexual Imagery	5
Self-harm behaviours.....	5
Children / young people with mental health difficulties or illness.....	5
Up skirting.....	5
Contextual/ Extra familial risks	5
Exploitation.....	5
Key Contacts.....	6
Local Multi Agency Safeguarding Arrangement.....	6
Safeguarding Bedfordshire	6
Key Definitions.....	7

Safeguarding Policy 2026/27



Framework.....	7
Statutory Guidance:	8
Non-Statutory Guidance:	8
The Designated Safeguarding Lead.....	9
Roles	9
Key processes	11
Expectations.....	12
Safer Recruitment and Selection	13
Our Role in the Prevention of Abuse.....	14
The Curriculum	14
Safeguarding in specific circumstances: Children/Young People who are vulnerable to extremism	15
Risk reduction	15
Safeguarding Children/Young People in Specific Circumstances: Female Genital Mutilation (FGM) / Forced Marriage / Modern Day Slavery	16
Types of human trafficking.....	17
Safeguarding Children/Young People in Specific Circumstances: Child on Child abuse	17
Safeguarding Children/Young People in Specific Circumstances: Sexualised behaviours....	19
Safeguarding Children/Young People in Specific Circumstances: Gang related violence (Contextual/Extra Familial Risk).....	20
Safeguarding Children/Young People in Specific Circumstances: Youth Generated Sexualised Imagery	20
Safeguarding Children/Young People in specific circumstances: Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE).....	22
Children in specific circumstances	23
Mental Health.....	23
Homelessness	24
Domestic Abuse	24
Cybercrime	25
Children with additional needs	26
Children/Young People who are lesbian, gay, bi or trans (LGBT).....	27
What we do when we are concerned about a child/young person.	27
Involving parents/carers	28
Multi-agency work	28
Responding to an allegation or concern about a member of staff.....	29

Safeguarding Policy 2026/27



Intention

The Open Door Academy has an absolute commitment to ensuring the highest standards of safeguarding.

The welfare of our students is paramount. All students regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities. The Open Door Academy recognises the importance of providing an environment that will help students to feel safe, secure, and respected.

We encourage students to talk openly; and enable them to feel confident that they will be listened to. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support and protection.

The Open Door Academy is committed to; and understands the vital contribution that all staff, support staff and visitors make to safeguarding children. We aim to ensure that child protection concerns, and referrals are handled sensitively, professionally, and in a timely manner and support the specific needs of the individual child.

Child Protection is defined as:

The activity that is undertaken to protect specific children who are suspected to suffering or likely to suffer significant harm. This includes harm that occurs inside or outside the home, including online. (Working Together, DfE 2024).

This policy should be used in conjunction with staff training, current Keeping Children Safe in Education guidance and continued professional development.

Aims

- To develop an ethos in which students feel secure and know that they are safe
- To discourage bullying and abuse and where they occur to encourage their disclosure
- To provide a network of people who will respond appropriately to student needs
- To ensure that teaching supports students with the skills and language they need to stay safe from bullying and abuse as per outcomes in the EHCP.

Safeguarding Policy 2026/27



This includes, but is not limited to safeguarding children/young people in specific circumstances:

Neglect	Physical Abuse
Emotional abuse	Sexual Abuse
Bullying including online and prejudice-based bullying	Racist, disability and homophobic or transphobic abuse
Gender based violence/violence against women and girls	Radicalisation and/or extremist behaviour
Child Sexual Exploitation and trafficking	Honour Based abuse
Child on Child abuse	Teenage relationship abuse
Substance abuse	Gang/youth violence including initiation/hazing
Domestic abuse/violence	Female Genital Mutilation
Forced Marriage	Fabricated/induced illness
Poor parenting	Online including grooming via social networking, online gaming, video messaging
The impact of new technologies on sexual behaviour: e.g. Youth Produced Sexual Imagery	Self-harm behaviours
Children / young people with mental health difficulties or illness	Up skirting
Contextual/ Extra familial risks	Exploitation

Safeguarding Policy 2026/27



Key Contacts

Role	Name	Contact details	
		Email	Phone/Mobile
Designated Safeguarding Lead (DSL)	Jo Carter	DSL@theopendooracademy.co.uk	01525 643955
Deputy Designated Safeguarding Lead (DDSL)	Becky Newman	DSL@theopendooracademy.co.uk	01525 643955
CBC Local Authority Designated Officer (LADO)			0300 3008142
BB Local Authority Designated Officer (LADO)	Sandeep Mohan	LADO@bedford.gov.uk	
LBC Local Authority Designated Officer (LADO)			01582 548069
Prevent Coordinator	Stephanie Golby	Stephanie.Golby@luton.gov.uk	01234 718700 during office hours
Integrated Front Door	Stephanie Golby Mon-Fri, 9am – 5pm		01234 718700 during office hours
	Outside of these hours	Integrated Front Door	
Police	In an emergency		999
	For nonemergency		101

Local Multi Agency Safeguarding Arrangement Note:

The Children and Social Work Act 2017 (the Act) replaces Local Safeguarding Children Boards with new local safeguarding arrangements led by three safeguarding partners (local authorities, chief officers of police, and clinical commissioning groups). The Act places a duty on those partners to make arrangements for themselves and relevant agencies they deem appropriate, to work together for the purpose of safeguarding and promoting the welfare of children/young people in their area. Education is one of the relevant agencies.

