PACE Academy Trust

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Safeguarding and Child Protection Policy 2026-27

UN Convention on the Rights of the Child
Article 19 Governments must do all they can to ensure that children are protected from all forms of violence, abuse, neglect and bad treatment by their parents or anyone else who looks after them

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Introduction and Aims

At PACE Academy Trust, the safety and welfare of our pupils is of the utmost importance. Article 19 of the United Nations Convention on the Rights of the Child (UNICEF) states that 'Governments must do all they can to ensure that children are protected from all forms of violence, abuse, neglect and bad treatment by their parents or anyone else who looks after them'. Article 19 is about children having the right to feel safe and to be protected from violence, abuse and neglect; this policy underpins that right.

Our schools will ensure that all children are safeguarded by expecting members of staff to maintain a culture of vigilance and work together proactively with children and families who may need help. Every member of staff who comes into contact with our pupils, and their families, has a role to play in keeping children safe.

We know that children learn best when they are healthy, safe and secure, when their individual needs are met and when they have positive relationships with the people caring for them. We aim to have schools which are welcoming, safe and stimulating and where children are safe, enjoy learning and where everyone feels included, respected and valued. All necessary steps are taken to keep children safe, well and ensure they thrive.

We actively promote an inclusive, respectful and anti-discriminatory culture as a core aspect of safeguarding, recognising that all children have the right to feel safe, valued and protected from prejudice-based harm.

This policy aims to provide all staff, volunteers, children and their families with a clear and secure framework for ensuring that all children in our schools are protected from harm, both while at school and when off the school's premises.

We will always maintain an attitude of 'it could happen here.'

What is Safeguarding?

Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge.
- protecting children from maltreatment.
- preventing impairment of children's mental and physical health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

This policy has been developed with regard to the Department for Education's statutory guidance *Keeping Children Safe in Education 2026* and *Working Together to Safeguard Children 2023*, together with locally agreed multi-agency safeguarding arrangements. It also has regard to other relevant safeguarding legislation and statutory requirements, including:

- the Education Act 2002.
- Part 3 of the Schedule to the Education (Independent School Standards) Regulations 2014.
- Children Acts 1989 and 2004.
- the Safeguarding Vulnerable Groups Act 2006, as amended, including amendments made by the Crime and Policing Act 2026.
- section 5B of the Female Genital Mutilation Act 2003.

- the Counter-Terrorism and Security Act 2015 and statutory Prevent duty guidance.
- the Human Rights Act 1998.
- the Equality Act 2010, including the Public Sector Equality Duty.
- statutory Operation Encompass guidance.
- the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025; and
- the statutory framework for the Early Years Foundation Stage.

As academies, PACE schools will also comply with their funding agreements and articles of association. Each school will follow the locally agreed procedures published by its safeguarding partners.

Links with other School Policies

PACE recognises that several other school policies and procedures form part of the wider safeguarding and welfare agenda and therefore this Safeguarding and Child Protection Policy should be read in conjunction with the policies listed below:

- Code of Conduct for staff
- Acceptable Use Policies for staff, pupils, parents, volunteers
- Anti-bullying and anti-discrimination policy
- Behaviour policy
- Attendance policy
- Online safety (inc social media) policy
- Health and Safety Policy
- Safer Recruitment Procedures
- Whistleblowing
- First Aid Policy
- Managing Medical Needs Policy
- Educational Visits Policy
- Early Years Policy

Equity

PACE Academy Trust is committed to anti-discriminatory safeguarding practice. We recognise that some children may face increased risk of harm or additional barriers to recognising or reporting abuse. All children will receive appropriate protection and support, taking account of their individual circumstances and communication needs. In implementing this policy, PACE schools will have due regard to their obligations under the Human Rights Act 1998, the Equality Act 2010 and the Public Sector Equality Duty. Reasonable adjustments and proportionate positive action will be considered where required to safeguard children and remove barriers to their protection.

Contextual Safeguarding

It is important that we recognise the contextual differences across our schools. This means that in each of our settings there will need to be a different emphasis on certain aspects of safeguarding, depending on the needs and vulnerabilities of the community.

In each of our schools, we ask, *'what are we protecting our children from?'* and work with the local authority, staff and pupils for their views on this. We use this insight to help ensure our training and the

support we offer is matched to the needs of the community we serve.

These are the main issues identified in our locality/school:	Our school response. What we are doing to tackle this issue:
	•
	•
	•
	•

Key School Contacts

Position	Name	Contact Details (email/phone)
Senior Designated Safeguarding Lead		
Deputy Designated Safeguarding Lead		
Deputy Designated Safeguarding Lead		
Deputy Designated Safeguarding Lead		
Deputy Designated Safeguarding Lead		
Designated Teacher for Children who are Looked After (CLA)		
Senior Mental Health Leader		
Designated Governor for Safeguarding		
PACE Safeguarding Leads	Zoe Harris - CEO Clare Wingrave – Safeguarding Trustee Jo Grinter - COO	Zoe.harris@paceacademytrust.com

Roles and Responsibilities

All Members of Staff must:

- Read and understand Part One of *Keeping Children Safe in Education 2026* in full and review it at least annually. All staff must confirm that they have read and understood Part One and this policy at the beginning of each academic year.
- Attend child protection training, every two years as a minimum, and updates on safeguarding and child protection at least annually.
- Be aware of the mandatory duty that requires teachers to report known cases of Female Genital Mutilation involving children under the age of 18 to the police.

- Recognise that racism, faith-based prejudice and other forms of discriminatory behaviour can constitute harm in their own right and may significantly affect a child's welfare, wellbeing and sense of safety.
- Have a responsibility to provide a safe environment in which children can learn.
- Know what to do if a child tells them he/she is being abused or neglected.
- Know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals.
- Never promise a child that they will not tell anyone about an allegation.
- Be aware of the signs of abuse, neglect and exploitation so that they can identify cases of children who may need help or protection.
- Maintain an attitude of 'it could happen here.'
- Always act in the best interests of the child.
- Maintain records about any concerns they have about a child on our safeguarding software system.

