POLICY

CHILD PROTECTION & SAFEGUARDING

Approval Date	**2026/27 - AUTUMN TERM**
Review Date	**2027/28 - AUTUMN TERM**
Owner	Trust Lead for Safeguarding & Behaviour

Policy Type		
		Trust Policy to be adopted in full
	■	Trust Policy adapted by the Academy
		Academy Policy

Approval Body		
		Executive
		Trust Board
	■	Local Advisory Body (LAB)

Our Four Critical Questions

Why do we exist?

To improve outcomes, transform lives and enable social mobility.

How do we behave?

Trust • Kindness • Endeavour

What do we do?

We create a strong network of schools which transform the lives of students by enabling them to achieve high educational and personal goals, regardless of their background.

How do we succeed?

Through a clear backbone, strong culture, academic rigour and smart systems.

Orion Education

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Child Protection and Safeguarding Key Contacts and Contact details

Principal	Ricky Archer rarcher@orionspires.org.uk
Designated Safeguarding Lead	Mr Lee Moors lmoors@orionspires.org.uk
Deputy Designated Safeguarding Lead(s)	Lisa Pollard lipollard@orionspires.org.uk Kev Reygate kreygate@orionspires.org.uk Dominic Chidlow dchidlow@orionspires.org.uk
Orion Trust Safeguarding Lead	Miss E Campbell ecampbell@trs.co.uk
Orion Trustee for Safeguarding	Being appointed Sept 2026
Local Authority Designated Officer (LADO)	KCC LADO: 03000 411111 (24 Hour 03000419191)

1. Aims and Scope

Orion Education ensures all staff, volunteers, trustees, and the members of Local Advisory Boards (LABs) are committed to providing a caring, positive, safe and stimulating environment.

We are committed to safeguarding children and young people, and we expect everyone who works in our academies to share this commitment. Adults in our academies take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We work with other agencies to ensure there are adequate arrangements within our academies to identify, assess and support those children who have or are suffering from harm. We will always act in the best interest of the child creating a culture of vigilance for all.

This policy is published on our website and is reviewed annually and outlines our core beliefs and practices that are compliant with the Local Authority/Local Safeguarding Partnership (LA/LSPs) child protection procedures, including academy procedures, local details and contextual issues.

This policy should be used alongside Keeping Children Safe in Education 2026 (KCSIE 2026), the Department for Education's statutory safeguarding guidance, which comes into force on 1 September 2026. All staff are expected to understand and comply with the safeguarding responsibilities set out within KCSIE 2026.

1.1 Our Principles

- Safeguarding is everyone's responsibility.
- We believe that every child has a right to be and feel safe and protected from being physically or psychologically harmed.
- We believe that children must receive the right help at the right time to address risks and prevent issues escalating.
- Pupils, regardless of age, gender, ability, culture, race, language, religion, or sexual identity, have equal rights to protection. All children have a right to be heard and to have their wishes and feelings considered.
- At our academy we remain vigilant about safeguarding concerns and maintain an attitude of 'it could happen here.'
- We are mindful that all children and young people are at risk of or may have already experienced some form of sexual harassment or exposure to sexual content.
- We provide regular staff training to raise knowledge and awareness, ensuring staff are fully aware of their responsibilities in identifying and reporting concerns or abuse.
- Working in partnership with external agencies is essential to supporting children and families.
- Working in partnership with parents, in the child's best interests and keeping them informed of any safeguarding concerns unless it would put a child at risk of harm.
- Every complaint or suspicion of abuse from within or outside the academy will be taken seriously and will be referred to the relevant external agency
- We commit to teaching children about how to keep themselves and their peers safe and healthy, through our teaching and learning, extra-curricular activities, pastoral care and extended academy activities. We will teach about safeguarding, including keeping safe online, as part of providing a broad and balanced curriculum covering relevant issues through personal, social health and economic education.

1.2 Key definitions

Safeguarding and promoting the welfare of children is defined for this policy

- 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 the impairment of children's mental and physical health or development
- Making sure that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children, so that the need for action to protect children from harm is reduced.

Contextual safeguarding relates to incidents and/or behaviours outside of school, taking into consideration wider environmental factors beyond the family that are present in a child's life, which threaten their safety and/or welfare.

2. Legislation and statutory guidance

This policy is based on the guidance and procedures set out by our local safeguarding partnership, along with the following legislation and guidance.

- Keeping Children Safe in Education, September 2026 ('*KCSIE 2026*')
- Working Together to Safeguard Children, 2026
- The Children Act 1989
- Early Years and Foundation Stage Statutory Framework, 2025
- Disqualification under the Childcare Act 2006, (updated 31 August 2018)
- The Prevent Duty Guidance: for England and Wales, March 2024
- S175/S157 Education Act 2002 *The Education (Independent School Standards) Regulations 2014)*
- Education And Skills Act 2008
- Human Rights Act 1998
- Data Protection Act 2018 and UK GDPR and the Data (Use and Access) Act 2025 – 'data protection laws'
- Sexual Offences Act 2003
- Equality Act 2010
- Multi-Agency Statutory Guidance on Female Genital Mutilation (FGM) and Mandatory Reporting Of FGM: Procedural Information, 2020
- Promoting and supporting mental health and wellbeing in schools and colleges 2021
- Mental Health and Behaviour in Schools (November 2018)
- Preventing and Tackling Bullying (July 2017)
- Working together to improve school attendance (July 2026)
- Relationships and sex education (RSE) and health education (July 2025)

3. Equality Statement

Orion Education is committed to anti-discriminatory practices and recognises the diverse circumstances of pupils. We are mindful of our public sector equality duty to eliminate discrimination, harassment and victimisation, to advance equality of opportunity and to foster good relations between people with different protected characteristics.

We give special consideration to children and young people who may have particular vulnerabilities

or barriers to disclosing abuse including those who:

- have Special Educational Needs and Disabilities (SEND)
- are currently, or have been previously looked-after
- are young carers
- have English as an additional language; are asylum seekers
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance/alcohol abuse or domestic violence or where they are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.

Orion Education has due regard to the need to achieve the objectives set out under s149 of the Equality Act 2010 to:

a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

4. Key responsibilities

4.1 All staff

All staff are responsible for providing a safe environment in which children can learn. All staff will promote the welfare of children and young people, safeguarding their wellbeing by endeavouring to protect them from maltreatment; or circumstances that could impair health or development; ensuring that children and young people grow up in circumstances consistent with the provision of safe and effective care; and by taking appropriate action to enable all pupils to have the best outcomes. This relates to all staff who are working in academies, volunteers, trainee teachers, supply staff, Local Advisory Boards (LABs) and the central team.

