

Fylde Coast Academy Trust



Westminster Academy Safeguarding and Child Protection Policy

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1 Aims, Scope and Principles

- To embed a safeguarding culture and whole school approach to safeguarding which is enshrined in academy ethos and at the forefront of and underpins all relevant aspects of process and policy development and ensuring that all systems, policies and processes operate with the best interests of children at heart.
- To inform all adults working or volunteering in Fylde Coast Academy Trust (FCAT) of the regulations that must be followed in order to ensure safeguarding of children and young people in those organisations.
- To clarify the procedures for reporting suspected wrongdoing or bad practice in respect of the protection of children and young people within our organisations.
- To support the development of safe environments for children and young people to learn, develop and grow up in.
- To safeguard children from extremism and radicalisation and to support the Government's Prevent Strategy.

This policy is informed by statutory guidelines on safeguarding in 'Keeping Children Safe in Education' originally published in March 2015, subsequently updated in September 2026. KCSIE (2026) contained substantive changes that strengthen or clarify existing content, changes to multi-agency working ahead of legislative changes in the Children's Wellbeing and Schools Bill. Throughout this policy, the term "data protection laws" refers collectively to the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025.

This Policy was reviewed during summer 2026 and will be further reviewed in light of the full return to school for all children in September 2026. Consultation will take place with the FCAT Designated Safeguarding Leads prior to approval from FCAT Trustees.

This policy applies to all staff, volunteers and trainees within FCAT (including directly employed staff, those employed through an agency/third party, volunteers, Local Governing Body members, FCAT Members and Trustees, self-employed contractors and frequent visitors to FCAT). **Everybody working for, volunteering or training with FCAT is responsible for the safeguarding of children and young people in those organisations.** Standard arrangements for child protection (as set out in this policy) apply to all services/activities provided by Governors under the direct supervision and/or management of school staff. Where services are provided (e.g., on-site lettings) by another body, the governing body will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place and that these meet the requirements set out in Keeping Children Safe in Education. These will be inspected as required and channels for liaison regarding related matters will be implemented. This requirement will be implemented as a condition of use. If allegations are received related to an incident that 'happened' when an individual or organisation was using school premises, safeguarding policies and procedures, including informing the LADO as necessary will be implemented.

This policy incorporates DfE Early Years Foundation Stage (EYFS) safeguarding reforms which apply in full in all Trust Early Years settings. The Early Years Foundation Stage statutory framework should be read alongside KCSIE where children aged 0-5 attend school-based nurseries or reception classes. [Early years foundation stage \(EYFS\) statutory framework - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/115690/early-years-foundation-stage-eyfs-statutory-framework-2017.pdf)

The rest of this policy is divided into the following sections:

- Safeguarding information that all staff, volunteers and trainees need to know in order to protect children, young people and ensure their own safety in respect of working with children and young people.

- Actions to follow when concerns about the health and wellbeing of a child or young person are raised.
- Developing a safe environment for children and young people.

2 Key Contacts

FCAT Safeguarding Group

c/o Helen Livsey (FCAT Safeguarding Clerk) – 07454824607 or 01253207709

While there are prominent escalation routes within this policy and named Safeguarding personnel, safeguarding action must never depend on one individual being contactable. Robust DSL/DDSL cover is in place whenever pupils are on site or on a school activity, including a shared mailbox. A DSL/DDSL absence will never delay emergency action, police contact or a social-care referral.

Named personnel with designated responsibility for Child Protection

	Academic Year 2026/27	Most recent training
Referral	CPOMS Add new link: westminsterpa.cpoms.net/dash	
Designated Safeguarding Lead and contact details	Mrs Jenny Nicol j.nicol@westminster.fcat.org.uk	August 2025 (next training Sept 2027)
FCAT Safeguarding Lead	Linda Emmett governance@fcat.org.uk	July 2026
Deputy Designated Safeguarding Lead and contact details	Annette Threlfall a.threlfall@westminster.fcat.org.uk	DSL July 2025
Deputy Designated Safeguarding Lead and contact details	Terri Buchan t.buchan@westminster.fcat.org.uk Vicky Webster	July 2025

	v.webster@westminster.fcat.org.uk	
<i>Designated Safeguarding Governor</i>	Ted Cooper t.cooper@unity.fcat.org.uk	Sept 2026

Key Contacts outside the Academy:

Blackpool Council Social Care Team for immediate concerns:

Daytime Hours	01253 477299
Out of Hours	01253 477600

Blackpool Local Authority Designated Officer (LADO):

Daytime Hours	01253 477541
Out of Hours	01253 477592
lado@blackpool.gov.uk	

Lancashire County Council: Immediate Safeguarding Concerns

8.00am - 8.00pm	0300 123 6720
Out of Hours	0300 123 6701

Lancashire Local Authority Designated Officer (LADO): e.g., Mr Tim Booth

Daytime Hours	01772 536694
Out of Hours	0845 0530009
Tim.booth@lancashire.gov.uk https://www.safeguardingpartnership.org.uk/report/	

Pan Lancashire Safeguarding Procedures and Children's Boards

From 29 September 2019, the arrangements for local safeguarding children boards ceased to exist and in their place is the new 'Safeguarding Children Partnership Arrangements for Blackburn with Darwen, Blackpool and Lancashire'.

Blackburn with Darwen, Blackpool and Lancashire Children's Safeguarding Assurance Partnership

Telephone No	01253 477907
Web address	www.blackpoolsafeguarding.org.uk
E mail	paul.threlfall@blackpool.gov.uk

Training Enquiries:

Telephone No	01772 538354 or 01254 581161
E mail address	lscbtu@lancashire.gov.uk
By post:	Room CH3:37/ CH3:40, County Hall, Preston, PR1 0LD

NSPCC Whistleblowing helpline – 0800 028 0285.

3 Introduction

FCAT are committed to safeguarding children and young people within our areas of responsibility and recognise the importance of ensuring that all adults working or volunteering in our organisations clearly understand their legal responsibilities, specific roles and the procedures to follow in order for this to happen.

We also understand that, because of the day-to-day contact with children and young people, we and our colleagues are well placed to observe the outward signs of abuse and are in a position to provide support at an early opportunity. In addition, for some children experiencing, or at risk of, abuse, the academy/college may be the only stable secure and predictable element in their lives and key to providing them with the support needed to ensure their safety and wellbeing. A culture of listening to children and taking account of their views will be embedded in all academies and staff will understand the difficulties that some children may have in approaching staff and will consider carefully how to build trusting relationships and how to facilitate communication.

This policy provides the procedures for staff, volunteers and trainees to carry out in order to protect children and young people in our care and explains what to do when concerns about the safety and welfare of children and young people are identified or suspected. It outlines the procedure and support for managing any allegation made against person(s) working in or on behalf of an FCAT organisation and provides guidance on the promotion of safer environments for our children and young people.

The FCAT Governor Safeguarding Network, made up of Designated Safeguarding Governors from each FCAT academy monitors safeguarding practices across the Trust and provides scrutiny and challenge as required. This scrutiny extends through the FCAT Safeguarding Trustee to the FCAT Board. The FCAT Safeguarding Quality Improvement Group is made up of Designated

Safeguarding Leads (DSL) from each FCAT academy, focusing on consistently developing and improving safeguarding practice.

4 Definition of Safeguarding

Safeguarding and protecting the welfare of children and young people involves:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting them from maltreatment, abuse and/or neglect whether that is within or outside the home, including online. Specific types of abuse are defined later in this policy.
- Preventing impairment of mental and physical health and/or development.
- Ensuring the provision of safe and effective care.
- Enabling the best possible outcomes for children and young people.

5 Equality Legislation

It is recognised that being subjected to harassment, violence and or abuse, may breach children's rights, as set out in the Human Rights Act.

In accordance with the Equality Act 2010 (in relation to school safeguarding), FCAT academies must:

- not unlawfully discriminate against pupils because of their protected characteristics
- consider how they are supporting pupils with protected characteristics
- take positive action, where proportionate, to deal with the disadvantages these pupils face. For example, by making reasonable adjustments for disabled children and supporting girls if there is evidence they are being disproportionately subjected to sexual violence or harassment
- be conscious that pupils with protected characteristics may be more at risk of harm and integrate this into safeguarding policies and procedures.

6 Whole School Approach to Safeguarding

Westminster Academy will ensure they facilitate a whole school approach to safeguarding. This means involving everyone in the school and ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy. All systems, processes and policies will operate with the best interests of the child at their heart. The academy will promote an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of the safeguarding responsibilities.

Where there is a safeguarding concern, governing bodies, proprietors and school leaders will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

Westminster Academy's safeguarding policies and procedures will be transparent, clear and easy to understand for staff, pupils, students, parents and carers. Systems in place will be well promoted, easily understood and accessible for children to confidentially report any forms of abuse or neglect, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

7 Safeguarding Information that all Staff, Volunteers and Trainees need to know

It is the responsibility of **everyone** working, volunteering or training in our organisations to ensure the safeguarding of children and young people there. We are in a position to identify concerns early and have a duty to prevent these from escalating and provide support to children and young people when required. Every staff member regardless of role, is required to read and understand Part 1 of Keeping Children Safe In Education Although the DfE has provided a Part 1 overview, this does not substitute the requirement to read Part 1 in full. [Keeping children safe in education 2016 - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/626272/Keeping_Children_Safe_in_Education_2016.pdf)

A person will be engaging in regulated activity with children if they work on a frequent basis in a specified establishment, such as a school, or in connection with the purposes of the establishment, where the work gives the opportunity for contact with children. A person will also be in regulated activity if, as a result of their work or volunteering, they:

- Will be responsible, on a frequent basis in a school or college, for teaching, training, instruction, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or,
- Engage in intimate or personal care or healthcare or any overnight activity, even if this only happens once.

Where a school is subject to the EYFS framework, volunteers are not permitted to begin working within the setting covered by the EYFS framework until the school or nursery have received the volunteer's enhanced DBS certificate including barred list information.

[The Safeguarding Vulnerable Groups Act 2006](#) provides the type of work that will be regulated activity if "it is carried out frequently by the same person" or if "the period condition is satisfied".

Most school staff and those working with children will be engaging in regulated activity, in which case an enhanced DBS check which includes children's barred list information, is required. For all other staff (e.g., contractors) who have an opportunity for regular contact with children who are not engaging in regulated activity, an enhanced DBS certificate, which does not include a barred list check, will be appropriate. Barred list checks must not be requested on any person who is not engaging in or seeking to engage in regulated activity.

At FCAT, our policy is that DBS certificates are required prior to an individual starting work in regulated activity.

Separate barred list checks must be carried out in the following circumstances:

- For newly appointed staff or volunteers who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the DBS service (and where all other relevant checks have been carried out, as per paragraph 311 of KCSIE 2026)
- Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks as per paragraph 311 of KCSIE 2026, have been carried out).

Individuals can join the DBS update service at the point that an application for a new DBS has been made, or within 30 calendar days of the issue date on the certificate.

There are limited circumstances where schools will need to carry out new checks on existing staff or volunteers. These are when:

- An individual working or volunteering at the academy moves from a post that was not in regulated activity with children into work which is considered regulated with children. In such circumstances, the relevant checks for that regulated activity must be carried out
- There has been a break in service of 12 weeks or more, or
- There are concerns about an individual's suitability to work with children

All staff should be aware of systems within their school which support safeguarding and these should be explained to them as part of staff induction and include:

- Child protection policy
- Behaviour policy
- Staff code of conduct, including Acceptable Use Policy
- Staff disciplinary policy

- Whistleblowing policy
- Safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
- Role of the designated safeguarding lead (including the identity of the DSL and any deputies).

All staff, volunteers and trainees should be prepared to identify children and young people who may benefit from early help i.e., by providing support as soon as the problem emerges at any point in that child/young person's life. In the first instance discussions about requirements should be had with the Designated Safeguarding Lead (DSL).

All staff have an important part to play in supporting the mental health and wellbeing of children, including through the delivery of relationships, health and sex education.

All staff, volunteers and trainees are required to attend safeguarding awareness as part of their induction to the organisation. This training covers Part 1 of the statutory guidance on safeguarding 'Keeping Children Safe in Education'. Staff, volunteers and trainees are also required to attend refresher training on an annual basis and any supplementary training as required. This training will include online safety training and will be aligned and considered as part of the whole academy safeguarding approach, wider staff training and curriculum planning and will be regularly updated. This training will include and understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

All staff, volunteers and trainees must know the name of their DSL and how to contact him/her should it become necessary to raise any concerns about the health and wellbeing of a child or young person. A list of DSLs from each organisation is at Appendix A.

All staff should be aware of the indicators of abuse, neglect, exploitation and modern slavery, understanding children can be at risk of harm inside or outside of the school/college, inside or outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination. These experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff will be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practices.

All staff, volunteers and trainees working in our organisations have a responsibility to provide a safe environment in which children and young people can learn. This is a legal duty of care in accordance with the Department for Education (DfE) statutory guidance 'Keeping Children Safe in Education'. Training will be provided to staff, volunteers and trainees in how they can fulfil this responsibility.