[Safeguarding Bedfordshire](#)

Key Definitions

The aim of safeguarding is to enable children to have optimum life chances and enter adulthood successfully. Staff have a responsibility to provide a safe environment in which children can learn.

Child protection is incorporated within the umbrella term of safeguarding and is the process and activities undertaken to fulfil statutory obligations to protect specific children who have been identified as suffering, or at risk of significant harm. All agencies and individuals should proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

(Working Together to Safeguard Children, DfE 2018, p.11)

All staff follow and use current Keeping Children Safe in Education (KCSIE) guidance. In KCSIE, Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment
- 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; and
- taking action to enable all children to have the best outcomes

Framework

This policy has due regard to all relevant legislation and statutory guidance, including but not limited to, the following: Legislation:

- The Children Act 1989
- The Children's Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003
- Apprentices, Skills, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- UK GDPR
- General Data Protection Regulation & Data Protection Act 2018
- The Children (Disqualification) and Childcare (Early Years Provision of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (offences) Act 2019
- Domestic Abuse Act 2021
- Human Rights Act 1998

Statutory Guidance:

- DfE (2015) The Prevent Duty: (June 2015)
- DfE (2023) Working Together to Safeguard Children (December 2023)
- Current Keeping Children Safe in Education guidance
- HM Government (2021) 'Channel Duty and Guidance: Protecting people vulnerable to being drawn into terrorism'.
- Home Office and Foreign, Commonwealth and Development Office (2022) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'.
- DfES GUIDANCE "Safeguarding Children and safer recruitment in Education" 2007
- Safeguarding Children's Board: local policies and procedures
- Multi-Agency Statutory Guidance on Female Genital Mutilation (2020)

Non-Statutory Guidance:

- DfE (2015) 'What to do if you're worried a child is being abused':
- DfE (2017) 'Child Sexual Exploitation'
- DfE (2018) 'Information sharing'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for educational settings working with children and young people'.
- DfE (2021) 'Teacher Standards'
- DfE (2022) 'Recruit teachers from overseas'.
- Guidance for Safer Working Practice for those Working with Children and Young People in Educational Settings (2023)
- Mental Health and Behaviour in School (2018)
- Knife Crime: Safeguarding children and young people in education (March 2019)
- Teaching online safety in school (June 2019)
- Mental health and wellbeing provision in schools (October 2018)
- The Designated teacher for looked after and previously looked after children (February 2018)

The Designated Safeguarding Lead

Our Designated Safeguarding Lead Jo Carter is a member of the Senior Leadership Team and takes lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children/young people in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children/young people's attendance, engagement and achievement at school. They will provide support to staff members to carry out their safeguarding duties and will liaise closely with other services such as the Children's Social Care, health, police etc.

The Deputy Designated Safeguarding Lead/s (DDSL) are trained to the same level as the Designated Safeguarding Lead and will undertake this role operationally with direct oversight and management from the Designated Safeguarding Lead who maintains lead responsibility for safeguarding and child protection (including online safety, filtering and monitoring).

Roles

The role of the DSL will:

- support staff who make referrals to the Local Authority Children's Social Care and act as a source of support, advice and expertise for all staff
- refer cases to the Police where a crime may have been committed.
- inform Head Teacher/ Principal of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- be aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance – PACE Code C 2019
- seek advice in regard to safeguarding matters related to radicalisation and make referrals to Channel as required.
- liaise with the Designated Senior Manager for allegations to ensure where necessary referrals have been made to the Disclosure and Barring Service when a person is dismissed or resigned due to risk/harm to a child.
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health
- lead regular case monitoring reviews of vulnerable children. These reviews, together with any actions arising from the review and the rationale for decision-making will be recorded in case files.
- ensure safeguarding and child protection information will be dealt with in a confidential manner and in accordance with Pan Bedfordshire information sharing guidance. <https://www.safeguardingbedfordshire.org.uk/p/about-us/pan-bedfordshire>

- ensure staff will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to deal with an individual child/young person and/or family.
- ensure a written record will be made of what information has been shared with whom, and when.
- ensure that child protection files are kept up to date.
- ensure rationale for making decisions is recorded (Inc. decision not to make a referral)
- ensure safeguarding and child protection records will be stored securely in a central place separate from academic records.
- ensure individual files will be kept for each child/young person: the Academy will not keep family files.
- ensure access to safeguarding and child protection records by staff other than by the DSL will be restricted, and a written record kept of who has had access to them and when
- ensure parents are usually (subject to the point below) aware of information held on their children and are kept up to date regarding any concerns or developments by the appropriate members of staff.
- ensure general communications with parents will be in line with any home school policies and give due regard to which adults have parental responsibility.

