Windsor Academy Trust

Windsor Olympus Academy

Policy: Child Protection and Safeguarding Policy	
Responsible Committee:	Education Performance and Standards Committee
Implementation date:	September 2026
Next review date:	July 2027

DOCUMENT CONTROL	
VERSION NUMBER:	V1.0
POLICY STATUS:	Statutory
POLICY TYPE:	Trustwide
REQUIRED TO PUBLISH:	Yes
POLICY LEAD:	Director of Education

VERSION CONTROL		
VERSION	**DATE**	**CHANGES**
V 1.1	July 2026	Section 5.2, Section 5.12.6, Section 5.21.1, & Section 5.24 - Terminology changed back to ‘nudes and semi-nudes

Table of amendments 2026

Update to include that safeguarding checks are carried out for visitors	2.2.2
Reference to trainee teachers	2.3.2
Reference to Family Help Misogyny reference	3.2
Update to LCC information	3.3
Annex B (formerly Annex C): The DSL role description has been moved to Annex B and expanded Responsibility for cover arrangements in the absence of the DSL	3.4
Mention of Safeguarding separation	4.4
Early Help expanded to include Family help and community-based early help	4.9
Title amendment to include, neglect and exploitation	5
The DfE has completely removed Annex A from the statutory framework	5.1.2
Amend text to mandate that 100% of staff must read Part One in full.	Section 3.2 & Section 9.2 & Section 9.3
Terminology changed back to ‘nudes and semi-nudes	Section 5.2 Section 5.12.6, Section 5.21.1, & Section 5.24
Update the title and header text across both sections to reference KCSIE 2026, removing Annex B.	Contents Page & Section 5.3 Header
Added reference to modern slavery, explaining that an organised network or gang, will have child victims who may identify as part of this group	5.3.5
CSE guidance explicitly highlights that victims must not be criminalised for actions taken under coercion.	5.3.7
Abuse can be committed by an individual or an organised network and most sexual abuse is committed by individuals known to the victim.	5.3.9
Add other activities involved in serious violence Insert explicit reporting mandate - Serious Violence Added - children as victims	5.4
Retitled “Child-on-child abuse” to “Child-on-child abuse (including harassment and violence)	5.12
Inserted misogyny and sexism as recognised forms of harmful sexual behaviour (HSB)	5.12.6
Added reference to misogyny and HSB Added reference to risk and needs assessment now explicitly required Added reference to safeguarding separation	5.13
Detail the statutory duty of police to notify schools of domestic abuse	5.19

incidents.	
Digital Safeguarding (also known as-online safety/E-safety) including the use of Artificial Intelligence (AI) Update in title and to reflect AI considerations	Contents page & 5.21
Academy must conduct a formal, documented annual effectiveness review of filtering and monitoring systems	5.23
Amended to state that mental health problems can, in some cases, develop into standalone safeguarding concerns. Added links to available mental health resources	5.28
Schools must not initiate social transition Parental involvement is the default position unless a documented safeguarding risk exists. Single-sex facilities (toilets and changing spaces from age 8) must be strictly protected based on biological sex with no exceptions	5.29.2 - 5.29.18
New Subsection - Mobile Phone Policy and wearable devices	Contents page & Section header 5.31, 5.31.1
Honour based abuse - update in title	5.6
Add in new section - Young carers	6.9.5
Clarifies that a child having a medical condition isn't in itself an indicator that a child is at greater safeguarding risk.	6.11
Title update to include trainee teachers	7
Clarified LADO threshold expectations Added trainee teachers to the list of personnel governed under Part Four procedures	8, 8.9
Updated terminology and risk markers	Section 6 & Section 4.9
New addition Teaching safeguarding and preventative education	9.11
Added reference to the Data (Use and Access) Act 2025	11

Contents

Key contacts	1
Introduction and Context	2
Our responsibilities	2.1
Our principles	2.2

Scope	2.3
Our Policy	2.4
Safeguarding Roles and Responsibilities	3
Responsibility of all staff, volunteers and governors	3.1
Responsibility of all academy staff	3.2
Responsibility of Governors and academy leadership	3.3
Responsibility of the Designated Safeguarding Lead	3.4
Safeguarding Processes and Procedures	4
How to report any concerns	4.1
Taking Action	4.2
Children's disclosure of abuse	4.3
Suspecting that a child is at risk of harm	4.4
Notifying parents	4.5
Referral to Children's Social Care	4.6
Private Fostering	4.7
Reporting directly to child protection agencies	4.8
Early help	4.9
Abuse, neglect and exploitation	5
Child abuse and types of abuse	5.1
Safeguarding Issues	5.2
Restrictive interventions and the use of reasonable force	5.30
Child Sexual Exploitation and Child Criminal Exploitation – CSE and CCE	5.3
Serious Violence	5.4
County Lines	5.5
Honour-Based Abuse(HBA)	5.6
Female Genital Mutilation	5.7
Forced Marriage	5.8
Breast Ironing/Flattening	5.9
Preventing Radicalisation	5.10

Channel	5.11
Child on Child Abuse	5.12
Child on child sexual violence and sexual harassment	5.13
Responding to reports of sexual violence and sexual harassment	5.14
Risk Assessment	5.15
Action following a report of sexual violence and/or sexual harassment	5.16
Ongoing response – safeguarding and supporting the victim	5.17
Academy procedures	5.18
Domestic Abuse and Children	5.19
Adolescent to Parent Violent Abuse	5.20
Digital Safeguarding (also known as-online safety/E-safety) including the use of Artificial Intelligence (AI)	5.21
Photography and images	5.22
Filtering and monitoring & the use of AI	5.23
Sharing of consensual and non-consensual self-generated intimate images and/or videos	5.24
Upskirting	5.25
Homelessness	5.26
Children with Special Educational Needs (SEN) and disabilities	5.27
Mental Health	5.28
Children who are lesbian, gay, bisexual, or gender questioning	5.29 - 5.29.18
Mobile Phone and Wearable devices	5.31 - 5.31.1
Attendance & Alternative provision	6
Children Missing Education (CME)	6.9
Young Carers	6.9.5
Elective Home Education (EHE)	6.10
Children with medical conditions who cannot attend school	6.11
Recruitment of staff, trainee teachers and volunteers	7
Dealing with allegations against staff and volunteers which meet the harms threshold	8
Concerns or allegations that do not meet the harm threshold/low level	8.9

concerns	
Training for all staff and children	9
Establishing a safe environment in which children can learn and develop	10
Anti-bullying	10.1
Confidentiality and sharing information	11
Storage and handling of records	11.4
Use of academy premises for non-academy activities	12
Management of the Policy	13
Feedback on this policy	13.4
Raising safeguarding concerns about a child	Appendix 1

1.Key contacts:

The Head Teacher	**Robert Sloan**	**rsloan@olympus.windsoracademytrust.org.uk**
The Designated Safeguarding Lead	**Sally-Jo Wilkinson**	**swilkinson@olympus.windsoracademytrust.org.uk**
The Deputy Designated Safeguarding Lead (s)	**Ladlee Bains**	**lbains@olympus.windsoracademytrust.org.uk**
The Designated Lead for Looked after Children is:	**Zoe Evans**	**zevans@olympus.windsoracademytrust.org.uk**
Board Safeguarding governor:	**Julie Houlder**	**jhoulder@windsoracademytrust.org.uk**
The Special Educational Needs Coordinator is	**Zoe Evans**	**zevans@olympus.windsoracademytrust.org.uk**
The WAT Education Director	**Helena Brothwell**	**hbrothwell@windsoracademytrust.org.uk**
The WAT Head of Student Services	**Emma Dodds**	**edodds@windsoracademytrust.org.uk**
WAT Head of Safeguarding	**Genna Griffiths**	**ggriffiths@windsoracademytrust.org.uk**

2.Introduction and Context

2.1. Our responsibilities

Windsor Academy Trust is committed to safeguarding children, and we expect everyone who works in our academy to share this commitment. This policy sets out how Windsor Olympus Academy will deliver these responsibilities.

2.1.1.This policy must be read in conjunction with the statutory guidance documents ‘Keeping children safe in education’ (September 2026), ‘Working together to safeguard children’ (2026), a guide to inter-agency working to safeguard and promote the welfare of Children.

2.1.2. Furthermore, we will follow the procedures set out by the

- Sandwell Metropolitan Borough Council (SMBC) (with Sandwell Children's Trust delivering services on their behalf),
- Sandwell Clinical Commissioning Group and West Midlands
- Police as the key statutory safeguarding partners

2.2. Our principles

2.2.1. We believe that our academy should provide a child-centred, caring, positive, safe and stimulating environment that promotes the emotional, social, physical and moral development of the individual child.

2.2.2. We recognise the importance of providing an environment within our academy that will help children feel safe and respected.

We will ensure that relevant and statutory safeguarding checks are carried out for visitors, including but not limited to:

- Educational psychologists, social workers
- Education visitors/guest speakers
- Contractors working on school site
- Children's family members, or others attending school events

2.2.3. We recognise the importance of enabling children to talk openly about anything that worries them and to feel confident that they will be listened to, kept safe and never be made to feel that they are creating a problem for reporting abuse, sexual violence or sexual harassment.

2.2.4. We recognise that children may not feel ready or know how to tell someone they are being abused, exploited or neglected and may not recognise their experiences as harmful.

2.2.5. We recognise that children with additional needs or vulnerabilities including disability and/or sexual orientation or language barriers may require additional support to enable them to tell someone they are being abused.

2.2.6. We ensure that children are taught about safeguarding, including online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum in line with the DfE's 'Teaching online safety in school (June 2019) and UKCIS 'Education for a connected world' June 2020.

2.2.7.We will work with parents to build an understanding of the academy's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situations.

2.2.8.Safeguarding arrangements in our academy are underpinned by two key principles:
▪ safeguarding is everyone's responsibility: all staff, governors and volunteers should play their full part in keeping children safe; and maintain and attitude of 'it could happen here' and
▪ a child-centred and coordinated approach: a clear understanding of the needs and views of Children.

2.3. Scope

2.3.1.In line with the law, this policy defines a child as anyone under the age of 18 years or any child on roll at this academy.

2.3.2.This policy applies to all members of staff in our academy, including all permanent, temporary and support staff, including trainee teachers, supply staff, governors, volunteers, contractors and external service or activity providers.

2.4. Our Policy

2.4.1.There are 6 main elements to our policy, which are described in the following sections:

- The types of abuse that are covered by the policy
- The signs of abuse that staff and volunteers should look out for
- Roles and responsibilities for safeguarding
- Expectations of staff and volunteers with regard to safeguarding, and the procedures and processes that should be followed, include the support provided to children.
- How the academy will ensure that all staff and volunteers are appropriately trained, and checked for their suitability to work within the academy
- How the policy will be managed and have its delivery overseen

2.4.2.Through implementation of this policy, we will ensure that our academy provides a safe environment for children to learn and develop.