All staff including volunteers are required to read and understand Part One of KCSIE 2026. Staff with safeguarding leadership responsibilities, including the DSL, DDSLs, senior leaders and those with specific safeguarding duties, should read and understand the guidance in full. Copies of safeguarding policies and guidance will be provided during induction, and safeguarding updates will be delivered regularly throughout the academic year.

Copies of these documents will be provided to new staff at induction. Staff who are responsible for the management of safeguarding in academies, e.g. senior leadership teams, HR etc. should read KCSIE in its entirety.

Academy staff are particularly important as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

Staff and governors are encouraged to review Annex C of KCSIE2026, which provides a summary of changes from previous versions of the guidance. This supports ongoing awareness and compliance with statutory safeguarding guidance.

In particular, the annex removes the 'supervision exemption' which means that any person volunteering in a academy or college in a role that involves teaching, training, instructing or supervising children on more than 3 days in a month or overnight is now in regulated activity.

Staff will be aware of:

- What to do if they have a concern about a child or young person's welfare, following the process set out below under the heading "**What to do if you have a concern about a child or young person**"
- What to do if they have a concern about someone working with children and young people, following the process set out below under the heading "**Allegations or concerns about adults working with children or young people**"
- The process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- Their role in working with agencies, as part of the Early Help process involved in safeguarding pupils, including identifying emerging problems.
- Academy systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role of the DSL, the behaviour policy, and the safeguarding response to children who go missing from school.
- The importance of promoting a caring, safe and positive environment that encourages self-esteem and assertiveness - maintaining an ethos where pupils feel secure and have opportunities to talk and are listened to.
- Ways to support all pupils especially those vulnerable to abuse through sensitive monitoring, by ensuring that all pupils have a network of people they can go to if necessary.
- The possible increased vulnerability of pupils with additional needs and those who have been bullied or isolated by their peers in the past, e.g. SEND pupils.
- Opportunities within curriculum time which equip pupils with the skills they need to stay safe from harm; that is appropriate to their age and development and to know who to go to for help.
- When to report and share information, whom it should be shared with and will only disclose the information on a 'need to know' basis.
- The different types of abuse, neglect and exploitation set out below in Appendix 1 and understanding that children can be at risk of harm inside and outside of the academy, inside and outside of home, and online.
- The effects of witnessing abuse and adverse childhood experiences.
- What to do if a child tells them they are being abused, neglected or exploited and how to reassure victims that they are being taken seriously, will be supported and kept safe, following the process set out below under the heading "**What to do if you have a concern about a child or young person**".
- The likelihood that children and young people will have experienced sexual harassment and abuse on and off-line.

Safeguarding work can be emotionally challenging. Staff who are involved in disclosures or safeguarding cases will be offered access to supervision, peer support, or counselling where appropriate. The academy is committed to supporting staff wellbeing and resilience as part of its safeguarding culture.

4.2 Principal

Will ensure policies and procedures adopted by the LAB associated with protecting children are fully implemented, understood and followed by all staff. The Principal will ensure that the DSL and DDSLs are properly supported with adequate time, training and resources and that there is always adequate cover if the DSL is absent. The Principal will ensure their academy maintains up-to-date

records of all safeguarding concerns, using our online safeguarding recording tool for concerns, LADO referrals, physical restraint incidents and first aid incidents.

4.3 Designated Safeguarding Lead (DSL) / Deputy Designated Safeguarding Lead (DDSL)

All academies have appointed a member of the senior leadership team as the Designated Safeguarding Lead (DSL). The DSL has the overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety) in school and has received specific training to provide them with the knowledge and skills required. The DSL is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children. DSL responsibilities now include oversight or online safety systems and multi-agency working, in accordance with KCSIE 2026.

The role requires the DSL to:

- Ensure child protection procedures are in place and updated as appropriate
- Ensure all staff are aware of Orion Education, the LA's and the Academy's safeguarding and child protection policy and procedures by overseeing staff training and induction.
- Be available to provide advice/support to staff and for a confidential discussion about concerns.
- Be available to provide support to pupils.
- Liaise with the Principal to keep them informed regarding child protection procedures and matters, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with relevant staff about concerns so that concerns are considered holistically.
- Lead on safeguarding referrals to external agencies (implementing the process set out below in this policy) and liaise with Social Services and other relevant agencies as required.
- Liaise with LADO and any case manager appointed in relation to matters involving concerns about adults working with children.
- Ensure records are kept of any concerns/suspected cases of abuse/referrals, including:
    - 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 outcomes
- Check the academy's online safeguarding system is up-to-date and that staff are proficient in using it.
- Act as first point of contact for external agencies that are pursuing Child Protection ('CP') investigations
- Co-ordinate arrangements for monitoring of pupils on roll who are in need of protection.
- Co-ordinate the Academy's representation at CP conferences and Core Group meetings and the submission of written reports for conferences.
- Keep an up-to-date list of pupils on the child protection register.
- Keep an up-to-date list of looked after children.
- Where a looked after child or child on the child protection register is missing from education, the DSL will ensure that local procedures are followed, including referrals to children's social care and the police if appropriate.
- Ensure that all the Safeguarding team have up-to-date contact information for local Social Services.
- Review data to analyse trends and patterns, to develop preventative strategies.
  Support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising

that even when statutory social care intervention has ended, there is still a lasting impact on children.
- The DSL is expected to be aware that children must have an 'appropriate adult' in police investigations.
- Engage with parents and work with the Principal and relevant academy leaders to identify the impact safeguarding issues may be having on children's attendance, engagement and achievement.

4.4 Visitors

When visiting our academy, all visitors will be expected to sign-in using the designated system and will be provided with a lanyard that they are expected to wear at all times. All Orion Education staff wear blue lanyards; visitors wear light blue and any visitor that is not DBS checked and requires to be supervised at all times will wear a red lanyard.

