Mulberry
Academy Hastings

Child Protection and Safeguarding Policy

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1. Key contacts

- Designated Safeguarding Lead: Gareth Wall g.wall@hastings.mulberryschoolstrust.org
- Deputy Designated Safeguarding Lead: Alison Early a.early@hastings.mulberryschoolstrust.org
- Deputy Designated Safeguarding Lead: Sophie Blattman s.blattman@hastings.mulberryschoolstrust.org
- Deputy Designated Safeguarding Lead: Rianne Stanley r.stanley@hastings.mulberryschoolstrust.org
- Designated Teacher for Looked after Children: Jay Dann-Finch j.dann-finch@hastings.mulberryschoolstrust.org
- Nominated Governor for Safeguarding and Child Protection: Andy Davey clerk@mulberryschoolstrust.org
- Principal: Simon Addison s.addison@hastings.mulberryschoolstrust.org
- Chair of Trustees: Jane Farrell clerk@mulberryschoolstrust.org
- Local Authority Designated Officer (LADO): Consultation via the online portal here
- Referrals into Early Help and Social Care Single Point of Access: 01323 464222 or Contacting the Single Point of Access (SPoA) | East Sussex County Council
- Emergency Duty Service (after hours, weekends and public holidays): 01273 335905

2. Introduction

2.1. Our whole-school approach to safeguarding is based upon an understanding of the local context and an attitude of '*it could happen here'*. Safeguarding is the responsibility of everyone and underpins everything we do at Mulberry Academy Hastings. We offer a safe, secure and caring environment which allows us to promote our values of Achieving Ambitions, Working Together, Delivering Excellence and Nurturing Potential.

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2.2. Pupils' welfare is our paramount concern. The Board of Trustees ensures that our academy safeguards and promotes the welfare of children and works with other agencies to ensure robust arrangements to identify, assess and support children who are experiencing or likely to experience harm.

2.3. Safeguarding is not an isolated activity which is undertaken by a select few within certain areas of academy practice. Safeguarding children is everyone's responsibility and everyone at our academy who has contact with children and families must play an active role in keeping children safe from harm. In that respect we take a whole-school approach to safeguarding, ensuring that it is at the forefront of all our work, that it underpins all of our policies and processes and that everything we do is always with the best interests of the children at heart.

2.4. Our academy will provide a caring, positive, and stimulating environment that promotes the social, physical, emotional, and moral development of the individual child, and where children feel safe and secure.

2.5. We always take a child centred approach to our work and ensure that we listen to the voice of the child so that all children feel heard and understood. When children talk to an adult about a concern they will always be taken seriously, they will always be supported and kept safe, they will never be given the impression that they are creating a problem or have anything to feel ashamed about.

2.6. We understand that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This will not prevent staff from having professional curiosity and speaking to the DSL or the DDSL if they have concerns about a child.

2.7. So that children are able and confident to raise concerns with adults we ensure that our safeguarding systems are well promoted, easily understood and easily accessible. Alongside this we expect all staff to develop positive relationships with children, which build trust and facilitate communication.

2.8. To support children who may not wish to directly speak with an adult in the academy there are other means, such as a safeguarding email address and an online reporting tool, which are monitored by key staff in the safeguarding team.

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2.9. To support children who may wish to seek help from beyond the academy we have posters and signposting to agencies such as Childline and the NSPCC.

2.10. As well as systems for individual children to raise concerns, we also gather pupil voice, to understand the experience of all pupils at the academy and to inform the development of safeguarding practice. We always aim to capture the full breadth of the pupil demographic, including pupils with SEND and those who are known to be vulnerable.

2.11. So that children are supported to identify and manage risk in their lives we teach a range of knowledge through specific topics related to safeguarding as part of our broad and balanced preventive curriculum.

2.12. Teachers recognise that there are opportunities to reinforce the learning around these topics within all subject areas and will plan to do so. Non-teaching members of staff recognise that they too can support learning in these areas through broader modelling of behaviours or messages.

2.13. We know that the use of technology is a significant component of many safeguarding issues so as part of our whole-school approach to safeguarding we have a separate Online Safety Policy which covers this area of work.

2.14. We recognise that abuse may occur in a range of situations: within families or households, within the community, at school, online or face to face. We also recognise that it is not only adults who may abuse children but also that children can abuse other children as well.

2.15. All staff have an awareness of safeguarding issues that often overlap and they will look for behaviours and indicators that could be signs that children are at risk.

2.16. We recognise that just because children are not raising concerns, that is not to say that there are no concerns. This is why we listen to children, teach them about risk and safety, and raise awareness around how to seek support.

2.17. We take a zero-tolerance approach to child-on-child abuse. **Further information on this area of practice is within Appendix B of this policy.** This should also be read alongside the Behaviour, Anti-Bullying and Online Safety policies.

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2.18. We understand that children may also cause harm to other family members, including parents/carer and siblings. We will respond to concerns of child to parent/carer and/or sibling abuse to ensure the child and parent/carer and/or sibling is supported and protected, including considering a referral or signposting to Capa First Response.

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

3. Scope

3.1. This policy applies to children under the age of 18 years. In line with the law, this policy defines a child as anyone who has not yet reached their 18th birthday.

3.2. This policy explains how the academy will fulfil its safeguarding responsibilities and promote the welfare of children.

3.3. Safeguarding is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable children to have the best outcomes.

3.4. This policy explains how the academy will carry out its child protection responsibilities.

3.5. Child protection is the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

3.6. This policy applies to all adults engaged in any activity at the academy, including all permanent, temporary and support staff, governors, trainee teachers, volunteers, contractors and external

service or activity providers. Within this document the term 'staff' will be used to denote those adults, specified within the previous sentence.

4. Roles and responsibilities

4.1. The Board of Trustees will ensure:

- Compliance with safeguarding legislation.
- Safeguarding policies are reviewed annually.
- Safeguarding is appropriately resourced.
- A DSL and DDSL are appointed.
- A specific governor is appointed to take leadership responsibility for safeguarding arrangements.
- Staff and governors receive safeguarding training and training for specific safeguarding related roles.
- Appropriate filtering and monitoring systems are in place for the academy computer system and internet connection.
- Safer recruitment procedures are followed.
- Safeguarding is a standing governance priority.
- Safeguarding arrangements are fully embedded within the academy's ethos and reflected in the academy's day-to-day practice.

4.2. The Principal will:

- Promote safeguarding culture.
- Ensure policies are implemented.
- Support the DSL and DDSL.

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- Ensure staff training takes place.
- Ensure safeguarding concerns are addressed effectively.
- Ensure concerns about adults' conduct/behaviour are addressed effectively and in line with statutory guidance.

4.3. The DSL will fulfil their role as outlined in Annex B of Keeping Children Safe in Education 2026 and, as such, will:

- Provide safeguarding leadership.
- Ensure the DSL or a DDSL is available during school hours and out of hours when an arranged school activity is taking place, such as a school trip.
- Manage referrals.
- Liaise with other safeguarding agencies and professionals.
- Contribute to safeguarding assessments, including Children's Social Care assessments.
- Attend strategy meetings and conferences.
- Manage safeguarding records.
- Ensure appropriate information sharing.
- Support staff.
- Lead safeguarding training.
- Understand the views of children.
- Support transitions and the transfer of safeguarding records.

4.4. The DDSL will:

- Support the DSL in their role.

- Deputise in the absence of the DSL.

4.5. The Designated Teacher will:

- Champion educational achievement and promote high aspirations for looked-after and previously looked-after children (known in East Sussex as children we care for and children we cared for).
- Act as the academy's lead professional and main point of contact for these pupils.
- Oversee and monitor Personal Education Plans.
- Monitor attendance, progress and attainment and ensure appropriate interventions are in place for children we care for and cared for.
- Work collaboratively with social workers, carers, parents, the Virtual School Head and other professionals.
- Ensure staff understand the impact of trauma, attachment and care experience.
- Promote pupil voice and involve children in decisions about their education.
- Support successful transitions between schools and into further education or employment.
- Contribute to the effective use of Pupil Premium Plus funding.
- Work closely with the DSL and DDSL to address welfare and safeguarding concerns promptly.

4.6. All staff will:

- Read Part One and Annex A of KCSIE 2026.
- Complete safeguarding training.
- Know the identity of the DSL and DDSL.
- Understand safeguarding procedures.
- Report concerns immediately.