2.4.3.The academy will ensure that we facilitate a whole school approach to safeguarding which means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

3.Safeguarding Roles and Responsibilities

3.1. All staff, volunteers and governors have responsibility for the following:

- to provide a safe environment in which children can learn
- identify children who may be in need of extra help or who are suffering, or are likely to suffer significant harm.
- to take appropriate action, working with other services as needed.
- to keep themselves updated with the systems within the academy which support safeguarding that were explained to them as part of their induction (including the staff Code of Conduct). This includes knowing the role, and working with, the academy's Designated Safeguarding Lead.
- to ensure they receive appropriate safeguarding and child protection training (including digital safeguarding/online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) which is regularly updated.
- In addition to working with the Designated Safeguarding Lead or deputy, staff members should be aware that they may be asked to support social workers to make decisions about individual children.

3.2. All academy staff are responsible for:

- knowing who the academy's Designated Safeguarding Lead (DSL) and deputy are
- raising any concerns with the Designated Safeguarding Lead and deputy immediately
- completing a written safeguarding concern when making a referral. Staff should be clear that this should be done immediately, always on the same day
- ensuring that their safeguarding and child protection training including digital safeguarding is up to date.
- being alert to the signs of abuse, including child on child abuse and their need to refer any concerns to the designated staff member.
- Recognise that dismissing abuse as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys' can lead to a culture of misogyny
- maintaining an attitude of 'it could happen here'. When concerned about the welfare of a child, staff members should always act in the interests of the child.
- knowing the academy's procedures for dealing with children who go missing from education, particularly on repeat occasions, and reporting any such concerns to the designated lead.
- listening to, and seeking out, the views, wishes and feelings of children.
- sharing information and working together to provide children with the help they need.
- referring to the Head Teacher any concerns about another member of staff immediately, or if the concerns are about the Head Teacher, refer them to the member of the Executive Team who is nominated to be responsible for liaising with the local authority and other partner agencies.
- raising concerns about poor or unsafe practice and potential failures in the academy's safeguarding regime through the academy's Whistleblowing Policy.
- being aware of your safeguarding partnerships Sandwell Metropolitan Borough Council (SMBC) (with Sandwell Children's Trust delivering services on their behalf), Sandwell Clinical Commissioning Group and West Midlands Police and ensuring these procedures are followed.
- to be able to identify children who may benefit from Family Help. Family Help means providing support as soon as a problem emerges at any point in a child's life, from foundation years through to the teenage years.
- knowing the academy's procedures for dealing with child-on-child abuse, including sexual harassment and sexual violence between children. Recognising that for some (but not all) forms of child-on-child abuse, it's more likely that girls will be victims and boys perpetrators.
- reading KCSIE 2026 part 1 in full.

3.3. Board of Directors/ Local Community Committees (LLC) and Academy leadership are responsible for:

3.3.1. Reading, understanding and applying KCSIE 2026.

- ensuring that there is an effective Child Protection and Safeguarding Policy in place together with a Staff Code of Conduct, which are provided to all staff.

- ensuring all staff are given a mandatory induction, which includes clear guidance on their safeguarding and child protection responsibilities, including online safety, and procedures to follow if anyone has any concerns about a child's safety or welfare.
- ensuring that policies and procedures adopted by the Board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- ensuring that the academy has an appropriate senior member of staff from the academy leadership team, with appropriate status and authority, funding, resources and support to take the lead in responsibility for safeguarding and child protection- the Designated Safeguarding Lead (including online safety and understanding the filtering and monitoring systems and processes in place); and that they receive DSL /level 3 training which is updated every two years.
- ensuring that they are aware of and follow local procedures related to safeguarding.
- ensuring that they are doing all they reasonably can to limit children's exposure to online harms from the academy's IT system, but that 'over-blocking' does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.
- ensuring that the academy has in place filtering and monitoring, the efficacy of which is regularly monitored and reported on, and which complies with current filtering and monitoring standards.
- ensuring that all staff and volunteers undergo safeguarding and child protection training (including online safety, which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring)
- ensuring governors receive appropriate safeguarding and child protection (including online safety which includes an understanding of filtering, monitoring systems and cyber security) training at induction which is updated regularly and at least annually to keep pace with KCSIE updates. This training should equip them with the knowledge to provide strategic challenges to test and assure themselves that the safeguarding policies and procedures in place in the academy are effective and support the delivery of a robust whole school approach to safeguarding and child protection.
- ensuring that they are aware of their obligations under the Human Rights Act 1998, The Equality Act 2010 including The Public Sector Equality Duty, and their local multi agency safeguarding arrangements (see KCSIE 2026 Part 2 The management of safeguarding)
- ensuring they have appropriate levels of security protection procedures in place in order to safeguard children, staff and systems which meet the standards in 'Cyber security standards for schools and colleges' guidance.
    - ensuring robust cover arrangements for the DSL role (for example, using a confidential shared mailbox or equivalent system) to ensure the continuity of safeguarding responsibilities

3.4. Designated Safeguarding Leads are responsible for:

- Taking lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).
- managing referrals from academy staff or any others from outside the academy
- working with external agencies and professionals on matters of safety and

safeguarding and in some cases acting as the lead practitioner.
● undertaking relevant training and attending update sessions
● liaising with the Head Teacher to inform them of issues – especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations This should include being aware of the requirement for children to have an Appropriate Adult (PACE code C 2019)
● raising awareness of safeguarding and child protection amongst the staff and parents; and ensuring that child protection information is transferred to the child's new school/academy.
● ensuring that the academy has a robust process in the event of allegations of abuse made against the Head Teacher.
● ensuring all staff receive the appropriate training, and keep it up to date, in line with advice from Sandwell Metropolitan Borough Council (SMBC) (with Sandwell Children's Trust delivering services on their behalf), Sandwell Clinical Commissioning Group and West MidlandsPolice
● notifying the Children's Social Care department if there are concerns over unexplainable and/or persistent absences from education of a child.
● informing the local authority when a private fostering arrangement is in place.
● managing security within the academy and reviewing it annually
● ensuring that important policies, such as those for behaviour and anti-bullying, are kept up to date.
● keeping all child protection records up to date on CPOMS; including a clear summary of the concern, decisions reached and the rationale behind the decision, details of how the concern was resolved/outcomes.
● having an overview of the numbers of safeguarding and child protection referrals made, and providing an anonymised report to the Head Teacher.
● having in place effective ways to identify emerging problems and potential unmet needs for individual children and families.
● ensuring that there is a planned programme of evidence based, inclusive, age and stage appropriate, RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.
● ensuring through the safeguarding curriculum that children know the process of raising a concern (about themselves or a friend/other), that they know the academy's Designated Safeguarding Lead (and deputy), and are aware of other support mechanisms such as ChildLine etc.
● ensuring at least one person on any appointment panel has undertaken safer recruitment training which is renewed every two years.
● ensuring the adherence to statutory responsibilities to check staff working with children, taking proportionate decisions on whether to ask for checks beyond what is required; and ensuring volunteers are appropriately supervised.
● ensuring procedures are in place to handle allegations against members of staff and Volunteers.
● ensuring there are procedures in place to handle allegations against other children
● ensuring that there is support available for staff involved in difficult child protection cases/incidents both at the academy and externally through counselling and/or other services.
● creating a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and in the academy's development
● taking lead responsibility for promoting the educational outcomes for children who have or have had a social worker.
● making this policy available to parents and carers as appropriate

- ensuring that our staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role.
    - ensuring robust cover arrangements for the DSL role (for example, using a confidential shared mailbox or equivalent system) to ensure the continuity of safeguarding responsibilities
- ensuring all staff have regular reviews of their own practice to ensure they improve over time.
- ensuring any paper records are secure and kept separately from the child's main file in a locked location.
- fulfilling their duties in line with KCSIE 2026 Annex B.

4.Safeguarding Processes and Procedures

The academy will deliver its responsibilities for identifying and acting on early help needs, safeguarding and child protection in line with the policies and procedures identified in the Sandwell metropolitan Borough Council s safeguarding partners policies and procedure guidance, available at: https://www.sandwellcsp.org.uk/key-safeguarding-issues/policies-procedures/

4.1. How to report any concerns

4.1.1.Clear procedures on the reporting of any concerns are given to all staff, trainee teachers and volunteers in the academy. This is done as part of the staff induction training and staff are given a reminder of this annually in refresher training. These procedures can be found in staff room.

4.1.2. All concerns should be reported in writing, using the academy's safeguarding concern process (whether online or paper based). Concerns should always be completed as soon as possible, on the same day. Staff should never wait until the next day to complete a safeguarding concern report. Concerns about a member of staff should be reported immediately.

4.1.3. All child protection and/or safeguarding concerns should be reported to Sally-Jo Wilkinson (Designated Safeguarding Lead). See Appendix 1 for a flow diagram which explains how all disclosures are dealt with at the academy.

4.1.4.The academy takes its responsibility to safeguard children seriously. Failure to follow these reporting procedures may result in disciplinary action.

4.2. Taking Action

4.2.1.If at any time it is considered that a child has suffered significant harm or is likely to do so, a referral should be made to Sandwell Emergency Duty Team 01215693100, or call 999 if you are concerned a child needs immediate protection.

4.2.2.If the child has an injury that requires medical attention, the child protection process will not delay the administration of first aid or emergency medical assistance.

4.2.3.The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to

Safeguard Children. NPCC- ‘When to call the police’ should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

4.3. Children’s disclosure of abuse

4.3.1. At Windsor Olympus Academy we have a clear procedure for reporting concerns. If a child talks to a member of staff about any risks to their safety or wellbeing, the staff member will let the child know that the staff member must pass the information on to the safeguarding team (DSL) in order to offer the proper support that the child
requires. Staff members will allow them to speak freely and will not ask investigative questions.

4.3.2.Staff will be aware that children may not feel ready or know how to tell someone they are being abused, exploited or neglected, and /or they may not recognise their experiences as harmful. Staff will be aware this could be due to their vulnerability, disability and or sexual orientation or language barriers.

4.3.3.The staff member will tell the child what will happen next. It is the duty of the member of staff to inform the Designated Safeguarding Lead of what has been discussed. The staff member will write up details of their conversation with the child as soon as possible and certainly on the same day, on CPOMS. If CPOMs is temporarily unavailable the academy ‘back up’ paper procedures should be followed

4.3.4. Information will be shared on a need-to-know basis only. Issues or concerns will not be discussed with colleagues, friends or family unless necessary for the welfare of the child.