When the Academy has concerns about a child/young person, the Designated Safeguarding Lead or Deputy will decide what steps should be taken in accordance with Threshold of Need: Guidance for Effective Support for Children & Families and initiate a response accordingly. This may include providing a single agency early help response or a referral to Children's Social Care for a statutory social work assessment. The Head of Provisions will be kept apprised of cases as appropriate.

The DSL and deputies should liaise with the three safeguarding partners and work with agencies in line with Working Together to Safeguard Children (2023), when to call police should help the DSL understand when they should consider calling the police and what to expect if they do so.

The DSL will not disclose to a parent any information held on a child/young person if this would put the child at risk of significant harm. In such circumstances, advice will be sought from Children's Social Care.

If a child/young person moves from our school, the DSL will ensure child protection records are forwarded on to the DSL at the new school, with due regard to their confidential nature and in line with current government guidance on the transfer of such records.

The DSL shall ensure the child protection files are transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child/young person arrives (KCSIE 2026).

The DSL will also consider if it would be appropriate to share any information that would allow the new school or setting to continue supporting children/young people, in advance of the child/young person leaving.

Direct contact between the two schools may be necessary, especially on transfer from primary to secondary schools. The DSL will record where and to whom the records have been passed and the date. We will ensure secure transit and obtain a confirmation of receipt.

If sending by post, children/young person's records will be sent by "Special/Recorded Delivery". For audit purposes, a note of all children/young people's records transferred or received should be kept in either paper or electronic format. This will include the child/young person's name, date of birth, where and to whom the records have been sent and the date sent and/or received.

if a child/young person is permanently excluded and moves to a Pupil Referral Unit or Alternative Learning Provision, child protection records will be forwarded on to the relevant organisation.

- if a child/young person is being removed from school roll in order to be home educated, the Academy will ensure all relevant safeguarding information is shared with the Elective Home Education team.
- where a vulnerable child/young person is moving to a Further Education establishment, consideration should be given to the student's wishes and feelings on their child protection information being passed on in order that the FE establishment can provide appropriate support.
- when a DSL resigns their post or no longer has child protection responsibility, there should be a full face-to-face handover/exchange of information with the new post holder - this exchange should be recorded as part of the incoming role holder's induction/performance management.
- in exceptional circumstances when a face-to-face handover is not feasible, the Head Teacher / Principal will ensure that the new post holder is fully conversant with all procedures and case files.

Key processes

All staff should be aware of the guidance issued by the SCPs within the Threshold of need Guide in order to secure support and intervention for children/young people at the earliest possible opportunity in the least intrusive way. This document is integral

to safeguarding children/young people in Borough Council's educational establishments and we will always use the Effective Support Strategy to underpin decision-making.

Expectations

All staff and regular visitors will:

- be familiar with this safeguarding policy and implement this consistently in the course of their work with children/young people.
- be aware of the role and identity of the Designated Safeguarding Lead/s and Deputies for the Academy.
- refer child protection concerns to Children's Social Care in the absence of the DSL and be aware of the statutory assessments under Section 17 and Section 47 of the Children Act 1989 that they may contribute to
- be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc.
- be involved in the implementation of individual education programmes, Early Help/ assessments and TAF Support Plans, Child in Need plans and Child Protection plans.
- be alert to signs and indicators of safeguarding concerns and possible abuse.
- record concerns and pass the record to the DSL, or a member of the Safeguarding Team
- recognise and respond to concerns about the behaviour of staff, students and volunteers which indicates they may pose a risk of harm to children following interagency procedures agreed by the SCPs.
- deal with a disclosure of abuse from a child/young person in line with the guidance
- all staff and Governors will receive safeguarding training, (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at the point of induction - this will be regularly updated at a minimum of three-year intervals.
- the DSL together with named Deputies will undertake additional higher level training in order to ensure they have appropriate knowledge and skills to undertake the role and will utilise these training opportunities available from the SCPs and other organisations as agreed by the governing body - this training will be regularly updated at a minimum of two-yearly intervals
- in addition to the above, all staff will receive annual safeguarding updates, which may include E-learning, circulation of information and guidance internally, staff meetings, inset training.
- the subject / topics for training and updates will take into consideration SCP's priorities, local context, and needs of our pupils and identified training needs of staff.

Safer Recruitment and Selection

The Academy pays full regard to 'Keeping Children Safe in Education' (DfE 2024). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS), Childcare (Disqualification) Regulations (where applicable) and prohibition order checks in respect of the following which will also include historic GTCE sanctions. Schools and colleges should “inform shortlisted candidates” that online searches may be carried out in the recruitment process.

The Open Door Academy acknowledge that S128 checks should be completed on those members of staff and Governors taking part in management. A section 128 would prohibit someone from:

- serving as a governor of a maintained school
- holding a management position in an independent school, academy or free school as an employee
- becoming a trustee of an academy or free school trust; a governor or member of a proprietor body for an independent school
- becoming a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibilities.
- all recruitment materials will include reference to the Academy's commitment to safeguarding and promoting the wellbeing of children/young people.
- Jo Carter, Mandy Surridge and David Washington have undertaken Safer Recruitment training. One of the above will be involved in all staff/volunteer recruitment processes and sit on the recruitment panel.