The Designated Safeguarding Lead (DSL)

The role of the Designated Safeguarding Lead carries a significant level of responsibility, and they should be given the time, funding, training, resources and the support they need to carry out the role effectively. DSLs will:

- Fulfil the responsibilities of the DSL as set out in the PACE DSL job description and Annex B of *Keeping Children Safe in Education 2026*.
- Be supported by other senior DSLs across PACE and through supervision where appropriate
- Take lead responsibility for early help, safeguarding and child protection within the school.
- Keep written records of all concerns when noted and reported by staff or when disclosed by a child, ensuring that such records are stored securely and reported onward in accordance with this policy guidance, but kept separately from the child's general file.
- Consult initially with a statutory child protection agency to talk about any doubts or uncertainty.
- Make a formal referral to a statutory child protection agency or police as necessary,
- Notify children's social care if a child with a child protection plan is absent for more than two days without explanation.
- Ensure that when a child with a child protection plan leaves the school, their information is passed to their new school and the child's social worker is informed.
- Liaise with the headteacher or head of school to inform him or her of issues- especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations.
- Ensure that all staff sign to indicate that they have read and understood this policy.
- Ensure that the child protection policy is updated annually and shared with governors.
- Keep a record of staff and governor attendance at safeguarding and child protection training.
- ensure there is a process for contacting the school's DSL out of school hours including publishing the name of the safeguarding lead on the website.
- Have an understanding of the importance of safer recruitment processes and an awareness of how safer recruitment practice is managed within the school.

Across PACE our DSLs will attend the required training every two years and refresher training annually.

During term time, the DSL or an appropriately trained deputy DSL will be available during school hours for staff to discuss safeguarding concerns. During out of school hours, DSLs can be contacted through the safeguarding mailbox, which continues to be monitored on a regular basis.

When the DSL is absent, a named deputy DSL will provide cover. Where neither the DSL nor a deputy DSL is available immediately, the school will refer any immediate concerns to the PACE Strategic Lead for Safeguarding (DSL trained) who will also be responsible for monitoring the safeguarding mailbox.
These arrangements will ensure that safeguarding concerns are received, monitored and acted upon without delay.

The Headteacher:

- Ensures that the policy and procedures are implemented and followed by all staff.
- allocates sufficient time and resources to enable the DSLs to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings.
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's whistle blowing procedures.
- Ensures that child's safety and welfare is addressed through the curriculum.
- Ensures that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of KCSIE.
- Undertakes/updates their safer recruitment training every two years and ensures other staff involved in recruitment of staff have also received training.
- Ensures robust cover arrangements are in place when the DSL is unavailable.

The Strategic Safeguarding Lead for PACE Academy Trust:

- Provides safeguarding training for governors and directors - at least twice yearly.
- Monitors the safeguarding audits to identify common areas for further training.
- Ensures governors and directors are kept up to date through regular (at least twice yearly) safeguarding reports to the LGB/Strategic board.
- Ensures that there is a termly network meeting for DSLs and that senior DSLs have access to supervision.
- Ensures the PACE Safeguarding and Child Protection policy is reviewed annually and that other polices related to safeguarding are reviewed regularly and reflect current legislation.
- Monitors the Single Central Register at least twice yearly for each school, ensuring compliance and best practice.
- Has oversight of safeguarding practice across PACE.
- Supports DSLs with serious cases and complex reviews.
- Ensures all DSLs have been provided with a copy of the DSL job description which is reviewed annually in line with KCSiE updates.
- Ensures staff, governors and trustees involved in recruitment have completed safer recruitment training; and that this is updated in line with this policy.

Our Governors are responsible for:

- Appointing a nominated governor for safeguarding and child protection on the governing board.
- Ensuring safeguarding is given a high profile at governance level.
- Ensuring that an effective safeguarding and child protection policy and procedures is in place and underpins the safeguarding culture of the school.
- Ensuring the policy is reviewed annually.
- Ensuring staff are provided with Part One of Keeping Children Safe in Education, 2026– Appendix A and are aware of specific and relevant safeguarding issues.
- Ensuring that all the DSLs undergo formal child protection training every two years and receive regular (annual) safeguarding refreshers.

- Creating a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Ensuring that the wellbeing curriculum contains safeguarding specific topics.
- Ensuring appropriate filters and monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material.
- Ensuring that there is a Designated Teacher for Children Looked After.
- Monitoring the Single Central Register to ensure compliance.
- Ensuring that at least one member of the board has completed safer recruitment training and has assurance that the headteacher and other senior staff involved in recruitment have also completed this training.

What school staff should do if they have concerns about safeguarding practices within the school

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

Our whistleblowing procedures can be accessed via the PACE website. The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally.

Types of Abuse, Neglect and Exploitation

Abuse:
A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse may also include children causing harm to parents, carers or other adults, sometimes referred to as child-to-parent or caregiver abuse. Staff should be aware that emotional abuse can include persistent verbal abuse, criticism, belittling, humiliation and name-calling.

All members of staff should be aware that 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. Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is very important that members of staff report concerns – they do not need 'absolute proof' that the child is at risk.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be domestic abuse, including where children see, hear or experience its effects.

Detailed definitions and indicators of the different types of abuse and neglect can be found in Keeping Children Safe in Education. In summary these are:

Physical abuse: a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person. Emotional abuse may also include criticism, belittling, name-calling. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: Sexual abuse involves forcing, causing or inciting a child or young person to take part in sexual activities, whether or not the child is aware of what is happening.

Children who are sexually abused are more likely to know the person abusing them than not. Sexual abuse can be perpetrated by adults or other children. Children under the age of 13 can never legally consent to sexual activity.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Adult males do not solely perpetrate Sexual abuse. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and their school or colleges policy and procedures for dealing with it.

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

Safeguarding Children in Specific Circumstances

We will always maintain an attitude of 'it could happen here'

Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including child sexual exploitation, forced labour, slavery and child criminal exploitation. Children may be exploited for criminal, labour or other purposes and may not recognise themselves as victims.

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

Both CSE and CCE are forms of abuse and both occur when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited, even if sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. It is important to note that the experience of girls who are criminally exploited can be quite different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too.

Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions.
- Children who associate with other young people involved in exploitation.
- Children who have older boyfriends or girlfriends.
- Children who suffer from changes in emotional well-being.
- Children who misuse drugs and alcohol.
- Children who go missing for periods of time or regularly come home late.
- Children who regularly miss school or education or do not take part in education.

CCE and CSE may be committed or facilitated by individuals, groups or organised criminal networks. Victims may identify as being part of the group exploiting them and may not recognise themselves as victims. Staff should be aware that exploitation may constitute modern slavery.

Children who are exploited may be criminalised for behaviours they have been coerced into carrying out. This should not prevent professionals from recognising them as victims who require safeguarding support. Staff should also recognise that most sexual abuse is perpetrated by someone already known to the child.

Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. It is important to note that the experience of girls who are criminally exploited can be quite different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. Children may be manipulated, coerced or exploited for financial gain, including through online activity or criminal exploitation.

Serious Violence

Supporting young people to build resilience and raise their awareness of the risks associated with gangs and serious youth violence is key to helping keep young people safe in their communities. Children can be targeted at any age so whilst our schools are all primary settings, it is important that we remain vigilant in this area of safeguarding, particularly as our schools are in areas of Croydon and Merton where gang activity exists.