5 What to do if you have a concern about a child or young person

Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child. **If staff have any concerns about a child's welfare, they should act on them immediately and inform the DSL or the Deputy DSL.**

The DSL will then advise on next steps, which may include:
- Internal pastoral support for the child[1]
- An early help assessment
- A referral to statutory children's services if the child may be in need, or suffering or likely to suffer harm
- Calling the police

5.1 Family Help and Early Intervention

Family Help and early intervention means providing support as soon as a problem emerges at any point in a child's life, from the early years through to adolescence. If staff members have concerns about a pupil who is not in immediate danger, in need or at risk of harm, they must speak to the DSL about whether a Family Help referral, specialist support referral or statutory intervention is appropriate. This is 'support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. If Family Help, early intervention or other support is appropriate, the DSL will keep the case under review and consider a referral to Children's Social Care if the child's situation does not appear to be improving.

The academy recognises the Families First Partnership Programme and the introduction of Family Help services. Staff should be aware of local Family Help pathways and work collaboratively with partner agencies to provide support at the earliest opportunity, helping to prevent concerns from escalating and improving outcomes for children and families.

Any child may benefit from Family Help, early intervention, or additional support, but staff should

[1] This may include considering where doing so does not place the child at additional risk, whether the DSL (or a deputy) should inform parents or carers to further support the child's wellbeing,

be particularly alert to the following indicators where a child:

- Has SEND (whether or not they have a statutory Education, Health and Care plan) or certain health conditions or specific additional needs.
- Has a mental health need.
- Is pregnant and/or a young parent.
- Exhibits early signs of harmful, abusive, or violent behaviour towards others.
- Is involved in child-to-parent or child-to-carer abuse.
- Is a young carer.
- Is showing signs of being drawn into anti-social or criminal behaviour, including gangs, county lines, or organised crime.
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion, or is in alternative provision or a pupil referral unit.
- Has a parent or carer in custody or is affected by parental offending.
- Is frequently missing or absent from education, home, or care.
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation.
- Is at risk of being radicalised into terrorism
- Is in family circumstances presenting challenges for the child, such as drug or alcohol misuse, adult mental health issues, or domestic abuse.
- Is misusing alcohol or drugs themselves.
- Is at risk of honour or faith-based abuse, including Female Genital Mutilation (FGM) or Forced Marriage.
- Is a privately fostered child

5.2 Child Protection Referrals

Where a child is in need, suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care and, if appropriate, the police, is made immediately. Referrals will follow the local referral process which is to contact Kent Children and Families Hub and will be led by the DSL or their deputy, though all staff should be aware that anyone can make a referral.

Kent Multi- Agency Safeguarding Hub 03000 41 11 11

All members of staff and volunteers at school are expected to be vigilant and look out for:

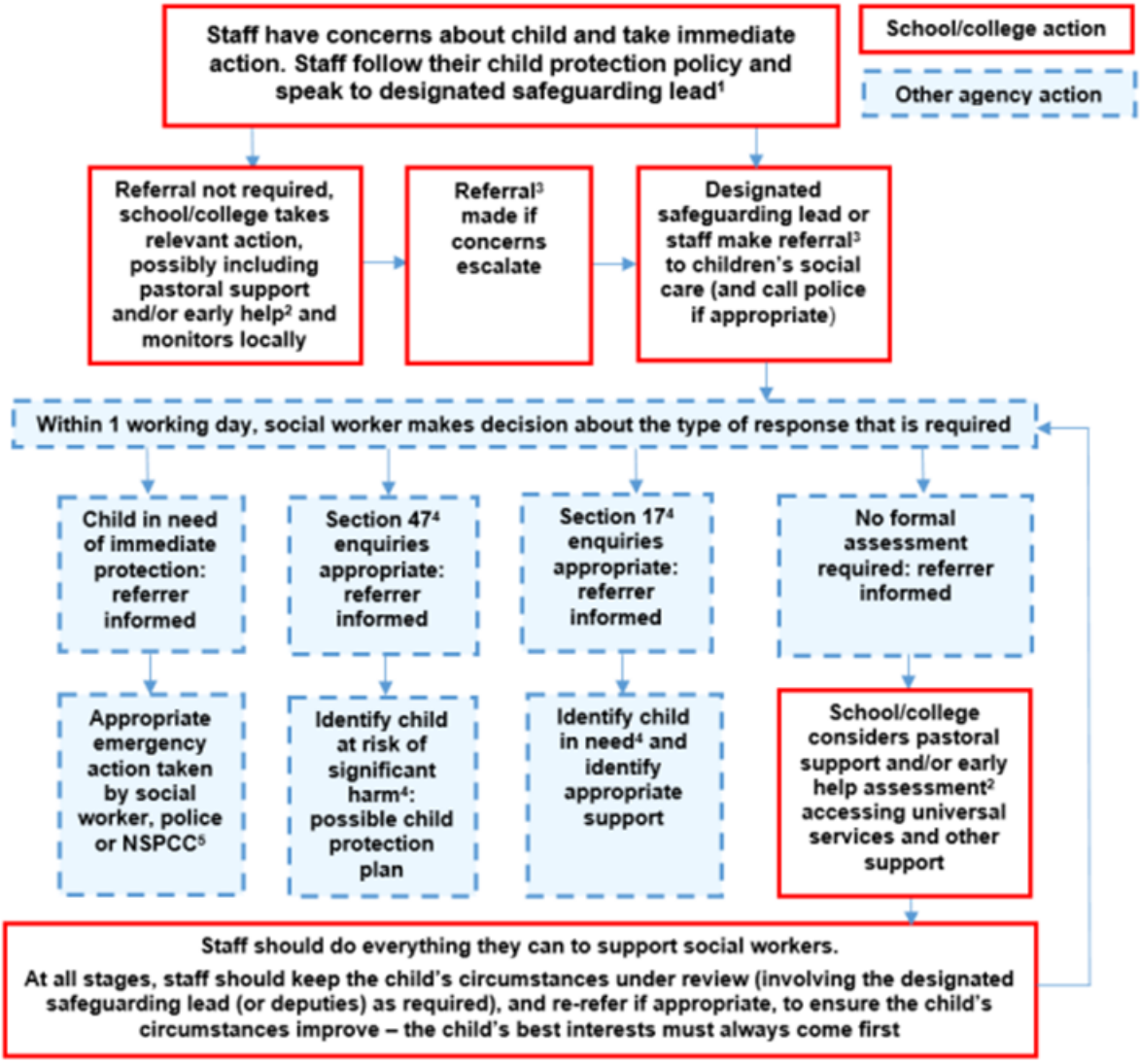
- Sudden changes in pupil behaviour
- Pupils becoming withdrawn
- Unexplained bruising/injury
- Unexplained absence that is suspect
- Reluctance to leave the classroom because "something" needs to be discussed
- Conversation in which a pupil reveals information of a worrying nature

Any member of staff who has reason to be concerned should always act in the best interestof the child or young person and **inform the DSL of their concerns**, any signs of abuse, (see Appendix 1 for different types and signs of abuse) and details of any disclosure and/or anxieties they may have about the child's welfare.