All staff, volunteers and trainees need to recognise that some children and young people may be especially vulnerable to abuse, for example, those with Special Educational Needs and those living in adverse circumstances and to be mindful of this as part of their working practice. All staff need to also understand that children and young people that are abused, neglected and/or exploited may find it difficult to develop a sense of self-worth or to view the world in a positive way and to take this into consideration if their behaviour becomes challenging.

All staff, volunteers and trainees must maintain an attitude of professional curiosity and of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a

child or young person, staff, volunteers or trainees must always act in the best interests of the child or young person.

Staff, volunteers and trainees must be aware that failure to act in accordance with their duty of care to safeguard children (the law, professional guidelines or organisational policies and procedures) may result in criminal and/or for staff disciplinary action up to and including dismissal being taken.

All staff, volunteers and trainees are responsible for their own actions and behaviour and must avoid any conduct which would lead any reasonable person to question their motives or intentions. (Appendix B: Safeguarding Acceptable Behaviour Code)

Any person working or training in or on behalf of the organisation has a legal duty to report any concern(s) they may have regarding another individual working in or on behalf of the academy/college. It is understood this may be difficult as it may relate to a colleague or a person may feel that the concern is not serious enough. All concerns must be reported to the DSL and any individual that does raise a concern will be supported to do so.

If an allegation against a member of staff (including supply staff, trainee teachers, volunteers and contractors) is made, the procedures identified in Appendix F will be instigated.

If, as a result of a disciplinary investigation, a member of staff is dismissed, or removed from working in a regulated activity with children and young people because it is believed that they:

- harmed or pose a risk of harm to a child/young person under the age of 18 through their action or inaction or
- received a caution or conviction for a relevant offence

The organisation, has a legal duty to refer that individual to the Disclosure and Barring Service (DBS) for them to consider if that person will be listed on the DBS Children or Adults' Barred Lists, preventing them from engaging in regulated activity with children, vulnerable adults or both in the future. The DBS must be informed immediately if a person is dismissed or removed due to safeguarding concerns, or would have had they not resigned. This is a legal duty and failure to do so is a criminal offence.

In line with the Inspection Framework, all Ofsted inspections will report on whether or not arrangements for safeguarding children and young people on site are effective.

Enhanced Governor/Trustee Training

All Governors and Trustees should have appropriate safeguarding/child protection training, which should be distinct from the training provided to all staff, tailored and not operational. This at induction and in an ongoing manner with annual updates.

Training should provide knowledge for strategic challenge and enable Governors to test and assure that safeguarding policy and procedures are effective and support the delivery of whole-school safeguarding. Training is likely to be more effective if 'face to face' (even if virtual) rather than online alone and needs to be strategic in focus. It is important for data to be used effectively and for DSL to provide the right information to Governors. The system needs to check that the right safeguarding measures are in place at a school and that the DSL has the right time allowance, team and processes and to scope safeguarding strategy over 3-5 years.

Domestic abuse has been added to the list of safeguarding issues that all staff should be aware of. The guidance makes it clear that domestic abuse:

- can be psychological, physical, sexual, financial, or emotional
- can impact on children through seeing, hearing or experiencing effects of domestic abuse and/or experiencing it through their intimate relationships.

All staff must be aware that children may not feel ready or know how to tell someone they are being abused. A culture of staff vigilance, 'it could happen here' and support, coupled with effective personal development, are central to helping pupils to seek help when needed.

8 Actions to Follow When There are Concerns About the Health/Wellbeing of a Child or Young Person

If, at any point, there are concerns about or there is a risk of immediate serious harm to a child or young person, the DSL at the organisation must be informed. A list of DSLs from each organisation and an outline of the role is at Appendix B. Staff will immediately report:

- If they have any concerns about a child's welfare
- any suspicion that a child/young person 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/young person may have suffered harm (e.g., worrying drawings or play)
- any concerns that a child/young person may be suffering from inadequate care, ill treatment, or emotional maltreatment
- any concerns that a child may be suffering from mental health problems (which could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation)
- any concerns that a child/young person is presenting signs or symptoms known to be indicators of abuse, neglect and/or exploitation
- any significant changes in a child/young person'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/young people (e.g., living in a household with children/young people present).

Knowing what to look for is vital to the early identification of abuse, neglect and/or exploitation. If staff members are unsure, they should always speak to the DSL. The DSL will consider options which include:

- managing any support for the child internally via Westminster Academy's own pastoral support processes, including considering where doing so does not place the child at additional risk, whether the DSL or DDS should inform parents and carers to further support the child's wellbeing
- undertaking a family held assessment, or
- making a referral to statutory services, for example, as the child could be in need, is in need, or is suffering, or likely to suffer harm.

If the DSL is not available, the Headteacher (unless the concern is about the Headteacher) must be informed of any concerns. If the concern is about the DSL, concern should be raised with the Headteacher. If the concern is about the Headteacher, concern should be raised with the DCEO or Director of Primary Education.

If neither the DSL nor the Headteacher is available, and there is risk of immediate serious harm to a child or young person, a referral to **Children's Social Care on 01253 477299 (office hours) or 01253 477600 (out of office hours) for Blackpool based children and young people and 01772 536694 (office hours) or 0845 0530009 (out of office hours) for Lancashire County based children and young people must be made immediately.** The Local Authority Designated Officer (LADO) for Blackpool Council is Laura Dalton –

lado@blackpool.gov.uk. The LADO for Lancashire County Council is Tim Booth – tim.booth@lancashire.gov.uk **Anyone can make a referral.** The DSL must be informed as soon as possible afterwards.

If the child/young person's situation does not appear to be improving, the staff member with concerns must use the escalation procedures (See Appendix H). **Concerns must always lead to help for the child/young person at some point.**

In cases where a child/young person discloses information, staff must handle this with sensitivity, recognising that this will have been difficult for the child to do. However, the child/young person disclosing must be made aware that the information cannot remain confidential and that the DSL will need to be notified. Staff must not take it upon themselves to investigate any claim but, where possible, elicit and clarify any information disclosed in order to pass this on to the DSL. A record of the conversation must also be taken. Guidance on how to respond to a disclosure and how to record incidents is at Appendix E. Staff should be proactive in sharing information as early as possible to help the DSL to identify, assess and respond to risks or concerns about the safety and welfare of children. The DSL will liaise with the Mental Health Lead (and where appropriate the mental health support team) and will take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing (or have experienced) and in identifying the impact that these issues may have on children's attendance, engagement and/or achievement at school, underpinned by statutory guidance '[Working together to improve school attendance - GOV.UK](https://www.gov.uk/government/publications/working-together-to-improve-school-attendance)'

If a member of staff, volunteer or trainee discovers that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under the age of 18, the member of staff themselves must report this to the Police as well as to the DSL. See heading "**Female Genital Mutilation (FGM) and the FGM mandatory reporting duty for teachers**" for a definition of FGM.

Any child may benefit from support before statutory intervention, including from universal services and community based early help, but all academy/college staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm. Staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- is homeless or is at risk of homelessness
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of modern slavery, trafficking, including sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves

- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage (legal and unofficial)
- is a privately fostered child
- is persistently absent from education, including unexplainable and/or persistent absences for part or all of the school day

All staff should be aware of the process for community-based Family Help assessments:

- the criteria, including the level of need, for when a case should be referred to Family Help support and services provided at:
 - Targeted early help level (under sections 10 and 11 of the Children Act 2004)
 - Statutory services delivered under section 17 of the Children Act 1989 (children in need, including how this applies for disabled children)
- The criteria, including the level of need, for when a case should be referred to the local authority children's social care for assessment and for statutory services under section 47 of the Children Act 1989 (reasonable cause to suspect a child is suffering or likely to suffer significant harm)
 - Section 31 of the Children Act 1989 (care and supervision orders) and
 - Section 20 of the Children Act 1989 (duty to accommodate a child)
- And clear procedures and processes for cases relating to:
 - The abuse, neglect and exploitation of children
 - Children managed within the youth secure estate
 - Disabled children

Any Early Help provision should be coordinated by the DSL or a Deputy in liaison with external agencies as appropriate.

Westminster Academy is a full participant in Operation Encompass, which seeks to protect children from the impact of domestic abuse.

9 Opportunities to Teach Safeguarding

Westminster Academy will ensure that children are taught about how to keep themselves and others safe, including online. Education will be tailored to the specific needs and vulnerabilities of individual children, including children who are the victims of abuse, and children with special educational needs and/or disabilities (SEND).

Relevant topics will be included within Relationships and Health Education (for all primary pupils) and Relationships, Sex and Health education (for all secondary pupils). In teaching these subjects, Westminster Academy will have regard for the statutory guidance, revised for introduction in September 2026, available here.

Westminster Academy plays a crucial role in preventative education. This is most effective in the context of whole-school approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. Westminster Academy has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life, underpinned by the Behaviour Policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered regularly timetabled lessons and reinforced throughout the whole curriculum. This programme is inclusive and developed by age and stage of development.

10 Developing and Maintaining a Safe Environment for Children and Young People

All recruitment and selection must be carried out in accordance with the Recruitment and Selection Policy and Procedures of the relevant organisation which must comply with safer recruitment statutory guidance. As part of this process, DBS checks must be carried out prior to a new employee starting in post.

Former volunteer supervision exemptions have been removed for relevant regulated activity. Trainee teachers are treated as part of the workforce from day one.

In addition to DBS checks, if a candidate has previously worked overseas in the last 10 years, leaders must complete any further checks they deem appropriate such as criminal records checks for overseas applicants [Criminal records checks for overseas applicants - GOV.UK](#) or a letter from the professional regulating body confirming that there have been no sanctions or restrictions [Regulated Professionals Database](#)

Staff are asked to complete an annual declaration, confirming there has been no changes to their DBS status. In addition, each organisation must ensure that individuals appointed to carry out teaching work are not prohibited from teaching or disqualified from working with children and young people under the Childcare (Disqualification) Regulations 2009.

Online searches for shortlisted candidates should be considered as part of the appointment process for student-facing staff. Consent is not required although candidates should be told. This should be implemented at the shortlisting stage. Candidates should be asked for social media 'handles. It is anticipated that results will be interpreted as with the DBS process. Systems must avoid discrimination e.g., on the basis of sexuality and/or gender. Recruitment must reflect this requirement.

All staff members must undergo safeguarding and child protection training at induction. The training should be regularly updated with a full update annually. Induction and training should be in line with any published local multi-agency safeguarding arrangements. In addition, all staff members should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Regulations also apply in terms of appointment of casual and temporary employees, volunteers, contracted workers, governors, regular visitors and students in placements across the organisations.

All governors need to be enhanced DBS checked on appointment. They will be required to complete an annual declaration, confirming no changes to their DBS status.

All staff are required to work in an open and transparent way and to discuss and/or take advice from management over any incident which may give cause for concern.

Any incidents and/or decisions in respect of safeguarding practice must be recorded.

Children and young people need to be made aware of how best to keep themselves safe and to counteract danger. They must be provided with information on how to do this and of their right to be listened to should they suspect danger to themselves or their peers for example, through the school's personal development curriculum.

Children and young people must be made aware of appropriate people within the organisation that can provide them with support in respect of safeguarding issues and/or any matters they would like to disclose and how to contact them.

All staff must ensure that children and young people are protected from potentially harmful and inappropriate online material and are taught online safety. Governors must ensure that appropriate filters and monitoring systems are in place to protect children and young people from potentially harmful and inappropriate online material. Clear policy regarding the use of mobile and smart technology will be implemented.

We are committed to working with parents and carers in a positive, open and honest way and will discuss any concerns with them as far as possible. However, **we will not** discuss concerns with parents/carers in the following circumstances:

- where sexual abuse or sexual exploitation is suspected
- where organised or multiple abuse is suspected
- where Fabricated or Induced Illness (previously known as Munchausen by proxy syndrome) is suspected
- where female genital mutilation (FGM) is suspected
- in cases of suspected forced marriage
- in cases of where a child/young person is suspected of being subjected to radicalism and/or extremism
- where contacting the parents/carers would place a child, young person or others at immediate risk.

In these cases, staff must contact the DSL and or Headteacher for advice and support.

We are committed to inter agency working and the sharing of valuable information in order to provide a co-ordinated offer of help when additional needs of children and young people are identified.

All staff, volunteers and trainees must feel able to raise concerns about poor and unsafe practice and potential failures within organisations' safeguarding procedures and be assured that those concerns will be taken seriously. Concerns need to be raised firstly with the DSL, and then with the Headteacher. Valid concerns and revisions to safeguarding practice must also be reported to the FCAT Governor Safeguarding Network and FCAT Safeguarding Trustee and shared with the FCAT Safeguarding Quality Improvement Group for implementation. If a member of staff or volunteer feels unable to raise the issue within their organisation or feels their concern is being overlooked, they need to report the matter to the FCAT Safeguarding Network Lead and/or FCAT Safeguarding Trustee via Helen Livsey (governance@fcat.org.uk).