4.4. Suspecting that a child is at risk of harm

4.4.1.There will be occasions when staff may suspect that a child may be at risk but have no ‘real’ evidence. In these circumstances, staff will try to give the child the opportunity to talk. All staff should be aware that children can abuse other children (child on child abuse) and that it can happen both inside and outside of school and online.

Safeguarding separation may be used to support a child at risk. Please refer to the WAT Attendance policy for details.

4.4.2.Staff should use CPOMS to record these early concerns. Following an initial conversation with the child, if the member of staff remains concerned, they should discuss their concerns with the Designated Safeguarding Lead Sally-Jo Wilkinson.

4.4.3.Staff will be aware of the harm caused by child-on-child abuse including sexual violence or harassment and recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

4.4.4. Staff will use the academy’s Anti-Bullying Policy where necessary.
However, there will be occasions when a child’s behaviour warrants a response under child protection rather than anti-bullying procedures.

4.4.5.The academy acknowledges that some children can be particularly vulnerable or may have an increased risk of abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare. To ensure that all of our children receive equal protection, we will give special consideration to children that are considered to be Vulnerable.

4.5. Notifying parents

4.5.1.The academy will normally seek to discuss any concerns about a child with their parents. The Designated Safeguarding Lead Sally-Jo Wilkinson, or a member of the safeguarding team, will make contact with the parent in the event of a concern, suspicion or disclosure.

4.5.2.However, if the academy believes that notifying parents could increase the risk to the child, exacerbate the problem or compromise the safety of a staff member, advice will first be sought from Children's Social Care.

4.6. Referral to Children's Social Care

4.6.1.The Designated Safeguarding Lead or deputy Ladlee Bains will make a referral to Children's Social Care if it is believed that a child is suffering or is at risk of suffering significant harm.

4.6.2.Contacts at Sandwell Local Authority
are:sandwell_lado@sandwellchildrenstrust.org

4.6.3.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.

4.7. Private Fostering

4.7.1.A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent, person with parental responsibility or close relative, in their own home, with the intention that it should last for 28 days or more.

4.7.2. Comprehensive guidance on private fostering can be found here in the DfEs publication 'Children's Act 1989 Guidance on Private Fostering'.

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

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

4.7.5.We have a mandatory duty to notify the local authority if we are involved directly or indirectly in arranging for a child to be fostered privately. Notifications must contain the information specified in Schedule 1 of The Children (private Arrangements for Fostering Regulations 2005 and must be made in writing

4.7.6.Academy staff should notify the designated safeguarding lead or deputy when they become aware of private fostering arrangements.

4.7.7.On admission to the academy, we will take steps to verify the relationship of the adults to the child who is being registered.

4.8. Reporting directly to child protection agencies

4.8.1.Staff will follow the reporting procedures outlined in this policy. However, they may also share information directly with Children's Social Care, police, or the NSPCC if:

● The situation is an emergency and the Designated Safeguarding Lead Sally-Jo Wilkinson their deputy Ladlee Bains and the Headteacher are all unavailable

● They are convinced that a direct report is the only way to ensure the child's safety.

4.9. Early help, including community-based early help

4.9.1.At Windsor Olympus Academy, we also liaise with a wide variety of outside agencies, many of which are able to see children weekly. Examples of the wider agencies we liaise with include; multi-agency team/s, careers services, academy nurse, Child and Adolescent Mental Health Services (CAMHs), Educational Welfare Officer/s (EWO's), our local Police Community Support Officers (PCSO's), the Police and other services. We encourage families, children, and parents to work with these partner agencies also. The provision of early help services should form part of a continuum of help and support to respond to the different levels of need of individual children and families.

Any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help.

4.9.2.Staff and volunteers working within the academy should be alert to the potential need for early help for children. Staff and volunteers should be alert to children with additional vulnerabilities who may benefit from Early Help:

• is disabled or has certain health conditions and has specific additional needs

• 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 education, home or care

• 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 exploitation, modern slavery, trafficking, including criminal or sexual exploitation

• is at risk of being radicalised into terrorism

• 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, domestic abuse and parental pregnancy.

• is misusing alcohol and other drugs themselves

• is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and

• is a privately fostered child.

5. Abuse, neglect and exploitation

5.1 Child abuse and types of abuse

5.1.1.Abuse is 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. They may be abused by an adult or adults, or another child or children.

5.1.2.Further information and resources can be found in annexes of KCSIE 2026 of this policy.

5.1.3. All staff are advised to maintain an attitude of ‘it could happen here’ where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

5.1.4.All staff will receive ongoing training regarding types of abuse including local and national context. If staff have a concern, they should follow their own organisation’s child protection policy and speak to the designated safeguarding lead (or a deputy).

Options will then include:

- managing any support for the child internally via the school or college's own pastoral support processes
- undertaking a family help 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.

5.1.5.The DSL and/or deputy will respond to all concerns, following local authority procedures and where there is an immediate risk of serious harm to a child will inform the police.

5.1.6.There are four types of child abuse as defined in 'Keeping Children Safe in Education'

- physical abuse
- emotional abuse
- sexual abuse
- neglect

Staff should be aware that emotional abuse can include 'verbal abuse'.

5.1.11. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different 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

5.2 Safeguarding Issues

5.2.1 All staff must have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes can be signs that children are at risk.

5.30 Restrictive interventions and the use of reasonable force.

5.30.1 Windsor Academy Trust (WAT) is committed to proactively minimising the need for restrictive interventions through early support, prevention, and de-escalation strategies. We believe the use of restrictive interventions, including reasonable force and seclusion, should always be a last resort, used only when lawful and necessary to keep individuals and the wider school community safe. All interventions must be exercised in a manner that is necessary, proportionate, and involves the least amount of force for the shortest possible time. Consideration should be made to the latest reasonable force policy.

5.30.2 All members of school staff have a legal power to use reasonable force (Section 93, Education and Inspections Act 2006). This power may be used to prevent or stop a student

from:

• Causing injury to themselves or others.

• Committing a criminal offence.

• Damaging property.

• Causing disorder among students.

5.30.3 Staff must be aware that the inappropriate or excessive use of force can constitute

Physical Abuse.

• Punishment: It is strictly illegal to use force for the purpose of punishment.

• Life-Threatening Techniques: Techniques that affect a student's airway, breathing, or circulation, such as pressure to the neck, abdomen, or covering the mouth/nose are strictly prohibited.

• Ground Restraint: Use of force on the ground is dangerous; if a student is unintentionally held on the ground, staff must release or re-position them as quickly as possible.

• Seclusion: This is a non-disciplinary intervention involving confining a student alone and preventing them from leaving. It must not be used as a punishment and requires specific recording and reporting.

Listed below specific types of intervention as identified by the DfE:

• Restrictive intervention: a means to prevent, restrict, or subdue movement of the body, or part of the body, of a pupil. This guidance uses ‘restrictive interventions’ as the umbrella term to describe both physical and non-physical actions aimed to restrain pupils in different ways.

• Reasonable force: a term used in legislation which includes physical restrictive interventions. All members of school staff have the legal power to use reasonable force in limited circumstances. Reasonable means using no more force than is necessary for the least amount of time, the application of which will depend on the circumstances.

• Significant incident: any incident where the use of force goes beyond appropriate physical contact between pupils and staff as described in ‘Other physical contact with pupils’ within this document. This includes when physical force is used to implement a non-physical restrictive intervention.

• Seclusion: a non-disciplinary intervention involving keeping a pupil confined to a place away from others, and preventing them from leaving either by physical obstruction, blocking, or making them believe they will be punished if they try to leave.

• Restraint: a term used in legislation referring to a non-disciplinary intervention

which immobilises a pupil or limits their movement. This may or may not include direct physical contact. For example, holding a pupil's arms to their sides or removing a pupil's crutches would both be considered forms of restraint.

5.30.4 A significant incident is defined as any use of force that goes beyond appropriate physical contact (such as first aid or guiding a student). This ensures transparency and allows the Trust to monitor patterns, identify unmet needs, and support staff welfare.

5.30.5 Reporting to Parents (Statutory Guidance) Schools have a statutory duty to report each significant incident involving the use of force to the student's parents in writing. This must be done as soon as practicable, ideally on the same day, unless doing so would place the student at risk of significant harm.

5.30.6 Staff likely to need to use restrictive interventions will receive adequate training in safe, lawful use and preventative strategies. Following any incident, students and staff should receive support and, where appropriate, a medical assessment for any injuries.

5.30.7 This section must be read in conjunction with the school Behaviour Policy, Searching,

Screening and Confiscation Guidance, and the Equality Act 2010 regarding students with SEND

5.3 Child Sexual Exploitation and Child Criminal Exploitation – CSE and CCE

5.3.1 Both CSE and CCE are forms of abuse that 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 in 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. CSE and CCE can affect children both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

5.3.2 Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines (see below), 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.

5.3.3 Children can become trapped by this type of exploitation as perpetrators can threaten victims and their families. Staff must recognise that children involved in CCE are vulnerable and are victims themselves and that they may still have been criminally exploited even if the activity appears to have been something they have agreed or consented to

5.3.4 Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength,status, and access to economic or other resources.

5.3.5 The abuse can be perpetrated by individuals or groups, males or females, and children or adults. It can take place as a one off or over a period of time and may occur online. Abuse can be committed or facilitated by an organised network or

gang, and victims may identify as part of this group. This may constitute modern slavery. Staff must treat this as a safeguarding concern and refer to the DSL.

5.3.6 It is important that staff recognise that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however, staff should be aware that girls are at risk of criminal exploitation too.

5.3.7 Staff must also be aware that both boys and girls being criminally exploited may be at higher risk of sexual exploitation. It is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

5.3.8 Staff should be aware that CSE 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 have sex. Some children believe they are in a genuine romantic relationship.

5.3.9 As a result, many children who are victims of sexual exploitation do not recognise themselves as such which can be an additional barrier to disclosure. Abuse can be committed by an individual or an organised network and most sexual abuse is committed by individuals known to the victim.

5.3.10 Staff will receive training and updates on CSE and CCE to ensure awareness of and mitigate these additional difficulties to ensure children receive appropriate intervention and support at the earliest opportunity.

5.3.11 CSE is a form of child sexual abuse and can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media.

5.3.12 The local response and support for CSE and CCE can be found at: Family Information Service Hub | Child sexual exploitation and abuse

5.4 Serious Violence

5.4.1 All staff should be aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, as significant decline in performance, signs of self-harm or significant changes in wellbeing, or unexplained injuries.