When an individual concern/incident is brought to the notice of the DSL they will be responsible for deciding what the appropriate next steps are in line with the flowchart below. Where there is doubt as to the seriousness of this concern or disagreement between the DSL and the member of staff

reporting the concern, advice will be sought from social care. However, in exceptional circumstances, such as in an emergency or a genuine concern that appropriate action has not been taken, staff members can speak directly to children's social care and make a referral directly themselves. If a member of staff makes a referral, they should inform the DSL immediately. Prior to any written referral being sent to social care, there should be a verbal consultation with social care by calling the local social care duty desk e.g., the Front Door service.

5.3 Flowchart showing overview of when referrals will be made



[1] In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of the full version of KCSIE.
[2] Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.
[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.
[4] Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.
[5] This could include applying for an Emergency Protection Order (EPO).

5.4 Involving the police

Where the concern raised with the DSL may have involved a crime the DSL will consider whether to refer the matter to the police in line with the NSPCC's "When to call the police guidance for schools and colleges". In cases of alleged or reported rape, assault by penetration[2], sexual assault[3], child sexual abuse, FGM, honour-based violence a report will always be made.

5.5 Recording of concerns

The DSL/DDSL will be responsible for recording information about each case and for collecting reports and notes from those involved. This includes keeping a note of the rationale of all decisions, including instances where no referral was made and why. Where a pupil has made a disclosure, the DSL should ask the person who initially listened to the pupil to record what the pupil said on the academy's safeguarding platform.

Orion Education requires all staff to record non-urgent concerns on their academy's safeguarding system, as soon as possible, within the same day. Any urgent concerns, where a child might be in need or at risk of or suffering harm must be reported immediately to the DSL (or in their absence the DDSL) and then reported on the academies' safeguarding system, as soon as possible within the same day or as directed by the DSL on that occasion. All reports will include complete details of the child, any others involved and of the incident. All names will be written in full, and all people mentioned will give their designation (i.e. Deborah Jones, Head of English.)

5.6 Informing parents

The parent/carer will normally be contacted before a referral is made. However, if the DSL has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the referral, but a rationale for the decision to progress without informing the parent should be provided with the referral.

5.7 Guidance for staff when a pupil makes a disclosure

Staff should use child-preferred terminology when recording or discussing disclosures. Terms such as 'victim' and 'alleged perpetrator' should only be used if the child is comfortable with them, in line with KCSIE 2026 recommendations.

A pupil may quite innocently disclose details of abuse that occurs within the family. It is also the case that pupils with experience of abuse may unburden themselves to a member of staff as an adult they can trust. Some members of staff feel disloyal and uncomfortable in reporting abuse; all members of staff have a duty to report findings to the DSL or DDSL. **Do not investigate suspicions regarding child protection issues. Find your DSL immediately, without delay to inform them of the concern.**

[2] For example, rape or penetration with an object or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.

[3] This may include an online element which facilitates, threatens and/or encourages sexual violence.

If a child discloses a safeguarding issue to a member of staff, they should:

- Listen to and believe them and allow them time to talk freely and do not ask leading questions.
- Explain that the disclosure must be reported – it is important for members of staff to stress that they want to help bypassing the information to the correct person and cannot keep it a secret.
- Staff should not take a decision as to whether or not the abuse has taken place.
- Stay calm and do not show that they are shocked or upset.
- Tell the child they have done the right thing in telling, without saying they should have told sooner.
- **Refer the concern to the DSL or their Deputy immediately.**
- Write up the conversation as soon as possible in the child's own words. Sticking to the facts, without including any judgement, including as much detail as possible.
- The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence.
- The record should be dated and signed by the person making it and should use names, not initials.
- **The record/evidence must be kept securely and handed to the DSL or their deputy immediately**. This is logged on the academy's safeguarding system CPOMS. This must not replace speaking with the DSL.
- Whilst the DSL will generally lead on making referrals, anyone can make a referral to children's social care and/or the police directly. If a member of staff makes a referral, they must tell the DSL as soon as possible.
- It is important that the concerns and fears are not discussed with the parent(s) or indeed with anyone who is not involved in the case before the DSL has been consulted.
- In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the child protection referral process should not delay the administration of first aid or emergency medical assistance. If a child or young person is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness, or threats to remove the child during the academy day, for example, urgent Police intervention will be requested.
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or they may be being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

Staff may find disclosures and child protection situations stressful and upsetting, the DSL will provide the opportunity to talk through concerns or anxieties and offer further support as appropriate.

5.8 Information sharing and confidentiality

Sharing of information is essential to ensure the welfare, care, and safety of pupils.

Staff have the professional responsibility to share relevant information about the protection of children with other practitioners particularly investigating agencies. Staff who receive the information about pupils and families in the course of their work should have the information only within the professional context and must not use or disclose it except in the proper performance of their duties. Child protection records should be kept securely locked and used in line with the GDPR. Security and confidentiality equally apply to documents stored online within academies.

The Data Protection Act 2018 and GDPR DO NOT prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. Fears about sharing information MUST NOT be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

The Academy will follow Information Sharing Advice for Safeguarding Practitioners May 2024.

5.9 Reviewing Cases, monitoring and identifying patterns and trends

The DSL and DDSL will meet on a weekly basis to discuss child protection and Child in Need cases, these meetings will be minuted. The DSLs will take part in regular de-briefing sessions throughline management. Each term, the DSL will review all cases and evaluate how wellthe academy managed the cases.

The following procedure will be used as a guideline:

- Was this policy and "Keeping Children Safe in Education" followed?
- Were the records produced appropriate?
- Did the external agencies respond appropriately?
- How was the involvement of family members dealt with?
- Was the case well managed 'by the academy'; are improvements needed?
- Are any patterns or trends emerging that require action to be taken?

The LAB will receive regular reports about all child protection/safeguarding matters i.e. numbers of child protection referrals and allegations against staff and trustees will receive summary reports covering such matters across all trust academies.