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- Maintain professional curiosity.
- Contribute to safeguarding assessments where requested.
- Understand their safeguarding responsibilities.

5. Supporting children

5.1. Our academy will support all pupils by:

- Taking a child centred approach to all aspects of our work.
- Providing a preventive curriculum which includes social and emotional aspects of learning.
- Ensuring that safeguarding is included across the curriculum to help children stay safe, recognise when they do not feel safe, and identify who they can talk to.
- Ensuring a comprehensive response across the curriculum to online safety, enabling children and parents to learn about the risks of new technologies and social media and to use these responsibly at school and at home.
- Recognising that effective education needs to be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.
- Filtering and monitoring internet use, to safeguard from potentially harmful and inappropriate online material.
- Ensuring that our safeguarding systems are well promoted, easily understood and easily accessible to children.
- Providing pupils with appropriate adults to approach if they are in difficulties and ensuring that when children talk to an adult about a concern they may have, they will always be taken seriously, they will always be supported and kept safe, and they will never be given the impression that they are creating a problem or have anything to feel ashamed about.

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- Ensuring that our systems of gathering pupil voice capture the full breadth of the pupil demographic, including pupils with SEND and those who are vulnerable or have experienced challenges in their lives, to understand the experience of pupils at the school, so that this can inform the development of safeguarding practice.

- Supporting the child's development in ways that will foster security, confidence, and independence, and encourage development of self-esteem and self-assertiveness while not condoning aggression or bullying.

- Liaising and working together with other support services and those agencies involved in safeguarding children.

- Monitoring children who have been identified as having welfare or safeguarding concerns and providing appropriate support.

- Ensuring that all staff are aware of the early help process, and understand their role in it, including acting as the lead professional where appropriate.

- Ensuring that all staff have a clear understanding of the needs of the children they are working with and understand that whilst all children need to be protected some groups of children are potentially at greater risk of harm through additional vulnerabilities or circumstances.

5.2. Additional vulnerabilities and circumstances can include:

- Looked after children (known in East Sussex as children we care for).

- Previously looked after children (known in East Sussex as children we cared for).

- Children who are disabled or have certain health or medical conditions (including allergies) and have specific additional needs.

- Children who have special educational needs (whether or not they have a statutory Education, Health, and Care plan).

- Children who have a mental health need.

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- Children who are young carers.
- Children who are pregnant and/or are parents themselves.
- Children who have exhibited early signs of abusive, violent, and/or harmful behaviours.
- Children showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Children frequently going missing from education, home, or care.
- Children who have been repeatedly removed from the classroom, experienced multiple suspensions, are on a reduced timetable, are at risk of being permanently excluded from the school, or are attending an Alternative Provision, including East Sussex Academy.
- Children at risk of exploitation, modern slavery, trafficking, sexual exploitation (by an individual or an organised network) or criminal exploitation (including financial exploitation).
- Children at risk of being radicalised into terrorism.
- Children with a parent or carer in custody, or who are affected by parental offending.
- Children in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues, or domestic abuse.
- Children misusing drugs or alcohol themselves.
- Children at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage.
- Children who have returned home to their family from care.
- Children showing early signs of abuse and/or neglect.
- Privately fostered children.

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- Children or young people who are lesbian, gay, bisexual, or questioning their gender or who are perceived by other children to be lesbian, gay, bisexual or gender questioning (whether they are or not).

5.3. Whilst being lesbian, gay, bisexual, or gender questioning, or perceived to be, is not in itself an inherent risk factor for harm, we acknowledge that this group can be targeted by other children. Risks can be compounded where children who are lesbian, gay, bisexual or gender questioning lack a trusted adult with whom they can be open, so as a school we endeavour to reduce any additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. We will follow the guidance in Keeping Children Safe in Education 2026 regarding children who are questioning their gender, including but not limited to matters relating to social transition requests, understanding children's thoughts and feelings, promoting welfare, working with parents/carers, and discussing constraints.

5.4. Children with special educational needs or disabilities (SEND) or certain medical or health conditions (including allergies) can face additional safeguarding challenges and additional barriers can exist when recognising abuse, neglect, and exploitation in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- Being more prone to peer group isolation or bullying and cyberbullying (including prejudice-based bullying) than other children.
- The potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse.
- The need for intimate care or that these children are isolated from others.
- That these children are more likely to be dependent on adults for care.

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- These children may have issues with cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content and or behaviours in school without understanding the consequences of doing so.

5.5. Children who have a social worker due to safeguarding or welfare needs may be vulnerable to further harm due to experiences of adversity and trauma, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and positive mental health. Our academy will identify the additional needs of these children and provide extra monitoring and pastoral and/or academic support to mitigate these additional barriers. We recognise that even when social care intervention has ended, these additional barriers may persist, therefore so too will our additional monitoring and support.

5.6. Staff are aware that mental health problems can, in some cases, develop into safeguarding concerns, including self-harm, suicidal ideation or risk of suicide. Mental health problems can also be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. Where it is known that children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences, this can impact on their mental health, behaviour, and education. Our school will identify the additional needs of these children and provide extra monitoring and pastoral support to mitigate these additional barriers. Where necessary, referrals will be made to mental health professionals for further support.

5.7. Our academy is a part of Sussex Police Operation Encompass, and we will support individual children as necessary when we receive a notification of an incident of domestic violence or abuse.

5.8. Children are vulnerable to extremist ideology and radicalisation. Like protecting children from other forms of harms and abuse, protecting children from this risk is all part of our whole-school approach to safeguarding. (See Preventing Extremism and Radicalisation Safeguarding Policy for further information.)

5.9. Our academy takes a trauma informed approach to supporting children, considering their lived experience, and factoring this into how we can best support them with their welfare and engage them with their learning.

6. The use of restrictive interventions including the use of reasonable force

6.1. There are circumstances when it will be necessary for staff to use restrictive interventions, including reasonable force to safeguard children. If staff use restrictive interventions, including reasonable force, they will do so in line with the Department for Education guidance Restrictive interventions, including use of reasonable force in schools April 2026, the Local Authority's guidance, and the academy's Behaviour Policy.

6.2. When managing incidents where restrictive interventions or reasonable force has been used the academy will consider whether to liaise with the LADO, where it is thought that the physical intervention may lead to an allegation.

7. Procedure for reporting and responding to concerns about children

7.1. We have developed a structured procedure in line with Pan-Sussex Child Protection and Safeguarding Procedures and Keeping Children Safe in Education 2026, which will be followed by all members of the academy community in cases where there are welfare or safeguarding concerns for a child.

This procedure is detailed in Appendix A of this policy.

7.2. The names of the DSL and DDSL will be clearly advertised throughout the academy, with a poster naming the safeguarding team together with photographs displayed in the academy reception, as well as in each classroom and the staffroom. This poster provides information as to how students, staff and visitors can raise concerns.

7.3. We will ensure that all parents and carers are aware of the responsibilities of staff members to safeguard and promote the welfare of children and act in the best interests of children by publishing the policy and procedures on our website and by referring to them in our introductory school materials.

8. Record keeping

8.1. Accurate and timely record keeping is an important part of the academy's accountability to children and their families and will help us in meeting our key responsibility to respond appropriately to welfare concerns about children.

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8.2. All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. Information will be kept confidential and stored securely.

8.3. Records will include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached and the outcome.

8.4. Records will be factual, accurate, relevant, up to date and auditable. They will support monitoring, risk assessment and planning for children and enable informed and timely decisions about appropriate action to take.

8.5. All staff members (including supply staff and trainee teachers), governors, volunteers, contractors, and activity providers will ensure that they record and report safeguarding concerns in line with guidance from the East Sussex Safeguarding Children Partnership (ESSCP) Keeping Records of Child Protection and Welfare Concerns Guidance. At Mulberry Academy Hastings we use an encrypted and secure web based database called CPOMS, to which all staff have access, for the purpose of recording concerns they may have about children.

8.6. The DSL will ensure that records are maintained accurately for children with safeguarding concerns and that stand-alone files are created and maintained in line with requirements of this policy, ESCC guidance, and Keeping Children Safe in Education 2026.

8.7. The DSL will ensure that files are only accessed by those who need to see them and where files or content are shared, this will happen in line with information sharing advice and guidance.