Our Role in the Prevention of Abuse

In accordance with Working Together 2023, the Academy recognises the need to safeguard children/young people from abuse, specifically:

- neglect
- emotional abuse
- physical abuse
- sexual abuse

In addition, the Academy are alert to the need to safeguard children/young people in specific circumstances as defined within Keeping Children Safe in Education 2025.

Our safeguarding policy cannot be separated from the general ethos of the Academy, which should ensure that children/young people are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

The Curriculum

The Open Door Academy acknowledge preventative education is most effective in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.

The Open Door Academy have a clear set of values and standards, upheld and demonstrated throughout all aspects of school/college life. These are underpinned by the Academy/college's behaviour policy and pastoral support system, as well as by a planned programme of evidence based ASPIRE programme and reinforced throughout the whole curriculum. Such a programme is fully inclusive and developed to be age and stage of development appropriate (especially in considering the needs of children/young people with SEND and other vulnerabilities).

This program will tackle at an age-appropriate stage issue 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, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support.

what constitutes sexual harassment and sexual violence and why these are always unacceptable?

Safeguarding in specific circumstances: Children/Young People who are vulnerable to extremism

The Open Door Academy seeks to protect children/ young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

In accordance with the Prevent Duty placed upon the Academy by the Counter Terrorism and Security Act 2015 we understand the specific need to safeguard children, young people and families from violent extremism. School/service is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

School/service values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both children/young people and teachers have the right to speak freely and voice their opinions. However, free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Essential to this school are the fundamental British Values of Democracy, Rule of Law, Equality of Opportunity, Freedom of Speech and the rights of all women and men to live free from persecution of any kind and it would be expected that views and opinions expressed would be commensurate with these.

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation.

Risk reduction

The Head of Provisions will assess the level of risk within the Centre and put actions in place to reduce that risk. Risk assessment may include consideration of the Academy's RE curriculum, SEND policy, assembly policy, the use of school premises by external agencies, integration of children/young people by gender and SEN, anti-bullying policy and other issues specific to the Academy's profile, community and philosophy.

In accordance with the Prevent Duty, Jo Carter is the Single Point of Contact (SPoC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.

When any member of staff has concerns that a child/young person may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and to the DSL if this is not the same person. Concerns must be recorded on the Academy's safeguarding referral form.

If a child/young person is thought to be at risk of radicalisation, a referral will be made using the National Prevent Referral Form which shall be sent directly to the Police.

Initial advice may be sought from The Channel Team or Integrated Front Door (IFD) on 01234 718700

In all cases, in accordance with advice provided from the Channel Team or the IFD, The Open Door Academy will ensure appropriate interventions are secured which are in line with local procedures in order to safeguard children/young people assessed as being vulnerable to radicalisation.

If the Academy are concerned that a child/young person may be at risk of significant harm in relation to radicalisation or involvement in violent extremism, a child protection referral will be made to Children's Social Care.

Safeguarding Children/Young People in Specific Circumstances: Female Genital Mutilation (FGM) / Forced Marriage / Modern Day Slavery

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It can be known as female circumcision or female genital cutting and is often carried out for cultural, religious and social reasons within families and communities.

FGM is illegal in the UK and it's also illegal to take a British national or permanent resident abroad for FGM or help someone trying to do this.

Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers (along with social workers and healthcare professionals) 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. This is in addition to following the Academy's safeguarding reporting procedures. A teacher means any person within the Education Act 2002 (section 141A(1)) employed or engaged to carry out teaching work at schools or other institutions.

Those failing to report such cases will face disciplinary sanctions.

If the Academy are concerned that a child/young person has experienced or is at risk of FGM, a Child Protection referral will be made to the Integrated Front Door (IFD).

in accordance with interagency procedures produced by the LSCP. In addition, all teachers will follow mandatory reporting duties. Please refer to Pan Bedfordshire Practice Guidance for practitioners on Female Genital Mutilation (FGM).

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they are bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.

The Anti-social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry - this includes: o taking someone overseas to force them to marry (whether or not the forced marriage takes place) o marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not) o breaching a Forced Marriage Protection Order.

Further multi-agency statutory guidance for dealing with forced marriage can be found [here](#) The right to choose: government guidance on forced marriage.

Modern Day Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking (the definition of which comes from the Palermo Protocol). Modern Day Slavery crimes include holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

Although human trafficking often involves an international cross-border element, it is also possible to be a victim of Modern Day Slavery within your own country.

Types of human trafficking

There are several broad categories of exploitation linked to human trafficking, including:

- sexual exploitation
- forced labour
- domestic servitude
- organ harvesting
- child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc.
- forced marriage and illegal adoption (if other constituent elements are present).