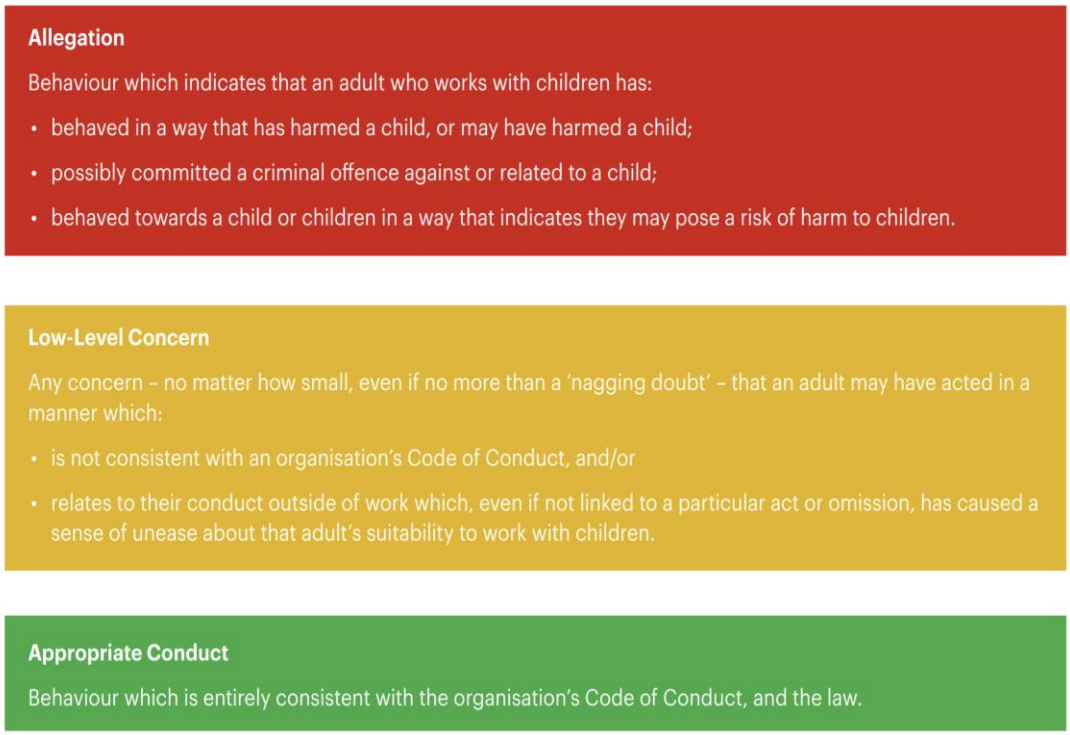
Orion Education takes part in yearly audits and academies may take part in audits issued by their local authority.

5.10 Multi-Agency Working

The Academy has a pivotal role to play in multi-agency safeguarding arrangements and works in line with the guidance entitled 'Working together to Safeguard Children'. Our staff train and engage with the local Safeguarding Partnership which is made up of the Police, Education, Health and Social Care and follow the locally agreed multi-agency safeguarding arrangements put in place for Bromley.

6 Allegations or concerns about adults working with children

- It is essential that if ever there is a case of suspected abuse or inappropriate behaviour by a member of staff (including supply staff, trainee teachers, volunteers, and contractors), action is taken quickly andprofessionally in the interest and welfare of the pupil
- There are different types and levels of concern relating to staff behaviour as highlighted below:



6.1 Allegations or suspected abuse

- In the rare event that a member of staff suspects another member of staff (including supply staff, trainee teacher, volunteer, or contractor), of being involved in abuse or inappropriate behaviour, it is their responsibility to discuss these concerns with the Principal and DSL or Deputy DSL(S), except where the subject of the allegations is either of these.
- Allegations made by pupils about members of staff must be taken seriously and reported as described below.
- Other than in a case where the subject of the allegations is the Principal, the Principal should be immediately informed. They should contact the LADO and Trust safeguarding lead immediately, in addition to following the child protection procedures above.
- Any allegation against a member of staff, volunteer, supply staff member, contractor or governor should be referred immediately to the Headteacher/Principal, who will consider whether an onward referral to the Local Authority Designated Officer (LADO) is required.
- Where the Principal is the subject of the allegations, the allegations should be referred to the Chair of the LAB or directly to the LADO.

6.2 Low-level concerns

Our academies promote an open and transparent culture in which all concerns about all adults working in or on behalf of the academy (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately. The definition of a 'low-level' concern does not mean that it is insignificant. KCSIE defines low-level concerns as 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 or college may have acted in a way that:

• is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and

• does not meet **the harm threshold** or is otherwise not serious enough to consider a referral to the LADO.

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; or,
• humiliating children

Staff should report low-level concerns when they are concerned about the conduct of staff or about an incident related to themselves. Our academies create a transparent culture where we encourage staff to self-refer for support. All staff sign a code of conduct and are aware of the professional expectations when working in an academy setting and with children of school age.

Staff must speak with the DSL about low-level concerns related to colleagues. Incidents or concerns related to supply staff and contractors will be notified to their employers, so patterns of inappropriate behaviour can be identified.

All concerns will be recorded, but will be kept confidential, complying with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR.) The DSL will review records to identify potential patterns of concerning, inappropriate or problematic behaviour.

6.3 Whistleblowing policy

All Orion Education academies have a Whistleblowing Policy which is available on the academy's website and updated regularly. This policy is referred to in training and staff are encouraged to use it if necessary.

6.4 External providers / non-academy activities on the academy site

Where academies are used for non-academy activities, those providers are expected to meet the guidance in Keeping Children Safe in Out of School Settings (see paragraph 167). If academies receive allegations related to an incident that happened when an external individual or organisation was using their academy premises for the purposes of running activities for children...the academy will follow their safeguarding policies and procedures, including informing the LADO.

7 Training

Staff training procedures will ensure:

- All staff will be kept up to date on safeguarding issues (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and will be able to identify concerns and understand protocols to protect and safeguard pupils
- All members of staff know how to respond to a pupil who makes a disclosure
- All staff are made aware of their responsibilities in reporting concerns about a colleague's behaviour
- All staff will be trained in local early help process and referrals process
- The DSL and deputies will undertake refresher trainingonce every 2 years, with an annual update

- All Trustees, members of LABs, staff and volunteers will undertake refresher training once every 3 years as a minimum
- All new trustees, members of the LAB, staff, supply teachers and volunteers will also undertake induction training on child protection/safeguarding. Training will cover child protection policy, behaviour policy, the staff code of conduct, and the safeguarding response to children who go missing from education and the role of the DSL
- All Trustees, LAB members, staff, volunteers, supply staff, contractors and agency workers will receive safeguarding information appropriate to their role. All staff are required to read and understand Part One of Keeping Children Safe in Education 2026. Staff with safeguarding leadership responsibilities should read the guidance in full.
- Safeguarding updates will include Artificial Intelligence (AI)-related safeguarding risks, online harms, Family Help arrangements, emerging contextual safeguarding concerns and any significant updates to statutory guidance.
- Dealing with A Disclosure of Abuse - All staff will be made fully aware oftheir responsibilities in reporting concerns regarding a colleague's behaviour.
- Through mandatory training, INSET days, online courses, and Appendix 1 of this policy all staff will receive training on recognising signs of abuse.