Other activities that may be included in serious violence are:

- Physical assault
- Carrying, threatening with, or using weapons
- The fact that it could occur in the context of peer conflict, bullying, or criminal exploitation

5.4.2 Schools should also try to be alert to when children might be at highest risk around the school day (for example immediately after school).

5.4.3 All staff should be aware of the range of risk factors which increases the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced maltreatment and having been involved in offending such as theft or robbery.

Early, evidence-based support for those considered at risk, as well as in 'teachable moments' when issues emerge is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support.

5.4.4 Staff will receive training and updates on serious violence and have access to information and resources to support development of their knowledge, skills and understanding. Staff play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in violence (who may also be victims themselves).

5.4.5 Staff must immediately report any concerns regarding a child carrying, using, or expressing an intent to use a weapon to the DSL or a deputy. The DSL must conduct a rapid risk assessment and implement immediate actions to de-escalate peer conflict. Where there is a risk of imminent harm an immediate referral to the police should be made.

Further information on indicators, risk factors, and protective actions relating to serious violence is provided in Annex A.

5.5 County Lines

5.5.1 County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or "deal lines". It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as 'cuckooing'. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations. County line activity and the associated violence, drug dealing, and exploitation has a devastating impact on children, vulnerable adults and local communities.

5.5.2 Signs to look out for:

- Persistently going missing from school or home and / or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones

- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

5.5.3 Where staff have a concern around county lines, they should inform the DSL immediately who will follow the local authority safeguarding procedures. Where there

is a risk of imminent harm, an immediate referral to the police should be made.

5.5.4
https://sandwellfch.trixonline.co.uk/chapter/child-criminal-exploitation-and-county-lines

5.6 Honour or Faith Based Abuse (HBA)

5.6.1 Honour or Faith based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast Ironing.

5.6.2 Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead (or deputy). Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

5.6.3 Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency. Where FGM has taken place please refer to section 5.7 of this policy. (see below)

5.7 Female Genital Mutilation

5.7.1 Female Genital Mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

5.7.2 All staff should speak to the DSL or deputy with regard to any concerns about FGM

5.7.3 Teachers should be aware that there is a mandatory legal duty upon them that, if in the course of their work, they discover that an act of FGM appears to have been carried out on a girl under 18 years, they must report this to the police

5.7.4 Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out and discuss any such cases with the Designated Safeguarding Lead and children’s social care. The duty does not apply in relation to at risk or suspected cases though staff will always refer to the DSL to take the next appropriate steps

5.8 Forced Marriage

5.8.1 A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to marriage and pressure or abuse is used. A marriage must be entered into with the free and full consent of both parties, there must be a choice.

5.8.2 Forced marriage is recognised as a form of violence against women and

men, domestic/child abuse and a serious abuse of human rights.

5.8.3 An arranged marriage is not the same as a forced marriage. In an arranged marriage, the families take a leading role in choosing the marriage partner, but both parties are free to choose whether to enter into the marriage or not.

5.8.4 Where staff or volunteers have any reason to suspect that someone is experiencing pressure or being forced into marriage, they must report this to the DSL through the academy process.

5.8.5 For more information on forced marriage see Annex A in KCSIE

5.9 Breast Ironing/Flattening

5.9.1 Breast ironing or flattening is the process during which pubescent girls' breasts are ironed, massaged, flattened and/or pounded down over a period of time (sometimes years) in order for the breasts to disappear or delay the development of the breasts entirely.

5.9.2 Staff or volunteers worried about the risk of breast ironing in the academy should refer through the appropriate channels to the Designated Safeguarding Lead as soon as possible who will make a referral to children's services. If staff or volunteers are concerned that the girl is in immediate danger, contact the police by calling 999.

5.9.3 The DSL will need to contact the Foreign and Commonwealth Office if the girl has been taken abroad:

5.9.4 For more information on breast ironing/ flattening see KCSIE, Annex A.

5.10 Preventing Radicalisation

5.10.1 The Counter-Terrorism and Security Act, 2015, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism "the Prevent duty".

5.10.2 Where staff are concerned that children are developing extremist views or show signs of becoming radicalised they should discuss this with the Designated Safeguarding Lead and be recorded on CPOMS.

5.10.3 The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

5.11 Channel

5.11.1 We understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

5.11.2 We use the curriculum to ensure that children understand how people with

extreme views share these with others to radicalise others, especially using the internet.

5.11.3 We are committed to ensuring that our children are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the academy's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

5.12 Child on Child Abuse (including harassment and violence)

5.12.1 All staff should be aware that children can abuse other children at any age and that it can happen both inside and outside of school and online. Staff should be aware that child-on-child abuse is a safeguarding issue for both victims and alleged perpetrators

5.12.2 All staff must know the indicators and signs of child-on-child abuse, know how to identify it and respond to reports of it. This includes sexual violence and sexual Harassment, physical assault and harm, or the threat of harm with a weapon and harmful sexual behaviour, including misogyny.

5.12.3 All staff must be aware that even if there are no reports it does not mean child on child abuse is not happening. It may be the case that it is just not being reported.

5.12.4 Staff must be vigilant and if they have any concerns they should speak to the DSL or deputy.

5.12.5 We will minimise the risk of all types of child-on-child abuse by All staff are aware that children can abuse other children and that it can happen both inside and outside of school, and online. This is most likely to include, but not limited to: ● bullying (including cyberbullying, prejudice-based and discriminatory bullying) ● abuse in intimate personal relationships between peers ● 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) ● 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 ● causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party ● consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery); Please see UKCIS guidance 'Sharing nudes and semi-nudes advice for education settings' ● 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 cause the victim humiliation, distress or alarm and ● 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). Staff are clear as to the school policy and procedures with regards to child on child abuse as defined in the anti-bullying, school behaviour policy and broader child protection procedures. Staff understand that even if there are no reports it does not mean it is not happening. As such it is vital that if staff have any concerns regarding child on child abuse they should

speak to their DSL (or Deputy DSL). Child on Child abuse will not be tolerated by WAT or minimised in any way and is always taken seriously. Staff understand the importance of challenging inappropriate behaviours between peers that are actually abusive in nature. All allegations of child on child abuse will be recorded as per school system, investigated and dealt with accordingly. Victims, perpetrators and other children affected by child on child abuse will be supported through school and multi-agency support mechanisms. We make it clear to children how and where they can confidently report abuse, knowing that it will always be taken seriously. Signs that a child may be suffering from child on child abuse can also overlap with those indicating other types of abuse and can include: Child Protection and Safeguarding Policy WAT July 2023 21 ● Failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected ● Physical injuries ● Experiencing difficulties with mental health and/or emotional wellbeing ● Becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much ● Broader changes in behaviour including alcohol or substance misuse ● Changes in appearance and/or starting to act in a way that is not appropriate for the child's age ● Abusive behaviour towards others. Abuse affects children very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse

5.12.6 All staff must challenge inappropriate behaviours between children including, but not limited to:

- Bullying (including cyberbullying, prejudiced based and discriminatory bullying, inappropriate touching).
- Abuse in intimate personal relationships between peers.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates threats and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault which may also include an online element.
- Sexual harassment such as sexual comments, remarks, jokes and online harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- consensual and non-consensual sharing of Nudes and Semi-Nudes.
    - Sexism, such as, prejudice, stereotyping, or discrimination based on a person's sex or gender
    - Misogyny, such as the hatred of, contempt for, or prejudice against women or girls. It can also include an aversion to women, bias against women or a belief that men are better than women.
- Up skirting – 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.

5.12.7 All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

5.13 Child on child sexual violence and sexual harassment

5.13.1 This section of the policy must be read in conjunction with KCSIE.

5.13.2 Sexual violence and sexual harassment can happen anywhere, Staff should be aware that it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely that it will be perpetrated by boys.

5.13.3 All staff should be aware of and respond appropriately to all reports and concerns. Staff are aware that all instances of harmful sexual behaviour should be responded to with the same safeguarding principles, and considered within a child protection context. A risk and needs assessment is explicitly required, including the consideration of using Safeguarding separation as a tool to support safety.

5.13.4 The academy has a zero-tolerance approach to sexual violence and sexual assault, including Harmful Sexual Behaviours (HSB). It is never acceptable, will not be tolerated and will never be passed off as ‘banter’ ‘just having a laugh’ or ‘part of growing up''. Staff will recognise the escalatory nature of misogyny and the benefits of early identification.

5.13.5 We recognise that Harmful Sexual Behaviours (HSB) exists on a continuum, and may escalate into sexual violence and sexual harassment. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

5.13.6 We also recognise that sexual violence and sexual harassment can occur online and face to face (both physically and verbally) and is never acceptable. All staff and volunteers will maintain an attitude of ‘it could happen here’.

5.13.7 We will ensure that all children are taught, in an age-appropriate way, about sex and relationships and understand that the law is in place to protect children rather than criminalise them.

5.13.8 We recognise that some children will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the academy’s Behaviour Policy.

5.14 Responding to reports of sexual violence and sexual harassment.

5.14.1 Allegations may be made against children by other children in the academy, which are of a safeguarding nature.

5.14.2 Safeguarding issues raised in this way may include sexual violence, sexual harassment, sexual exploitation, physical abuse, emotional abuse.

5.14.3 We will support and reassure the victims that they are being taken seriously and that they will be supported and kept safe. We will ensure that victims are never given the impression that they are creating a problem or made to feel ashamed by reporting sexual violence or sexual harassment.

5.14.4 We will ensure that we are aware of intra-familial harms and support

is provided for siblings following incidents.

5.14.5 Abuse that occurs online or outside of the academy will not be downplayed and will be treated equally seriously.

5.14.6 All staff will be trained in how to manage a report.

5.14.7 The academy recognises that certain children may face additional barriers to disclosure because of their vulnerability, disability, sex, ethnicity and/or sexual orientation and that procedures will ensure that all children are able to report easily.

5.15 Risk Assessment

5.15.1 Where there has been a report of sexual violence the DSL or deputy will make an immediate written risk and needs assessment which will be kept under review and will work to engage with children's social care and specialist services as required.

5.15.2 Action will be taken immediately to protect the victim, alleged perpetrator(s) and other children in the academy. The academy will not wait for the outcome or even the start of any police investigation before taking action to protect the children involved.

5.15.3 Any relevant action under the academy behaviour policy will be considered.

5.15.4 Where there has been a report of sexual harassment the need for a risk assessment will be considered on a case-by-case basis.

5.15.5 The risk and needs assessment will consider:-

- The victim, especially their protection and support.
- Whether there may have been other victims.
- The alleged perpetrator(s).
- All the other children (and, if appropriate adults and staff) at the academy, especially any actions that are appropriate to protect them from the alleged perpetrator(s) or from future Harms.