8.8. We will continue to support any pupil leaving the academy about whom there have been concerns by ensuring that all appropriate information, including welfare and safeguarding concerns, is forwarded under confidential cover to the pupil's new school as a matter of priority, and within 5 working days.

8.9. When a pupil is due to transfer to another school the DSL will consider if it would be appropriate to share any information with the new school or college in advance of the pupil leaving. For example,

information (such as children who have or have had a social worker and have been victims of abuse) that would allow the new school or college to put support in place for when the child arrives, ensuring appropriate support is maintained.

8.10. When a new pupil joins our academy, and there is a record of safeguarding or welfare concerns, we will ensure that this information is shared appropriately with the DSL, the Special Education Needs Coordinator (SENCO), and the Designated Teacher, as necessary.

9. The management of safeguarding

9.1. We recognise that safeguarding is not a discrete area of work: there is a safeguarding dimension to almost every area of academy practice. As part of our whole-school approach, and to ensure a holistic view of all children, we have structures and systems in place, such as scheduled meetings and shared databases, to ensure that the DSL has oversight of areas of academy organisation which may not fall directly within their remit but may impact upon effective safeguarding. These areas include behaviour, attendance, medical needs, first aid, SEND, and bullying. Information from these areas will be factored into safeguarding decision making for individual children so that their needs are considered holistically.

9.2. We will ensure that the DSL is kept informed of any incident of restrictive intervention with a child and will be aware of behaviour plans for specific children. See Behaviour Policy/Restrictive Interventions Policy for further information.

9.3. We will ensure that the DSL is kept informed of attendance patterns, and where there are concerns for individual children the response to this will be considered within the context of safeguarding. See Attendance Policy for further information.

9.4. We will ensure that the DSL is kept informed of arrangements for first aid and children with medical conditions and allergies and is alerted where a concern arises, such as an error with the administering of medicines or intervention, or repeated medical appointments being missed, or guidance or treatments not being followed by the parents or the child. See Supporting Pupils with Medical Conditions and Allergy Policy for further information.

9.5. Systems are in place to ensure that hate incidents, e.g., racist, homophobic, transphobic, gender or disability-based bullying and cyberbullying, are reported, recorded, and considered under

safeguarding arrangements by the DSL. See Behaviour, Anti-Bullying and Online Safety Policies for further information.

9.6. The DSL links with curriculum leads, such as PSHE and ICT, to ensure that the curriculum supports the wellbeing and resilience of pupils and teaches them about risk assessment and safeguarding issues, such as healthy relationships and online safety. See PSHE/RSE/Online Safety Policies for further information.

10. Safer workforce and managing allegations against staff and volunteers

Safer workforce

10.1. Our school operates robust safer recruitment procedures to help prevent unsuitable individuals from working with children, in accordance with Part Three of Keeping Children safe in Education 2026. Please refer to the Recruitment Policy for further details.

10.2. All individuals working in any capacity at our academy will be subjected to safeguarding and pre-employment checks in line with statutory guidance. This includes identity verification, enhanced DBS checks (and barred list checks where appropriate), prohibition checks, and ongoing safeguarding vigilance.

10.3. We will ensure that agencies and third parties supplying staff provide written confirmation that appropriate safeguarding checks have been completed. The academy will verify the identity of all agency workers on arrival.

10.4. Professional visitors, (e.g. Educational Psychologists, Social Workers, Local Authority Officers) must present valid professional identification. Where necessary, further safeguarding assurances will be sought from their employer.

10.5. External organisations and speakers will be subject to appropriate vetting and risk assessment, including consideration of:

- Educational value
- Age appropriateness
- Safeguarding assurances and DBS requirements

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10.6. Parents or other relatives of children or other visitors attending activities such as a parents' evening or sports day will not be expected to provide any DBS or barred list checks. The Principal and DSL will decide case by case or event by event the level of supervision, if any, required for such persons.

10.7. The academy will obtain written confirmation from alternative provision providers that appropriate safeguarding checks have been completed for their staff and volunteers. The academy retains responsibility for safeguarding pupils in alternative provision.

10.8. All job descriptions and person specifications will clearly set out safeguarding responsibilities.

10.9. At least one member of every interview panel will have completed up to date safer recruitment training.

10.10. The Principal and the DSL are responsible for maintaining an accurate and up to date Single Central Record (SCR).

Managing allegations and low-level concerns

10.11. The school will manage all concerns relating to staff (including supply staff and trainee teachers), volunteers, contractors, and organisations using the premises in line with Part Four of Keeping Children Safe in Education 2026. The Pan Sussex Procedures will be adhered to and the flowchart in **Appendix D of this policy** will be followed.

Allegations that meet the harm threshold

10.12. Any allegation that a person who works with children has:

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

must be reported immediately to the Principal/DSL (or CEO if the concern is related to the Principal).

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10.13. The school will consult with the LADO within one working day and must not undertake an internal investigation prior to this consultation. However, we may need to commence with some initial fact-finding prior to any internal investigation.

Working with the LADO

10.14. Referrals will be made where concerns relate to an adult's conduct, behaviour, or suitability, including concerns arising both inside and outside the workplace (e.g. criminal behaviour, safeguarding breaches, or inappropriate conduct).

10.15. The LADO will:

- Provide advice and guidance
- Liaise with police, Children's Social Care, and other agencies
- Manage and oversee the process to ensure cases are dealt with fairly and without delay

Low-level concerns

10.16. Low-level concerns (those that do not meet the harm threshold) will be:

- Reported to the Principal
- Recorded promptly and accurately
- Reviewed to identify patterns or cumulative risk
- Addressed in line with the staff code of conduct

10.17. Where a pattern of behaviour emerges, or the concern escalates, consideration will be given to making a referral to the LADO.

Immediate safeguarding action

10.18. In all cases, the welfare of the child is paramount. The academy will:

- Take immediate steps to safeguard the child
- Assess and manage any ongoing risk
- Consider whether the adult should be removed from duties involving children pending outcome enquiries

Record keeping, outcomes and duties

10.19. The academy will maintain clear and confidential records of all concerns, decisions, and outcomes.

10.20. Outcomes will be recorded in line with statutory categories (e.g. substantiated, unsubstantiated, unfounded, false, or malicious), and:

- A DBS referral will be made where required
- Other bodies will be informed, where appropriate, such as the Teaching Regulatory Agency, Ofsted, the police, etc
- Lessons learned will be used to improve safeguarding practice

10.21. Records will be retained in accordance with Keeping Children Safe in Education and data protection requirements.

More information and details of procedures related to reporting and responding to concerns about children are detailed in Appendix C of this policy.

11. Staff induction, training, and development

11.1. All new members of staff, including newly qualified teachers and teaching assistants, will be given an induction which includes the following:

- Issue and explain the safeguarding and child protection policy.
- Issue and explain the behaviour policy.
- Issue and explain the staff behaviour policy and code of conduct.

- Issue and explain the policy or guidance which includes the safeguarding response to children who are absent from education, particularly on repeat occasions and/or for prolonged periods.
- Explain the role of the DSL and share the identity of the DSL and DDSL.
- Issue Part One and Annex A of Keeping Children Safe in Education 2026.
- Child protection and safeguarding training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring).
- All new members of staff are expected to read the above-mentioned documents and to sign an acknowledgement of this.

11.2. The safeguarding induction and ongoing safeguarding training of staff will be integrated, aligned, and considered as part of the whole-school safeguarding approach and wider staff training and curriculum planning. It will include:

- Staff understand the difference between a safeguarding concern and a child in immediate danger or at risk of significant harm.
- Staff 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.
- Staff understand that children's poor behaviour may be a sign that they are suffering harm or that they have been traumatised by abuse.
- Staff understand that children who have a social worker may be educationally disadvantaged and face barriers to attendance, learning, behaviour, and positive mental health and that these barriers may persist even when the social care intervention ceases.
- Staff understand that mental health issues for children may be an indicator of harm or abuse, or where it is known that a child has suffered harm or abuse this may impact on their mental health, behaviour, and education.

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- Staff understand that safeguarding incidents and/or behaviours can be associated with factors outside the academy and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSL, 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 (including financial exploitation), sexual abuse, serious youth violence (including physical assault, carrying, threatening with, or using weapons), and county lines.

- Staff understand that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently via online channels and in daily life. Children can also abuse other children online. This can take the form of abusive, harassing, and misogynistic and misandrist messages, the sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

- Staff to be aware that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of the academy and online.