8. Technology and E-safety

Please refer to the Trust IT Acceptable Use policy for further information, a summary of key safeguarding measures is set out below.

8.1 Staff use of technology

To ensure the safeguarding of pupils, staff should NOT use their mobile phones inclass. If there is a one-off emergency and a member of staff's mobile phone needs to be on silent for a specific time, they are to seek the permission of the Principal or Vice Principal in their absence.

Staff must not use their own cameras or other recording devices to photograph or record pupils either in school, during visits or outside of school.

Anything relating to Orion Education academies, especially information on pupils, should be emailed via staff Trust email accounts and never personal email accounts as this leaves staff vulnerable to safeguarding issues.

It is a disciplinary offence to send any unsuitable adult or discriminatory material through the academy's network, or to make derogatory comments about pupils or staff, or to bring the academy into disrepute.

8.2 Pupil use of technology

Most of our pupils will use mobile phones and computers at some time. They are a source of fun, entertainment, communication and education. However, some individuals use these devices and technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing pupils to engage in sexually harmful conversations, webcam photography or face-to-face meetings.

Cyber-bullying by pupils, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. Chat rooms and social networking sites are not allowed to be accessed in school.

No pupils in our academies, past or present, should be on staff social media accounts. If a pupil tries to contact a member of staff online e.g. via Facebook, they should immediately inform the DSL. It is a serious disciplinary offence for a member of staff to contact any child on any social media platform. It is also a serious disciplinary offence to bring the academy, Orion Education or its staff into disrepute in any way by writing or implying derogatory comments about them online. The online safety curriculum at all academies is written in line with the guidance, 'Teaching on- line safety in schools,' January 2023. A whole academy approach is taken to online safety, with lessons during PSHE lessons, assemblies etc.

8.3 Filtering and monitoring

Reviews should be carried out by the SLT member responsible for filtering and monitoring, with the support of the academy's designated safeguarding lead and IT support. They should include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record should be kept of these checks.

KCSIE 2026 signposts schools and colleges to the DfE's latest filtering and monitoring standards and cyber security standards for schools and colleges, which schools should read and have regard to when assessing whether their filtering and monitoring systems are appropriate. Our academies have monitoring filters to safeguard children from potential harm and inappropriate material. The governing body will ensure filtering and monitoring systems are reviewed at least annually and that safeguarding leaders understand the effectiveness of these systems in protecting children online.

8.4 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are becoming increasingly accessible and are used by staff, pupils and parents/carers in a variety of ways.

The academy recognises the increasing safeguarding risks associated with Artificial Intelligence (AI), including deepfakes, nudification applications, AI-generated sexual imagery, online grooming, image manipulation and technology-facilitated abuse.

Filtering and monitoring systems will take account of emerging AI-related risks. Staff will receive appropriate guidance on identifying and responding to AI-enabled abuse and online harms.

Any misuse of AI to intimidate, harass, exploit, bully or abuse another individual will be addressed through safeguarding and behaviour procedures. The academy recognises that nude or semi-nude images may be artificially generated, manipulated or altered using Artificial Intelligence technologies. Any AI-generated or AI-manipulated imagery will be managed in accordance with safeguarding, online safety and child-on-child abuse procedures, with appropriate consideration given to the welfare of all children involved.

The academy will regularly review emerging technologies and assess any associated safeguarding risks before implementing AI tools for educational purposes.

9 Extended School and Off-Site Arrangements

Where extended school activities are provided by and managed by the academy, the academy's own safeguarding and child protection policy and procedures apply. If other organisations provide services or activities on the academy's site, the academy will check that they have appropriate procedures in place, including safer recruitment procedures. When pupils attend off-site activities

during academy hours, the academy will check that effective child protection and safeguarding arrangements are in place.

Where pupils participate in exchange visits or extended homestays, the academy will conduct suitability checks for both UK and overseas host families. These checks will follow the guidance set out in Annex D of Keeping Children Safe in Education 2026. Additional safeguarding procedures will be implemented for extended homestays, including clear communication with host families, emergency contact protocols and ensuring pupils understand how to report concerns.

10 Non-Recent Allegations

Allegations against an adult that is no longer working/volunteering with children should be referred to the Police. Where it is known that the adult is still working/volunteering with children, all allegations (including historical/non-recent allegations of abuse) should be referred to the Police and the LADO in the local authority that the adult is working/volunteering.

Where an adult makes an allegation to an academy that they were abused as a child, they should be advised to report the allegation to the police. Non-recent allegations should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. Abuse can be reported no matter how long ago it happened.

If an allegation is made against anyone working with children in the Academy, the Academy should not undertake their own investigation without prior consultation with the Local Authority 'designated officer' (LADO) or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the academy may discuss informally with the Local Authority 'designated officer' (LADO) on a no-names basis (if local safeguarding procedures allow). All allegations should be investigated as a priority to avoid any delay.

11Use of 'Reasonable Force'

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children. The academy recognises the additional vulnerability when using reasonable force in response to incidents involving children with SEND, mental health or with medical conditions. The academy will consider its duties under the Equality Act 2010 and their Public Sector Equality Duty. Positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children and agreeing them with parents and carers can reduce the occurrence of challenging behaviour and the need to use reasonable force.

The academy's procedures for the use of reasonable force can be found in the Behaviour Policy.

12. Safeguarding issues in academies (see also list of signs of abuse, neglect and exploitation in Appendix 1)

Safeguarding issues can manifest themselves in many ways and may overlap. All staff should be aware of safeguarding issues that can put children at risk of harm, abuse, neglect, exploitation or vulnerability both inside and outside the home, including online. Staff should maintain professional curiosity and be alert to indicators that a child may require additional support or safeguarding intervention.