5.16 Action following a report of sexual violence and/or sexual harassment.

5.16.1 When a report has been received the DSL or deputy will consider the following:

- The wishes of the victim.
- The nature of the alleged incident (s) including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed.
- The ages of the children involved.
- The developmental stages of the children involved.
- Any power imbalance between the children.
- If the alleged incident is a one off or a sustained pattern of abuse.
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers.
- If there are any ongoing risks to the victim, other children, or staff.
- Intra familial harms.
- Support for siblings.

- Other related issues and the wider context including links to CSE and CCE.

5.16.2 Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator(s) and any other children involved or impacted.

5.16.3 The DSL will consider 4 options when managing a report.

- Manage the report internally.
- Provide support through the local Early Help process.
- Make a referral to Children's Social Care
- Report to the police

5.16.4 All concerns, discussions, decisions and reasons for decisions, including rationale for not escalating will be recorded on CPOMS.

5.16.5 The academy will ensure that if a child is convicted or receives a caution for a sexual offence the risk assessment will be updated to ensure relevant protections are in place and needs are being met.

5.16.6 If a report is assessed as being unsubstantiated, unfounded, false or malicious the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been by someone else and that this is a cry for help. In such circumstances the DSL may make a referral to children's social care. An Early Help process may be initiated.

5.16.7 If a report is deliberately invented or malicious, the academy will consider what disciplinary action is appropriate as outlined in the behaviour policy.

5.17 Ongoing response – safeguarding and supporting the victim

5.17.1 The following principles will help shape and decisions regarding safeguarding and supporting the victim:

- The needs and wishes of the victim will be paramount.
- Consideration of the age and development stage of the victim, nature of the allegations and the potential risk of further abuse.
- The victim will never be made to feel they are the problem or made to feel ashamed.
- Proportionality of response. Support will be tailored on a case-by-case basis.
- A holistic approach with an awareness of health needs associated with sexual assault including physical, mental and sexual health problems and unwanted pregnancy.

5.18 Academy procedures

Windsor Olympus Academy will ensure that all staff follow the procedures set out by the Sandwell's Safeguarding Children Board and take account of guidance issued by the Department for Education (DfE) to:

Ensure we have a Designated Safeguarding Leads for child protection, who has received appropriate training and support for this role. The formal training will be updated every 2 years. The DSL will be updated on a regular basis (at least annually) to keep up with current safeguarding developments and priorities.

The Designated Safeguarding Leads for Windsor Olympus Academy are:

1. Mrs Sally-Jo Wilkinson
2. Miss Ladlee Bains
3. Mrs Lauren Smith
4. Rosie Clarke
5. Clark Gould
6. Sal Nasir

5.19 Domestic Abuse and Children

5.19.1 This form of abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional. 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.

The statutory duty of police to notify schools of domestic abuse incidents, through 'Operation Encompass' ensures schools will receive and securely record concerns, alongside specific police incident logs, ensuring absolute compliance with data protection laws.

5.19.2 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).

5.19.3 Exposure to domestic abuse and/or violence 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.

5.19.4 We encourage children to come forward by raising awareness of the issue and teaching the children about health relationships through SRE, the wider curriculum and modelling behaviour in the academy.

5.20 Adolescent to Parent Violent Abuse

5.20.1 APVA is a hidden form of domestic violence and abuse that is often not spoken about. By raising awareness around this issue, we can provide better protection to victims and apply an appropriate safeguarding approach.

5.20.2 What to look out for when a child is witnessing domestic abuse:

- The emotional responses of children who witness domestic violence may include fear, guilt, shame, sleep disturbances, sadness, depression, and anger (at both the abuser for the abuse and at the victim for being unable to prevent the abuse).
- Physical responses may include stomach aches and/or headaches, bedwetting, and loss of ability to concentrate. Some children may also experience physical or
  sexual abuse or neglect. Others may be injured while trying to intervene on behalf of the victim or a sibling.
- The behavioural responses of children who witness domestic abuse may include acting out, withdrawal, or anxiousness to please. The children may exhibit signs of anxiety and have a short attention span which may result in poor academic performance and attendance. They may experience developmental delays in

speech, motor or cognitive skills. They may also use violence to express themselves, displaying increased aggression with peers or family. They can become self-injuring.

- If a child discloses that they have witnessed domestic abuse, or an adult linked to a child in the academy discloses that they are being abused, follow the academy safeguarding procedures and report your concern to the Designated Safeguarding Lead.

5.21 Digital Safeguarding (also known as-online safety/E-safety) including the use of Artificial Intelligence (AI)

5.21.1 It is essential that children are safeguarded from potentially harmful and inappropriate online material. The breadth of issues classified within digital safeguarding is considerable but can be categorised into four areas of risk. These are content, contact, conduct, commerce.

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 (e.g. consensual and non-consensual sharing of nudes and semi-nudes, sharing other explicit images and online bullying, and

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

5.21.2 We will ensure digital safeguarding is a running and interrelated theme when devising and implementing policies and procedures. This will include considering how digital safeguarding is reflected, as required, in all relevant policies. In addition, we will consider digital safeguarding whilst planning the curriculum, staff training, the role of the DSL and parental engagement.

Staff will be aware that Intimate images can be generated using AI, e.g. through deepfakes. Understanding that, generative AI applications can simulate harmful online interaction for young people and that this is a safeguarding concern.

5.21.3 Whilst the DSL has lead responsibility for digital safeguarding, we will ensure there is support, if required, for operational digital safeguarding and the appropriate technical and safeguarding knowledge, skills and understanding to be able to quality assure systems, policies and processes, train staff and contribute to the safeguarding curriculum is available.

5.21.4 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) can be found at Generative artificial intelligence in education..

To complement this, the department, in partnership with the Chiltern Learning Trust and Chartered College of Teaching, have published online resources to help school and college staff to use AI safely and effectively. Module 3 provides important information on identifying and mitigating key risks associated with safeguarding, ethics, data protection, and intellectual property.

5.21.5 We are thoroughly committed to improving children's online safety awareness at Windsor Olympus Academy. Our Technology Acceptable Use policy is signed by all children and staff annually.

5.21.6 If a child, parent/carer or member of staff has a concern relating to online safety children are encouraged to report it. They can report it directly to Mrs Wilkinson or Miss Bains at the academy.

5.21.7 Through our regular communication with parents, we will reinforce the importance of children being safe online, explain what systems we use to filter and monitor online use, explain what children are being asked to do online including sites they will be asked to access and who from the academy (if anyone) their child is going to be interacting with online.

5.22 Photography and images

5.22.1 The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

5.22.2 To protect children, we will:

- Seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications).
- Seek parental consent.
- Use only the child's first name with an image.
- Ensure children are appropriately dressed.
- Encourage children to tell us if they are worried about any photographs that are taken of them.
- Remove photographs where requested.
- Only use school equipment when taking photographs of children.
- Comply with GDPR.

5.22.3 Parents, carers or relatives may only take still or video photographic images of children in the academy or on academy-organised activities with the prior consent of the academy and then only in designated areas. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected.
https://drive.google.com/file/d/14ZQoTtGDwRI32BC7BhKts12vFbpIXEFt/view?usp=sharing

5.23 Filtering and monitoring & Use of AI

5.23.1 The academy will limit children's exposure to risks from the academy's IT system.

5.23.2 The academy has in place appropriate filtering and monitoring systems that are in line with the recommendations in the UK Internet Centre document Appropriate Filtering for Education Settings and in part, by the risk assessment required by the Prevent Duty

5.23.3 The Department for Education's filtering and monitoring standards set out that schools and colleges should:

• identify and assign roles and responsibilities to manage filtering and monitoring systems.

• The Academy must conduct a formal, documented annual effectiveness review of filtering and monitoring systems across all school-owned devices. Incorporating DfE product safety expectations regarding the safe, secure deployment of Generative AI in education.

• block harmful and inappropriate content without unreasonably impacting teaching and learning.

• have effective monitoring strategies in place that meet their safeguarding needs.

• schools can use the department's 'plan technology for your school service' to self assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them

5.23.4 Schools will use the DfE published Generative AI: product safety expectations to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

5.24 Sharing of consensual and non-consensual nudes and semi-nudes.

5.24.1 All staff will be trained in digital safeguarding and will have a role in educating and protecting children about online harms.

5.24.2 All staff will be available and approachable for children to make disclosures which will then be referred to the DSL for further action.

5.24.3 We will seek to prevent children from online harms through educating them about the laws and potential consequences of activity online.

5.24.4 Digital safeguarding may be addressed through lessons, specialised digital safeguarding sessions, PHSE, flexi-learning weeks and assemblies.

5.24.5 Professionals should be alert to the following definition:

- Self-generated intimate images and/or videos, and content generated or

altered via Artificial Intelligence, such as deepfakes.

5.24.6 Terms such as ‘revenge porn’ and ‘upskirting’ are also used to refer to specific incidents of self-generated intimate images and/or videos, and content generated or altered via Artificial Intelligence being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

5.24.7 In dealing with cases of sending of self-generated intimate images and/or videos, and content generated or altered via Artificial Intelligence, such as deepfakes. The response to these incidents will be guided by the principle of proportionality and the primary concern at all times will be the welfare and protection of any children involved.

5.24.8 We will:

- Outline our expectations and explain the rules of having a mobile, tablet or smartphone;
- Ask children what they feel is acceptable to send to other people then discuss appropriate images and the dangers of inappropriate images (listed above);
- Make sure children are comfortable saying no, that they know their body is private and being asked to share explicit images is inappropriate and illegal;
- Explain to children about the importance of trust and consent in a healthy relationships;
- Tell children that it’s not ok for someone to make them feel uncomfortable, to pressure them into doing things that they don’t want to do, or to show them things that they’re unhappy about;
- Tell children what can happen if things go wrong through real life examples such as television programs or news stories as far as possible;
- Ask children about the ‘Granny rule’. Would you want your Granny to see the image you’re sharing?
- Talk about whether a person who asks for an image from you might also be asking other people for images;
- Discussions about ‘revenge’ sending of images after relationships have broken down or a friend has done something as a joke and lost control of the image etc.
- Let children know that they can speak to us if this ever happens and that disclosures will be treated confidentially and without embarrassment and support will be given. Staff will react calmly and listen to the concerns of the child and explain that they must share the information confidentially with the DSL;
- Provide details of sources of support and coping strategies if the child finds themselves in an uncomfortable position such as the Zipit App or ChildLine

5.24.9 When a child has been affected by the sending/receiving of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes staff will:

- Recognise that if the child has been sending self-generated intimate images and/or videos including those generated using AI e.g. deepfakes, the child may feel anxious talking about this.
- Recognise that they themselves may feel shocked, upset, angry, confused or disappointed while listening to the child.
- Give themselves time to process the information, remembering that the child will

be watching their reactions.
- Reassure the child that they are not alone.
- Listen and offer support – they're probably upset and need help and advice, not criticism;
- Not shout or make them feel like it's their fault;
- Will not ask questions like "why have you done it?" as this may stop them from opening up;
- Discuss the problem and the wider pressures that they may face, to help them to understand what's happened and understand any wider safeguarding concerns;
- Assure the child that they will do all they can to help and explain that they will seek the support of the DSL
- Remind them that they can always talk to Childline or another trusted adult if they are not comfortable talking directly to the staff member.