- Staff to understand, that even if there are no reports in the academy of child-on-child abuse it does not mean it is not happening; it may be the case that it is just not being reported.

- Staff to understand the importance of challenging inappropriate behaviours between children, which are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

- Staff know how to respond to a child who makes a report of abuse or harm.

- If staff are unsure, they should always speak to the DSL or DDSL.

- If staff have any concerns about a child’s welfare, they should act on them immediately.

- Staff should not assume a colleague, or another professional will take action.

- The DSL or DDSL should always be available to discuss safeguarding concerns. If in exceptional circumstances the DSL and DDSL are not available this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from SPoA. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as is practically possible.

- Teaching staff in all subject areas to understand that there will be various opportunities, planned and unplanned, to reference, reinforce or develop aspects of the safeguarding agenda within their lessons such as online safety, healthy relationships, challenging hate or prejudice and critical thinking.

11.3. The DSL will undergo updated safeguarding and child protection training every two years. In addition to this their knowledge and skills will be updated regularly, and at least annually, to keep up with developments relevant to the role.

11.4. All staff members of the academy will receive appropriate safeguarding and child protection training (whole-school training) annually. The DSL will provide ongoing briefings to the academy on any changes to safeguarding and child protection legislation and procedures and relevant learning from local and national serious practice reviews as required, throughout the year.

11.5. Staff members who miss whole-school training will be required to undertake other relevant training to make up for it, e.g., by attending additional group sessions put on by the DSL, or receiving 1:1 training from the DSL. The DSL will be responsible for arranging this.

11.6. The nominated governor for safeguarding and child protection will attend Governor Services training prior to or soon after appointment to the role; this training will be updated every two years.

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

11.8. On the first occasion which staff members provided by other agencies and third parties, e.g., supply teachers and contractors come to our academy to work, they will be provided with details of the

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safeguarding arrangements at our academy, which will include identifying the DSL and the process for reporting welfare concerns.

11.9. The academy will maintain accurate records of staff induction and training.

12. Confidentiality, consent, and information sharing

12.1. We recognise that all matters relating to safeguarding and child protection are confidential and we will always be clear about the purpose of sharing confidential information and only share as much as we need to achieve the purpose.

12.2. All staff members are aware that they cannot promise a child they will keep secrets which might compromise the child's safety or wellbeing.

12.3. The Principal or the DSL will disclose information about a pupil to other members of staff on a need-to-know basis, and in the best interests of the child.

12.4. All staff members have a professional responsibility to share information with other practitioners and agencies in order to safeguard children and will be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children.

12.5. When deciding what information to share staff will consider:

- The relevancy of the information, including the current safeguarding risk.
- What is necessary for the practitioner, agency, or receiving setting to know.
- Whether it is clearly presented and appropriately contextualised.

12.6. The academy may have to share information about parents or carers, such as their medical history, disability, or substance misuse issues, for investigations of child abuse carried out by Children's Social Care.

12.7. We will proactively seek out information as well as sharing it. This means checking with other professionals whether they have information that helps us to be as well informed as possible when working to support children.

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12.8. The Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025, known at the 'data protection laws', do not prevent the sharing of information for the purpose of keeping children safe and fears about sharing information must not be allowed to stand in the way of the need to safeguarding and promote the welfare and protect the safety of children. The data protection laws are there to ensure that personal information is managed in a sensible way and that a balance is struck between a person's privacy and public protection.

12.9. We should be sharing any concerns we have with parents at an early stage unless this would put a child at greater risk or compromise an investigation. Parents need to know what our responsibilities are for safeguarding and protecting children and that this involves sharing information about them with other professionals.

12.10. We will try to get consent from parents (or the child, if they have sufficient understanding) to share information, if possible. However, we do not need consent if we have concerns about a child's safety and well-being. If we decide to share information without consent, we will record this with a full explanation of the decision.

12.11. Consent will not be sought from parents or carers (or the child, if they have sufficient understanding), if:

- It would place a child at increased risk of harm.
- It would place an adult at risk of serious harm.
- It would prejudice a criminal investigation.
- It would lead to unjustified delay in making enquiries about reports of significant harm to a child.
- Required by law or a court order to share information.

12.12. Consent is not necessary in cases where Children's Social Care are making child protection enquiries under Section 47 of the Children Act 1989.

12.13. Consent is necessary, for:

- Children's Social Care investigations or assessments of concerns under Section 17 of the Children Act 1989. Children's Social Care will assume that we have obtained consent from the parents to share information unless we make them aware that there is a specific issue about consent. This must be discussed with a social worker in the Duty and Assessment Team (DAT).

- Early help (level 3) referrals and assessments. Assessments are undertaken with the agreement of the child and their parents or carers.

- Referrals to the Team Around the Family (TAF) Coordinator. Referrals must be made with the consent of the child and their parents or carers.

12.14. Where there is any doubt about the need for seeking consent, advice will be sought from the DSL or from the Children's Social Care SPoA.

12.15. A record will be made of the decision to share information, with or without consent, and the reasons for it. Equally a record will be made of any decision not to share information including the reason for this.

12.16. All our staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing in order to safeguard and promote children's welfare.

12.17. We will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information and when information can be shared without consent.

13. Inter-agency working

13.1. We will develop and promote effective working relationships with other agencies, including agencies providing early help services to families, the police, and Children's Social Care.

13.2. We will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children.

13.3. We will participate in safeguarding practice reviews, other reviews, and file audits as and when required to do so by the ESSCP. We will ensure that we have a clear process for gathering the

evidence required for reviews and audits, embedding recommendations into practice and completing required actions within agreed timescales.

14. Professional challenge and disagreements

14.1. Working with children and families, and in particular child protection work, is stressful and complex, as well as involving uncertainty and strong feelings. To ensure that the best decisions are made for children, we need to be able to challenge one another's practice.

14.2. We will promote a culture within our academy that enables all staff members to raise, without fear of repercussions, any concerns they may have about the management of safeguarding in the academy. This may include raising concerns about decisions, action, and inaction by colleagues about individual children. If necessary, staff members will speak with the DSL, the Principal, or the Chair of Trustees.

14.3. Cooperation across agencies is crucial; professionals need to work together, using their skills and experience, to make a robust contribution to safeguarding children and promoting their welfare within the framework of discussions, meetings, conferences, and case management.

14.4. If there are any professional disagreements with practitioners from other agencies, the DSL or the Principal will raise concerns with the relevant agency's safeguarding lead in line with Section 5.2.2 Resolving Professional Differences guidance in the Pan-Sussex Child Protection and Safeguarding Procedures.

14.5. If the school disagrees with the child protection conference chair's decision, the DSL or the Principal will consider whether they wish to challenge it further and raise the matter with Children's Services Head of Safeguarding.

15. Contractors, service and activity providers, alternative provision providers, and work placement providers

15.1. We will ensure that contractors and providers are aware of our academy safeguarding and child protection policy and procedures. We will require that employees and volunteers provided by these organisations use our procedure to report concerns.

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15.2. We will seek written confirmation that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding check in line with Keeping Children Safe in Education 2026. If assurance is not obtained, permission to work with our children or use our academy premises may be refused.

15.3. When we commission services from other organisations, we will ensure that compliance with our policy and procedures is a contractual requirement.

15.4. When the academy places a pupil with an alternative provision provider, the academy continues to be responsible for the safeguarding of that pupil. To fulfil our safeguarding responsibilities, we will:

- Complete quality assurance checks and visits of the provision to ensure the placement meets the pupil's needs.
- Ensure that the alternative provision provider is aware of any risk factors or safeguarding concerns for any pupil placed with them by the school and that they can meet their needs.
- Obtain written confirmation that the alternative provider has completed appropriate safeguarding checks on all individuals working at the establishment, i.e. those checks that the academy would otherwise perform in respect of our own staff.
- Obtain written confirmation that the alternative provider will inform the academy of any arrangements that may put the child at risk.
- Ensure that agreements and protocols with the alternative provision provider for the sharing of information, such as daily attendance or emerging concerns, are established and adhered to.
- Ensure we always know where the child is based during academy hours and have records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend.
- Complete regular reviews of alternative provision placements (at least six times a year) to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs.
- Ensure that where safeguarding concerns arise with any aspect of the alternative provision, the placement is immediately reviewed, and terminated, if necessary, unless or until concerns have been satisfactorily addressed.