Staff should be aware of the indicators which may signal that children are at risk from, or are involved with serious violent crime may include:

- Increased absence
- Change in friendship groups
- Relationships with older individuals or groups

- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions
- Significant decline in performance

These may indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Across PACE, we need to be alert to the possibility of children and young people bringing weapons onto their school site. There are various reasons why young people may be carrying a weapon. These should be explored with the young person. Staff should report concerns where a child is carrying, using, threatening to use, or expressing an intent to use a weapon. The DSL will seek advice from the Strategic Lead for Safeguarding to determine whether the police should be informed via 101 of any pupils found in possession or a weapon in school. The police will be informed of any weapon that is found on the school site.

Staff should be aware that risks may be heightened for children with disrupted educational experiences, persistent absence or a history of offending behaviour.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line." Those involved with county lines will often go missing for a few days at a time. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children involved in county lines may be considered as having been trafficked and victims of criminal exploitation.

Female Genital Mutilation (FGM) and so-called "Honour Based" Abuse

So-called 'honour-based' abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation).

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.

Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions.

Breast Ironing

Breast Ironing is viewed as a form of protection for girls in making them appear younger thus reducing the likelihood of pregnancy practiced in African countries, notably Cameroon. Staff worried about the risk of breast ironing should speak to our DSL as soon as possible.

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 communities use religion and culture to coerce a person into marriage. We have a vital role in safeguarding children from forced marriage.

Safeguarding Children who are Susceptible to Extremism and Radicalisaton

PACE schools value freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both children and teachers have the right to speak freely and voice their opinions; this is underpinned by UNICEF Article 14*,* which states that *'every child has the right to think and believe what they choose and also to practice their religion, as long as they are not stopping other people from enjoying their rights'.* Free speech that is designed to manipulate vulnerable individuals or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of the law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

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.

Radicalisation is the process of a person legitimising support for, or the use of terrorist violence. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for, which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media has become a major factor in the radicalisation of young people.

Reducing the Risk of Radicalisation

The head and DSL will assess the level of risk within the school using the **LGFL Prevent Risk Assessment** and put personalised actions in place that reduce the contextual risk.

Across PACE we also aim to reduce risk through:

- Promoting active engagement with parents/carers as they are in a key position to spot signs of radicalisation. We will assist and advise families who raise concerns and point them to the right support mechanisms. We will also discuss any concerns about radicalisation with a child's parents in line with this policy unless we have specific reason to believe that doing so would put the child at risk.
- Ensuring that as many members of staff as possible undertake preventing radicalisation training.
- Ensuring children are safe from terrorist and extremist material when accessing the internet in school.
- Referring individuals to the Channel programme, if the school is concerned that an individual might be vulnerable to radicalisation.

Domestic Abuse, Sexual Violence and Sexual Harassment

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 Domestic Abuse Act 2021 defines this abuse as:

'Behaviour of a person (A) towards another person (B) is domestic abuse if:
A and B are each aged sixteen or over and are personally connected to each other, and the behaviour is abusive.'

Behaviour is abusive if it consists of any of the following:

- Physical or sexual abuse
- Violet or threatening behaviour
- Controlling or coercive behaviour
- Economic abuse
- Psychological, emotional or other abuse

Domestic abuse can have an enormous impact on affected children and young people. It can affect their mental health, safety, physical health and wellbeing, educational attainment, family and peer relationships, and their ability to enjoy healthy, happy, respectful relationships in the future. 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.

It is likely that there will be young people and staff within our schools who are experiencing or perpetrating domestic abuse or sexual violence. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never feel that they are creating a problem or feel ashamed that they are reporting abuse.

Sexual harassment creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. When there has been a report of sexual violence, the designated safeguarding lead should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. These issues affect men and women but are mainly experienced by women and girls. It is important to always consider domestic and sexual abuse as a possible explanation for any unusual behaviour.

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school or college. Sexual harassment is likely to:
violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes. Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim
- displaying pictures, photos or drawings of a sexual nature
- upskirting
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
    - ~ consensual and non-consensual sharing of nude and semi-nude images and/or videos.
    - ~ sharing of unwanted explicit content
    - ~ sexualised online bullying
    - ~ unwanted sexual comments and messages, including, on social media
    - ~ sexual exploitation; coercion and threats
    - ~ coercing others into sharing images of themselves or performing acts they are not

comfortable with online.

Any concerns that a child may be at risk of significant harm must be reported immediately to the DSL as they are likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response by the school.

Inappropriate Sexual Behaviour

Developmental sexual activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information-gathering and experience-testing. It is characterised by mutuality and by seeking consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. it may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative input may be enough to address the behaviour.

Child-on-child Sexual Harassment and Sexual Violence

Child-on-child abuse is when children abuse other children. This can happen inside and outside of school. Just because Child-on-child abuse is not reported, it does not mean that it is not happening.

Child -on-child abuse including sexual violence and harassment can occur between two children of any age and sex. It can occur through a group of children or a single child sexually abusing or harassing another. We recognise that it is more likely that girls will be victims and boys perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously.

Child-on-child abuse is a safeguarding concern for both the victim and the alleged perpetrator. Appropriate and timely assessment and support for all children involved can be an important protective factor and may help prevent the escalation of harmful behaviours.

Across our schools, we are aware of and respond appropriately to **all** reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school. We have a zero-tolerance approach to child-on-child abuse including sexual violence and harassment and recognise a continuum of behaviour that may begin with harmful sexual behaviour and progress through sexual harassment to sexual violence. We will remain alert to misogynistic attitudes and behaviours and seek to identify concerns at an early stage before they escalate.

Child-on-child abuse will never be passed off as "banter" or children "just having a laugh" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Forms of child-on-child abuse include:

~ bullying (including cyberbullying, prejudice-based bullying, faith-targeted abuse and other discriminatory behaviour)

~ abuse in intimate personal relationships between children (also known as teenage relationship abuse) physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing

physical harm

~ sexual violence and sexual harassment.
~ consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery
~ 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
~ upskirting (which is a criminal offence45), 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 cause the victim humiliation, distress, or alarm
~ initiation/hazing type violence and rituals.

It is essential that **ALL** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, 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. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

Upskirting

'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence. Anyone of any gender can be a victim.

Making or sharing nudes and semi-nudes, including AI-generated images

Making or sharing nudes or semi-nudes includes photographs, videos and live streams, as well as images that have been digitally altered or wholly generated using artificial intelligence, sometimes described as deepfakes or deep nudes.

This means:

- A person under the age of eighteen creates and shares nudes or semi-nudes of themselves with a peer under the age of eighteen.
- A person under the age of eighteen shares nudes or semi-nudes created by another person under the age of eighteen with a peer under the age of eighteen or an adult.
- A person under the age of eighteen is in possession of nudes or semi-nudes created by another person under the age of eighteen.