Children may also cause harm to parents, carers or other family members. This behaviour may be referred to as child-to-parent or child-to-carer abuse and should be recognised as a safeguarding concern. Staff should report any such concerns in accordance with the academy's safeguarding procedures so that appropriate support and intervention can be provided.

12.1 Child-on-child abuse (including harassment and violence)

All children and young people may have been exposed to sexual harassment and sexualised content. Pupils and young people may exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, and sexual abuse.

Developmental sexual activity encompasses actions that are to be expected from pupils and young people as they move from infancy through to an adult understanding of their physical, emotional, and behavioural relationships with each other. Inappropriate sexual behaviour can be inappropriate socially, inappropriate to development, or both. It is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a pupil.

It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is "acting out" which may derive from other sexual situations to which the pupil or young person has been exposed.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression, together with secrecy, or where one participant relies on an unequal power base. Pupils who are victims of sexual violence or sexual harassment will likely find the experience stressful and distressing, which could adversely affect their educational attainment. It is important that all victims are taken seriously and offered appropriate support.

The academy recognises that children who display harmful behaviours towards others may themselves be vulnerable and require safeguarding support. Child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. Both the child experiencing harm and the child displaying harmful behaviour will be considered through a safeguarding lens and offered appropriate support and intervention. Prevention, education and early intervention remain central to the academy's approach.

Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated.
- Knowing that abuse is abuse and should never be tolerated or passed off as 'banter','just having a laugh' or 'part of growing up'.
- Challenging behaviours (potentially criminal) such as grabbing bottoms, breasts, or genitalia, flicking bras and lifting skirts up. Dismissing or tolerating such behaviours risks normalising them.

In cases of suspected or reported child-on-child abuse, the procedure set out in Appendix 2 must be followed.

Staff should understand that:

- even if there are no reports of child-on-child abuse it does not mean it is not happening;
- Child on child abuse is preventable - knowing how to recognise behaviours and indicators of risk early, timely, evidence-based support can be key to preventing children from going on to commit abuse or violence

12.2 Children absent from education

Children Absent from Education (CME) is a safeguarding matter and attendance, absence and exclusions are closely monitored. A pupil going missing from education is a potential indicator of abuse, and neglect, including sexual abuse and exploitation. **See the Attendance and Admission policy for more information on procedures related to CME.** The DSLs will monitor unauthorised absences and take appropriate actions including notifying the Local Authority, particularly where pupils go missing on repeated occasions. Staff must be alert to the signs of pupils at risk of travelling to conflict zones, female genital mutilation and forced marriage.

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

Whilst being lesbian, gay or bisexual is not in itself a safeguarding concern, we recognise that these children may be targeted by their peers and may experience bullying, discrimination or prejudice-related incidents.

With regard to children who are questioning their gender, the Cass Review highlighted that there are still uncertainties regarding the long-term impact of social transition and that some children may present with wider vulnerabilities, including complex mental health, emotional or psychosocial needs. Families should be encouraged to seek appropriate clinical advice and support when making decisions about supporting a gender-questioning child.

The academy will take a careful, safeguarding-led and individualised approach when supporting a gender-questioning child. In line with KCSIE 2026, the academy will consider the views, wishes and feelings of the child, involve parents/carers where appropriate, assess any safeguarding risks, consider the child's wellbeing and wider vulnerabilities, and take account of any relevant professional or clinical advice.

In the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them, the academy will involve the designated safeguarding lead to determine what action is needed to safeguard the child, before the parents or carers are contacted or any decisions are taken.

In supporting a gender-questioning child, the academy will:

- Consider the broad range of the child's individual needs and circumstances.
- Work in partnership with parents/carers to determine what is in the best interests of their child except where doing so may place the child at risk of significant harm.
- Consider and act upon any relevant clinical or professional advice available and seek any additional non-clinical professional advice where relevant e.g. from the SENCO, including involving the DSL.
- Assess and respond to any safeguarding concerns or wider vulnerabilities.
- Take appropriate action to reduce the risk of bullying, harassment, discrimination or social isolation.
- Ensure that decisions are made in the best interests of the child and are reviewed as circumstances change.

12.4 Special Educational Needs

Children and young people with Special Educational Needs and Disabilities can faceadditional

safeguarding challenges because:

- There may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's SEND without further exploration.
- Pupils with SEND can be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- Pupils with SEND can be disproportionally impacted by things like bullying without outwardly showing any signs; and
- Difficulties may arise in overcoming communication barriers
- The need for intimate care or that these children are isolated from others,
- These children are more likely to be dependent on adults for care, and these children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

Our academies identify pupils who might need more support to be kept safe or to keep themselves safe by:

- Identifying those with additional needs and monitoring their progress closely
- Building positive relationships with parents and children
- Giving access to services in school e.g. counselling services
- Referrals to external agencies as appropriate
- Close liaison between the DSL and SENDCO

Please refer to our SEND policy for further information.

12.5 Looked After Children (and previously looked after children)

Looked-after children (and previously looked-after children) (those who have been in local authority care) are a particularly vulnerable group. Academies will ensure that prompt action is taken when necessary to safeguard these children, working with the child's social worker and virtual school head (whose details will be held by the DSL), and the LAB and Trust ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after (and previously looked after) by a local authority.

Each academy's designated member of teaching staff has responsibility for their welfare and progress, will ensure that the needs identified in personal education plans are met. The academy ensures that the designated member of staff receives appropriate training to carry out their role and has the information they need in relation to any child's looked-after status, their care arrangements (including contact arrangements with birth parents and those with parental responsibility) and details of the child's social worker and virtual school head.

The designated member of staff will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care and will work closely with virtual school heads to promote their educational achievement. The DSL will ensure they have details of the local authority Personal Advisor appointed to guide and support any care leavers and will liaise with them as necessary regarding any issues of concern affecting them.

All Orion Education academies have a 'Children Looked After Policy' which updated bi-yearly. This policy is referred to in training and staff are encouraged to use it if necessary.

12.6 Mental Health

All staff should also be aware that mental health problems can, in some cases, develop into safeguarding concerns and be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. KCSIE 2026 places greater emphasis on the relationship between safeguarding, trauma, adverse childhood experiences (ACEs), and mental health. Staff should recognise that mental health difficulties may be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect, or exploitation. Where staff have concerns about a child's mental health, wellbeing, or behaviour, they should follow the academy's safeguarding procedures and discuss concerns with the DSL or DDSL.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. All staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Warning signs staff are well placed to recognise including:

- *significant changes in behaviour,*
- *ongoing difficulty sleeping,*
- *withdrawing from social situations,*
- *not wanting to do things they usually like, and*
- *physical signs of self-harm or neglecting themselves.*

Through our training, staff will be made aware of how to recognise different behaviours associated with different types of abuse. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.