Safeguarding Children/Young People in Specific Circumstances: Child on Child abuse

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the Academy or college and/or can occur between children/young people outside of these environments.

All staff, but especially the DSL (and Deputies) should consider whether children/young people are at risk of exploitation or abuse outside of their families. Extra-familial harms take a variety of different forms and children/young people can be vulnerable to multiple harms including, but not limited to, sexual abuse, including harassment and exploitation, domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

The Open Door Academy recognises that children/young people can abuse each other, and such behaviours are never viewed simply as 'banter' or as part of growing up. We recognise that child on child abuse can take many different forms such as:

- cyber-bullying
- sending or posting sexually suggestive images including nude or semi-nude photographs via mobiles or over the internet by persons aged under 18 (referred to as youth Produced Sexual Imagery)
- sexual assault
- sexual violence or harassment
- upskirting
- sexually harmful or problematic behaviour
- gang initiation or hazing type violence
- harassing messages and misogynistic messages
- the non-consensual sharing of indecent images
- the sharing of abusive images and pornography, to those who do not want to receive such content
- the exploitation of others, linked youth produced images.

Upskirting is an illegal offence which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

The Open Door Academy understands serious violence and what may signal that children/young people are at risk from or are involved in serious violent crime. Indicators may include increased absences, a change in friendships/relationships with older individuals or groups, a significant decline in performance, self-harm, significant change in wellbeing or signs of assaulted/unexplained injuries. Unexplained gifts or new possessions could indicate that children/young people have been appropriated, or are involved with, individuals associated with criminal networks or gangs.

Contextual safeguarding/extra familial risk as referenced in KCSIE (2024) highlights that 'assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's

social care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process’.

Contextual safeguarding can also be known as ‘risk outside the home’ (Working Together, 2023)

The Open Door Academy has a thorough understanding of contextual safeguarding and will make a referral in the first instance if apparent. The Open Door Academy has adopted a Child on child Abuse Policy which outlines the actions school will take in responding to reports of Child on child abuse.

The Open Door Academy manage the use of mobile and smart technology on the premises and reflect this in the behaviour / child protection policy.

We carry out an annual review of our approach to online safety, filtering and monitoring supported by an annual risk assessment that considers the risks to children/young people. ‘Report Abuse in Education’ (NSPCC helpline) is still available. Young people and adults can contact the NSPCC helpline, Report Abuse in Education on 0800 136 663 or email help@nspcc.org.uk

Safeguarding Children/Young People in Specific Circumstances: Sexualised behaviours

Where children/young people display sexualised behaviours, the behaviours will be considered in accordance with the children/young person’s developmental understanding, age and impact on the alleged victim. Tools such as Brook Traffic Light Tool may be used to assist in determining whether the behaviour is developmental or a cause for concern. This will assist in ensuring the child(ren)/young people receive the right support at the right time either via an Early Help response or referral to Children’s Social Care.

The Open Door Academy will follow Keeping Children Safe in Education Guidance (DfE, 2024) when responding to such issues alongside local interagency procedures. This includes responding to any reports in a child-centred manner and undertaking an immediate risk and needs assessment in relation to the victim, the alleged perpetrator and other children/young people.

We will seek specialist advice, guidance and assessment and will work with partner agencies in relation to management of information and what should be shared with staff, parents and carers.

All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report.

In all cases of child on child abuse the Academy will consider the vulnerability of all children/young person including those alleged to have caused the harm and those

alleged to be victims and provide a safeguarding response. Consideration will be given to violence in young people's relationships.

Where necessary, the Academy's Behaviour and Child on Child Abuse policy will be invoked, and any sanctions applied will be consistent with these procedures.

Where issues indicate that a criminal offence may have been committed, a report will be made to Bedfordshire Police.

Safeguarding Children/Young People in Specific Circumstances: Gang related violence (Contextual/Extra Familial Risk)

The Open Door Academy recognises the risks posed to children/young people in relation to involvement in gang related activity, which may be street gangs, peer group or organised crime. Children/young people who are involved in gangs are more like to suffer harm themselves, through retaliatory violence, displaced retaliation, and territorial violence with other gangs or other harm suffered whilst committing a crime. In addition, children/young people may experience violence as part of an initiation or hazing practice.

The Academy understands that Early Help can be crucial in the early identification of children/young people who may need additional support due to gang related activity and as such will provide an Early Help response, including referral when concerns are raised about indicators of gang activity.

If, however, information suggests a child/young person may be at risk of significant harm due to gang related activity, a referral will be made to Children's Social Care.

Where there are concerns that a child/young person may be, or is at risk of, becoming involved in gang related activity, a referral will be made to the Serious Youth Violence Panel in accordance with local procedures as part of the safeguarding response.

The Open Door Academy understand the process of completing a multi-agency information sharing form which highlights broader concerns contextually occurring outside of the child/young person's home.