11 Supporting Children who go Missing From Education or who are Absent From Education on Repeat Occasions or Prolonged Periods (including persistent and/or unexplainable absence for part or all of the school day)

FCAT remains committed to [Working together to improve school attendance - GOV.UK](#)

Going missing from education or being absent, particularly repeatedly, persistently (below 90%), severely (below 50%), or for unexplainable periods, is a vital warning sign of potential safeguarding risks. These include abuse, neglect, child criminal exploitation, child sexual exploitation, extra-familial harm, mental health crises, or domestic abuse. Early intervention is essential to identify underlying risks and prevent escalation.

Academies must monitor pupil attendance twice daily on Bromcom. Attendance data is routinely triangulated with safeguarding indicators to spot emerging patterns of absence. Unexplained or

irregular attendance will always be investigated promptly by the attendance and pastoral teams in consultation with the Designated Safeguarding Lead (or deputy).

The Academy will maintain at least two emergency contact numbers for every pupil on roll to ensure swift communication and escalation in the event of an unexplained absence.

Academies must operate a robust first-day call process for all unexplained absences. First-day contact is explicitly prioritised for vulnerable pupils, including Looked After Children (LAC), children with an allocated Social Worker (Child Protection or Child in Need plans), children receiving Early Help, children with Special Educational Needs and Disabilities (SEND), and those identified by the DSL (or deputy) as facing acute safeguarding risks. Where a child with an allocated Social Worker is absent without explanation, the Academy will notify the child's Social Worker (and Virtual School Head, where applicable) on the first day of absence as part of first-day response procedures. If contact cannot be established for a vulnerable pupil, or if there are immediate concerns for a pupil's safety or wellbeing, staff will escalate to a home visit, contact emergency services, or make an immediate referral to Local Authority Children's Social Care.

Where voluntary support is ineffective or absence becomes persistent/severe, the Academy will work collaboratively with parents/carers, local authority attendance teams, early help lead practitioners, and statutory partners to identify and remove barriers to attendance. The local authority will be notified as early as possible regarding pupils who are consistently or severely absent, or where a pupil is at risk of being removed from roll, in line with statutory Children Missing Education (CME) and pupil registration regulations. Social Care Services will be informed immediately if absence gives rise to concerns that a child is experiencing or is at risk of significant harm.

Academies must follow statutory guidance for pupils who are suspended, permanently excluded, or placed in Alternative Provision / Off-Site Direction. Regular attendance checks are conducted for all pupils accessing alternative provision to ensure continuous safeguarding and engagement.

12 Supporting Looked After Children and previously Looked After Children

The most common reason for children becoming looked after is as a result of abuse and/or neglect.

It is critical Westminster Academy has access to the information needed in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangement with birth parents or those with parental responsibility.

The academy should be provided with information about the care arrangements and levels of authority delegated to the carer by the authority looking after the child.

A previously looked after child potentially remains vulnerable and it is important that all agencies work together and prompt action taken when necessary to safeguard these children, who are a particularly vulnerable group.

Academies need to assign a designated teacher, with appropriate training, qualifications and experience, to promote the educational achievement of looked after children and previously looked after children.

The role of virtual school head is to manage pupil premium plus for looked after children. The designated teacher should work with the virtual school head to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. The designated teacher should also work with the virtual school head to promote educational achievement of previously looked after children. The role

was extended in June 2021, to include non-statutory responsibilities for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker. Virtual school heads should work with local authorities to set and report on ambitious targets to improve their attendance.

Virtual school heads also have responsibility towards children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England or Wales.

The statutory guidance on [promoting the education of looked-after and previously looked-after children](#) contains further information on roles and responsibilities.

13 Supporting Young Carers

Westminster Academy is alert to the needs of young carers, recognising that caring responsibilities can impact on attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authorities and health services. FCAT is committed to supporting Young Carers, with a policy published on the FCAT website and engaged in partnership with Blackpool Carers Centre.

14 Supporting Children with Special Educational Needs and Disabilities (SEND)

Academies need to be aware that children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Additional barriers can exist alongside abuse, neglect and exploitation in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care, and
- These children may have issues over cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or the consequences of doing so.

Any reports of abuse involving children with SEND will require close liaison with the designated safeguarding lead (or deputy) and the special educational needs coordinator (SENCO).

Academies should consider providing extra pastoral support and attention to children and young people with SEN where necessary, particularly with ensuring support for communication is in place.

When applying disciplinary measures such as restraint, physical intervention or isolation to children and young people with SEND, staff need to be aware of the vulnerability of this group and safeguard against the use of these as far as possible by planning positive and proactive support to reduce the risk of dangerous behaviour in the first place.

15 Safeguarding Children with Medical Conditions

The fact that there has been an incident relating to the management of a child or young person's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at an increased risk of being

neglected, abused or exploited by a person inside or outside of the family unit because of their medical condition. This could be where relevant information about a child or young person's medical condition is not provided to the academy, or where they are sent repeatedly without essential medication, thereby putting the person at risk. FCAT considers government guidance when safeguarding children with medical needs, including:

- [Supporting pupils with medical conditions at school - GOV.UK](#)
- [Supporting pupils with medical conditions at school - GOV.UK](#)
- [Allergy safety in schools - GOV.UK](#)

16 Children who are lesbian, gay or bisexual

A child or young person being lesbian, gay or bisexual is not in itself a risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are. Westminster Academy is committed to addressing vulnerabilities such as risk of bullying and taking steps to prevent it, including putting appropriate sanctions in place.

17 Children who are Questioning Their Gender

There has been a significant increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.

It is not for Westminster Academy to initiate any action in this area, and therefore, this information is for where a child or their parent has raised a request relating to social transition at the Academy. DSL involvement would only take place in significant circumstances. Parental involvement remains the default and priority, unless doing so created a safeguarding risk. A documented decision and rationale, considering equality and human-rights would be undertaken. High risk cases would trigger trust or legal advice.

Westminster Academy keeps in mind that it is common for children to engage in activities that are less typically associated with their sex. Sometimes children can go through a period of questioning their gender but for the majority, this will not continue into adulthood. Academies will consider the feelings of children who are questioning their gender and will be appropriately professionally curious about the full range of the child's experiences. Academies remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, relating to relationships with family, peers or their broader social environment, including discriminatory bullying. Westminster Academy will maintain flexibility and avoid rigid rules based on gender stereotypes.

18 Regulations and Safeguarding Requirements Relating to School Premises and Gender

Toilets; Changing Rooms; Showers; Overnight or Residential Accommodation and Single-Sex Sports

Westminster Academy will not allow children into toilets designated for the opposite biological sex. Separate toilets for boys and girls aged 8 and over (apart from where individual toilets are in a room and can be locked from the inside, intended for use by one pupil at a time) will be provided.

If a gender questioning child does not want to use the toilet designated for their biological sex, Westminster Academy will consider whether an alternative toilet facility could be provided (for example self-contained individual toilets), without compromising the provision of single-sex

facilities. Any alternative arrangements should not compromise the safety, comfort, privacy or dignity of the child, or of any other children.

Westminster Academy will maintain a clear record of these situations, ensuring they are communicated appropriately and regularly reviewed.

Academies will not allow a child, aged 11 years or older at the start of the school year, to undress in front of a child of the opposite biological sex. This is required by the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014. Suitable changing accommodation and showers will be provided for pupils aged 11 years and over at the start of the school year and have regard to the pupils ages, numbers and sex and any special requirements they may have and are informed by the academies Safeguarding obligations.

When responding to a request to support any degree of social transition, Westminster Academy will not allow a child access to changing rooms designated for the opposite sex. If a gender-questioning child does not want to use the changing rooms and showers designated for their sex, Westminster Academy will consider whether an alternative changing or washing facility can be provided without compromising the provision of single sex provisions. These alternative arrangements should not compromise the safety, comfort, privacy or dignity of the child or of any other children.

19 Addressing Child-on-Child Abuse (including harassment and violence)

All staff, volunteers and trainees should recognise that children are capable of abusing their peers (often referred to as child-on-child abuse). This can happen both inside and outside of school/college and online.

Staff, volunteers and trainees need to recognise the gendered nature of child-on-child abuse (i.e., that it is more likely that girls will be victims and boys' perpetrators) and that all child-on-child abuse is unacceptable and will be taken seriously.

Academies must ensure procedures are in place to monitor, investigate and address child on child abuse. In the case of sexual or physical abuse, the DSL may be called on to work with the Police and/or social care services to provide appropriate support to the victim and the perpetrator.

Staff must understand that even if there are no reports in their schools/colleges it does not mean it is not happening. It may be the case that abuse is not being reported. As such, it is important that when staff have any concerns regarding child-on-child abuse (whether these concerns are thought to have taken place on or off-site) they should speak to their DSL (or a deputy). Westminster Academy will be alert to when children may be at highest risk around the school day.

It is essential staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Academies have a responsibility to ensure that pupils and staff, volunteers and trainees are aware that child on child abuse should never be tolerated or passed off as 'banter', 'having a laugh' or 'part of growing up'. All academies have a zero-tolerance approach to abuse.

All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator.

Victims of child on child (and all) abuse will be taken seriously, kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

Reporting procedures for concerns regarding child-on-child abuse are the same as those for any safeguarding concern (see flow chart at Appendix J) and will follow guidance encapsulated in KCSIE.

Academies will be aware that perpetrators may present an ongoing risk to other children and will address harmful sexual behaviour (this applies to behaviour occurring online, face to face or both) to help prevent problematic, abusive and/or violent behaviour in the future. They will be mindful of the continuum that exists for children's sexual behaviours, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Stages of typical sexual development and behaviour for different age groups can be found in [sexual development and behaviour in children \(NSPCC learning\)](#).

When assessing harmful sexual behaviour, the ages and development stage of the children involved is critical. Sexual behaviour between children may be considered harmful if there is a significant age difference, typically more than two years difference or if one is pre-pubescent and the other is not. However, a younger child can also abuse an older child, especially if they hold power over them. Advice on responding to children who display sexualised behaviour is available in [responding to children who display sexualised behaviours](#).

Academies will ensure that children's wishes and feelings are taken into account when determining what action to take and which services to provide, operating at all times within the legal framework. Staff recognise that racism, faith-based abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and will be considered within safeguarding practice where appropriate.

Academies will ensure that reporting systems are well promoted, easily understood and easily accessible for children to confidently report abuse

Children can also abuse their peers online and this can take the form of abusive, harassing and/or misogynistic messages, the non-consensual sharing or making or sharing nudes or semi-nude images (including AI generated), especially in chat groups and the sharing of abusive images and/or pornography to those who do not want to receive such content.

Children need to know that whilst consensual sharing or making of nudes or semi-nudes (including AI generated) images of children may not be abusive it is illegal. Non-consensual sharing of sharing or making of nudes or semi-nudes' images (including AI generated) of children is illegal and abusive.

Staff must be aware that the viewing of nudes or semi-nudes is illegal and must not be viewed when a disclosure is made. Every incident of nudes, semi-nudes or deep-fakes will receive a safeguarding response, regardless of how it is described. Staff will not view, copy, forward, print, store or request the image, except where national guidance expressly permits a DSL-led decision.

As well as knowing how to respond to concerns, all staff should know that child-on-child abuse is preventable. As well as knowing how to recognise behaviours and indicators of risk early, staff should know that timely, evidence-based support can be key to preventing children from going on to commit abuse or violence.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as teenage relationship abuse)
- Physical abuse such as hitting, kicking, shaking, biting, hair-pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Serious physical assault and harm, or threat of harm with a weapon
- Harmful 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 standalone or part of a broader pattern of abuse and/or misogyny/misandry
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual making or sharing of nudes and semi-nudes
- Upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- Discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents

All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to bullying (including cyberbullying); physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; sexting (also known as youth produced sexual imagery); and initiation/hazing type violence and rituals; upskirting, 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. Incidents of child-on-child abuse have increased significantly in the last few years. Children living away from home are particularly vulnerable to abuse from their peers. This form of abuse and a significant proportion of sex offences are committed by teenagers and, on occasion, younger children. Staff and carers need to understand the difference between consenting and abusive sexual behaviour and not consider abusive sexual behaviour between young people as 'normal'. Suspected incidents of child-on-child abuse should be treated and taken as seriously as would incidents perpetrated by an adult and reported to the DSL as early as possible. Children and young people who abuse their peers have often suffered considerable disruption in their lives and / or witnessed or been the victims of abuse themselves. They, as well as the victims, may need support to reduce the potential for them to harm other children and young people in the future. See the pan Lancashire procedures in respect of this at http://panlancashirescb.proceduresonline.com/chapters/p_peer_abuse.html?zoom_highlight=peer

20 Serious Violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Concerns about a child carrying or using a weapon (or expressing intent to do so) should be reported to the DSL or DDSL. The DSL will assess risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict.

Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or involved in committing violence (who may also be victims themselves). Staff are alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g., suspensions, permanent exclusions, time in alternative provision) or a history of offending. Westminster Academy will try to be alert to when children might be at highest risk around the school day.