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15.5. When sending pupils on a work placement, as part of work experience, we will seek reassurances about their policies and procedures to protect children from harm, as outlined in Keeping Children Safe in Education 2026. We will ensure relevant checks are completed for any children over the age of 16 years who will be engaging in regulated work, where appropriate, in line with Keeping Children Safe in Education 2026.

16. Site security

16.1. The academy site is surrounded by a continuous perimeter fence to reduce the risk of unauthorised access and egress.

16.2. All staff members have a responsibility to ensure our buildings and grounds are secure and for reporting concerns that may come to light.

16.3. We check the identity of all visitors and volunteers coming into the academy. Visitors are expected to sign in and out using the InVentry system in reception and to display a visitor's badge while on the academy site. Any individual who is not known or identifiable will be challenged for clarification and reassurance.

16.4. The academy will not accept the behaviour of any individual, parent, or anyone else, that threatens academy security or leads others, child, or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the academy site.

17. Use of the premises for non-school activities

17.1. When we hire or rent out academy facilities or premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we always ensure that appropriate arrangements are in place to keep children safe.

17.2. When the services or activities being provided are under the direct supervision or management of the academy, then arrangements for child protection and safeguarding outlined within this policy and in Keeping Children Safe in Education 2026 will apply.

17.3. When services or activities are being provided separately by another body this will not necessarily be the case. The academy will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed) and that

they follow the safeguarding arrangements in the After-school clubs, community activities, and tuition safeguarding guidance for providers, February 2026; and ensure that there are arrangements in place to liaise with the school on these matters where appropriate.

17.4. The academy will also ensure safeguarding requirements 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.

Please see the Letting of Academy Premises Policy for further detail.

18. Whistleblowing and complaints

18.1. We will ensure that all staff members are aware of their duty to raise concerns, where they exist, about the management of safeguarding and child protection, which may include the attitude or actions of colleagues (including low-level concerns). If necessary, they will speak with the Principal, or with the Local Authority Designated Officer (LADO). Should staff not feel able to raise concerns with any of the aforementioned, they can contact the NSPCC helpline on 0800 028 0285 or via help@nspcc.org.uk or Whistleblowing Advice Line NSPCC. **More information about how low-level concerns and allegations about the conduct/behaviour of adults are managed can be found in Appendix C of this policy.**

18.2. We have a clear reporting procedure for children, parents, and other people to report concerns or complaints, including abusive or poor practice. This is outlined in our Complaints Policy.

19. Quality assurance

19.1. We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures. This will include periodic audits of welfare concern and safeguarding files and records by the DSL.

19.2. We will complete a self-assessment audit of the academy's safeguarding arrangements at least annually (as specified by the ESSCP). At Mulberry Academy Hastings we use the audit tool provided by The East Sussex Education Division.

19.3. The academy's senior management and the governing body will ensure that action is taken to remedy without delay any areas for development identified in safeguarding and child protection arrangements.

20. The legal framework

20.1. Section 175 of the Education Act 2002 places a duty on governing bodies of maintained schools and further education institutions (including sixth-form colleges) to make arrangements for ensuring that their functions relating to the conduct of the school are exercised with a view to safeguarding and promoting the welfare of children who are pupils at the school. Section 157 of the same Act places a similar duty on non-maintained and independent educational establishments, including free schools and academies.

20.2. Under Section 10 of the Children Act 2004, all maintained schools, further education colleges and independent schools, including free schools, academies and early years providers, are required to cooperate with the local authority to improve the well-being of children in the local authority area.

20.3. Under Section 14B of the Children Act 2004, the ESSCP can require a school, college, or early years provider to supply information in order to perform its functions. This must be complied with.

20.4. This policy and the accompanying procedures have been developed in accordance with the following statutory guidance and local safeguarding procedures:

- Working Together to Safeguard Children 2026 statutory guidance, March 2026
- Keeping Children Safe in Education statutory guidance for schools and colleges, September 2026
- Pan-Sussex Child Protection and Safeguarding Procedures
- Information Sharing advice for practitioners providing safeguarding services for children, young people, parents and carers, May 2024
- What to do if you're worried a child is being abused, March 2015
- Early Years Foundation Stage statutory framework for group and school-based providers, September 2026

21. Policy review

21.1. This policy and the procedures will be reviewed every academic year. All other linked policies will be reviewed in line with that policy review cycle.

21.2. The DSL will ensure that staff members are made aware of any amendments to policies and procedures.

22. Linked policies and procedures

- First Aid and Medical Policy
- Supporting Students with Medical Conditions Policy
- Pupil and Student Attendance Policy
- Online Safety policy
- Trust Complaints Policy
- Equality Policy including Equality Objectives
- Trust Health and Safety Policy and other linked policies and risk assessments
- ICT Acceptable Use Policy (staff and pupils/students)
- Trust School Trips and Visits Policy
- Trust Restrictive Intervention Policy
- Trust Safer Recruitment Policy
- Special Educational Needs and Disabilities Policy
- Trust Code of Conduct for Staff Policy
- Trust Whistleblowing Policy
- Anti-Bullying Policy
- Behaviour Policy
- Drugs Policy
- RSHE Policy
- Spiritual, Moral, Social and Cultural Development Policy
- Preventing Extremism and Radicalisation Safeguarding Policy

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Appendix A: Procedure for reporting and responding to concerns about children

1. Recognition – what to look for

1.1. Staff members will understand what abuse, neglect, and exploitation are having read Part One and Annex A of Keeping Children Safe in Education 2026. They will look for indicators of abuse, neglect, and exploitation and should refer to the detailed information about the categories of abuse and risk indicators in the Sussex Child Protection Procedures for further guidance.

1.2. In an abusive relationship, the child may:

- appear frightened of their parent(s)
- act in a way that is inappropriate to their age and development, although full account needs to be taken of different patterns of development and different ethnic groups
- however, they may also not exhibit any signs of stress or fear

1.3. In an abusive relationship, the parent or carer may:

- persistently avoid child health services and treatment of the child's illnesses
- have unrealistic expectations of the child
- frequently complain about or to the child and fail to provide attention or praise
- be absent
- be misusing substances
- persistently refuse to allow access on home visits by professionals
- be involved in domestic violence and abuse
- be socially isolated

1.4. Serious case reviews, now known as safeguarding practice reviews, have found that parental substance misuse, domestic abuse, and mental health problems, if they coexist in a family, could mean significant risks to children. Problems can be compounded by poverty, frequent house moves or eviction.

2. Safeguarding children Continuum of Need

2.1. The Safeguarding Children Continuum of Need has been developed so that everyone working with children in East Sussex has a common language for understanding the needs and risks surrounding children and their families. It is important that all members of staff are familiar with it.

2.2. The Continuum of Need shows that a child's or family's additional needs can be on a range from one to four, and that needs can move between levels. The Continuum of Need will be used by practitioners to identify the right level of support for the child in the least intrusive way while keeping the child safe.

The Continuum of Need is accessible on the East Sussex County Council Website.

2.3. When assessing cases of possible neglect, the ESCC Neglect Matrix will be used. This tool mirrors the Continuum of Need, but with greater focus upon potential indicators of neglect mapped across each of the four levels of need.

3. What action to take if you have concerns about a child

3.1. When concerned about the welfare or safety of a child, staff should always act immediately and in the best interests of the child.

3.2. Staff should always speak to the DSL or DDSL about any concern with a child and should never assume a colleague, or another professional will take action.

3.3. The DSL or DDSL should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL or DDSL is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from SPoA. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as is practically possible. All concerns should be reported using CPOMS, or if made by an external visitor,

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then this should be done using the Welfare Concern Form, available from reception or the staffroom. This will then be uploaded to CPOMS by a member of the safeguarding team.