5.24.10 If a child has shared consensual or non-consensual self-generated intimate images and/or video, the DSL or deputy will:

- Ask them who they initially sent it to, their age, and if they know whether it's been shared with anyone else.
- Support the victim to get the images removed by contacting the Internet Watch Foundation.
- Assess the situation for wider safeguarding concerns and agree who will be contacted and when then contact parents/police/CEOP/ as appropriate to the case.
- Contact the Child Exploitation and Online Protection Centre (CEOP) if the image was requested by an adult, as this is grooming which is illegal.
- Contact the DSL at the relevant school if the image was requested by a school aged child not from this academy, to raise awareness of potential wider safeguarding issues or circulation of the image in their school.
- All actions and information to be logged on CPOMS.
- Parents to be contacted as appropriate.

5.24.11 If a child has been sent/received a self-generated intimate images and/or videos including those generated using AI e.g. deepfakes:

- The DSL or deputy should ask them if they know the person who sent it and their age.
- if the image was sent by another child, staff may want to help the child to speak to the sender in order to stop future messages. If the child agrees, staff can also help them to block the sender on social media.
- The DSL will consult the UKIS advice service (publishing.service.gov.uk).
- if the image was sent by an adult, staff should contact CEOP, the Child Exploitation and Online Protection Centre, as this may be part of the grooming process.
- All actions and information to be logged on CPOMS.
- Parents to be contacted as appropriate.

5.24.12 Staff must not:

- View, copy, print, share, store or save images.
- Ask a child to share or download images (if you have already viewed the images

by accident, you must report this to the DSL).
- Delete the images or ask the child to delete it.
- Ask the child/children who are involved in the incident to disclose information regarding the
- image (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the child it involves or their, or other, parents and/or carers.

5.25 Upskirting

5.25.1 Under the Voyeurism (Offences) Act 2019, upskirting is a criminal offence punishable by up to two years in prison. 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 a criminal offence. Anyone of any gender, can be a victim.

5.25.2 Any concerns related to upskirting must be reported to the DSL in line with the reporting process outlined within this policy and where appropriate staff will also consult the behaviour policy.

5.26 Homelessness

5.26.1 Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead is aware of routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

5.26.2 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.

5.26.3 In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised that 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.

5.26.4 Children's services 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. 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 children's social care where a child has been harmed or is at risk of harm.

5.27 Children with Special Educational Needs (SEN) and disabilities

5.27.1 Children with SEN and disabilities can be more susceptible to safeguarding risks as:
- Staff may not be able to spot the signs of abuse in children with SEND or assume that indicators of possible abuse such as behaviour, mood and injury

relate to the child's disability without further exploration
- Children with SEND may be prone to peer group isolation and more vulnerable to bullying, coercion and 'grooming' without outwardly showing any signs
- Children with SEND may experience increased feelings of anxiety which prevent them from 'speaking out'
- Some children with SEND rely on adults for personal care, and this vulnerability puts them at greater risk of being harmed or abused
- Children with SEND are more likely to work alone with a single adult, putting them at greater risk of being harmed or abused
- Children with SEND may not be able to recognise that they are being abused

5.27.2 In addition to these increased risk factors, disabled children may have communication difficulties which make it difficult to tell others what is happening to them. Adults, including professionals assessing their needs and caring for them, may concentrate on the child's special needs and overlook signs and symptoms that they are being maltreated.

5.27.3 All staff must therefore be aware of and extra vigilant to the possible indicators of abuse and/or neglect for disabled children. The designated safeguarding lead should liaise regularly with the special educational needs co-ordinator, the behaviour lead and the attendance lead, maintaining a culture of vigilance and being alert to any relevant new information or concerns.

5.27.4 If staff have a concern for a disabled child they must consider:

- The child's communication needs and how they can communicate effectively with them
- What information in relation to the child disability and special needs staff need to be aware of in order to assess risk of abuse
- What resources staff require in order to undertake an informed assessment of safeguarding risk
- Where child protection issues are considered regarding a child with disabilities, there must be involvement by key professionals who know the child well, including those who have a comprehensive understanding of the child's disability, method of communication, and any associated medical condition.

5.27.5 Schools should consider what specialist advice, guidance and training may be required in order for staff to understand why children with SEND can be more vulnerable to abuse and how to recognise signs of abuse and/or neglect of disabled Children

5.28 Mental Health

5.28.1 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. These concerns could include:

- Self-harm
- Suicidal ideation
- Risk of suicide

5.28.2 Only appropriately trained professionals should attempt to make a diagnosis

of mental health problems. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing mental health problems 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, there are likely to be potential warning signs which education staff are well placed to recognise.

These could 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.

5.28.3 Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, education staff are well placed to identify these and other potential warning signs. In doing so they can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention

5.28.4 We will ensure that we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

5.28.5 We seek to embed positive mental health and mental health awareness through our academy to create a culture where children can self-identify, signpost peers and seek support themselves. We undertake staff training and promote mental health awareness through the PHSE schemes.

The Promoting children and young people's mental health and wellbeing guidance sets out how schools and colleges can help prevent mental health problems by promoting wellbeing and resilience as part of an integrated, whole school/college approach to social and emotional wellbeing, which is tailored to the needs of our pupils and learners.

Schools and colleges can also access advice to help them identify children in need of extra mental health support. Additional guidance and resources can be found on the Promoting and supporting mental health and wellbeing in schools and colleges website on GOV.UK. The department has also published advice and guidance on Preventing and tackling bullying (which may also be useful for colleges).

5.28.6 If staff have a concern about a child's mental health that is also a safeguarding concern, they should follow their child protection policy and speak to their designated safeguarding lead or deputy. If staff feel that a child is in danger, they should call 999 or take them to A&E immediately. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

5.29 Children who are lesbian, gay, bisexual, or gender questioning

It is not the responsibility of our academies to initiate any processes regarding a student's social transition. The following guidance applies exclusively to situations where a child or their parent/carer has explicitly requested support for social

transition, and the academy is responding to this request.

5.29.1 We recognise that it is entirely normal for children to participate in activities that do not conform to typical gender expectations. In our primary settings, for instance, children may naturally explore a variety of toys or clothing choices. While some children may go through a phase of exploring their gender identity, research indicates that for many, this does not persist into adulthood, though for a minority, these feelings may intensify during puberty.

5.29.2 Staff must dedicate time to thoughtfully listening to and understanding the feelings of any child exploring their gender identity, exercising appropriate professional curiosity regarding their wider experiences. Staff must remain vigilant to the potential vulnerabilities these students face, including complex mental health or psychosocial challenges related to family dynamics, peer relationships, and the wider social environment, including the risk of discriminatory bullying.

5.29.3 To reiterate and reinforce our approach, academy leaders must continuously strive to understand the holistic experience of children questioning their gender. Our safeguarding vigilance must encompass all potential vulnerabilities, proactively identifying any complex emotional needs or external pressures, such as bullying or relationship difficulties, that may impact the child's wellbeing.

5.29.4 Staff must implement inclusive practices throughout school life that offer flexibility and actively avoid enforcing rigid gender stereotypes, always fostering a culture of respect where prejudice and bullying are entirely prohibited.

5.29.5 Bullying severely damages a child’s mental wellbeing and academic progress. The Trust's stance is firm: all forms of bullying, regardless of the motivation, are entirely unacceptable. Staff are required to take robust action against any bullying behaviour, addressing incidents immediately to prevent escalation.

Considering requests for support with social transition

5.29.6 Staff must never initiate any steps towards a child's social transition; this policy framework is triggered only upon a direct request from a student or their parents/carers. Staff must not implement any transitional changes unless an explicit agreement has been reached by the academy leadership in formal consultation with the child’s parents or carers.

5.29.7 When evaluating any request for social transition support, staff must ensure that all decision-making processes are thoroughly documented and securely recorded on CPOMS.

5.29.8 When determining how to support social transition requests, staff must carefully navigate their overlapping duties under safeguarding frameworks, the Equality Act, and human rights legislation. Any evaluation of potential discrimination must be balanced against a rigorous assessment of the welfare and best interests of both the individual child and the wider student body.

As we hold a statutory duty to safeguard and promote the welfare of all students, staff will consider how best to discharge this duty towards the transitioning child and

their peers, ensuring the agreed approach considers the impact on everyone involved. Consequently, the primary consideration must always be the overarching best interests of the child and their peers, which may sometimes differ from the child's immediate requests.

5.29.9 In almost all circumstances, staff must work in close partnership with parents/carers to establish the child's best interests. This process should incorporate any available clinical evidence and involve relevant internal professionals (such as the SENCO and the DSL). Leaders must holistically assess the child's circumstances, including any broader health or neurodevelopmental factors. When determining best interests, staff must adhere to a highly cautious approach.

Staff must be particularly alert to safeguarding considerations in primary settings. As noted in the Cass Review, early social transition, particularly prior to puberty or clinical consultation, can increase the likelihood of progressing to medical pathways. Staff must also be aware of the specific safeguarding risks associated with pre-pubertal children 'living in stealth' (where their biological sex is unknown to peers or staff).

Furthermore, staff must heed the Cass Review's emphasis on early clinical involvement when families contemplate social transition for younger children, maintaining a non-directive, flexible approach. Advising on the clinical risks and benefits of social transition as a planned intervention requires specialist medical training and falls completely outside the remit of academy staff.

Parents and carers should be actively involved and their views treated with importance

5.29.10 Parents and carers remain the primary figures in a child's life, and this principle applies strongly to gender identity. When a student requests transition support, academies must prioritise parental engagement and place significant weight on their perspectives.

Aligning with the Cass Review's findings that family support gives the best outcomes, schools and parents should collaborate to determine the safest path forward, thereby promoting wellbeing and protecting the child from harm.

Staff must proactively facilitate these discussions, offering staff presence or mediation if helpful. In exceptional cases where involving parents/carers presents a direct safeguarding risk to the child, the Designated Safeguarding Lead (DSL) must be immediately consulted to dictate the necessary protective actions before any parental contact is made or transition decisions are finalised.