Any concern that a child is carrying or using a weapon, has threatened harm with one, or has expressed an intention to carry or use one, will be reported to the DSL/DDSL immediately on the same school day, irrespective of age, or apparent seriousness. If there is an imminent danger, 999 will be called in the first instance.

Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge is vital. This includes access to trusted adults, social and emotional skills support and where available, targeted interventions such as mentoring or therapeutic support. More information can be found [about children, violence and vulnerability, 2024](#).

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and gender from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. A victim will never be made to feel ashamed for making a report.

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

21 Information Sharing

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's services. [Information sharing: advice for practitioners providing safeguarding services to children, young people parents and carers](#) supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information. Data protection laws do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the Designated Safeguarding Lead (or deputy). Fears about sharing information must not be allowed to stand in the way of the need to safeguarding and promote the welfare of children.

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including in relation to their educational outcomes. Westminster Academy has clear powers to share, hold and use information for these purposes.

As part of meeting a child's needs, the governing body and school leaders recognise the importance of information sharing between practitioners and local agencies. This includes ensuring arrangements are in place and understood that set out clearly the processes and

principles for sharing information within school and with local authority children's social care, the safeguarding partners and other organisations, agencies and practitioners as required.

When deciding what information to share, Westminster Academy will consider:

- The relevancy of the information, including the current safeguarding risk,
- What is necessary for the receiving setting to know, and
- Whether it is clearly presented and appropriately contextualised.
- Record the rationale for material sharing or non-sharing decisions
- Any uncertainty around data protection must not cause unsafe delay (Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025.)

Professional judgement will be used to ensure that the information shared is focused and proportionate. This could include summarising or omitting information which is not necessary for safeguarding purposes. Care will be taken to not omit information where it may be relevant to the understanding or managing safeguarding risk. This is further supported by the new information sharing duty, which is intended to give staff greater confidence to share information appropriately and in a timely way to safeguard children.

Westminster Academy is aware of the need to have regard for the relevant data protection principles, which allow the sharing (and withholding) of personal information, as provided for in the data protection laws.

Where children leave Westminster Academy, the designated safeguarding lead (or deputy) will ensure their child protection file is transferred to the new setting 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 setting to have support in place for when the child arrives. The designated safeguarding lead (or deputy) will ensure recur transit, and confirmation of receipt will be requested. This information will be transferred separately from the main pupil file.

In addition to the child protection file, the designated safeguarding lead (or deputy) will consider if it would be appropriate to share any information with the new setting in advance of the child leaving particularly where the information would support an assessment of risk to others in the school as well as the individual pupil.

Where information indicates a risk to others [and](#)/or the individual pupil, it is incumbent on the receiving school to assess risk and accordingly, put into place a safety and support plan for when the child arrives.

22 Information Security and Access Management

Westminster Academy takes measures to safeguard children by protecting personal information and ensuring the school has appropriate cyber security systems in place. Westminster Academy has implemented measures in line with the [cyber-security standards for schools and colleges](#). This outlines the actions that schools should consider implementing to strengthen resilience, reduce the risk of disruption, prevent data breaches, and mitigate safeguarding risks.

23 Online Safety

All organisations must implement a clear, holistic approach to mobile technology in relation to the impact on online safety. The management of children's personal access to the internet on school premises will be reflected in both mobile/smart technology and child protection policies.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. Westminster Academy's approach to online safety empowers us to protect and educate pupils, students and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate concerns where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

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

The Governing body will regularly review the effectiveness of online filters and monitoring systems and ensure that the leadership team and relevant staff are:

- aware of and understand the systems in place
- manage them effectively
- know how to escalate concerns when identified.

FCAT academies will communicate with parents and carers to reinforce the importance of children being safe online, sharing information with parents/carers about:

- systems they have in place to filter and monitor online use
- what children are asked to do online, including the sites they will be asked to access
- who from the school or college (if anyone) their child is going to be interacting with online.

Westminster Academy will ensure online safety is a running and interrelated theme whilst devising and implementing a whole-school approach to safeguarding and related policies and procedures. This includes considering how online safety is reflected in relevant policies and considering online safety when planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.

Guidance to support schools and colleges to understand safety considerations and legal responsibilities if they choose to use Generative AI (either teacher-facing or pupil-facing) is available [at Generative artificial intelligence in education](#).

The DfE, in partnership with the Chiltern Learning Trust and Chartered College of Teaching have published [online resources](#) to help schools and college staff to use AI safely and effectively.

The use of technology has become a significant component of many safeguarding issues and can be a significant component in safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. In terms of child sexual exploitation; radicalisation and sexual predation technology often provides the platform that facilitates harm. Academies and colleges must ensure an effective approach to online safety to protect and educate the whole school or college community in their use of technology and establish mechanisms to identify, intervene in and escalate any incident where appropriate.

Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual making or sharing of nudes or

semi-nudes (including AI generated), especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

Academies and colleges must be mindful of the content that their students/pupils may be exposed to online and do their very best to ensure that they are not able to access illegal, inappropriate or harmful material whilst using technology in their settings.

Academies and colleges must do their very best to ensure that students using technology within settings are not subjected to harmful online interaction with others.

Academies and colleges must do their very best to ensure that staff and students/pupils conduct themselves appropriately when using technology in their settings in order to reduce the likelihood of harm.

Academies and colleges must ensure appropriate filters and monitoring systems for their hardware and software are in place and be mindful of the proportion of time used.

Online safety will be considered when planning the academy curriculum, in teacher training, in the roles and responsibilities of the DSL and in parental engagement activities.

24 Visitors

Westminster Academy receives a range of visitors. These include professionals such as educational psychologists, social workers and other education related practitioners, as well as educational visitors like guest speakers or performers. The academy may also host individuals connected to the site, including contractors working on the building or grounds, children's family members or others attending for events such as sports days.

Third Party Visitors

Visitors can also be provided through a third party such as an agency, the academy will obtain written notification from any agency that they have carried out the same checks as the school or college would otherwise perform on any individual who will be working at the academy. This written notification confirms an enhanced DBS check has been completed and the certificate has been obtained by either the employment business or another such business. Where the position requires a children's barred list check, this must be obtained by the agency or third party obtaining an enhanced DBS with children's barred list information.

Contractors

Where Westminster Academy uses contractors to provide services, they will set out their safeguarding requirements in the contract between the organisation and the school. Westminster Academy will ensure that any contractor, or employee of the contractor, who works at the academy, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activities relating to children will require an enhanced DBS check (including barred list information).

For contractors who are not engaging in regulated activity relating to children, but whose work provides them with the opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) is required. In cases where the contractor does not have the opportunity for regular contact with children, academies will decide on whether a basic DBS check would be appropriate.

Self-Employed

If an individual working at the academy is self-employed, the academy will either obtain the DBS check, or request to see the certificate if the self-employed person has obtained their own check and ensure that the DBS check is at the level required by the school.

All visitors

All visitors to Westminster Academy are requested to provide their ID and current DBS certificate in order to be able to work independently with a child within school. A badge system is in place denoting a visitor's ability to work independently with a child. Where volunteers are supporting school on an ad-hoc basis (i.e., a one-off class trip), a risk assessment is completed with them and they are not permitted to be left unaccompanied with children or support with toileting. All visitors discuss our 'Safeguarding for visitors' leaflet with a member of school staff so that they are clear about expectations and procedures to raise concerns whilst in school or after they have left. The leaflet also states clearly behaviours that visitors need to abide by in order to keep children safe.

25 Filtering and Monitoring

Westminster Academy is committed to its responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn and will do all it can to reasonably limit children's exposure to risks from the schools IT systems.

As part of this process, Westminster Academy will ensure appropriate filtering and monitoring systems are in place and ensure that a review of their effectiveness is conducted at least once every academic year. Reviews will be conducted by the appropriate staff member with responsibility for filtering and monitoring, and include checks that the filtering is working appropriately on all internet-connected devices in all relevant locations and a record of these checks will be kept.

The leadership team and relevant staff will have an awareness of the provisions in place and manage them effectively and know how to escalate concerns when identified.

The DfE [filtering and monitoring standards](#) provide detailed guidance for schools and colleges. Westminster Academy utilises [plan technology for your school service](#) to self-assess against the filtering and monitoring standards.

Monitoring - SENSO Safeguard Cloud

[SENSO Safeguard Cloud](#) operates directly on school-owned devices, continuously monitoring user activity in real time. The software scans typed text and browsing activity against expert keyword libraries covering sensitive areas such as self-harm, mental health crises, radicalisation and online bullying. To prevent false alarms triggered by genuine classroom learning, the system uses contextual language analysis and visual threat detection to evaluate the actual meaning behind what a pupil is typing or viewing.

When a potential concern or risk is identified, the system immediately triggers an automated alert. At that exact moment, the software records the typed keystrokes and captures a screenshot of the user's screen to provide full context. An instant email notification is dispatched directly to the school's Designated Safeguarding Lead and nominated safeguarding staff. These alerts also link directly into CPOMS, our child protection and safeguarding system, allowing staff to swiftly review captured evidence, evaluate the severity of the incident and maintain centralised safeguarding records.

Filtering - Fortinet Fortiguard

We use [Fortinet FortiGuard web filtering](#) to manage and secure internet traffic across our network. The system works by scanning web requests in real time and classifying websites into core categories, automatically blocking access to harmful or inappropriate content such as adult material, violence and self-harm. To fulfil the statutory filtering requirements set out in the Keeping Children Safe in Education guidance, the platform integrates official national blocklists. Fortinet includes the list supplied by the Internet Watch Foundation directly in our category-based filtering under the category of child sexual abuse. This URL list is dynamically referenced through FortiGuard threat intelligence services and is updated centrally as and when

required. We also apply updates from the Counter-Terrorism Internet Referral Unit to restrict access to extremist material.

Alongside these automated agency feeds and category filters, the platform enables us to create and maintain custom block lists. This gives IT teams the ability to instantly restrict access to specific websites or domains that pose a safety risk or cause digital distraction in the classroom. By combining dynamically updated national threat intelligence with custom trust-level controls, we ensure our web filtering remains safe, responsive and fully compliant across all our schools.

The responsible member of staff for filtering and monitoring is Peter Montgomery, FCAT IT Lead.

26 Mobile Phones

Westminster Academy is a mobile phone-free environment, other than by exception across the whole school day. This includes lessons, movement between lessons, breaks and lunch. The academy follows the statutory guidance on [mobile phones in schools](#) which is clear that the DfE expects schools to implement a policy whereby pupils do not have access to their mobile phone throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime.

27 The use of “Reasonable Force” in Schools

Westminster Academy recognises there are limited circumstances when it is appropriate for trained staff in schools to use “reasonable force” to safeguard children. The term “reasonable force” covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding children to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. “Reasonable” in these circumstances means “using no more force than necessary for the least amount of time”, the application of which will depend on the circumstances.

The DfE believes that the adoption of a “no-contact” policy in a school can leave staff unable to fully support and protect the pupils. It is therefore expected that school leaders, governing bodies and proprietors will adopt sensible policies, which allow and support staff to make appropriate physical contact, using professional judgement to determine when this is necessary, within the context of the law and dependent on individual circumstances. [The Care and Control Policy](#), which outlines our policy in this area, can be found on the FCAT website. This policy includes consideration of heightened vulnerability, reasonable adjustments and proactive support planning for pupils with SEND, mental-health needs or medical conditions.

28 Alternative Provision and Off-Site Direction

Westminster Academy can place a pupil on an off-site direction or at an alternative provision. When it does so, it will be done in a pupil’s best interest and continues to be responsible for the safeguarding of the pupil.

Westminster Academy is aware that pupils on an off-site direction or in alternative provision often have complex needs and are aware of the additional harm that pupils may be vulnerable to. The academy will always obtain written information from any placement establishment that appropriate safeguarding checks have been carried out on individuals working at their establishment and that the provider will inform the academy of any arrangements that may put the child at risk (i.e., staff changes), so that the academy can assure itself that appropriate safeguarding checks have been carried out on new staff.

Westminster Academy will be aware, at all times, where a child is based during school hours. This includes comprehensive recordings of the alternative provider, school and any subcontracted provision or satellite sites the child may attend. Alternative Provisions and

placements will be regularly reviewed (at least half termly) to provide assurance around student attendance, and if the placement continues to be safe and meet the needs of the child. Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

Westminster Academy will have regard to three pieces of statutory guidance to when using an off-site direction or commissioning alternative provision:

[School suspensions and permanent exclusions - GOV.UK Alternative Provision](#) and [Education for children with health needs who cannot attend school](#).

29 Single Central Record (SCR)

Each academy/college is required to have a SCR and to manage and maintain this.

The purpose of the SCR is to act as a register to demonstrate that the academy/college has carried out all mandatory pre-employment checks on people working there in line with safer recruitment requirements. The SCR will be kept in electronic form in accordance with FCAT's template issued and updated by the academy's safeguarding lead.