3.4. In line with Pan-Sussex Child Protection and Safeguarding Procedures and Keeping Children Safe in Education 2026, we will consider:

- Providing community based early help, which may involve managing support for the child internally through our own pastoral support processes, where doing so does not place the child at additional risk.
- Seeking out support in the community and signposting families to support, making use of East Sussex 1 Space and East Sussex Family Hubs.
- Seeking advice or further signposting from the ESCC Consultation Advice Line.
- Engaging with the Team Around the Family process to coordinate support for the family.
- Where targeted Early Help (under sections 10 & 11 of The Children Act 2004) may be required we will make a referral to SPoA.
- If a concern is at level 4 of The Continuum of Need, we will make a referral to SPoA.
- Children's Social Care will consider whether this may be a Child in Need (Section 17 Children Act 1989) or Child Protection (Section 47 Children Act 1989). Further intervention to accommodate or remove a child from their home may be considered under sections 20 and 31 Children Act 1989.
- Informing the police where a crime may have been committed (using the NPCC - When to call the police guidance to inform this decision). Where the police speak with children formally at school then the requirement, outlined in PACE Code C 2019, for children to have an Appropriate Adult will be adhered to.

3.5. If a child reports that he or she has been abused or experienced harm in some way, the member of staff or volunteer should follow this guidance.

- Listen to what is being said without displaying shock or disbelief

- Only ask questions when necessary to clarify
- Accept what is being said
- Allow the child to talk freely – do not put words in the child's mouth
- Reassure the child that what has happened is not his or her fault
- Do not promise confidentiality
- Stress that it was the right thing to tell
- Do not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told
- Inform the DSL without delay
- All concerns should be reported using CPOMS, or if by an external visitor, then by completing a Welfare Concern Form, available from reception or the staffroom. This will then be uploaded to CPOMS.
- Dealing with a report from a child and safeguarding issues can be stressful. Consider seeking support for yourself and discuss this with the DSL.

4. Discussing concerns with the family and the child

4.1. In general, we will always discuss any concerns the academy may have with the child's parents or carers. They need to know that we are worried about their child. However, we will not discuss our concerns if we believe that this would place the child at greater risk or lead to loss of evidence for a police investigation.

4.2. If we make a decision not to discuss our concerns with the child's parents or carers this will be recorded in the child's safeguarding file with a full explanation for our decision.

4.3. It is important to consider the child's wishes and feelings, if age appropriate, as part of planning what action to take in relation to concerns about their welfare.

4.4. When talking to children, we will take account of their age, understanding, and preferred language, which may not be English. It is important to consider how a child with barriers to communication may need support in communicating.

4.5. How we talk to a child will also depend on the substance and seriousness of the concerns. We may need to seek advice from Children's Social Care or the police to ensure that neither the safety of the child nor any subsequent investigation is jeopardised.

4.6. If concerns have arisen as a result of information given by a child, we will reassure the child but not promise confidentiality.

4.7. We will discuss our concerns with the parents and seek their consent to making a referral to Children's Social Care, unless we consider that this would place the child at increased risk of significant harm.

4.8. We do not need the parents' consent to make a referral if we consider the child is in need of protection, although parents will ultimately be made aware of which organisation made the referral.

4.9. If parents refuse to give consent to a referral we may decide to continue, but we will make this clear to Children's Social Care.

4.10. If we decide to refer a child without the parents' consent, we will record this with a full explanation of our decision.

4.11. When we make our referral, we will agree with Children's Social Care what the child and parents will be told, by whom and when.

5. Early help for children and families

5.1. Most parents can look after their children without the need of help other than from their family or friends. However, some parents may need additional help from our academy or other services. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing help early is more effective in promoting the welfare of children than reacting later.

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5.2. Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for the children identified in Section 5 of the policy.

5.3. Our academy will work together with other agencies to provide a coordinated offer of early help, in line with Working Together to Safeguard Children 2026 and local guidance, to any child who needs it.

5.4. We will pool our knowledge within the academy and with other agencies about which families or children need additional support in a range of ways so that we can work out how best to help them. We will use the East Sussex Safeguarding Continuum of Need tool to identify what level of need the child or their family has.

5.5. We will work closely with targeted Early Help services and Children's Social Care if we feel families need more support and input, or children are at risk of harm, and we will continue to provide support if other services are also needed.

5.6. We will talk to the family about referral to a targeted Early Help service and explain that there may be a need to involve other professionals, including talking to a social worker about our concerns. We will seek the family's consent for the referral.

5.7. If the family does not consent to a referral to a targeted Early Help service, we will make an assessment about whether the needs of the child will escalate, or the child will become unsafe without help. If our assessment is that the needs or concerns will escalate, then we will contact the Children's Social Care SPoA for a consultation with a qualified social worker in order to make a shared decision about whether the level of concerns calls for a referral to Children's Social Care.

6. Children's social-care-led responses to concerns about a child

6.1. Once Children's Social Care has accepted our referral as needing a social-care-led response (Level 4 of the Continuum of Need), we will cooperate with Children's Social Care and the police in any emergency action they take using their legal powers for immediate protection of the child.

6.2. We will participate in any multi-agency discussions (strategy discussions), if invited to do so, and share information about the child and their family to plan the response to concerns.

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6.3. We will ensure that a relevant staff member participates in all initial and review child protection conferences if we are invited to attend. The staff member will work together with other agencies to discuss the need for and agree to an outcome focused child protection plan and will ensure that the child's wishes, and views are considered in their own right in planning.

6.4. If we are members of the core group to implement a child protection plan, we will ensure a relevant staff member participates in all core group meetings.

6.5. We will ensure that we complete all actions allocated to us as part of the outcome-focused plan, whether a child protection plan or a family support plan, in a timely way.

6.6. We will continue to monitor children once their plans are ended to ensure that they are supported and kept safe.

7. Record keeping

See Section 7 of the policy for more information.

8. Information sharing and consent

See Section 11 of the policy for more information.

9. Procedure for managing allegations of abuse against staff

9.1. If there is a concern about the conduct or behaviour of an adult towards a child or group of children, this must be reported immediately.

See Appendix C for more information.

Appendix B: Child-on-child abuse (including harassment and violence)

At this academy we take a zero-tolerance approach to child-on-child abuse (including harassment, violence, bullying, harmful sexual behaviour, sexual harassment, and sexual violence), recognising that all child-on-child abuse is unacceptable and will be taken seriously.

1.1. Throughout this appendix reference will be made to the terms perpetrator and victim. These terms appear within DfE guidance such as Keeping Children Safe in Education and are easily understood. These terms are being used within this document to aid the flow of sentences however when discussing incidents of child-on-child abuse with children, parents, or carers the term perpetrator will be replaced with 'child who has displayed X behaviour' and victim will be replaced with 'child who has experienced X behaviour'.

1.2. All staff will be aware that children can abuse other children and that it can happen both inside and outside of the academy and online.

1.3. Staff understand that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator and they will provide support and intervention to both children.

1.4. Staff will recognise that for some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys perpetrators.

1.5. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between children (teenage relationship abuse – including physical, sexual, emotional abuse, and stalking).
- 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).
- physical assault and harm, or the threat of harm with a weapon.

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- harmful sexual behaviour, sexual violence, and sexual harassment, which may include misogyny/misandry, and may be standalone or part of a broader pattern of 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).

- consensual and non-consensual making or sharing of nudes and semi nudes, including those generated using AI.

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.

- initiation and hazing type violence and rituals.

1.7. All staff understand the importance of challenging inappropriate behaviours between children, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, misogyny and an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

1.8. All staff understand that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they will act on them immediately rather than wait to be told.

1.9. The initial response to a report of child-on-child abuse from a child is incredibly important. How we respond to a report can encourage or undermine the confidence of future victims of child-on-child abuse to report or come forward.

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1.10. Staff understand that an initial report to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.

1.11. Staff will be mindful that certain children may face additional barriers to telling someone. This could be for many different reasons including, but not limited to, their vulnerability, disability, sex, ethnicity, and/or sexual orientation.

1.12. All staff will reassure victims that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the academy will not be downplayed and will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report.

1.13. All staff understand that even if there are no reports in the academy of child-on-child abuse it does not mean it is not happening; it may be the case that it is just not being reported. As such it is important for staff to speak with the DSL or a DDSL if they have any concerns regarding child-on-child abuse.

1.14. If a report of child-on-child abuse is made:

- Staff will record the report and inform the DSL. All concerns should be reported using CPOMS, or if by an external visitor, then by completing a Welfare Concern Form, available from reception or the staffroom. This will then be uploaded to CPOMS.

- The DSL will assess the information and identify appropriate outcomes to the incident, which may include academy-based support or interventions, support from universal services and community based early help, or referrals to other agencies, as necessary, such as to Family Help, CAMHS and the police (if the report involves a potential criminal offence).