Safeguarding Children/Young People in Specific Circumstances: Youth Generated Sexualised Imagery

The Open Door Academy recognises the impact of online social communication and the issue of sending or posting sexually suggestive images including nude or semi-nude photographs via mobiles or over the internet. We pay due regard to the Guidance issued by the UK Council for Child Internet Safety in relation to how we respond to incidents. Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024)

In all cases where an incident of youth produced sexual imagery is reported, the following actions will be undertaken:

- the incident should be reported to the DSL as soon as possible.
- the DSL should hold an initial review discussion or meeting with appropriate school staff.
- there should be subsequent interviews with the child(ren)/young people involved (if appropriate)
- parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child/young person at risk of harm.
- at any point in the process if there is a concern a child/young person has been harmed or is at risk of harm a referral should be made to Children's Social Care and/or Bedfordshire Police immediately.

An immediate referral will be made to Bedfordshire Police and Children's Social Care in the following circumstances:

- the incident involves an adult.
- there is reason to believe that a child/young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- the imagery suggests the content depicts sexual acts which are unusual for the child/young person's developmental stage, or are violent.
- the imagery involves sexual acts and any pupil in the imagery is under 13.
- there is reason to believe a child/young person is at immediate risk of harm owing to the sharing of the imagery, for example, the child/young person is presenting as suicidal or self-harming.

If none of the above applies, the Academy may choose to deal with the incident without involving Bedfordshire Police or Children's Social Care. This will usually be the case where the DSL is confident that they have enough information to assess the risks to the pupils involved and the risks can be managed within the Academy pastoral support and disciplinary framework. All decisions and rationale for decision making will be recorded. All decisions will be based on the best interests of the child/ren/young person.

The Academy will pay due regard to the Department for Education guidance: Searching, Screening and Confiscation advice.

Adults in the Academy will not view youth produced sexual imagery unless there is a good and clear reason to do so. Wherever possible the DSL will respond to an incident based on what they have been told about the imagery.

All incidents will be recorded.

Safeguarding Children/Young People in specific circumstances: Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of imbalance in power to coerce, manipulate or deceive a child/young person into taking part in sexual or criminal activity. Whilst age may be most obvious factor, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants, and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. This abuse can be perpetrated by individuals or groups, males or females and children/young people or adults. The abuse 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 maybe accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child/young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology (DfE, 2024).

All staff will be aware that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.

The Academy will have procedures in place in managing poor school attendance and this will need to be regularly reviewed.

Child sexual exploitation can occur through use of technology without the child/young person's immediate recognition, for example the persuasion to post sexual images on the internet/mobile phones with no immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child/young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

The Academy recognises that both boys and girls can be vulnerable to Child Sexual Exploitation and as such ensure staff are alert to signs and indicators.

The Academy recognises that there are various 'models' of CSE which include but not limited to:

- gangs and groups
- boyfriend/girlfriend model
- child on child
- familial
- online
- abuse of authority

Where concerns are identified in relation to Child Sexual Exploitation the Threshold of Need Guide will be consulted in order to ensure the child/young person receives support at the earliest possible opportunity.

An Early Help multi-agency response may be initiated from the Academy as the lead practitioner by completing an Early Help Assessment or completing an Early Help referral through the IFD.

If a child/young person is thought to be at risk of significant harm through child sexual exploitation a referral will be made to Children's Social Care.

Advice will be sought to establish if a National Referral Mechanism is appropriate.

In all cases, intelligence/information will be shared with Bedfordshire Police using the Multi Agency Information Sharing Form.

Children in specific circumstances

Further guidance in relation to safeguarding children/young people in specific circumstances can be found on the Central Bedfordshire, Central Bedfordshire & Luton Safeguarding Children Partnerships Procedures website.

Mental Health

All staff are aware that mental health problems can, in some cases, be an indicator that a child/young person has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained practitioners should attempt to make diagnosis of a mental health problem. However, staff will observe children/young people day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children/young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these experiences, can impact on children/young people's mental health, behaviour and education.

If staff have a mental health concern about a child/young person that is also a safeguarding concern, immediate action will be taken following the child protection policy including discussion with the DSL or Deputy. The DSL will liaise with the Senior Mental Health Lead, or Mental Health Support Team, where the safeguarding concern is linked to mental health.

The Academy will access a range of advice to help them identify children/young people in need of extra mental health support. This includes working with external agencies as described in Promoting and Supporting mental health and wellbeing in schools and colleges

Homelessness

The Open Door Academy recognises that being homeless or being at risk of becoming homeless presents a real risk to a child/young person's welfare.

The DSL (and any Deputies) are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

The Open Door Academy recognises that whilst in most cases school and college staff will be considering homelessness in the context of children/young people who live with their families, 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. Children's Social Care will be the lead agency for these young people and the DSL (or a Deputy) should ensure appropriate referrals are made based on their circumstances.

Staff are aware of the indicators that a family may be at risk of homelessness, to include: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

Referrals and/or discussion with the Local Housing Authority will be progressed as appropriate but will not replace a referral into Children's Social Care where a child/young person has been harmed or is at risk of harm.