Each SCR must record pre-employment details for the following people working at the academy/college:

- all staff directly employed to work at the academy/college
- anyone working in the academy/college who may be employed by a third party e.g., supply staff or contractors
- anyone working in the academy/college who may be self-employed
- all trainee teachers (student or employed)
- all members of the Fylde Coast Academy Trust (FCAT) (including Members, Trustees and centrally employed staff)
- all volunteers including governors.

In line with the trust SCR check template, the following pre-employment details should be included in the SCR for each of the above groups of people:

- an identity check
- a barred list check
- an enhanced Disclosure and Barring Service (DBS) check (including children's barred list if in regulated activity)
- Obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- Verify the candidates mental and physical fitness to carry out their work responsibilities
- a prohibition from teaching check
- a Section 128 check (for those in management positions)
- Appropriate checks for those employed to work in reception classes, or wrap around care for children up to the age of 8, to ensure not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations
- further checks on people living or working outside the UK
- If the person has lived or worked outside of the UK, make any further checks the Trust considers appropriate
- a check of professional qualifications
- a check to establish the person's right to work in the UK
- date 2 satisfactory references received and checked
- disqualification by association check
- safer recruitment and safeguarding training completion date (optional).

The SCR should be updated daily to demonstrate that mandatory pre-employment checks have been satisfactorily carried out on everyone working in the academy/college that day and record specifically:

- whether the check has been carried out and its outcome
- the name of the person carrying out the check
- the date on which each check was carried out or the certificate was obtained.

For any people working in the academy/college who are employed by a third party e.g., supply staff or contractors, the academy/college is required to seek confirmation from the third-party employer that they have satisfactorily completed mandatory pre-employment checks and that these have been recorded in the SCR. The confirmation needs to be provided by a manager or the Human Resources Department of the organisation concerned and not the individual working in the academy/college in order to ensure the information has been verified by an appropriate source. For any people working in the academy/college employed by a third party, the following additional information must be recorded on the SCR:

- that written confirmation that the third-party employer has satisfactorily carried out the pre-employment checks on the individual(s) concerned and has obtained documentation to evidence this;
- whether any enhanced DBS check certificate has been provided
- the date the confirmation was received.

The third-party employer must also be asked to provide a photograph of the individual(s) who will be working in the academy/college. Upon arrival at the academy/college, the person will be asked to present a photo ID to reception to confirm their identity. The ID check should be recorded by the person at the academy/college performing this check, along with the date and initials of the person who completed the check.

Ultimate responsibility for safeguarding compliance is that of each academy Headteacher and the SCR should be regularly audited (at least half termly) by the Headteacher and the DSL. Audits will be monitored by FCAT's Executive Team.

30 Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org

31 Children Missing from Education/Children Absent from Education (including on school grounds)

A child going missing from education is a potential indicator of abuse or neglect. Staff should follow the organisation's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse, neglect and/or exploitation, including sexual exploitation, and to help prevent the risks of their going missing in the future.

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage.

Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school or college's unauthorised absence procedures and children missing education procedures.

Missing from education on school grounds (absconding)

To abscond is to "leave the school premises without permission". Under Section 3 of the Health and Safety at Work Act (1947) and in Common Law, schools and other settings owe a duty of care towards their pupils. This requires all reasonable steps to ensure that pupils are safe and remain within the care of the school at all times throughout the school day and during school-led activities.

Where a pupil, present at registration, is found to be absent from school without authorisation, the following procedures should be followed:

- Member of staff to radio the information for speed and safeguarding reasons. A member from that class must then inform the Headteacher or member of SLT and the main office in person.
- SLT to organise a search and sweep of the building and grounds and known places that the pupil may have gone to in the school environment ensuring the use of radios in a professional manner.
- If the pupil is not found, then all available staff complete a more thorough sweep of the school and check the perimeter of the grounds.
- SLT to phone the police, as an emergency (999), when the area has been fully checked, if the child is not found
- School office to contact parents/carers and inform them of the situation.
- Consideration will be given to whether the search should be extended beyond the school perimeter. This decision will be based on staff's knowledge of the child and on the labels of risk, on what action is in the child's best interests.
- Any staff who leave school grounds must take a mobile phone to maintain contact.
- Once a pupil has been found then the Headteacher will use their professional judgement to outline the response towards the pupil and the support the pupil will need in the future.
- A written statement will be made by all appropriate parties and filed on CPOMS.
- Member of SLT to brief police and parents.

Where a pupil attempts or is seen to be leaving the school premises without authorisation, the following procedures will be followed:

- Member of staff to inform a member of SLT, and the main office and incident should be radioed.
- Staff must follow the child to the school fence or gate and must try to use de-escalation techniques with the child to stay in school.
- If by leaving the school, the child is known to be putting themselves in danger, adults must exercise their duty of care and stop the child, physically if necessary.
- As active pursuit may encourage the child to leave the site and may also cause the child to panic, possibly putting them at risk of running into the road, staff will not chase but will try to keep a child in sight at a distance at all times.
- The SLT lead will contact the child's parents/carers.
- If the child has left the immediate vicinity of the school grounds and is no longer visible, then the police must be informed.
- If the child returns of their own volition, parents/carers and the police will be informed as soon as possible.
- Upon their return to school, and when a child is calm, the child must be seen by SLT so that the reason for absconding may be discussed in detail. At this point a decision will be made to the appropriateness of further actions.
- A meeting with parents/carers will be arranged.
- Written statements will be filed on the incident and recorded on CPOMS.

32 Elective Home Education

In accordance with [school attendance \(pupil registration\) \(England\) Regulations 2024](#) Westminster Academy will make a return to the local authority when a pupil's name is deleted from the admissions register.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, it is recommended that the local authority, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible. This would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs and/or disability, and/or has a social worker, and/or is otherwise vulnerable.

33 Releasing a Pupil into the Care of Professionals

Before releasing a pupil into the care of an external professional, school staff must complete and document the following checks:

- Request and inspect official photo identification (e.g., agency ID badge) belonging to the professional.
- Record their full name, agency, and ID badge number.
- Verify that the school holds a current Letter of Assurance (or vetting letter) from the professional's employing organisation confirming they have undergone the necessary safer recruitment checks (including an Enhanced DBS check).
- Directly contact the pupil's parents or legal guardians to confirm that parental permission has been granted for the professional to collect the child. If this is going to be a regular occurrence, we will communicate this with the parent at the beginning of the agreed programme of meetings.
- Confirm that the destination, appointment details, and purpose of the visit provided by the professional exactly match the details and expectations communicated by the parents/guardians.
- Confirm that the pupil knows the professional and is happy and comfortable to leave the school setting with them
- Log all details on CPOMS.

- If a Duty Social Worker or Police Officer arrives at the school to remove a child due to a safeguarding concern:
- Inspect official photo identification (e.g., agency ID badge) belonging to the professional.
- Contact the Designated Safeguarding Lead (DSL) or Deputy DSL immediately.
- If the social worker or police officer explicitly states that notifying the parents would compromise the child's safety or an active investigation, do not contact the parents.
- Assure the child is supported by a familiar member of staff during the handover process.
- Log all details on CPOMs.

Appropriate Adult

The Headteacher and DSL need to be aware that, during formal police investigations, there is a requirement for a child to have a responsible adult and its implications. In English law, an appropriate adult is a parent, guardian or social worker; or if no person matching this is available, any responsible person over 18.

34 Community-Based Early Help Assessment

If children do not require the support of statutory children's services, the DSL or DDSL will generally lead the liaison with other agencies and set up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in carrying out this assessment, in some cases acting as the lead practitioner.

Any such cases should be kept under constant review and consideration given to a referral to local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Qualified lead practitioners (i.e., not a social worker) who may lead assessments before intervention can continue to lead work with families up to and including section 17.

Statutory Children's Social Care Assessments and Services

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care and if appropriate, the police, is made immediately. Referrals should follow the local referral process.

Local authority children's social care assessments should consider where children are being harmed in contexts outside of the home, so it is important that Westminster Academy will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

Referrals can be directly to the local authority using their online services.

Children in need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services, or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. As outlined in Working Together to Safeguard Children, local authorities, with their safeguarding partners and any relevant agencies, should develop, agree and publish local protocols for assessments and support.

Record Keeping and Referral

All concerns, discussions and decisions made, and the reason for those decisions, are recorded in writing. Concerns and referrals are kept in a separate child protection folder for each child and 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

Westminster Academy has an online system (CPOMS) for recording concerns, including Safeguarding concerns, about a child or any behaviour incidents. This system provides an important timeline record of reported concerns, incidents and subsequent responses. It also automatically alerts DSL deputies when the category 'Safeguarding' is selected. Our procedures state that staff members should also verbally alert the DSL and/or deputies as soon as possible regarding safeguarding concerns. See Flow Chart of school procedures in Appendix J.

All safeguarding concerns must be reported via the CPOMS system via the desktop icon. Please **also** alert the DSL and/or a member of SLT.

35 Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals (particularly older children) and should be treated as victims. It is not possible for a child to consent to being exploited, abused or trafficked, and they may not recognise it is happening to them.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of CCE too. Both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Further information on signs of a child's involvement in sexual exploitation is available in the Home Office guidance: ***Child sexual exploitation: guide for practitioners***

36 Child Sexual Exploitation (CSE)

Definition of consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g., to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal and/or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16, and
- Sexual intercourse without consent is rape

Statutory definition of Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse, which may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in a sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example, through others sharing videos or images of them on social media. It can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17-year-olds who can legally consent to having sex. It can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions that take place whilst under coercion.

CSE does not always involve physical contact and can happen online. A significant number of children and young people who are victims of CSE go missing from home, care and education at some point. Some of the following signs may be indicators of CSE:

- children/young people who appear with unexplained gifts or new possessions
- children/young people who associate with other young people involved in exploitation
- children/young people who have older boyfriends or girlfriends
- children/young people who suffer from sexually transmitted infections or become pregnant
- children/young people who suffer from changes in emotional wellbeing
- children/young people who misuse drugs and alcohol
- children/young people who go missing for periods of time or regularly come home late
- children/young people who regularly miss school or education or do not take part in education

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

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

CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purposes of exploitation. This may constitute modern slavery. A relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

The following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education. Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

37 County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money.

Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home
- have been the victim, perpetrator or alleged perpetrator of serious violence (e.g., knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity
- owe a ‘debt bond’ to their exploiters
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office and The Children’s Society County Lines Toolkit For Professionals.

38 Children and the Court System

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11-year-olds and 12-17-year-olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements

information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

39 Supporting the Government's Prevent Strategy

All staff, volunteers and trainees must be aware of the organisation's duty in terms of safeguarding children and young people against radicalisation, extremism, becoming terrorists and/or supporting terrorism as identified in the Government's Prevent Strategy (section 26 of the Counter-Terrorism and Security Act 2015) and the CONTEST strategy updated in 2018. Everyone working, volunteering and training in the organisation is expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs. We believe that children and young people need to be given the opportunity to explore diversity and understand that Britain is a multi-cultural society and that everyone should be treated with respect whatever their race, gender, sexuality, religious belief, special need or disability. This incorporates the new definition of extremism published in March 2024 and set out below:

Children may be susceptible to radicalisation and/or being drawn into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

All staff, volunteers and trainees must be aware of the indicators of vulnerability that may put children/young people at risk of radicalisation (See page 12 of this policy) and be prepared to identify any concerns about individuals/groups to the DSL.

All staff, volunteers and trainees must be aware that numerous factors can contribute to, and influence, the range of behaviours that define violent extremism but that this does not necessarily mean that children/young people become involved in extremist action. Appropriate interventions may not, therefore, relate to the threat of radicalisation but to other issues, for example, mental health, relationship and/or abuse of drugs and alcohol issues etc.

Westminster Academy recognises its key responsibilities in fulfilling the Prevent Duty (Jun 2015) to:

- 1) Protect young people from being drawn into extremism or terrorism (becoming terrorists and/or supporting terrorism) by having in place robust safeguarding policies which:
 - Identify young people at risk of radicalisation
 - Report any risks or concerns
 - Promote and exemplify British values
 - Build resilience in young people to radicalisation
- 2) Implement robust ICT policies
- 3) Assess the risk of radicalisation across the organisation
- 4) Train staff.

Work in partnership with agencies including the 'Safeguarding Children Partnership Arrangements for Blackburn with Darwen, Blackpool and Lancashire'.

Use DfE guidance 'Protective preparedness for educational settings' to reduce academy vulnerability and to respond appropriately to the Terrorism (Protection of Premises) Bill, known as 'Martyn's Law'.

All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in education settings should familiarise themselves with the revised [Prevent duty guidance: England and Wales \(2023\) - GOV.UK](#) especially paragraphs 141-210, which are specifically concerned with education (and also covers childcare). The guidance is set out in terms of three general themes: leadership and partnership, capabilities and reducing permissive environments. The school or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

Preventing radicalisation

Radicalisation is defined as causing someone to become an advocate of radical political or social reform by supporting terrorism and violent extremism and as the process of a person legitimising support for, or use of, terrorist violence.