All incidents require a safeguarding response, whether the sharing appears to be consensual or non-consensual.

Any member of staff who becomes aware of an incident must report it to the DSL immediately. Staff must not view, copy, print, share, store, save or ask a child to download the imagery. Staff must not delete the imagery or ask the child to delete it, investigate the content themselves, share information unnecessarily, or say anything that could blame or shame a child. Staff should explain that the concern must be reported and reassure the child that they will be supported.

We want the pupils to be fully aware of the dangers and possible repercussions of sharing nudes or semi-nudes. Through our Safeguarding and Wellbeing curriculum, this information will be communicated to pupils in an age-appropriate way.

Disclosures can happen in a variety of ways. The child affected may inform a class teacher, the DSL in school, or any member of the school staff. They may report through an existing reporting structure, or a friend or parent may inform someone in school or college or inform the police directly. A child who discloses that they are the subject of nude or semi-nude imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort, and they may have already tried to resolve the issue themselves.

Mental Health

Mental health concerns that may become safeguarding concerns include, but are not limited to, self-harm, suicidal thoughts and behaviours, and risk of suicide. All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff should observe children day-to-day and identify those whose behaviour suggests that they may well be experiencing a mental health problem or be at risk of developing one. These concerns must be logged into the school's safeguarding reporting system.

Across PACE Academy Trust, we have a curriculum and resources in place to support the mental health and wellbeing of our pupils. Staff should remain alert to warning signs such as significant changes in behaviour, withdrawal, sleep difficulties, changes in attendance, unexplained injuries and signs of self-harm. Any staff member concerned about a child's mental health or wellbeing should speak to a DSL.

Bullying (Including Online Bullying)

While bullying between children is not a separate category of abuse and neglect, it is a serious issue that can cause considerable anxiety and distress. At its most serious level, bullying is thought to result in up to twelve child suicides each year. All incidences of bullying should be reported and will be managed through our behaviour and anti-bullying procedures. All pupils and parents receive a copy of the anti-bullying procedures on joining the school and have access to it via the school website. The subject of bullying is addressed at regular intervals in the Wellbeing curriculum. If bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the head teacher and the DSL will consider implementing child protection procedures.

Racism, Faith-Targeted Abuse and Prejudice-Based Harm

Racism, faith-targeted abuse and other forms of prejudice-based harm can significantly affect a child's welfare, wellbeing and sense of safety. Such abuse may occur face-to-face or online and may be perpetrated by adults or children. All concerns of this nature will be treated seriously and responded to through the school's safeguarding, behaviour and anti-discrimination procedures.

Children with family members in prison

Across PACE we recognise that a number of our children may have family members in prison. These children may be at risk of poor outcomes including poverty, stigma, isolation and poor mental health, particularly if they are a parent or sibling. We will work with families to identify these children and put in place personalised support.

Homelessness or at risk of becoming homeless

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a child may be at risk of homelessness include:

- household debt
- school debt
- domestic abuse
- tired and withdrawn
- absence from school
- unkempt appearance
- decline in performance
- Recent or previous house or school moves

When children are identified as homeless or at risk of homelessness, our staff will work with the family to identify the support needed. This may include an Early Help referral, access to pastoral support and practical necessities such as food packages, sanitary items and uniform support.

Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate online materials. Across PACE Academy Trust, children are taught regularly about online safety and the dangers online. All staff follow our Online Safety (inc Social Media) Policy to ensure children are kept safe from harm online.

Our Computing and Safeguarding/Wellbeing curriculums cover the four areas of risk:

~ **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

~ **contact:** being subjected to harmful online interaction with other users; 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 (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.

~ **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

A child may be experiencing abuse online if they:

- spend lots, much more or much less time online, texting, gaming or using social media.
- are withdrawn, upset or outraged after using the internet or texting.
- are secretive about who they are talking to and what they are doing online or on their mobile phone.
- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

As part of our Safeguarding and Wellbeing Curriculum, and the Computing curriculum, children are taught about online safety and how to seek help if they view something inappropriate. The safeguarding curriculum includes age-appropriate teaching about online harms, including the sharing of images, deepfakes, pornography, misogynistic influencers, online manipulation, healthy relationships and seeking support.

Further information about this can be found within our Safeguarding and Wellbeing Policy/Curriculum Themes and Online Safety Policy.

The school will ensure staff undergo regularly updated safeguarding training and that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

Due to ever evolving technology and associated risks, our PACE schools are aware of the rapid changes and have regular reviews regarding our approach to online safety as well as our filtering and monitoring systems.

In line with national expectations, pupils should not have access to mobile phones during the school day except where authorised by the school as part of an agreed arrangement. Schools should ensure their Mobile Phone Policy reflects this expectation.

Mobile phone and camera requirements

In all PACE settings, including Early Years, personal mobile phones and cameras must not be used to photograph or record children. Only school-authorised devices may be used for this purpose, in accordance with the staff code of conduct, acceptable use requirements, and data protection arrangements. Personal devices must be stored securely and must not be accessed while staff are caring for or supervising children, except in an emergency and in accordance with school procedures.

Cybercrime

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

Cyber-dependent crimes include:
unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
'Denial of Service' (Dos or DDoS) attacks or 'booting.' 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 DSL should consider referring into the nationwide police programme called Cyber Choices. This aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences.

Filtering and Monitoring

Across PACE, the internet connection is provided by LGfL. This means we have a dedicated and secure, school-safe connection, which is protected by firewalls and multiple layers of security, including a web filtering system, which is made specifically to protect children in schools.

We do all that we can do to limit children's exposure to the above risks from our IT systems. As part of this process, our governing bodies and OpenAir (our IT support service) ensure that each of our PACE schools has appropriate filters and monitoring systems in place; these are regularly reviewed to determine their effectiveness. As well as leaders in school, OpenAir are responsible for monitoring the use and effectiveness of filters and will report concerns to the DSL and our PACE Chief Executive Officer. We consider the age range, number of children, how often they access the IT system and the safeguarding

risks.

We use a variety of ICT facilities to communicate with our staff, pupils, and wider community including external post and telephones, photocopying and printing, email, internet-enabled platforms and channels or social media. These facilities are provided for business purposes only. It is important to recognise that whilst use of these facilities is essential to the delivery of our services, the ICT resources and facilities we use also pose risks to online safety, to the safety of children, to data protection and to network security.