The Local Authority has a legal duty to address concerns under the Homelessness Reduction Act 2017. The focus is early intervention and to encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

Domestic Abuse

All staff are aware of The Domestic Abuse Act 2021 which introduced the first statutory definition of domestic abuse and recognises that children/young people can be victims

of domestic abuse; they may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (as below). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Staff will continue to develop their understanding of domestic abuse, and how all children/young people can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Staff are aware exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children/young people. In some cases, a child/young person may blame themselves for the abuse or may have had to leave the family home as a result.

The Open Door Academy recognises that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse is not limited to physical acts of violence or threatening behaviour, and can include emotional, psychological, controlling or coercive behaviour, sexual and/or economic abuse.

Staff understand that anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Types of domestic abuse include intimate partner violence, abuse by ex-partners, family members, teenage relationship abuse and adolescent to parent violence.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse 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/young person under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

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.

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 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'- attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; making, supplying or obtaining malware such as viruses, with the intent to commit further offences.

Children/young people with a particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child/young person in this area, the DSL (or Deputy), should consider referring into the Cyber Choices programme.

Cyber Choices is a nationwide police programme supported by the Home Office and led by the National Crime Agency which aims to intervene where children/young people are at risk of committing, or being drawn into, low level cyber-dependent offences.

Additional advice can be found at: [Cyber Choices](#)

Children with additional needs

The Open Door Academy recognises that while all children/young people have a right to be safe, some children/young people may be more vulnerable to abuse, for example a young carer, a child/young person frequently missing from home/care, children/young people with disabilities or special educational needs, a child/young person living with domestic abuse, parental mental ill health or substance abuse, or a child/young person who has returned home to their family from care.

We recognise that additional barriers can exist when recognising abuse and neglect in children/young people with special educational needs or disabilities, medical or physical health conditions.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child/young person's condition without further exploration;
- these children/young people being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children/young people;
- the potential for children/young people with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children/young people with SEND will therefore require close liaison with the DSL (or Deputy) and the SENCO or the named person with oversight for SEND.

The Open Door Academy will consider extra pastoral support and attention for these children/young people, along with ensuring any appropriate support for communication is in place.

If The Open Door Academy is considering excluding, either fixed term or permanently, a vulnerable child/young person and/or a child/young person who is the subject of a child protection plan or where there is an existing child protection file, we will call a multi-agency risk-assessment meeting prior to making the decision to exclude.

Where a parent/carers has expressed their intention to remove a child/young person from school with a view to educating at home, we work together with Local Authority and other key practitioners to coordinate a meeting with parents/carers where possible. We will do this before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child/young person. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

In the event of a one-off serious incident resulting in an immediate decision to exclude, a risk assessment must be completed prior to convening a meeting of the Governing Body.

Children/Young People who are lesbian, gay, bi or trans (LGBT)

The Open Door Academy recognises that whilst the fact that a child/young person may be LGBT is not in itself an inherent risk factor for harm, children/young people who are LGBT can be targeted by other children/young people.

A child/young person who is perceived by other children/young people to be LGBT (whether they are or not) can be just as vulnerable as those who identify as LGBT.

The Open Door Academy will endeavour to reduce barriers faced by children/young people who are LGBT and will provide a safe space for them to speak out or share their concerns with members of staff. This safe space is the meeting room next to the staff office.

What we do when we are concerned about a child/young person.

All concerns will be viewed alongside Central Bedfordshire Council's Thresholds of Need Guide in order to ensure the appropriate support or intervention is provided at the earliest opportunity in the least intrusive way.

The Academy also places due regard to the guidance contained in 'What to do if you are worried a child is being abused', 2015.

If, in consultation with the Central Bedfordshire Council's Thresholds of Need Guide, the level of concern sits at Level 2 then support will be provided by the Academy as the Lead Practitioner. The Bedford directory can be used to identify appropriate agencies and wider support for families. If, in consultation with the Thresholds of Need Guide, the concern sits at a Level 3, a referral will be made into the IFD.

In cases where it is not possible to obtain consent from the parent/carer, the Academy will seek advice from the Integrated Front Door (IFD).

The Academy will review each case to ensure that any support or intervention provided has impacted positively on the welfare/safety of the child/young person and that improvement is sustained.

In the event that provision of support has not led to improvements for the child/young person, or concerns escalate, the Academy will follow the step-up Escalation procedures published by the LSCP.

In consultation with the Thresholds of Need Guide, if the concerns about the child/young person indicate that they may be at risk of or suffering significant harm a referral will be made to the Integrated Front Door (IFD).

The parent/carer will be informed of the referral unless informing the parent may place the child/young person at increased risk of harm.

In the event of a professional disagreement in relation to a specific concern, the Academy will follow the Escalation procedures.

Involving parents/carers

In general, we will discuss any safeguarding and child protection concerns with parents / carers before approaching other agencies and will seek their consent to making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the DSL. However, there may be occasions when the Academy will contact another agency before informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child/young person. Parents / carers will be informed about the safeguarding policy through our website – www.TheOpenDoorAcademy.co.uk

Multi-agency work

The Academy understands its role in the Central Bedfordshire Safeguarding Children Partnership. Governing bodies, proprietors and the senior leadership teams, especially the DSLs, will make themselves aware of and follow their local arrangements.