- Where it is necessary to contact the police, we will explain to those children involved that the law is in place to protect children and young people rather than to necessarily criminalise them, and this will be explained in such a way that avoids alarming or distressing them.

- When responding to a report of child-on-child abuse the wishes of the victim, in terms of how they want to proceed, will be taken into account. This is especially important in the

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context of sexual violence and sexual harassment. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children.

- A risk assessment will be completed and where necessary a written support plan created for all children involved, including the child or children who has experienced the abusive behaviour and the child or children who is reported to have displayed the abusive behaviour as well as any others affected, with a named person they can all talk to if needed.

- Any risk assessment will give consideration to potential intra-familial harms and any necessary support for siblings.

- Where an incident has occurred within the school then the time and location will be identified, and a risk assessment completed to make the location safer.

- Risk assessments and support plans will be completed in conjunction with parents or carers, the child (depending on their age) and with support from any other agencies involved such as Children's Social Care or the police.

- The format of any support plan will vary with the exact nature of the incident but will always be in line with processes outlined in the behaviour or anti-bullying policies.

- If the incident involves a Harmful Sexual Behaviour (HSB) then the guidance in the East Sussex Protocol for Managing Peer on Peer Harmful Sexual Behaviour in Schools will be followed and a Safeguarding Risk Reduction Plan created accordingly.

- Incidents involving consensual and non-consensual sharing of nudes and semi nudes images and or videos, including where generated by AI**,** will require a safeguarding response and will be managed in line with guidance in Sharing nudes and semi-nudes: advice for education settings working with children and young people.

- Any risk assessments and support plans devised will be shared with staff within the academy, as necessary, to ensure that staff are aware of the additional measure in place to safeguard those children.

- Alongside actions to provide protection and support to both victims and perpetrators of child-on-child abuse, where appropriate, they may also need to be managed through the academy behaviour or anti bullying policies.

- All incidents of child-on-child abuse will be categorised and recorded by the nature of the incident i.e. bullying (including the type such as cyber, racial, biphobic, transphobic and homophobic etc), physical abuse (identifying the specifics: hitting, kicking, etc) or a Harmful Sexual Behaviour or other specifics such as sharing of nudes and semi-nudes or whether the incident was potentially criminal.

1.15. The academy will minimise the risk of child-on-child abuse by:

- Challenging behaviours, such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

- Addressing any inappropriate behaviour (even if it appears to be relatively innocuous) is an important intervention that helps prevent problematic, abusive, and/or violent behaviour in the future.

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending nudes or semi-nude images.

- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys, whilst at the same time recognising that any of these issues can affect any pupils regardless of their gender.

- Ensuring our whole-school approach to safeguarding and preventive curriculum helps to educate pupils about appropriate behaviour and consent.

- Ensuring pupils are aware of the different ways in which they can speak with a trusted adult in the academy, either directly or through other means such as the safeguarding email address or online reporting tool, which are monitored by key staff in the safeguarding team.

- Ensuring pupils are aware of the different ways in which they can speak with an adult outside of the school through agencies such as Childline or the NSPCC.

- Ensuring that staff are aware of child-on-child abuse and maintain an attitude of 'it could happen here', as they do with all areas of safeguarding.

- Ensuring that staff are trained to understand that a child harming another child could be a sign that the child is being abused themselves.

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Appendix C: Procedure for managing allegations of abuse against staff and low-level concerns

1.1. Within this document the term staff should be broadly read as any adult working within the academy, whether directly employed, providing a contracted service, a one-off service, such as a supply teacher, a trainee teacher, or a volunteer.

1.2. Our aim is to provide a safe and supportive environment which secures the wellbeing and best outcomes for the children at our academy. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

1.3. Allegations sometimes arise from a differing understanding of the same event but, when they occur, they are distressing and difficult for all concerned. We also recognise that some allegations are genuine and there are some adults who deliberately seek to harm or abuse children.

1.4. We will take all possible steps to safeguard our children and to ensure that the adults in our academy are safe to work with children. We will always ensure that the procedures outlined in Part Four of Keeping Children Safe in Education 2026 and Pan Sussex Procedures are adhered to and will follow the flowchart in Appendix D of this policy.

1.5. If an allegation is made or information is received about an adult who works in our academy (including supply teachers, trainee teachers, volunteers and contractors) which indicates that they have:

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

the person receiving the information will inform the Principal immediately. Should an allegation be made against the Principal, this will be reported to the CEO. In the event that neither the Principal

nor CEO are contactable on that day, the information must be passed to and dealt with by the member of staff acting as Principal.

1.6. The Principal or CEO will follow the flowchart in Appendix D of this policy. No member of staff or the governing body will undertake further investigations before receiving advice from SPoA or LADO.

1.7. Any member of staff (including supply teachers, trainee teachers, volunteers and contractors) who does not feel confident to raise their concerns with the Principal or CEO should follow the flowchart in Appendix D of this policy and make the appropriate contact directly with the SPoA or the LADO.

1.8. Supporting people:

- The academy together with Children's Social Care and the police, if they are involved, will consider the impact on the child concerned and provide support as appropriate.
- The Principal will ensure that the child and family are kept informed of the progress of the investigation.
- The academy will need to contact the Trust HR lead for advice in relation to the investigation of any allegation in line with the Councils' Disciplinary Policy, where appropriate.
- The staff member who is the subject of the allegation will be advised to contact their union, professional association, or a colleague for support, (depending on the outcome of the safeguarding strategy meeting which will be chaired by Children's Social Care or the LADO if the staff member is employed by ESCC).
- The HR lead for the organisation will ensure that the staff member is provided with appropriate support, if necessary, through occupational health or welfare arrangements.
- The Principal will appoint a named representative to keep the staff member updated on the progress of the investigation; this will continue during any police or Section 47 investigation or disciplinary investigation.
- The legislation imposing restrictions makes clear that "publication" of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. "Publication" includes "any speech, writing, relevant programme or other communication in

whatever form, which is addressed to the public at large or any section of the public". This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what were published could lead to the identification of the teacher by members of the public).

1.9. The academy has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our academy, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or the HR lead for the organisation. In the case of a member of teaching staff, a decision will be made about whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

1.10. In line with Keeping Children Safe in Education 2026, under no circumstances will the academy decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.

1.11. Where there are conduct issues with a supply teacher which may not reach the threshold for safeguarding, we will consult the LADO, nonetheless.

1.12. The agency for the supply teacher will be fully involved and expected to co-operate in any enquiries from the LADO, police, and/or children's social services.

1.13. Where directed to do so by the LADO, police and/or children's social services, the academy will support any safeguarding investigation of a supply teacher by collecting the facts when an allegation is made.

1.14. In this respect it may be that the academy take a lead on that safeguarding element of investigation.

1.15. If the academy receives an allegation relating to an incident that happened when an individual or organisation was using the academy premises for the purposes of running activities for children, we will respond, as with any safeguarding allegation, by following our safeguarding policies and procedures, including informing the LADO.

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2. Procedure for managing low-level concerns

2.1. As part of our whole-school approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the academy (including supply teachers, trainee teachers, volunteers, and contractors) are dealt with promptly and appropriately.

2.2. Creating a culture in which all concerns about adults, including allegations that do not meet the harms threshold, are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. This will encourage an open and transparent culture; enable our academy to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the academy are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the academy.

2.3. If anyone has a 'low-level' concern this does not mean that it is insignificant. A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the academy (including supply teachers, trainee teachers, volunteers and contractors) may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, but does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

2.4. Examples of such behaviour could include, but are not limited to:

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating, or offensive language
- Humiliating pupils

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2.5. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

2.6. It is crucial that any such concerns, including those which do not meet the allegation or harm threshold, are shared responsibly with the Principal (this should include self-referral) so that they can be recorded and dealt with appropriately. Where the concerns may be about the Principal, these should be reported to the CEO. Ensuring concerns are dealt with effectively should also protect those working in or on behalf of the academy from becoming the subject of potential false low-level concerns or misunderstandings.

2.7. If the concern has been raised via a third party, the Principal will collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously and to the individual involved, along with any witnesses.

2.8. Where a low-level concern arises about supply staff, trainee teachers, or contractors, their employer will be notified so that any potential patterns of inappropriate behaviour can be identified.

2.9. If there is ever any doubt as to whether information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, then the LADO will be consulted.