Radicalisation of children and young people may include encouraging them to undertake violent activities on the grounds of religious belief. This may include attacks on others including suicide attacks. Children and young people may be exposed to messages about and/or drawn into terrorism through a family member or friend, a religious group, or through social media or the Internet. This creates risk of a child or young person being drawn into criminal activity and exposure to significant harm.

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach. Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors. It is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that all our staff, volunteers and trainees are able to recognise these vulnerabilities.

Extremism is defined by the Government in the Prevent Strategy as 'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Also included in the definition is 'calls for the death of members of our armed forces, whether in this country or overseas'.

Extremism is the demonstration of unacceptable behaviour by using any means or medium to express views which:

- encourage, justify or glorify terrorist violence in furtherance of particular beliefs;

- seek to provoke others to terrorist acts
- encourage other serious criminal activity or seek to provoke others to serious criminal acts;
or
- foster hatred which might lead to inter-community violence in the UK.

(Definition from the Crown Prosecution Service).

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system for the purpose of advancing a political, religious or ideological cause.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism.

As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral.

Indicators of vulnerability and potential risk factors include:

- Identity crisis – the child/young person is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- Personal crisis – the child/young person may be experiencing family tensions, a sense of isolation and low esteem. They may have disassociated from their existing friendship group and become involved with new and different groups of friends. They may be searching for answers to questions about identity, gender, faith and belonging. The DfE will publish updated guidance on gender questioning children.
- Personal circumstances – migration, local community tensions and events affecting the child/young person's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet aspirations – the child/young person may have perceptions of injustice, a feeling of failure, rejection of civic life.
- Experiences of criminality – which may include involvement with criminal groups, imprisonment and poor resettlement/reintegration.
- Special educational needs – children/young people may experience difficulties with social interaction, empathy with others and awareness of the motivations of others.

This is not an exhaustive list and more critical risk factors could include:

- Being in contact with extremist recruiters
 - Accessing violent extremist websites, especially those with a social media networking element
 - Possessing or accessing violent extremist literature
 - Using extremist narratives and global ideology to explain personal disadvantage.
 - Justifying the use of violence to solve societal issues
 - Joining or seeking to join extremist organisations
 - Significant changes to appearance and/or behaviour
 - Experiencing a high level of social isolation resulting in identify/personal crisis.
- (Indicators taken from Blackpool Safeguarding Children Board Guidelines).

It is essential that academies/colleges work with students and their families to address extremism and tackle radicalisation.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multiagency Channel panel, which will discuss the individual referred to determine whether Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multiagency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided. The designated safeguarding lead (or a deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: Channel guidance and Channel training from the Home Office.

Additional support The Department has published further advice for those working in education settings with safeguarding responsibilities on the Prevent duty.

The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support. The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty.
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention.
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

Educate Against Hate, is a government website designed to support school and college teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help staff identify and address the risks, as well as build resilience to radicalisation.

The Education and Training Foundation (etfoundation.co.uk) provides online training modules for practitioners, leaders and managers, to support staff and governors/Board members in outlining their roles and responsibilities under the duty.

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

40 Harmful Sexual Behaviour

The DfE's advice on Sexual violence and sexual harassment between children in schools and colleges has been merged into Keeping Children Safe In Education. As part of this merger, the term "**child-on-child** abuse" rather than "peer-on-peer abuse" is used throughout the updated guidance.

FCAT academies will:

- emphasise the importance of explaining to children that the law is in place to protect rather than criminalise
- emphasise the importance of understanding intra-familial harms, and any necessary support for siblings following incidents
- be part of discussions with statutory safeguarding partners as required

Westminster Academy takes a zero-tolerance approach to sexual violence and sexual harassment and has appropriate school-wide policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) are unacceptable and the academy behaviour policy outlines appropriate potential sanctions.

Staff are aware that harmful sexual behaviour can happen inside or outside of school and online. These policies are reflected in the academy curriculum, Relationships, Sex and Health Education Policy and procedures, which specifically address sexual harassment, online abuse, sexual violence and issues of consent, ensuring that:

- academy staff have appropriate knowledge of paragraphs 156 - 161 of the 'Keeping Children Safe in Education' 2026 statutory guidance
- all pupils are supported to report concerns about harmful sexual behaviour freely
- all (such) concerns are taken seriously and dealt with swiftly and appropriately and that pupils are confident that this is the case
- comprehensive records of all allegations are kept
- work to prevent sexual harassment, online sexual abuse and sexual violence operates through a culture-led, whole-school approach that includes an effective behaviour policy, pastoral support and a carefully planned relationships, sex and health education curriculum

Academy staff will remain alert to factors that increase vulnerability or potential vulnerability such as mental ill health, domestic abuse, children with additional needs, and children from groups at greater risk of exploitation and/or of feeling unable to report abuse (for example, girls and LGBTQ+ children) and that if a mental health concern is also a safeguarding concern immediate action will be taken following the Safeguarding and Child Protection Policy and informing the DSL.

Academy staff are aware of the very high local incidence of multiple combinations of such potentially adverse childhood experiences and the needs this could present.

Academy staff will also seek to understand and minimise any barriers that could prevent a pupil from making a disclosure, for example communication needs, are identified and addressed.

Academy staff will assume that sexual harassment, online sexual abuse and sexual violence are happening in and around the school, even when there are no specific reports, and deliver a whole-school approach to address them.

Academy staff will be regularly trained to:

- have good awareness of the signs that a child is being neglected, abused and/or exploited, as described in 'What to do if you're worried a child is being abused'
- understand how to handle reports of sexual violence and harassment between children, both on and outside school premises (in line with DfE guidance)
- be confident about what to do if a child reports that they have been sexually abused by another child
- ensure that children are taught about safeguarding risks, including online risks in the areas of content (including misinformation, disinformation, 'fake news' and conspiracy theories, contact, conduct and commerce).
- support pupils to understand what constitutes a healthy relationship (online and offline).

41 Mental Health

Mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Schools have an important role to play in supporting the mental health and wellbeing of their pupils.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff are well placed to observe children day-to-day to identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, they are likely to be potential warning signs which education staff are well placed to recognise.

These can include:

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

Not every child who exhibits these behaviours are suicidal or has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention. Westminster Academy should ensure that any interventions offered are as safe and effective and appropriate for the need and phase of education.

If there are concerns about a child's mental health that is also a safeguarding concern, and staff must report this to the DSL or DDSL. If staff feel that the child is in immediate danger, they will call 999, or arrange for them to be taken immediately to A&E by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it is not an emergency, help can be sought from NHS111 online or call 111 and select the mental health option.

Staff can support the fulfilment of four key roles:

- Promoting good mental wellbeing and preventing the onset of mental illness. [The promoting children and young people's mental health and wellbeing](#) guidance sets out how schools can help prevent mental health problems.
- Observing pupils and identifying those who may be experiencing mental health problems or being at risk of developing one. [Observe and support the mental health and wellbeing of pupils and learners](#) support is available.
- Ensuring early targeted support is provided, and
- Liaison with/referral to specialist services where needed.

Where support is needed, the designated safeguarding lead (or deputy) should consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk. They should consider the range of locally available support to meet the needs of children and young people and where they have access, should make use of support from the respective Mental Health Support Team (MHST). Support outside of the school setting should also be considered, such as early support hubs and young futures hubs.

Westminster Academy will access advice to [help them identify children in need of extra mental health support](#). The NHS Every Mind Matters website also contains helpful information and advice about [looking after a child or young person's mental health](#).

42 Female Genital Mutilation (FGM) and the FGM Mandatory reporting Duty for Teachers

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM or already having suffered FGM.

Signs that a girl may be at risk of (or already have undergone) FGM

These indicators are not exhaustive and whilst the factors detailed below may be an indication that a child is facing FGM, it should not be assumed that is the case simply on the basis of someone presenting with one or more of these warning signs. These warning signs may indicate other types of abuse such as forced marriage or sexual abuse that will also require a multi-agency response.

The following are some signs that the girl may be at risk of FGM:

- The family belongs to a community in which FGM is practised
- The family makes preparations for the child to take a holiday, e.g., arranging vaccinations, planning an absence from school
- The child talks about a 'special procedure/ceremony' that is going to take place
- An awareness by a midwife or obstetrician that the procedure has already been carried out on a mother, prompting concern for any daughters, girls or young women in the family.

The following are some signs that FGM may already have taken place:

- Prolonged absence from school and noticeable behaviour changes on return to school
- Avoidance of specific classes or activities such as PE or sports, giving reasons of bladder, menstrual or abdominal problems
- Girls finding it difficult to sit still in class or looking uncomfortable when sitting
- Girls complaining of pain between their legs, or talking about something someone did that they are not allowed to talk about.

Girls are particularly at risk of FGM during the summer holidays as this is the time when families may take their children abroad for the procedure. Many girls may not be aware that they could be at risk of undergoing FGM.

There is a mandatory personal duty to report to the police the discovery or suspicion (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Note that visual evidence will be rare and teachers and/or school staff will not carry out examinations. All such cases must be discussed with the DSL at the first opportunity.

The duty does not apply in relation to at risk or suspected cases (i.e., where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

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

43 Trafficking, Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance. Modern slavery: how to identify and support victims - [GOV.UK](https://www.gov.uk/modern-slavery) ([Modern slavery training: resource page - GOV.UK](https://www.gov.uk/modern-slavery))

44 Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means 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. The involvement of a Social Worker in a child's life should inform decisions about safeguarding. This will allow any assessment to consider all the available evidence and the full context of any abuse. All staff should consider whether children are at risk of abuse or exploitation in situations outside their family. Extra familial harms take a variety of forms and children 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 – including physical, sexual, emotional abuse and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation. Additional information regarding contextual safeguarding is available here: [Contextual Safeguarding](#).

45 Westminster Academy Specific Safeguarding Issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information on the TES website www.tes.com and NSPCC www.nspcc.org.uk offer information for schools and colleges. Schools and colleges can also access broad government guidance, including on the issues listed below via the GOV.UK website www.gov.uk

- child abduction and community safety incidents
- child criminal exploitation (CCE) and child sexual exploitation (CSE)
- child sexual exploitation (CSE) – further information
- county lines
- children and the court system
- children missing from education / children who are absent from education
- children with family members in prison
- children missing from home or care
- Children Looked After
- cybercrime
- bullying including cyberbullying
- domestic abuse
- Operation Encompass
- Homelessness
- Child on child abuse (including harassment and violence)
- domestic abuse/violence (experienced, seen and/or heard), including teenage relationship abuse
- drug abuse
- fabricated or induced illness (FII)

- faith abuse
- so-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)
- Female Genital Mutilation (FGM) and the FGM mandatory reporting duty for teachers
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- mental health
- private fostering
- preventing radicalisation
- The Prevent Duty
- Channel
- serious violence
- sexting
- trafficking, Modern Slavery and the National Referral Mechanism

46 Types of Abuse – Definitions and Explanations

All academy staff should be aware of abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. In all cases, if staff are unsure, they should always speak to the DSL or a DDSL.

Abuse: a form of maltreatment of a child/young person. Somebody may abuse or neglect a child/young person by inflicting harm or by failing to act to prevent harm.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children and young people may be abused in a family or in an institution or community setting by those known to them, or more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

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

Sexual abuse: involves forcing causing or inciting a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child/young person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children/young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging children/young people to behave in sexually inappropriate ways, or grooming a child/young person in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate off line abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children/young people. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or colleges policy and procedures for dealing with it.

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

Forced Marriage

A forced marriage is a marriage conducted without the valid consent of one or both parties where duress is a factor. This is a crime in England and Wales. Duress may take the form of emotional, financial, physical and sexual threats and abuse. Forced marriage is also viewed by some as falling into the definition of 'honour' based abuse. Early or child marriage refers to any marriage of a child younger than 18 years old. The UN recognises it as a forced marriage because minors are deemed incapable of giving informed consent. Girls are the majority of the victims and hence are disproportionately affected. Forced marriage occurs within many cultures and classes. A person at risk of a forced marriage may suffer a range of abuses including emotional and physical abuse, unlawful imprisonment, abduction, rape, forced pregnancy or enforced abortion. Both women and men may be victims of forced marriage.

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (chapter 8 provides guidance on the role of schools and colleges) and,

Multi-agency statutory guidance for dealing with forced marriage which can be found at The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk) School and

college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)

So called Honour based abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family or community and include FGM, forced marriage and practices such as breast ironing. All forms of 'honour' based violence (HBV) are abuse, regardless of the motivation, and should be handled and escalated as such. Professionals in all agencies need to be alert to a child being at risk of (or having suffered) HBA and/or HBV.

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this and additional risk factors when deciding which safeguarding action to take.

Actions If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

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). Paragraph 144 of KCSIE 2025 offers useful guidance to help schools improve their cyber resilience.

Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - [NCSC.GOV.UK](https://www.ncsc.gov.uk).