Any device that connects to the school Wi-Fi system (be that a school device or personal device) will automatically link to the trust's filtering and monitoring system

The appropriateness of any filters and monitoring systems will be informed in part by each school's ***Prevent Risk Assessment.*** The school will ensure staff undergo regularly updated safeguarding training and that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

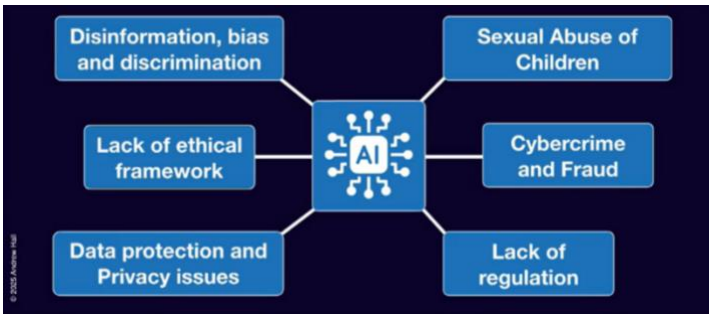
At each PACE school, a member of the Senior Leadership Team will:

- Identify and assign roles and responsibilities to manage filtering and monitoring.
- Ensure a review of filtering and monitoring provision is completed at least annually with support from the DSL and our IT provider. The review will check that filtering is operating appropriately on all internet-connected devices in all relevant school locations.
- Ensure a written record of the checks, findings, decisions and actions is retained.
- Ensure systems are in place to block harmful and inappropriate content without unreasonably impacting teaching and learning (over-blocking).
- Continuously aim to limit children's exposure to the risky online content through the schools' IT systems.
- Complete the GOV.UK self-assessment Plan technology for your school - GOV.UK and identify an action plan that work towards meeting the following DfE guidance: Filtering and Monitoring Standards.
- Understand how to use generative artificial intelligence safely
- Understand that filtering and monitoring requirements apply to the use of generative AI in education. Generative AI: product safety expectations - GOV.UK

All staff provided with access to ICT equipment must use these facilities to the highest professional and personal standards and in line with the standards of behaviour set out in the PACE Code of Conduct. To safeguard children and our systems, we have the right to monitor emails and internet use on PACE systems and devices.

Artificial Intelligence

Staff members are expected to use Artificial Intelligence (AI) tools responsibly and ethically, ensuring accuracy, transparency, and respect for privacy, in adherence with the PACE AI Policy and guidelines around the safe use of AI in education. Staff should be aware of the potential harm of Artificial Intelligence:



Operation Encompass

Across our PACE Academy trust schools, we have access to Operation Encompass. This system helps police and schools to work together to provide emotional and practical support for children. The system ensures that when 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 form an alert on the system for the DSL.

Vulnerable Groups

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

Children absent from education

Children absent from education are those who are absent for prolonged periods of time or repeated occasions, or both. A child absent from education, which is unexplainable and/or persistent, is a potential indicator of abuse or neglect. Our staff will follow this policy, alongside our attendance policy, particularly when children are persistently absent without reason to help identify risks and prevent the risks from escalating. It is essential that all staff are alert to signs to look out for, are professionally curious and aware of the individual triggers when considering the risks of potential safeguarding concerns. These may include travelling to conflict zones, Female Genital Mutilation, county lines and forced marriage. At PACE, we ensure that we have a multi-agency approach to managing poor attendance, especially when children have a social worker.

When children are *missing* from education (CME), our schools must liaise with the local authority and follow the relevant guidance.

Children with a Special Educational Need or Disability (SEND)

Across PACE Academy Trust, we recognise that children with special educational needs or disabilities (SEND) can face additional safeguarding challenges both online and offline. 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 being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND will therefore require close liaison between the DSL and the SENDCo.

Children with Medical Conditions

An incident relating to the routine management of a child's medical condition does not, in itself, require a safeguarding referral. A safeguarding referral will be considered where information indicates that the child may be at increased risk of neglect, abuse or exploitation because of their medical condition. This may include essential medical information being withheld from the school or a child repeatedly attending without necessary medication or treatment, placing them at risk.

Any such concern must be reported to the DSL and considered alongside the child's wider circumstances.

Elective Home Education

Many home educated children have positive learning experience. However, this is not the case for all. Elective home education can mean that some children are not in receipt of suitable education and are less visible to the services that are there to keep them safe and supported in line with their needs.

Parents need to complete a referral to the Local Authority if they are considering home education for their child. Any decision relating to elective home education must be based on a meaningful discussion between the school, Local Authority and the parents.

Children who are Looked After and Children who were previously Looked After

PACE recognises that children who are looked after or have been previously looked after are particularly vulnerable due to their status. The designated teacher for CLA has specialist knowledge of the issues faced by this group and will work alongside the designated safeguarding lead to seek advice if there are safeguarding concerns.

The designated teacher should work with the virtual school head (which is borough specific to the each CLA child) as well as the allocated social worker, 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 the educational achievement of previously looked after children.

Special Guardianship Orders

A special guardianship order is an order appointing one or more individuals to be a child's 'special guardian'. It is a private law order made under the Children Act 1989 and is intended for those children who cannot live with their birth parents and who would benefit from a legally secure placement.

Special guardians share parental responsibility with the child's birth parents but can make nearly all decisions about the child without the birth parents' consent or even knowledge. As the child's primary carer, they are responsible for all aspects of their wellbeing. The Special Guardianship lasts until the child is 18 (unless the order is changed or cancelled). The DSL should be aware of any child with a special guardianship order and must provide relevant, regular, support.

Court Orders for Parent Responsibility Orders

A Parental Responsibility Order is an order under the Children Act 1989, which fathers can apply for when they are not married or in a civil partnership with the mother and the mother refuses to allow the father to be registered or re-registered on the birth certificate, or refuses to sign a Parental Responsibility.

If the court decides that the father should have parental responsibility, the order will give him equal parental responsibility with the mother. An application for a Parental Responsibility Order may be made to the family proceedings court, the county court or the high court.

It is important to note that fathers who are named on the child's birth certificate are automatically granted parental responsibility.

Privately Fostered Children

Private fostering is when a child under the age of 16 (under eighteen if disabled) is cared for by someone who is not their parent is a 'close relative' for 28 days or more. Designated safeguarding leads must refer to their local authority any private fostering arrangements that they become aware of.

Young Carers

We recognise that caring responsibilities may affect a child's attendance, attainment, behaviour and wellbeing. Our staff will be alert to signs that a child may have caring responsibilities and will report any concerns to the DSL.

Early identification is important so that the child and family can receive appropriate support from the school, local authority, health services and other relevant partners. Support will be based on an assessment of the individual child's needs and reviewed regularly.

Children Questioning their Gender

The fact that a child or young person may be questioning their gender is not, in itself, a safeguarding concern. Staff should recognise that some children may experience a period of questioning their gender and that, for many children, this may be temporary and may not continue into adulthood.

Staff must be aware of the potential vulnerabilities that children who are questioning their gender may experience and ensure that any concerns are considered carefully, sensitively and on an individual basis. We will take time to understand the child's thoughts, feelings, views, experiences and wider circumstances, while maintaining appropriate professional curiosity and acting in the child's best interests.