2.10. To ensure that there is clarity about how staff (including supply teachers, trainee teachers, volunteers and contractors) should behave, and to avoid inadvertent or thoughtless behaviour, staff should ensure that they have fully read and understood the Staff Code of Conduct.

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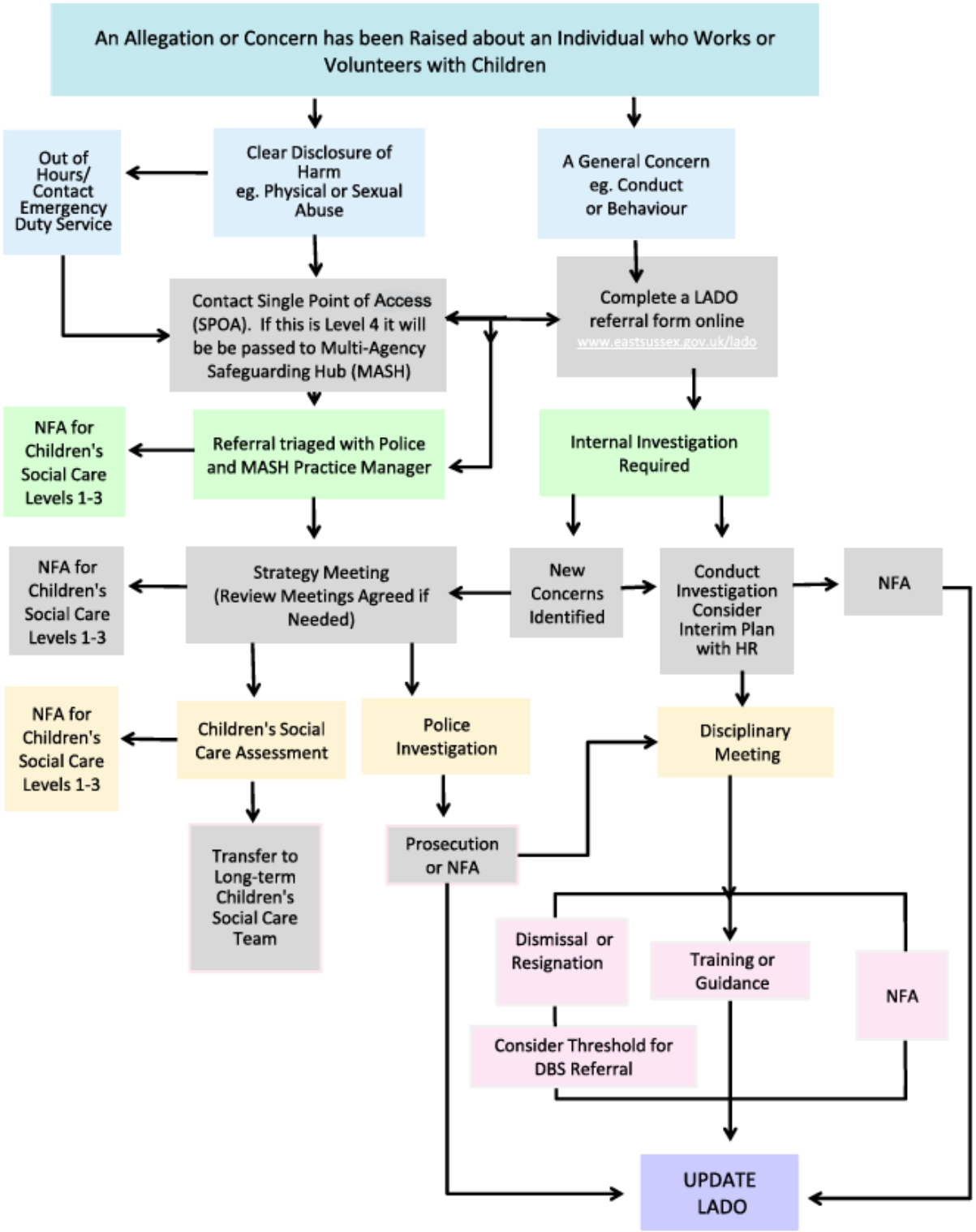
Appendix D: Managing Allegations Flowchart



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What to do if an allegation or concern has been raised about an individual who works or volunteers with children.

If an allegation or concern has been raised about an individual who works or volunteers with children (including staff, supply staff, trainee teachers, and contractors), you will initially need to decide whether it is a general concern, for example about conduct or behaviour, or if it is a clear report of harm, such as physical or sexual abuse.

What to do if a general concern has been raised.

If a general concern about an individual who works or volunteers with children (including staff, supply staff, trainee teachers, and contractors) has been raised, for example about conduct or behaviour, contact the Local Authority Designated Officer (LADO) for a consultation. The LADO may advise that an internal investigation takes place or that you contact the Single Point of Access (SPoA) or the Multi-Agency Safeguarding Hub (MASH).

If you are advised to complete an internal investigation, also consider consulting with Human Resources (HR) about putting in place an interim plan to ensure people are safeguarded whilst the internal investigation is completed.

There are three potential outcomes following an internal investigation. First, that no further action is taken. The second outcome is that a disciplinary meeting is held. Lastly, it may result in new concerns being identified.

In the case where a disciplinary meeting is held, the meeting could result in one of three possible outcomes. First, it could be decided that no further action is required. The second outcome could be that it is decided that training or guidance is required. Lastly, the disciplinary meeting could result in a dismissal or resignation.

If a dismissal or resignation takes place, you will need to consider whether the case meets the threshold for a referral to the Disclosure and Barring Service (DBS).

In the case where new concerns are identified during the internal investigation, you will need to either investigate these concerns as part of the internal investigation process also considering an interim plan with HR or convene a Strategy Meeting, where further review meetings can be agreed if needed.

The outcomes of the Strategy Meeting include no further action for Children's Social Care if assessed at Levels 1 to 3. Where the case is assessed by Children's Social Care, it may be transferred to the Long-Term Children's

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Social Care Team. Alternatively, the decision to move to a police investigation may be made at the Strategy Meeting resulting in a prosecution or no further action. In either case, you may still need to hold a disciplinary meeting, depending on LADO advice. The outcomes of a disciplinary meeting have been outlined earlier in this text.

If, on first contact with the LADO in response to a general concern being raised, you are advised to contact SPoA the following will happen. Professionals at SPoA will review the concern and if it is assessed at Level 4 on the Continuum of Need, it will be passed to MASH.

If the concern is passed to MASH, the police and MASH practice manager will triage the referral. They may decide that there is no further action for Children's Social Care if the case is assessed Levels 1 to 3. Alternatively, the police and the MASH practice manager may decide to convene a Strategy Meeting, where review meetings can be agreed if needed. The outcomes of the Strategy Meeting have been outlined earlier in this text.

In all cases, ensure that the LADO is updated regarding the outcome of any internal investigation or police investigation.

What to do if a clear report of harm has been made.

If an allegation or concern has been raised about an individual who works or volunteers with children (including staff, supply staff, trainee teachers, and contractors) and it is a clear report of harm, such as physical or sexual abuse, you will need to take the following actions.

First contact the SPoA. If the SPoA is closed, contact the out of hours emergency duty team. If it is decided by professionals at SPoA that the concern is at Level 4 on the Continuum of Need, it will be passed to the MASH. You may also be advised to contact the LADO at this point, and you will need to follow any advice or instructions they provide as well.

Where the concern is passed to MASH, the referral will be triaged by the police and MASH practice manager. They may decide that there is no further action for Children's Social Care if the case is assessed at Levels 1 to 3. Alternatively, the police and MASH practice manager may decide to convene a Strategy Meeting, where review meetings can be agreed if needed.

The outcome of the Strategy Meeting could be that it is decided that no further action for Children's Social Care is required because the case has been assessed at Levels 1 to 3. Alternatively, it could be decided at the

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Strategy Meeting that a police investigation is required, or a Children's Social Care Level 4 Assessment is required.

A police investigation could result in a prosecution or no further action. In either case, you may still need to hold a disciplinary meeting, depending on LADO advice. The outcomes of a disciplinary meeting have been outlined earlier in this text.

A Children's Social Care Level 4 assessment could result in no further action for Children's Social Care as the case has been assessed at Levels 1 to 3 or in a transfer to the Long-Term Children's Social Care Team.

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