Bullying, including cyberbullying

Cyberbullying is an increasingly common form of bullying behaviour which happens on social networks and mobile phones. Cyberbullying can include spreading rumours about someone, or posting nasty or embarrassing messages, images or videos. Children may know who's bullying them online – it may be an extension of offline peer bullying - or they may be targeted by someone using a fake or anonymous account. It's easy to be anonymous online and this may increase the likelihood of engaging in bullying behaviour. Cyberbullying can happen at any time or anywhere - a child can be bullied when they are alone in their bedroom - so it can feel like there's no escape. (Definition from <http://www.nspcc.org.uk>)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis.

It should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

Domestic abuse/violence

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children 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 (teenage relationship abuse), all of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The statutory definition of domestic abuse ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected". Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as **'teenage relationship abuse'**. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or a deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse.

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

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

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safe Young Lives: Young people and domestic abuse
- Domestic abuse: specialist sources of support, information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse
- Home: Operation Encompass

The named DSL or trained deputy as a key adult is Jenny Nicol.

47 Appendix A: Designated Safeguarding Leads (DSL's)

Linda Emmett, Deputy CEO for FCAT is the overarching Safeguarding Lead Officer for FCAT contactable via the Clerk to the Safeguarding Quality Improvement Group: c/o governance@fcats.org.uk

Organisation	DSL	Contact details
Armfield Academy	Leona Parkinson	01253 207702 l.parkinson@armfield.fcats.org.uk
Aspire Academy	Sian Rawson	01253 353155 s.rawson@aspire.fcats.org.uk
Garstang Community Academy	Lee Baker	01995 603226 l.baker@garstang.fcats.org.uk
Gateway Primary Academy	Emma Frankland	01253 402936 e.frankland@gateway.fcats.org.uk
Hambleton Primary Academy	Holly Wood	01253 70033 h.wood@hambleton.fcats.org.uk
Mereside Primary Academy	Lauren Richardson	01253 761531 l.richardson@mereside.fcats.org.uk
Montgomery Academy	Gill Smith	01253 356271 x 5158 g.smith@montgomery.fcats.org.uk
Unity Academy	Ben Mashiter	01253 478129 b.mashiter@unity.fcats.org.uk
Westcliff Primary Academy	Natalie Vanderwal	01253 353792 n.vanderwal@westcliff.fcats.org.uk
Westminster Primary Academy	Jenny Nicol	01253 621703 j.nicol@westminster.fcats.org.uk

48 Appendix B: Safeguarding Acceptable Behaviour Code

Staff, volunteers and trainees must behave professionally, treat all pupils with respect and ensure their behaviour does not inadvertently lay them open to allegations of abuse. These standards should be applied regardless of the age, culture, disability, gender, language, racial origin, religious belief or sexual identity of the pupil.

Staff, volunteers and trainees should understand the need to act as good role models for pupils and be aware that safe practice also involves using their judgment and integrity outside the academy setting.

In particular, staff, volunteers and trainees should:

- Ensure that all communication and contact with pupils takes place within clear professional boundaries and does not allow for misinterpretation of motives or behaviour (including 'grooming'). Staff, volunteers and trainees should not have any form of communication which could be interpreted as sexually suggestive or provocative i.e., verbal comments, letters, texts, emails or physical contact. Likewise, staff, volunteers and trainees must not establish or seek to establish social contact with pupils for the purpose of securing or strengthening a friendship. Meetings with pupils off academy/FCAT premises, including for private tuition during term or holiday time should not be arranged without the prior permission of the Headteacher/Deputy Chief Executive Office. Engagement of any sexual activity with, or in the presence of, a pupil, may be regarded as a criminal offence and will always be a matter for disciplinary action.
- Ensure that when one-to-one situations occur, reasonable and sensible precautions are used to protect children and adults. Ideally, these should take place where visual contact with others can be maintained for the duration of the meeting. One to one situation should only take place when necessary and should be properly managed and reported when they do take place.
- Not attend private pupil parties. Staff, volunteers and trainees should also be aware of their professional responsibilities if attending parties arranged by parents at which pupils might be present.
- Never swear, blaspheme or use offensive language in front of pupils.
- Never make sexual innuendos or comments of a sexual nature (other than for educational purposes) or make comments trivialising alcohol or drug abuse. Staff, volunteers and trainees should also avoid discussing their own sexual relationships in the presence of pupils.
- Never make demeaning or insensitive comments towards pupils.
- Ensure they are not under the influence of alcohol or drugs when undertaking duties on site at the academy or on behalf of the academy. This includes on school trips. Smoking and the consumption of alcohol is not permitted on any FCAT site.
- Ensure their dress and appearance is smart, appropriate to the role and not likely to be viewed as offensive, revealing or provocative.
- Not transport pupils in their own vehicle other than on approved academy/FCAT business with permission from the Headteacher/Deputy Chief Executive Officer.
- Not be alone in a vehicle with a pupil. At least one other member of staff should also be in the vehicle acting as an escort.
- Adhere to the academy's/FCAT's fire and evacuation procedures.
- Adhere to the academy's policy on use of mobile phones.
- Refrain from making comments about pupils, staff, the academy and FCAT on social media networks.
- Refrain from making 'friends' of and/or contacting pupils and ex pupils under the age of 18 on social media networks.
- Not email pupils and ex pupils unless for professional purposes. Appropriate formal language and tone must be used if/when using email to staff, pupils and parents.
- Not photograph pupils using their own cameras or phones unless with permission of the Headteacher/Deputy Chief Executive Officer. All photographs taken should be for academy/FCAT use only and should only be uploaded onto academy/FCAT computers by FCAT staff. Images used by the academy/FCAT should not name the pupils in them, unless by prior consent of parents.
- Avoid conferring special attention/favour on a child or give presents outside of the official rewards system, as this may be construed as 'grooming'.
- Report any accidents, incidents of bullying, or warning signs of 'grooming' they witness to the academy.
- Ensure that any work or activity that may conflict with the interests of the academy/FCAT, or which makes use of academy/FCAT resources or property is agreed in advance with the Headteacher/Deputy Chief Executive Officer.
- Ensure that any confidential information that comes into their sight/possession remains confidential and is not disclosed to others either inside or outside the academy/FCAT.

49 Appendix C: Designated Safeguarding Lead: Job Description

DSL should be appointed from within each organisation's Senior Leadership Team and the post holder should take the lead and overall responsibility for safeguarding and child protection in the organisation. This should be explicit within the post holder's own job description.

The DSL and Deputies should have as complete a picture as possible of safeguarding issues at their setting and are the most appropriate people to advise on responses to safeguarding concerns. The DSL must be given the time, funding, training, resources and support to carry out this role effectively.

Summary of responsibilities:

- Manage safeguarding referrals.
- Ensure each member of staff has access to and understands the Academy's/College's Safeguarding and/or Child Protection Policy and Procedures, especially new and part time staff.
- Ensure Safeguarding/Child Protection Policy is reviewed and updated annually and is available publicly
- Keep detailed records of cases.
- Where children leave the Academy/College, ensure their child protection file is copied for any new school or college as soon as possible but transferred separately from the main pupil file.

Duties:

1. To keep abreast of developments in the field of safeguarding/child protection by liaising with the local safeguarding partnership and outside agencies, attending relevant training or events and reading relevant bulletins and publications.
2. To work with outside agencies in line with 'Working Together to Safeguard Children'
3. To attend FCAT Safeguarding Quality Improvement Group meetings to learn about good practice at other academies and work together to continually improve safeguarding practices
4. To help promote children's educational outcomes by sharing information about the welfare safeguarding and child protection issues that children (including those with a Social Worker) are experiencing or have experienced with teacher, leaders and other staff
5. Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and procedures in place, including the review of DfE filtering and monitoring standards, the 'plan technology for your school service' self-assessment tool and guidance on the use of generative AI in education (paragraphs 163 - 166 of KCSIE 2026).
6. Ensure the Academy's Safeguarding Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly.
7. Ensure the Policy is available publicly.
8. Ensure that all new staff receive basic safeguarding awareness training during induction and all staff receive refresher training at least once every three years.
9. Act as a source of support, advice and expertise to staff on matters of safety and safeguarding.
10. Respond appropriately to all safeguarding concerns in line with LSCB procedures and refer all cases of abuse or suspected abuse to the local authority children's social care and to the Police where a crime may have been committed.
11. Liaise with the Headteacher to inform him/ her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
12. Ensure that students who are victims of abuse are supported appropriately and sensitively and that all actions are successfully carried out and monitored.
13. Update the school or college's anti-bullying and online safety policies and ensure that staff respond appropriately to incidents/allegations.
14. Receive Level 3 safeguarding training every two years in order to carry out the DSL role and regular updates to maintain currency of knowledge.
15. Maintain accurate, confidential and up to date documentation on all cases of safeguarding and child protection.
16. Where children leave the Academy/College, ensure their child protection file is copied for any new school or college as soon as possible but transferred separately from the main student file
17. Work directly with young people in need and their families in order to prevent young people suffering significant harm.
18. Review the safeguarding provision, identifying areas for improvement and producing termly reports for SLT.
19. Create a climate in the Academy/College whereby students are encouraged to talk about their issues and concerns.
20. Quality assures the work of colleagues in relation to safeguarding and child protection
21. Support the Headteacher in safer recruitment practices including in the referral of cases to the DBS and the Police where a person is dismissed or leaves due to risk/harm to a child/young person.

To ensure continuity of safeguarding responsibilities, Westminster Academy will implement robust cover arrangements for periods when the designated safeguarding lead is unavailable, due to illness, leave or other circumstances.

50 Appendix D: Safeguarding Governor: Roles and Responsibilities

Summary

To be the lead person on the Local Governing Body with an understanding of the safeguarding requirements for the academy. Safeguarding governors have an **oversight** rather than an operational safeguarding role.

A key part of this is to **monitor** safeguarding **provision and delivery** in the respective academy. This is best achieved through liaison with the academy DSL, analysis of information presented to the Local Governing Body and from other relevant sources e.g., FCAT Governor Safeguarding Network, FCAT Safeguarding Quality Improvement Group and/or Ofsted and subsequently asking questions of senior leaders (as necessary and most commonly at Local Governing Body meetings).

It is critical to challenge leaders to ensure that sufficient resources and training are in place to meet safeguarding needs and to evaluate the impact of this through data trends.

It is for senior leaders to act to resolve any concerns.

FCAT is expected to ensure effective safeguarding culture and practice in all academies and to satisfy itself that this is the case through monitoring e.g., peer and other review, data capture and to prompt action through senior leaders if any shortfall is identified.

Safeguarding (and all) Governors can provide a very useful 'early warning' aspect to this through their monitoring role. The positive actions of Governors also add significant value to safeguarding both in terms of culture and practice within academies and across the Trust as a whole.

Key Duties

- To liaise with the Designated Safeguarding Lead (DSL) on a regular basis to keep abreast of safeguarding priorities at the academy/college.
- To attend FCAT Safeguarding Governor Network meetings.
- To contribute to discussions to inform the development of safeguarding plans and strategies for the academy/college and FCAT, including the annual revision of the FCAT Safeguarding and Child Protection Policy.
- To take a lead role in holding senior leaders to account on the implementation of safeguarding procedures at the academy/college during Local Governing Body meetings.
- To take a lead role in challenging senior leaders on the use of resources to maintain safeguarding of children and young people on the site, including the allocation of staff and training to meet specific safeguarding needs, at Local Governing Body meetings.
- To have a broad overview of the FCAT Safeguarding and Child Protection Policy and 'Keeping Children Safe in Education', the Government's key guidance document in this area.
- To evaluate safer recruitment practices and participate in safeguarding training as required.
- To meet at least once per term with the academy DSL to audit the safeguarding areas outlined below, to discuss any wider concerns and to subsequently report the outcome to the Local Governing Body.

Suggested Annual Audit Activities

Autumn Term

- 1) Quality assures transition arrangements for vulnerable students
- 2) Review safer recruitment procedures

Spring term

- 1) Review specific risks for students of the academy, the curriculum for safeguarding, including its intent, implementation and impact
- 2) Review online filtering and monitoring, especially for vulnerable students

Summer Term

- 1) Review the safeguarding record keeping system, check for impact, review academy data and analysis of trends
- 2) Review academy safeguarding training record

51 Appendix E: Guidance on Responding to a Disclosure

Disclosures or information may be received from students, parents or other members of the public. The organisation recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all staff will handle disclosures with sensitivity and the organisation will make specific arrangements to ensure that students with communication difficulties are enabled to express themselves to an appropriate member of staff.

Such information cannot remain confidential and children and young people should never be promised that information they disclose will be kept confidential as, ultimately, this may not be in their best interests. Staff will immediately communicate what they have been told to the DSL and make a record.

Staff will not investigate but will, wherever possible, elicit and clarify enough information to pass on to the designated person in order that s/he can make an informed decision of what to do next. The person against whom any allegation is made must not be alerted or approached about the matter until a decision to investigate has been made.