Decisions relating to requests for social transition will be approached with particular care, consideration and appropriate safeguarding oversight. Schools will avoid automatic responses and will consider the individual child's welfare, age, understanding, family context, safeguarding information and any relevant advice before agreeing any arrangements.

We will avoid assumptions or rigid expectations based on gender stereotypes. Where practical arrangements are required, including the use of toilets, changing rooms or showers, these will be considered through a safeguarding lens. Children will not be permitted to use facilities designated for the opposite biological sex, including where the school is responding to a request to support social transition. Where mixed-sex facilities are available alongside single-sex facilities, the school will assess any safeguarding risks and put appropriate mitigations in place.

Early Help Procedures

Keeping Children Safe in Education and Working Together to Safeguard Children set out a clear expectation that local agencies and schools will work together and collaborate to identify those children with additional needs and provide support as soon as a problem emerges. Providing early help is far more effective in promoting the welfare of children – and keeping them safe – than reacting later, when any problems, for example neglect, may have become more entrenched.

We are committed to ensuring everything possible is done to prevent the unnecessary escalation of issues or problems. Children, young people and their families will be offered help when needs and/or concerns are first identified and, because of the early help offered, children's circumstances will improve and, in some cases, the need for more intrusive and intensive services are lessened or avoided. Parents are encouraged to use their own support networks and resources at the first stages of 'early help.' The school may help in clarifying or signposting these.

Our schools will always seek to discuss our concerns with the child's family (and if appropriate, directly with the young person) to let them know what is going on and how we are trying to help. We will need consent to share information to access support. We recognise that families may also be able to explain, assist or resolve the issues themselves.

Stage One - Universal services for all children, young people and their families

All children need support to learn and develop. In most cases, our schools will be able to meet the needs of a child or young person by personalising our approach, but some children require support which is additional to, or different from, what we normally provide.

Stage Two - Targeted early help for vulnerable children and families

If we have tried to meet the child or young person's needs from within the full range of support we can offer without progress/success, we will now need to engage additional support from other services. In doing so, we will need to decide whether the help the child and/or family needs can be met by involving one other service or if multiple services may be required. If we decide the child's need(s) require support from more than one service (and we have consent), we will undertake an Early Help Assessment with the family or check if an Early Help Assessment has already been initiated. The Early Help Assessment is the assessment tool used to assess needs that are not being met through our existing personalised support and where a child and family would benefit from coordinated support from other services apart from our schools.

If the family or young person will not consent to share information using an Early Help Assessment (CAF) or withdraws consent for early help, we will continue to support the needs of the child and their family through ordinarily available support and personalised services.

Team Around the Family

The Team Around the Family are the professionals from services we have invited to work together with the family to provide support. We aim to arrange a TAF meeting within 6 weeks of completing the early help assessment to establish a support plan and agree who is the best person to be the lead professional.

Child Protection Procedures

Taking Action

All concerns and disclosures should be logged onto the school's online safeguarding system where the DSL

will decide what action to take. Although any staff member can make a referral to the Local Authority's Social Care Service this should only be done in exceptional circumstances, where a DSL or senior leader is not available.

Social Care should decide within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. We will always follow up on a referral should information not be forthcoming.

Reporting Systems for Pupils

It takes a lot of courage for a child to disclose that they are being neglected and or abused. They may feel ashamed, particularly if the abuse is sexual their abuser may have made threats to kill or injure should they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.

There are clear, accessible and age-appropriate arrangements in our schools through which children can report concerns, abuse or worries about themselves or others. These arrangements are explained and regularly reinforced through the curriculum, assemblies and trusted relationships with adults.
Pupils will be told who they can speak to, how they can report a concern and what will happen after a report is made. We will always make it clear that concerns will be taken seriously, that children have the right to feel safe; that they will be listened to and supported, and that they will not be blamed or made to feel ashamed of reporting.

Across PACE we will ensure that our reporting arrangements take account of communication needs, SEND, language barriers and other factors that may make it more difficult for a child to speak out.

If a child talks to a member of staff about any risks to their safety or wellbeing, they will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter of professional judgement. If you jump in immediately the child may think that you do not want to listen but if you leave it until the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

Notifying Parents and Gaining Consent

The school will normally seek to discuss any concerns about a child with their parent/carers. This must be handled sensitively, and the DSL will make contact with the parents in the event of a concern, suspicion or disclosure and seek consent to share this information with the social care team. However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from Social Care.

Referral to Social Care

The DSL (or another member of staff) will make a referral to Social Care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

If a child is in immediate danger or is at risk of harm, a referral should be made immediately to Social Care and/or the police via 999. The DSL will wait to hear from Social Care or the police before releasing the child to the parent or carer.

Record Keeping

Record keeping is an essential part of child protection and safeguarding and across PACE we use a software package to manage this. It is vital that a record of any safeguarding concern is recorded accurately ***as soon***

after the event as possible and managed carefully and securely. This includes discussions and decisions made, including the rationale for those decisions e.g., even if referral was not made.

All records should be factual, objective, accurate and clear. This includes keeping copies within an electric file of all relevant referral forms, conference reports, strategy minutes etc. It is important to remember that any information recorded can be requested as evidence and whatever you record should be done objectively and with professionalism.

Child Protection data should be securely stored with access restricted to the Designated Safeguarding Lead (and their deputy) and headteacher. We also have a clear policy on the removal of files and by whom and as part of this, we will securely store safeguarding records for 25 years after the child's date of birth.

Transfer of Information

When a child leaves the school, the DSL will ensure that the child protection file is transferred securely and separately from the main pupil file to the receiving school as soon as possible. This will be **within five days for an in-year transfer** or **within the first five days of the start of a new term.** Confirmation of receipt will be obtained.

Where concerns are significant or complex, or statutory services are involved, the DSL will make direct contact with the receiving DSL and consider sharing relevant safeguarding information in advance of the child's transfer so that appropriate support can be in place when the child arrives.

The file transferred will include a clear, structured summary of current safeguarding concerns, relevant context and any ongoing support needs. Current risks will be distinguished from historic information.

Child Protection records do not form part of the pupil's educational record and are not required to be disclosed to parents/carers. Any requests from a parent/carers solicitor to have child protection records disclosed to them will be passed to either our legal advisor or we will consult with the Legal Services team at our local authority.

Confidentiality and Sharing Information

Timely and appropriate information sharing is essential to effective safeguarding. The Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 do not prevent or limit information being shared for the purpose of keeping children safe.

Our staff will share relevant, necessary and proportionate information with the DSL, safeguarding partners and other agencies where this is required to safeguard or promote a child's welfare. Fears about data protection must not prevent appropriate safeguarding action. Information may be shared without consent where consent cannot reasonably be obtained, where seeking consent may place a child at risk, or where another lawful basis applies.