If a student discloses feelings to staff but does not request any practical changes, confidentiality should be maintained unless a related safeguarding concern necessitates disclosure.

5.29.11 Accommodating social transition is an active intervention so we will take a very careful approach

We must exercise extreme caution regarding social transition. Reflecting the Cass Review's findings on the limited long-term evidence available, social transition must be recognised as an active intervention with potentially significant psychological

and long-term impacts on the young person. Primary academies, in particular, must proceed with the utmost caution; full social transition in these settings will only be agreed to in exceptionally rare circumstances. (delete if secondary)

5.29.12 Recognising that older students generally possess greater decision-making agency, academies should strive to maintain flexibility. Keeping options open prevents young people from feeling pressured into committing to an irreversible trajectory at a young age.

In addition to fulfilling our core safeguarding duties, we must adhere strictly to the Equality Act 2010 and the Human Rights Act 1998.

5.29.13 To uphold our rigorous safeguarding standards, and in strict compliance with the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, staff must categorically prohibit students from accessing toilets, changing rooms, or residential/boarding accommodations designated for the opposite biological sex, without exception. Furthermore, where single-sex sports are mandated for safety reasons, students must not participate in sports designated for the opposite sex; no exceptions will be made.

5.29.14 When addressing transition requests with students, staff must take the time to sensitively but clearly explain that support for social transition will not extend to permitting access to opposite-sex washrooms, changing facilities, or residential areas, nor will it include participation in opposite-sex physical education classes where safety parameters require single-sex environments.

5.29.15 Staff must assure children and their families that while robust action will be taken against any harassment or bullying, the academy will concurrently respect the rights, religions, and beliefs of all pupils and staff. To balance these needs, staff supporting a social transition may explore practical compromises, such as using the student's preferred name rather than enforcing specific pronoun usage.

Reviews

5.29.16 A child's needs and circumstances are fluid. If new safeguarding concerns emerge (for instance, complications arising from a child 'living in stealth'), or if a previously agreed transition plan places disproportionate strain on the academy's resources, the leadership must review the initial decision. This review process must factor in all previously stated principles, mandate parental involvement, and immediately engage the DSL. Regardless of social transition status, academies are legally obligated to accurately record a child’s biological sex on all relevant official systems, and all pertinent staff will be informed of the child's biological sex.

Children living in stealth

5.29.17 Staff will be acutely aware of the unique vulnerabilities facing children who have fully socially transitioned at an early age and are 'living in stealth' (where their biological sex is concealed from peers and staff). As highlighted by the Cass Review, these students often experience heightened anxiety and fear as puberty approaches. The DSL must be directly involved in overseeing the welfare of these specific cases.

Support for children who wish to detransition

5.29.18 Situations may arise where a student wishes to partially or fully reverse a previously accommodated transition request. In line with the Cass Review's recommendation to maintain flexible, open pathways, academies must ensure comprehensive support is readily available to any child who chooses to detransition.

5.31 Mobile Phone and wearable devices
In line with DfE guidance, we do not allow students to use mobile phones and other forms of technology such as tracking devices. (DfE guidance) If a student has a mobile phone or any other form of smart technology out in school, it will be confiscated and returned to the parent or carer.

5.31.1 Wearable devices
All personal devices (with the exception of school permitted items such as a school iPad) which have the ability to record audio and or video which may include but is not limited to smart watches, mobile phones, airpods, smart glasses and AI pins, are not allowed in school. Please refer to the Behaviour policy.

6. Attendance

6.1 Unexplainable and/or persistent absences from education is a safeguarding issue and must act as a warning sign to a range of concerns including neglect, sexual abuse, child sexual and child criminal exploitation (CCE) particularly county lines. It may also be an indication of child-on-child abuse including bullying and sexual harassment or significant mental ill health concerns. It must not be seen as an isolated concern.

6.2 Absence from education may increase known safeguarding risks. Early help risk indicators can include children who are repeatedly removed from the classroom or placed on part-time timetables.

6.3 We have a separate attendance policy (which includes protocols for children missing education and elective home education) in place which references both Working together to improve school attendance which sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns.

6.4 Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

Schools should always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. They should regularly review the alternative provision placements they make.

6.5 We have a named senior leader with strategic responsibility for attendance. Windsor Olympus Academy.

6.6 Academy attendance operational leads, in addition to the general safeguarding training that all staff receive are given access to role specific safeguarding training and ensure they understand the safeguarding implications behind poor or non-attendance.

6.7 Academy leaders and governors ensure that attendance data, particularly for identified vulnerable groups, is closely and regularly monitored, identifying trends or patterns which may indicate safeguarding concerns.

6.8 Schools also play a vital role in sharing and contributing to key information about children, including attendance data, exclusions, concerns about abuse, neglect, exploitation, and wider social and environmental factors including extra-familial contexts, which are a key aspect of keeping children safe.

6.9 Children Missing Education (CME)

6.9.1 Children who go missing from education are at significant risk. Children who are already known to children's social care, who are on a child in need or child protection plan or in the care of the local authority (looked after children) are additionally vulnerable and in need of additional protection.

6.9.2 We will follow the protocols laid out in our attendance policy.

6.9.3 The DSL will ensure the academy response to identifying children missing from education supports identifying potential abuse or exploitation and also prevents them going missing in the future.

6.9.4 The academy will ensure compliance with the guidance and regulations contained in the appropriate sections of the Keeping Children Safe in Education document and Working Together to Improve School Attendance.

6.9.5 **Young Carers** Staff will be alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Staff will be aware that additional support from external partners, or local authority and health services may be required.

6.10 Elective Home Education (EHE)

6.10.1 We will follow the protocols laid out our attendance policy, being mindful that as well as being less visible some of these children are "not in receipt of suitable education"

6.11 Children with medical conditions who cannot attend school, we will support them through the attendance and medical policies.

6.11.1 We will understand that a child having a medical condition isn't in itself an indicator that a child is at greater safeguarding risk. In the event of a clinical incident taking place, the DSL, in conjunction with the responsible healthcare professional will consider whether any safeguarding duty has been triggered and whether any further action is required.

7. Recruitment of staff, trainee teachers and volunteers

7.1 The academy will ensure that safer recruitment practices always follow KCSIE and will be adhered to by staff.

7.2 Every interview panel will have at least one member who has a current certificate in safer recruitment. These certificates will be updated every two years. We will check on the identity of candidates, follow up references with referees and scrutinise

applications for gaps in employment. We will record the answers to safeguarding questions asked during the interview process on staff personnel files. We will ensure that safeguarding considerations are at the centre of each stage of the recruitment process including carrying out an online search as part of due diligence on shortlisted candidates.

7.3 As part of our due diligence, we will carry out an online search on shortlisted candidates to help identify, through publicly available information, any incidents or issues which can be explored at interview.

7.4 We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our academy.

7.5 We will ensure that any alternative provision facility working with the academy provides us with evidence that they have made the appropriate level of safeguarding checks on individuals working in their provision.

7.6 Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.

7.7 We will ensure that all staff involved in recruitment are aware of government guidance on safer recruitment and that its recommendations are followed.

7.8 The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. The academy will ensure the correct level of DBS certificate is sought and ensure a prohibition check is undertaken.

7.9 The types of checks undertaken will be in accordance with the guidance given in the Keeping Children Safe in Education (KCSIE) document.

7.10 Any offer of appointment made to a successful candidate (including one who has lived or worked abroad) will be conditional on satisfactory completion of the necessary pre-employment checks as required in the guidance given in the Keeping Children Safe in Education (KCSIE) document.

7.11 Where an enhanced DBS Certificate is required, it will be obtained from the candidate before or as soon as is practicable after the person is appointed.

7.12 The academy 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 shortlisted candidates, including internal ones, before interview (unless the candidate has expressly denied permission for the employer to approach their referees). Where references have been sought, any issues or concerns they raise can be explored further with the referee and taken up with the candidate at interview.

7.13 The academy will keep a single central record in accordance with the regulations given in the Keeping Children Safe in Education (KCSIE) document.

7.14 Recruitment and/or deployment checks will be undertaken as stated in the

Keeping Children safe in Education (KCSIE) document.

7.15 The academy will carry out all relevant checks if there are concerns about an existing member of staff and refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

8. Dealing with allegations against staff and volunteers which meet the harms threshold

8.1. The academy holds a comprehensive 'Allegations against staff' policy and a staff code of conduct which outline in detail expected standards of adult behaviour and procedures to take where there are concerns. Where any member of the academy staff or any volunteer has concerns that a person has caused harm or poses a future risk of harm to vulnerable groups, including children they must act in accordance with this academy policy. A referral to the Local Authority Designated Officer (LADO) is an expected standard procedure considered immediately by the Headteacher.

8.2. We will prevent people who pose risks to children from working in our academy by ensuring that all individuals working in any capacity at our academy have been subjected to safeguarding checks in line with the statutory guidance Keeping Children Safe in Education.

8.3. At Windsor Olympus Academy we recognise the possibility that adults working in the academy may harm children. Any concerns about the conduct of other adults in the academy should be taken to the Head Teacher without delay (or where that is not possible, to the designated safeguarding lead); any concerns about the Head Teacher should go to a member of the Executive Team who is nominated to be responsible for liaising with the local authority and other partner agencies.

8.4. If for any reason you cannot make a referral through these routes you have a duty to refer directly to the Local Authority Designated Officer (LADO) whom you can contact here:

▪ Ms Michelle Pinnock-Ouma

8.5. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

8.6. Allegations against staff should be reported to the Head Teacher. Allegations against the Head Teacher or the designated safeguarding lead should be reported to a member of the Executive Team who is nominated to be responsible for liaising with the local authority and other partner agencies

8.7. Where a child makes an allegation against a staff member, supply teacher, trainee teacher or volunteer, the allegation will be taken seriously and acted upon immediately and assessed to determine if they meet the 'harms' threshold or can be dealt with under the 'low level concerns' advice in KCSIE. Parents will be contacted as soon as reasonably possible. The child will be offered support and their wishes will be carefully considered before any actions are carried out.

Where concerns or allegations relate to a trainee teacher placed with the school, staff will apply the same safeguarding procedures as any other member of staff. In addition, staff should ensure that training providers carry out their safeguarding duties.

8.8. Under its duty of care for its employees, the academy will ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. The academy will ensure its obligations for confidentiality when an allegation has been made.