Staff will:

- listen to and take seriously any disclosure or information that a child/young person may be at risk of harm
- try to ensure that the person disclosing does not have to speak to another member of academy/college staff
- clarify the information
- try to keep questions to a minimum and of an 'open' nature e.g. 'Can you tell me what happened?' rather than 'Did x hit you?'
- try not to show signs of shock, horror or surprise
- not express feelings or judgements regarding any person alleged to have harmed the child/young person.
- explain sensitively to the person that they have a responsibility to refer the information to the DSL
- reassure and support the person as far as possible
- explain that only those who 'need to know' will be told
- explain what will happen next and that the person will be involved as appropriate.

Guidance on Recording and monitoring

All concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing.

Accurate records need to be made as soon as practicable and will clearly distinguish between observation, fact, opinion and hypothesis. All records must be signed and dated. Any information given should be recorded verbatim where possible and a note made of the location and description of any injuries seen.

All child protection documents must be retained, separate from the child's main file. This will be locked away and be accessible only to the DSL or other designated person. These records will be copied and transferred to any academy/school/college or setting the child moves to, clearly marked 'Child Protection, Confidential, for attention of DSL. Original copies will be retained until the young person's 25th birthday.

An overview of collated referrals, academy/school/college action, timescales and social care responses must be maintained.

52 Appendix F: Procedures Following an Allegation Against a Member of Staff, Supply Staff, Volunteer or Trainee

Disclosures or information may be received from students, parents or other members of the public. The organisation recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all staff will handle disclosures with sensitivity and the organisation will make specific arrangements to ensure that students with communication difficulties are enabled to express themselves to an appropriate member of staff.

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An overview of collated referrals, academy/school/college action, timescales and social care responses must be maintained.

53 Appendix G: Safeguarding Escalation Procedures

The safeguarding escalation procedure is a formal way of ensuring a live safeguarding case can be reviewed, permitting professional dialogue between colleagues, agencies and other organisations involved with the case.

Escalation procedures should be used when all normal channels of requesting further support or action have been exhausted and in situations such as:

- A member of staff has made a referral and is concerned that the outcome does not sufficiently safeguard the child/young person.
- The child/young person's situation does not appear to be improving.
- The referrer or other members of the safeguarding team feel that a child/young person's case is not progressing despite there being a perceived need.
- A member of staff feels safeguarding concerns regarding a child/young person are not being addressed.
- One member of the safeguarding team disagrees with the actions of another.

In all situations where an escalation has been initiated, the first step will be to provide an overview and chronology of the case to date and subsequent actions that have occurred.

At each step, there must be a reported and recorded outcome.

Individual cases to be reviewed by each organisation's safeguarding team

https://panlancashirescb.proceduresonline.com/chapters/p_resolving_prof_disagree.html#resolved

54 Appendix H: Related Policies

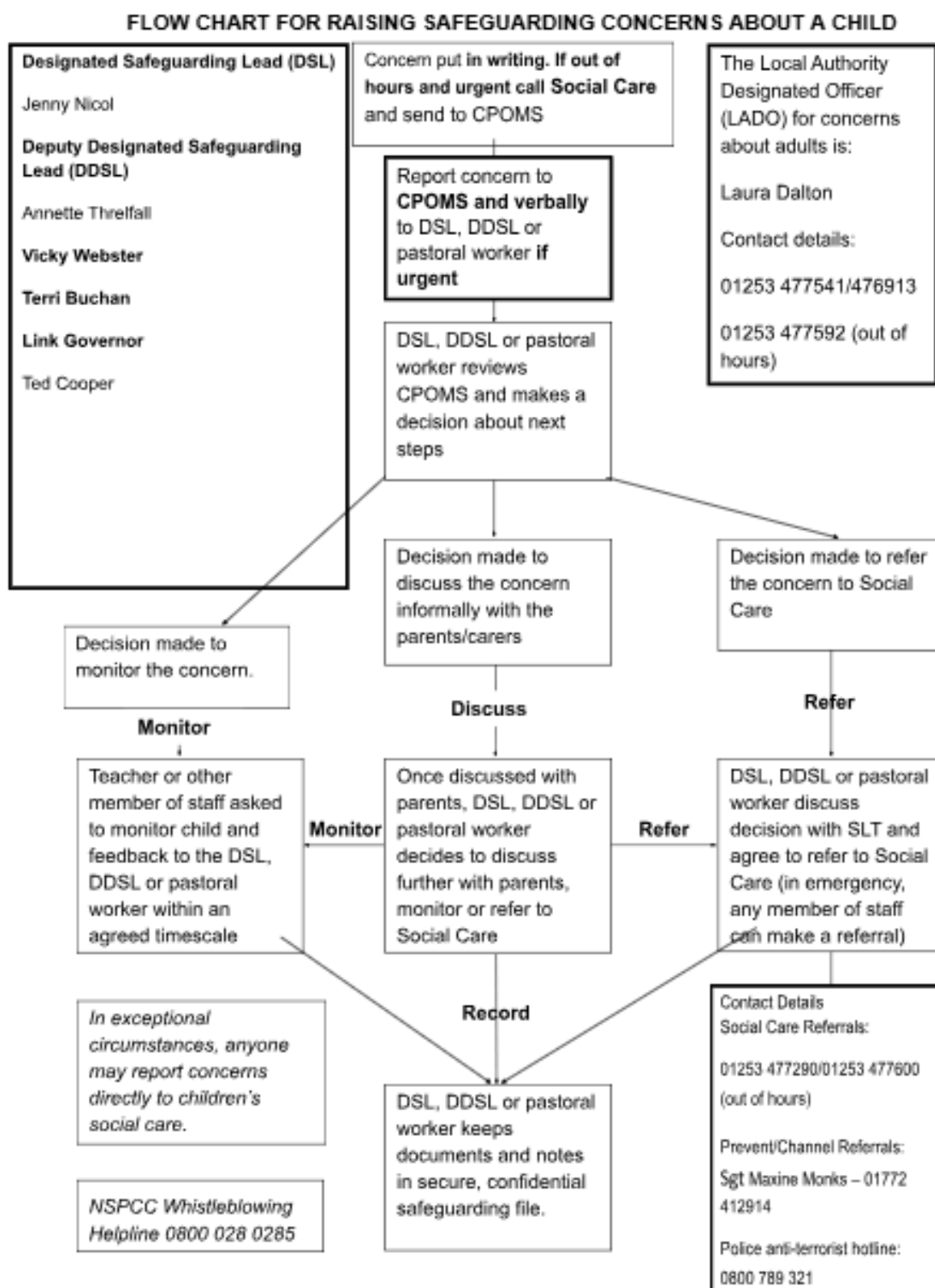
The following policies (non-exhaustive list) support the FCAT Safeguarding and Child Protection Policy:

- Acceptable Use of IT Policy (adults)
- AI Policy
- Anti-Bullying Policy
- Behaviour for Learning Policy
- Care and Control Policy
- Communications Policy (including staff/volunteer/student use of social media)
- Confidentiality Policy
- Curriculum Policy (PSHE)
- Data Protection Policy
- Disciplinary Policy
- Disclosure and Barring Service (DBS) Policy
- Drugs and Alcohol Policy
- Equality and Diversity Policy
- E-Safety Policy
- Health and Safety Policy
- Recruitment and Selection Policy (includes safer recruitment procedures)
- Special Educational Needs (SEN) Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Young Carers Policy

The following academy policies (non-exhaustive list) also support the FCAT Safeguarding and Child Protection Policy:

- Absconding Policy
- Attendance Policy
- Personal Relationships/SRE Education Policy
- Portable Digital Devices Policy
- Use of Digital and Video Images Policy
- Extremism and radicalisation policy and risk assessment
- Security Policy
- Visiting Speaker Policy
- Volunteer Policy and risk assessment

55 Appendix I: Flow Chart for Raising Safeguarding Concerns About a Child



56 Appendix J: Guidance for Visitors

No child should suffer harm of any form, either at home or at school. Everyone who works or visits our Academy has a responsibility to make sure that all our young people are safe.

If you are worried about the safety of any young person in our Academy you must report it the Designated Safeguard Lead or one of the Deputy Designated Safeguarding Leads.



Westminster
Primary Academy

CONTACTS

Headteacher
Mrs Beth Latham

Designated Safeguarding Lead
Mrs Jenny Nicol

Deputy Safeguarding Leads
Mrs Annette Threlfall
Miss Terri Buchan
Mrs Vicky Webster

Governor Responsible for Safeguarding
Mr Ted Cooper

Westminster Primary Academy
Westminster Road
Blackpool
FY1 2QE
admin@westminster.fcat.org.uk
www.westminsterprimary.co.uk



Westminster
Primary Academy

Safeguarding



Westminster Academy and Safeguarding

All visitors must sign in at reception on arrival. If you are working unsupervised with students you will be asked to produce your DBS certificate, together with proof of identification e.g. Passport or driving licence.

Health and Safety

If you require First Aid whilst on site, please ask for member of staff to direct you to a designated First Aider in school. Contractors must ensure they are fully conversant with the safety rules and regulations to be observed by contractors working on site.

Fire Alarm

If the fire alarm sounds (a long continuous siren) please leave the building as directed by the staff on the department where you are working and proceed to the Fire Assembly Point in the main playground.

What should you do if I am worried about a child?

If whilst working with or around a child you become concerned about:

- comments made by a young person
- marks or bruising
- changes in a child's behaviour or demeanour

Please report these concerns to a member of the safeguarding team immediately.

What should I do if a child discloses she/he/they are being harmed?

- record the details of the disclosure using the exact words or phrases used by the child.
- Bring this down to a member of the safeguarding team immediately so the concern can be discussed.
- Following this the safeguarding team will ensure that the concern is dealt with in the most appropriate manner.

Whistleblowing

What do I do if the alleged abuser is a member of the academy staff?

You should report the allegations to the Headteacher.

What should I do if the alleged abuser is the Headteacher?

You should report the allegation to the Designated Safeguard Lead who will notify the Chair of the Academy Council.

How do I ensure my behaviour is always appropriate?

Appropriate relationships with young people should be based on mutual trust and respect. Please do not;

- photograph children
- Exchange emails, text messages or agree to communicate via social media
- give out your own personal details

Please help safeguard the children in our care by following these guidelines.

Thank you for taking the time to read this please retain this leaflet for your information.

57 Appendix K: Remote Learning

Children and online safety away from school and college

Academies must do all that they reasonably can to keep all of their children safe. In most cases, the majority of children will not be physically attending the academy.

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk.

Any such concerns should be dealt with as per the existing safeguarding and child protection policy and where appropriate referrals should still be made to Children's Social Care and as required the police.

Recently published [guidance from the UK Safer Internet Centre on safe remote learning](#) and from the [London Grid for Learning on the use of videos and livestreaming](#) should be used to help plan online lessons and/or activities and plan them safely.

All staff must consider the safety of children when they are asked to work online. The starting point for online teaching should be that the same principles as set out in the academy's Staff Code of Conduct, Social Media Policy, Behaviour and Acceptable Use Policies, which encompass acceptable use of technologies, staff /pupil/student relationships and communication including the use of social media.

These policies apply equally to any existing or new online and distance learning arrangements.

The principles set out in the [guidance for safer working practice for those working with children and young people in education settings published by the Safer Recruitment Consortium](#) may be helpful.

Any use of online learning tools and systems must be in line with privacy and data protection/GDPR requirements.

An essential part of the online planning process is to ensure that children who are being asked to work online have very clear reporting routes in place so they can raise any concerns whilst online. As well as academy reporting routes, this should also signpost children to age-appropriate practical support from the likes of:

- [Childline](#) - for support
- [UK Safer Internet Centre](#) - to report and remove harmful online content
- [CEOP](#) - for advice on making a report about online abuse

Parents and Carers

Academies will be in regular contact with parents and carers during the outbreak. These communications should be used to reinforce the importance of children being safe online.

It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the academy (if anyone) their child is going to be interacting with online.

Parents and carers may choose to supplement the academy online offer with support from online companies and in some cases individual tutors.

Academies should emphasise the importance of securing online support from a reputable organisation/individual who can provide evidence that they are safe and can be trusted to have access to children.

Support for parents and carers to keep their children safe online includes:

- [DfE guidance supporting schools to teach pupils how to stay safe online within existing subjects](#)
- The Oak National Academy have produced resources to support teaching of the updated curriculum free
- UK Council for Internet Safety (UKCIS) guidance: [Education for a connected world](#)
- UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- National crime Agency's [CEOP Education Programme](#): Protecting children and young people from online child sexual abuse through education. Including PSHE Association accredited [lesson plans and resources](#) aligned to the RSHE curriculum, regular e-bulletins on new and emerging threats and [training for professionals on online child sexual abuse](#)
- Public Health England [Every Mind Matters](#)

- [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support
- [Internet matters](#) - support for parents and carers to keep their children safe online
- [London Grid for Learning](#) - support for parents and carers to keep their children safe online
- [Net-aware](#) - support for parents and carers from the NSPCC
- [Parent info](#) - support for parents and carers to keep their children safe online
- [Thinkuknow](#) - advice from the National Crime Agency to stay safe online
- [UK Safer Internet Centre](#) - advice for parents and carers