The Open Door Academy work in partnership with other agencies in the best interests of children/young people. The Academy will, where necessary, liaise with the Academy nurse, initiate an effective support response, and make referrals to Children's Social Care. Referrals and contacts should be made by the DSL or one of

the Deputy Leads to Family Partnership, Children's Social Care. Where the child/young person already has a social worker, the request for a service will go immediately to the social worker involved, or in their absence to their team manager or duty social worker.

We will co-operate with any child protection enquiries conducted by Children's Social Care: The Academy will ensure representation at appropriate inter-agency meetings such as Team Around the Family/Strategy meetings, Initial and Review Child Protection Conferences, together with core group meetings.

We will provide reports as required for these meetings in accordance with the Central Bedfordshire Safeguarding Children Partnership procedures. If the Academy is unable to attend, a written report will be sent. The report will, wherever possible, be shared with parents/carers at least 24 hours prior to the meeting.

Where a child is subject to an Inter-agency Child Protection Plan, Child in Need Plan or TAF Support Plan, the Academy will contribute to the preparation, implementation and review of the plan as appropriate.

If a child is subject to a referral to a multi-panel such as Multi Agency Risk Assessment Conference (MARAC) or CHANNEL Panel, the Academy will contribute to such arrangements.

We will keep updated CBCs QA Lead on all safeguarding concerns.

Responding to an allegation or concern about a member of staff

The Academy will comply with the LSCP procedures for managing allegations and concerns about adults that work or volunteer with children in all circumstances.

These procedures should be used in any case in which it is alleged that a member of staff (including supply staff), governor, visiting professional or volunteer has:

- behaved in a way that has harmed or may have harmed a child/young person.
- possibly committed a criminal offence against or related to a child/young person; or behaved in a way that indicates s/he may pose a risk of harm to children/young person.
- behaved in a way that indicates they may not be suitable to work with children/young person.

We will consult with the LADO when an allegation is made against a member of staff to agree how to progress this.

Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in school to abuse or mistreat children/young people.

All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children/young people **immediately**.

Allegations or concerns about colleagues and visitors must be reported directly to the Head of Centre unless the concern relates to Head of Centre. If the concern relates to the Head of Centre, it must be reported immediately to the Chair of Governors. Alternatively, concerns can be reported directly to the Local Authority Designated Officer (LADO) in Children's Social Care, who will liaise with the Directors, and they will decide on any action required.

Schools should follow their safeguarding policies and procedure in the event of an allegation regarding an "incident that happened when an individual or an organisation was using their school premises for the purposes of running activities for children/young people." This includes events such as community groups, sports associations, and more.

If the Head of Centre is not available, the member of staff should report their concerns to the most senior member of staff available who will make contact with the LADO and discuss the concerns.

Contact with the LADO should happen at the earliest possible opportunity and within 1 working day.

We are aware we can seek appropriate advice from the Local Authority Designated Officer (LADO). The CBC LADO (known as the Allegations Manager) can be contacted on 0300 3008142.

The LADO may request a referral - if this is requested, the referral will be completed and submitted within 1 working day.

The Academy will engage with the LADO at all stages of the management of the allegation/concern and comply with the statutory guidance contained within Keeping Children Safe in Education (2024) and the local procedures published by the Central Bedfordshire Safeguarding Children Partnership above.

In this regard, the Academy will consider whether it is necessary to suspend the member of staff while the allegation or concern is investigated, however all reasonable alternatives to manage the risk will be considered.

Due consideration will be given to the view of the LADO in relation to suspension or in-work safeguards while a matter is investigated.

Should the Academy dismiss a member of staff/volunteer as a result of a substantiated allegation or should a member of staff/volunteer resign before an investigation has been completed, in accordance with statutory duty, a referral to the Disclosure and Barring Service will be made.

Safeguarding Policy 2026/27



If the member of staff is engaged in teaching work, the Academy will, in accordance with published guidance from the Department for Education, consider whether a referral to the Teaching Regulation Agency (TRA) should be made.

The Academy will adhere to the statutory guidance contained within Keeping Children Safe in Education (2025) with regard to record keeping, references and compromise or settlement agreement. If an allegation is shown to be deliberately invented or malicious, the Academy will consider whether any disciplinary action is appropriate against the individual who made it as per the Academy's behaviour policy.

The Academy has appropriate policies and processes in place to manage and record any such concerns that do not meet the harm threshold and take appropriate action to safeguard children/young people.

If a member of staff, student or volunteer has any concerns about poor, unsafe practice, or failures of the safeguarding regime, they are encouraged to raise this with the Head Teacher/Principal, Senior Leadership Team or Governing Body, following the Whistle Blowing Procedures of the Academy. The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college.

Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email help@nspcc.org.uk.