8.9. Concerns or allegations that do not meet the harm threshold/low level concerns

8.9.1 The academy holds a comprehensive 'Allegations against staff' policy and a staff code of conduct which can be found in the staff room and which outline, in detail, expected standards of adult behaviour and procedures to take where there are concerns. Where any member of the academy staff or any volunteer has concerns about a member of staff, they must act in accordance with this academy policy

8.9.2 A low-level concern is described in KCSIE as

- behaviour which is inconsistent with the staff code of conduct, including inappropriate conduct outside work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO

8.9.3 All staff must be made aware that is it crucial that all low-level concerns are shared responsibly with the Head Teacher or DSL, recorded and dealt with appropriately, to create and embed a culture of openness, trust and transparency in which the school or college's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

9.Training for all staff and children

9.1. Every year all staff (including non-teaching, trainee teachers and volunteers) must undertake a variety of Child Protection and Safeguarding training including on KCSIE. This training will be informed by national and local context as well as identified gaps in knowledge and understanding

9.2. Training is recorded and logged. All staff are informed clearly as to how to report anything of concern to Sally-Jo Wilkinson immediately. See Appendix 1 for a flow diagram of how concerns are dealt with at the academy. In addition, all staff must read KCSIE part 1 in full.

9.3. All new members of staff, including newly-qualified teachers, trainee teachers and teaching assistants, will be given induction that includes basic child protection training on how to recognise signs of abuse, how to respond to any concerns, online safety, including filtering and monitoring and familiarisation with the safeguarding and child protection policy, behaviour policy, staff code of conduct, systems and processes for CME and Keeping Children Safe in Education: Statutory Guidance for Academies and Colleges, Part One in full and other related policies.

9.4. The designated safeguarding lead will undergo updated level 3/DSL level child protection training every two years and in addition to formal training, their knowledge and skills will be refreshed at least annually.

9.5. All staff members of the academy will undergo safeguarding and child protection training (whole-academy training) which is regularly updated.

9.6. All governors must undergo governor specific online awareness training at least every two years.

9.7. Staff members who miss the whole-academy training should notify the DSL and will be required to undertake other relevant training to make up for it, e.g., by joining another academy's whole academy training. It is the responsibility of each member of staff to ensure they have completed all mandatory safeguarding training.

9.8. We will ensure that staff members provided by other agencies and third parties, e.g., supply teachers, trainee teachers and contractors, have received appropriate child protection training commensurate with their roles before starting work. They will be given the opportunity to take part in whole academy training if it takes place during their period of work for the academy.

9.9. The designated safeguarding lead will provide an annual briefing to the academy on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews.

9.10. The DSL will ensure the academy maintains accurate records of staff induction and training.

9.11 In schools, 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 schools must have regard to the statutory guidance, which can be found here (revised for introduction September 2026). Staff play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.

10. Establishing a safe environment in which children can learn and develop

10.1. Anti-bullying

10.1.1 We hold a comprehensive anti-bullying policy

10.1.2 At this academy we do the following to raise awareness of bullying and what to do about it

10.1.3 If any child / member of staff / parent / carer has a concern about bullying, they should report it to: Sally-Jo Wilkinson or any member of staff.

11. Confidentiality and sharing information

11.1. Staff should only discuss concerns with the designated safeguarding lead, Head Teacher or Executive member (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a need-to-know basis.

11.2. All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that anything being released into the public domain does not compromise evidence.

11.3. Child protection files must be transferred to a new school within 5 days for in year transfers or within the first 5 days of the start of a new term

11.4 Storage and handling of records

11.4.1 Child protection information will be stored and handled in line with the principles set out in the Data Protection Act 1998, the GDPR (2018) the Data (Use and Access) Act 2025 and the academy's Data Protection Policy.

11.4.2 The Data Protection Act 2018, GDPR and the Data (Use and Access) Act 2025 do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information will not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

11.4.3 Any paper record of concern forms and other written information will be stored in a locked facility accessed only by the Head Teacher and Designated Safeguarding Lead. Any electronic information will be password protected and only made available to relevant individuals. Every effort will be made to prevent unauthorised access. Sensitive information will not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive; these items will also be password protected and kept in locked Storage.

11.4.4 Child protection information will be stored separately from the child's academy file and the academy file will be 'tagged' to indicate that separate information is held. If such records need to be sent to a new school or academy they will be sent separately from the child's file and under a confidential cover or in an encrypted electronic file.

11.4.5 Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they will refer the request to the Head Teacher or Designated Safeguarding Lead. The Data Protection Act does not prevent academy staff from sharing information with relevant agencies, where that information may help to protect a child.

11.4.6 We will ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

11.4.7 being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as ‘special category personal data’.

11.4.8 understanding that ‘safeguarding of children and individuals at risk’ is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

11.4.9 for schools, not providing children’s personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious ‘harms’ test is met, they must withhold providing the data in compliance with schools’ obligations under the Data Protection Act 2018, the UK General Data Protection Regulation (GDPR) and the Data (Use and Access) Act 2025.

11.4.10 Further details on information sharing can be found:

- in Working Together to Safeguard Children, which includes a myth-busting guide to information sharing.
- at Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers. The seven golden rules for sharing information will be especially useful.
- The Information Commissioner’s Office (ICO), which includes ICO GDPR FAQs and guidance from the department in Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR. When in doubt the academy will contact the WAT Data Protection Officer.

12. Use of academy premises for non-academy activities

12.1. Where the academy premises are hired or rented out the academy leadership will ensure that appropriate arrangements are in place to keep children safe.

12.2. The academy policies will apply where the services or activities are provided by the academy and are under the direct supervision or management of academy staff.

12.3. Where services or activities are provided separately by another body, the governors and academy leadership will seek written assurance that the body concerned has appropriate child protection and safeguarding policies in place (including inspecting these as needed) and ensure that there are arrangements in place to liaise with the academy on these matters where appropriate.

12.4. This applies whether or not the children who attend any of these services or activities are children on the academy roll.

12.5. The academy leadership and governors should also ensure safeguarding arrangements are included in any transfer of control agreement (i.e. lease or hire

agreement) as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

12.6. The guidance found in 'Keeping children safe in out-of-school settings' details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

13. Management of the Policy

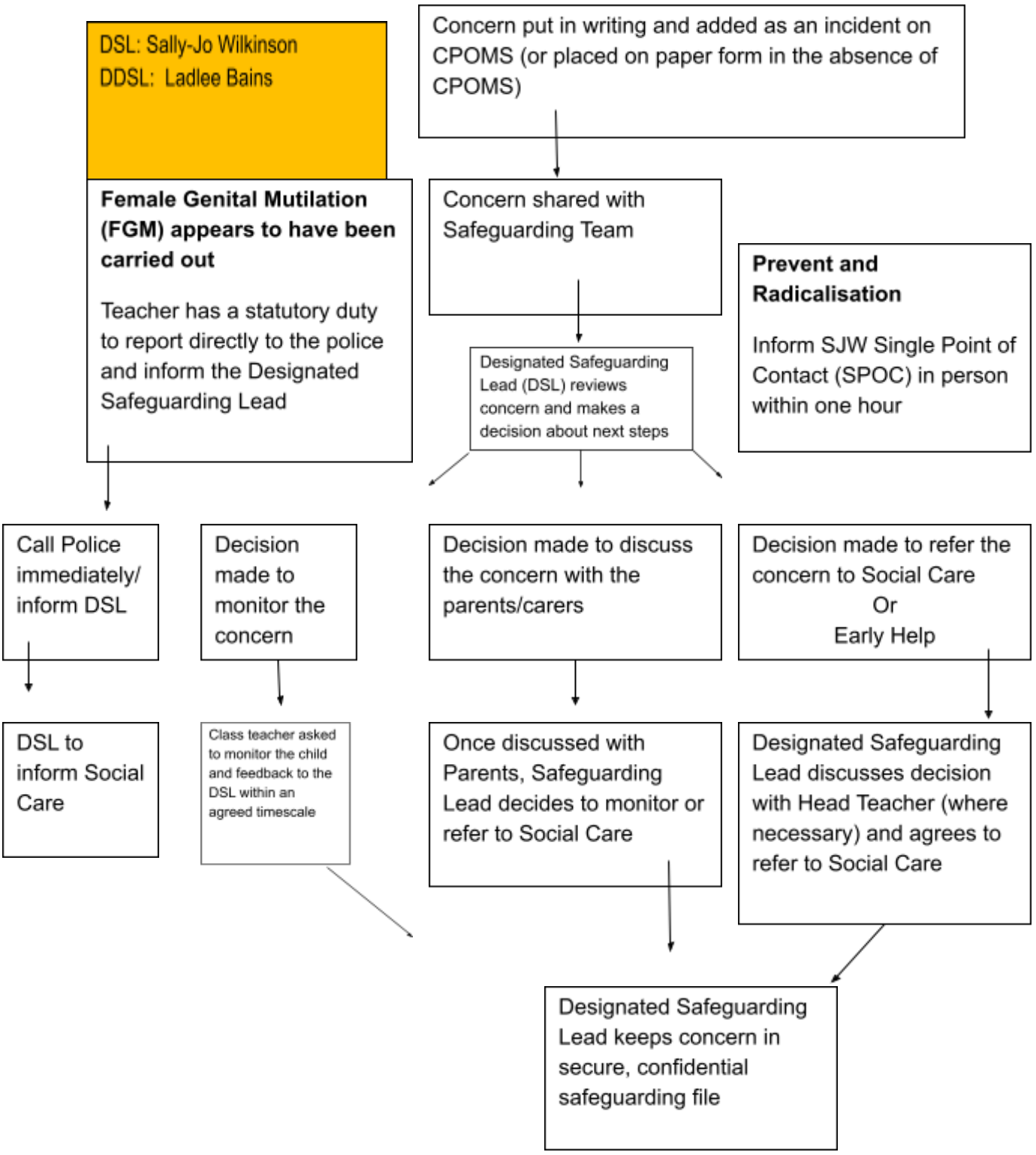
13.1. The academy will at all times adhere fully to the statutory guidance in place from the Department of Education issued under Section 175 of the Education Act 2002, the Education (Independent Academy Standards) Regulations 2014 and the Education (Non-Maintained Special Academies) (England) Regulations 2011, Current: Keeping children safe in education: Statutory guidance for academies and colleges and the departmental advice: What to do if you are worried a child is being abused – Advice for practitioners (September 2016). Nothing written in this policy overrides the academy's duties under such legislation.

13.2. Board members will oversee the policy, ensure its implementation and review its content on an annual basis.

13.3. The Head Teacher will report on safeguarding activity and progress within the academy to the Head of Safeguarding.

13.4 Feedback on this policy

Staff are encouraged to give feedback to Windsor Academy Trust directly through email at any point in the year ggriffiths@windsoracademytrust.co.uk.

Appendix 1

Raising safeguarding concerns about a child – (this outline cannot cover every eventuality – all cases will keep the best interests of the child at the heart of any decision)