Requests to access safeguarding records will be handled in accordance with data protection legislation, relevant exemptions, the rights and safety of the child and the rights of other individuals whose information may be contained in the record. Such requests must be referred immediately to the headteacher, Strategic Lead for Safeguarding and the PACE Data Protection Lead.

Alternative provision

Where a PACE school places a pupil with an alternative provision provider, the commissioning school remains responsible for safeguarding that pupil and for ensuring that the placement is suitable and meets the pupil's needs. Before a placement begins, we will obtain written confirmation that the provider has

completed the safeguarding and safer recruitment checks that the school would otherwise undertake for its own staff. We will also establish arrangements for the provider to notify it of any staff changes or other circumstances that may affect the child's safety.

We will know the address at which the child is receiving education, including any subcontracted provision or satellite site, and will monitor the child's attendance, welfare and the continuing suitability of the placement. The placement will be reviewed at least half-termly. Where safeguarding concerns arise, the placement will be reviewed immediately and ended where necessary unless and until the concerns have been satisfactorily addressed.

Safer Recruitment

Recruitment, Selection and Pre-Employment Vetting

Our school is committed to a culture of safe recruitment and, as part of that, adopt recruitment procedures in line with Keeping Children Safe in Education that help deter, reject or identify people who might abuse children.

The level of DBS certificate required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in a school or college. Details are outlined in the PACE Disclosure and Barring Policy.

For most appointments, an enhanced DBS certificate, which includes barred list information, will be required as most staff will be engaged in regulated activity.

Regulated activity includes responsibility, on a frequent basis in a school, for teaching, training, instructing, caring for or supervising children; providing advice or guidance on their physical, emotional or educational wellbeing; driving a vehicle used only for children; or undertaking intimate or personal care, healthcare or overnight activity. These provisions apply to both paid staff and volunteers.

The former supervision exemption has been removed. This means that PACE schools will not permit an unchecked volunteer to undertake regulated activity. An enhanced DBS check with children's barred list information will be obtained for volunteers undertaking regulated activity.

Where a volunteer will not undertake regulated activity, the school will complete and retain a written risk assessment when determining whether an enhanced DBS check without barred list information is required.

Volunteers must not begin working within EYFS provision until the school has received the volunteer's enhanced DBS certificate, including children's barred list information.

We will not allow a member of staff or volunteer to start work without the school having had sight of their DBS certificate or the school obtaining a separate barred list check (pending the DBS check being completed).

Across PACE a renewed DBS check will be requested:

- every five years for staff
- every four years for governors and directors
- every three years for volunteers, agency and third-party staff

Pre-Appointment Checks

Any offer of appointment made by our school to a successful candidate, including one who has lived or worked abroad, will be conditional and only confirmed on satisfactory completion of the necessary pre-employment checks. These checks are detailed within our Safer Recruitment Procedures and our Disclosure and Barring Policy.

Employment History and References
The school will always ask for written information about previous employment history and check that information is not contradictory or incomplete. References will be sought on all short-listed candidates, including internal ones, before interview, so that any issues of concern they raise can be explored further with the referee, and taken up with the candidate at interview.

If a candidate for a teaching post is not currently employed as a teacher, we will check with the school, or local authority at which they were most recently employed, to confirm details of their employment and their reasons for leaving.

The Department for Education has also issued guidance on the employment of overseas-trained teachers (https://www.gov.uk/government/publications/employing-overseas-trained-teachers-from-outside-the-eea).

Further information about Agency and third-party staff, students, volunteers and contractors can be found within our DBS Policy.

Governors and Trustees
Across PACE all Governors and Trustees are required to have an enhanced criminal records certificate from the DBS. Governance is not a regulated activity and so governors and directors do not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity.

Governing bodies should ensure that all governors and directors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated (by this we mean at least annually).

Visitors
We do not have the power to request DBS checks and barred list checks, or ask to see DBS certificates, for visitors (for example children's' relatives or other visitors attending a sports day). Leaders should use their professional judgment about the need to escort or supervise visitors.

Single Central Record (SCR)
Our schools must keep a single central record. The single central record must cover the following people:

- all staff (including central staff, supply staff, and teacher trainees on salaried routes).
- all members of the governing body, directors and members.

The information that must be recorded in respect of staff members is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- an identity check.
- a barred list check.
- an enhanced DBS check/certificate.
- a prohibition from teaching check.

- further checks on people living or working outside the UK.
- a check of professional qualifications.
- a check to establish the person's right to work in the United Kingdom
- a section 128 check for leaders, governors, directors and members.

Each of our schools has its own SCR, with access to the PACE SCR, which includes all our centrally employed staff, directors and members.

We do not have to keep copies of DBS certificates to fulfil our duty of maintaining the single central record. To help our schools comply with the requirements of the Data Protection Act, where we choose to retain a copy, they should not be retained for longer than six months, or without the individual's consent. A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications should be kept for the personnel file.

Allegations of Abuse - Staff, Supply Teachers, Trainee Teachers, Volunteers and Contractors

It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer across PACE, is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation. Whilst schools within PACE are not the employer of supply teachers, trainee teachers, volunteers and contractors, all our schools will ensure allegations are dealt with properly.

Where a concern or allegation relates to a trainee teacher or a person supplied by an agency or third-party organisation, the school shares safeguarding responsibilities with the training provider, agency or employing organisation. In these situations, we will take the lead in gathering information required by the LADO, involve the provider fully and agree arrangements for information sharing, support, investigation and any decision about suspension or redeployment.

There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

Further information about managing safeguarding concerns and allegations about staff, supply teachers, trainee teachers, volunteers and contractors is set out in Part Four of *Keeping Children Safe in Education 2026*.

Local Authority Designated Officer (LADO)

If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff (including supply staff, volunteers, and contractors), then:

- this should be referred to the headteacher
- where there is a concern/allegation about the headteacher, this should be referred to the chair of governors
- staff can also report their concerns directly to the local authority designated officer(s) LADO(s).

- See Appendix C for LADO contact details.

Supporting those involved

Across our PACE schools, we have a duty of care to our employees. We will provide effective support for

anyone facing an allegation and provide the employee with a named contact if they are suspended.

The welfare of a child is paramount, and this will be the prime concern in terms of investigating an allegation against a person in a position of trust. However, when an allegation or safeguarding concern is being investigated it is likely to be an incredibly stressful experience for the adult subject to the investigation, and potentially for their family members. It is important we offer appropriate welfare support at such a time and recognises the sensitivity of the situation. Information is confidential and should not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Concerns or allegations that do not meet the harm threshold
All low-level concerns are shared initially with the DSL or the headteacher. These should be recorded in writing and include the details of the concern, the context in which the concern arose, and the action taken. The name of the individual sharing their concerns should also be noted although if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. Records should be reviewed so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified.

Where a pattern of behaviour is identified, the school will decide on a course of action. This might be through the instigation of the trust's disciplinary procedures or, where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, they must inform our Chief Executive Officer and make a referral to the LADO.

The headteacher should be the ultimate decision maker in respect of all low-level concerns and if they are in any doubt, they must consult with our Chief Executive Officer and the LADO.

Low-level concerns, which are shared about supply staff and contractors, should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

Some rare allegations will be so serious they require immediate intervention by children's social care services and/or police.

Complaints

Complaints about staff that may require a child protection investigation will be managed under the procedures for allegations against staff. Other safeguarding-related complaints, including concerns about pupils, school systems, activities or premises, will be managed under the PACE complaints procedure while ensuring that any immediate safeguarding action is not delayed. Nothing in the complaints procedure prevents a person from making a direct referral to children's social care, the police or the LADO where appropriate.

Monitoring and Quality Assurance of Safeguarding

PACE Academy Trust has a Safeguarding and Child Protection Policy which is reviewed by PACE Designated Safeguarding Leaders on an annual basis and then personalised to ensure it reflects the safeguarding context of each individual school. The nominated governor for safeguarding in each of our schools must ensure that the school has personalised the policy to reflect the contextual safeguarding needs of the school. The nominated governor must also meet with the school's DSL at least twice-yearly to monitor safeguarding practice across the school.

Every PACE school completes an annual safeguarding audit to ensure compliance and identify actions to support best practice. This audit is provided to the Local Authority and the Chief Executive Officer for PACE, usually by the end of the autumn term for the purpose of providing assurance and identifying next steps. PACE schools manage their own Single Central Registers although these are saved centrally so that they are accessible to trust leaders. Trust leaders and governors regularly monitor SCRs to ensure compliance and best practice.

Safeguarding reports are compiled by each school and presented at least twice yearly to local governing boards. The CEO and Link Trustee for Safeguarding also review these reports. A twice-yearly report to the Directors provides an overview of the main themes, lessons learned, key issues and developments relating to safeguarding.

Policy Review

The Strategic Board is responsible for reviewing this policy on an annual basis once updates within KCSIE have been released in readiness for the new academic year. It is the responsibility local governing body to ensure that the policy is personalised further to reflect the individual context of the school and to ensure it is shared with all staff and uploaded onto the school's website.

Appendix A: Special Circumstances

Trips Away from Home
Children need to be kept safe when taking trips away from home. It is therefore important that rigorous safeguarding and child protection policies and procedures are in place, in addition to health and safety procedures, adequate insurance, etc. Please refer to our Educational Visits Policy for more information

External Lettings and Outside Clubs
Where an external individual or organisation provides activities on our premises, we will seek assurance that appropriate safeguarding and child protection policies and procedures are in place and may inspect these arrangements where necessary. The provider must liaise with the school on safeguarding matters where appropriate. Safeguarding requirements will be included as conditions of any lease, hire or transfer-of-control agreement, and a failure to comply may result in the agreement being terminated.

We expect all outside of school services to follow the guidance.
'After-school clubs, community activities, and tuition - safeguarding guidance for providers (publishing.service.gov.uk)'

This is non-statutory guidance for organisations or individuals who provide community activities, tuition or after-school clubs for children. These are also known as out-of-school settings (OOSS). This guidance helps providers run safe settings to ensure the welfare of the children attending them. It covers best practices on:

- safeguarding and child protection
- the suitability of staff and volunteers
- health and safety
- governance

Any allegation relating to an individual or organisation using school premises to provide activities for children will be managed under the school's safeguarding procedures and reported to the LADO where appropriate.

Use of the Internet and Photos
See our Online Safety and Acceptable Use Policies.

Appendix B: Contacts and Further Information for Social Care

PACE has schools across Merton and Croydon, but our schools also border Lambeth, Surrey and Sutton.

CONTACTS AND FURTHER INFORMATION
To make a referral or consult regarding concerns about a child:

Croydon Children's Services (MASH):

- Referral Portal: https://ehmportal.croydon.gov.uk/web/portal/pages/help/apply/cpassess#h1
- Urgent concerns that need an immediate same day response: 0208 255 2888 (Monday to Friday 9am to 5pm)
- Email: masheducation@croydon.gov.uk
- Telephone Line: 0208 255 2888

Emergency Duty Team (out of hours): 0208 726 6400
You will need to submit a written referral alongside this.

Surrey Children's Services (Children's Single Point of Access-C-SPA):

- Referral Form: Surrey Childrens Services Request for Support Form - Surrey Safeguarding Children Partnership (surreyscp.org.uk)
- Phone: 0300 470 9100
- Email: cspa@surreycc.gov.uk
- Consultation Line: 0300 470 9100 option 3 (Monday-Friday, 9am-5pm)
- Emergency Duty Team (out of hours): 01483 517898 or email: edt.ssd@surreycc.gov.uk

Sutton Children's Services (Children's First Contact Service- CFCS):

- Referral Form: London Borough of Sutton Children's First Contact Service (google.com)
- Phone: 020 8770 6001 (Monday-Friday, 9am-5pm)
- Email: cspa@surreycc.gov.uk
- Consultation Line: 0300 470 9100 option 3 (Monday-Friday, 9am-5pm)
- Emergency Duty Team (out of hours): 01483 517898 or email: edt.ssd@surreycc.gov.uk

Merton Children's Services (Children and Families Hub- C&F Hub):

- Referral Form: Children-and-Families-Hub-Request-for-Service-Form-Feb-2022.docx (live.com) and email to: candfhub@merton.gov.uk
- Phone: 020 8545 4226 or 020 8545 4227 (Monday-Friday, 9am-5pm)
- Email: cspa@surreycc.gov.uk
- Emergency Duty Team (out of hours): 020 8770 5000

For allegations about people who work with children
If in doubt – do not hesitate - consult.

Appendix C: LADO Contact Details

Croydon LADO
LADO Service Manager: Steve Hall
Email: steve.hall@croydon.gov.uk
Telephone: 0208 726 6000 ext. 24334
Mobile: 07825 830328

LADO: Jane Parr
Email: jane.parr@croydon.gov.uk
Telephone: 0208 726 6000 ext. 24817
Mobile: 07716092630

Merton LADO
LADO: John Shelley
Email: lado@merton.gov.uk
Telephone: 0208 5453187

LADO Business Support: Jodie Louis
Email: lado@merton.gov.uk.cjsm.net
Telephone: 0208 5453179

In any case where there is a concern that a child is, or may be, at risk of significant harm by a member of staff, supply teacher, trainee teacher, volunteer or contractor they must make a referral directly to the local authority's LADO.

If a child or other person is at immediate risk of harm, the first response should always be to call the police on 999.