Academies have an important role to play in supporting the mental health and well-being of pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Orion Education has systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. We access a range of advice to help identify children in need of extra mental health support; this includes working with external agencies.

If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If child needs help urgently for their mental health, but it is not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

12.7 Sharing nudes and semi-nudes

The Academy will follow the guidance Sharing nudes and semi-nudes: how to respond to an incident in cases where nude or semi-nude images, videos or live streams online are shared by young people under the age of 18.

12.8 Upskirting

Upskirting 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. Instances of this will be handled in line with the child-on-child abuse policy set out at Appendix 2.

12.9 Domestic Violence

All schools assign themselves to Operation Encompass. This operation helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL) in school before the child or children arrive at school the following day. This ensures that the academy has up-to-date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. **National Domestic Abuse Helpline**, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

12.10 Gangs and Youth Violence

Being part of a friendship group is a normal part of growing up and it can be common for groups of pupils to gather in public places to socialise. Gangs are defined as a relatively durable, street-based group of young people who:

- See themselves (and are seen by others) as a discernible group
- Engage in criminal activity and violence
- Lay claim over territory
- Have some form of identifiable structural feather
- Are in conflict with other, similar gangs.

The factors which influence a pupil's propensity to initiate violence include:

- Parenting which is cold/uncaring, non-nurturing and neglectful
- Parenting which includes harsh disciplining
- Maltreatment, such as physical or sexual abuse in childhood (abuse by adults and peers within and outside of the family);
- Trauma such as domestic violence or involvement in or witnessing conflict violence.

12.11 Children and the Court System

Children are sometimes required to give evidence in criminal courts, either for crimescommitted against them or for crimes they have witnessed. Making child arrangements via the family courts following separation can be a stressful time and entrenched in conflict. Orion Education academies will support and offer guidance using the online child arrangements information tool for information on dispute resolution.

12.12 Preventing Radicalisation

- We are mindful of the Prevent Duty 2023, the need to prevent people from becoming terrorists or supporting terrorism.
- We will help support pupils who may be vulnerable and susceptible to such influences as part of our wider safeguarding responsibilities and where we believe a pupil is being directly influenced by extremist materials or influences, we will ensure that pupils are offered mentoring. In suchinstances, our academies will seek external support from appropriate services working to prevent extremism, to prevent people from becoming terrorists or supporting terrorism.
- Extremism is the process of a person legitimising support for, or use of, terrorist violence.
- Radicalisation refers to the process by which a person comes to support terrorismand extremist ideologies associated with terrorist groups.
- All adults working within Orion Education academies including visiting staff, volunteers, supply teachers, contractors and pupils on placement, are required to report instances

where they believe a pupil may be at risk of harm through extremism or radicalisation. It is a statutory duty under the Counter Terrorism and Security Act 2015, The Prevent Duty to report any concerns of radicalisation or extremism.

12.13 Child Sexual Exploitation and Criminal Exploitation

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.
The academy recognises that Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) may constitute forms of modern slavery. Where appropriate, referrals to the National Referral Mechanism (NRM) will be considered in line with statutory guidance.

Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online. The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist practitioners in identifying pupils or young people who may be victims of sexual and/or criminal exploitation (including financial exploitation).

Signs include:

- Underage sexual activity/Inappropriate sexual or sexualised behaviour
- Sexually risky behaviour, 'swapping' sex/ Repeat sexually transmitted infections
- In girls, repeat pregnancy, abortions, miscarriage
- Receiving unexplained gifts or gifts from unknown sources
- Having multiple mobile phones and worrying about losing contact via mobile
- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- Going to hotels or other unusual locations to meet friends/Seen at known places of concern
- Moving around the country, appearing in new towns or cities, not knowing where they are
- Getting in/out of different cars driven by unknown adults/ Contact with known perpetrators
- Having older boyfriends or girlfriends
- Involved in abusive relationships, intimidated and fearful of certain people or situations
- Recruiting other young people to exploitative situations
- Truancy, exclusion, disengagement with school, opting out of education altogether
- Unexplained changes in behaviour or personality (mood swings, chaotic, aggressive, sexual)
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- Drug or alcohol misuse

- Getting involved in crime/ Police involvement, police records
- Involved in gangs, gang fights, gang membership
- Injuries from physical assault, physical restraint, sexual assault.

This should be reported via normal social services channels who will then contact the police exploitation team.

12.14 Under-Age Marriage and Forced Marriage (FM)

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

Forced marriage is considered a human rights abuse and falls within the Crown Prosecution Service's definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistleblowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as an academy or through a third party.

12.15 Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices, and they need to look for signs,symptoms, and other indicators of FGM. It is a **statutory duty** for staff to report disclosures of FGM, and all staff are aware they need to phone police immediately after disclosure (Serious Crime Act 2015).

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. FGM is internationally recognised as **a violation of human rights of girls and women**. It is illegal in most countries including the UK.

Circumstances and occurrences that may point to FGM happening

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia, and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage.

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable/ Complaining about pain between legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection

The 'One Chance' Rule

As with Forced Marriage there is the 'One Chance' rule. It is essential that academies take action without delay.

12.16 Fabricated or Induced Illness

A rare form of child abuse, which may include parents/carers fabricating signs and symptoms of illness, falsifying medical records, letters or documents, or inducing illness.
Signs:

- Frequent and unexplained absences from school, particularly from P.E. lessons
- Regular absences for doctor's or hospital appointments
- Repeated claims by parent(s) that a child is frequently unwell and that he/she requires medical attention for symptoms which, when described are vague in nature,difficult to diagnose and which teachers/early years' staff have not themselves noticed (e.g. headaches, tummy aches, dizzy spells).
- Frequent contact with opticians and/or dentists or referrals for second opinions.

12.17 County Lines

County Lines is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market, and seaside towns. Key to identifying potential involvement in county lines are missing episodes when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can be due to other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

12.18 Honour/Gender-Based Violence/Violence Against Women and Girls

Violence against women and girls (VAWG) is a term that covers a number of offences including domestic violence, stalking, sexual assault, forced marriage and FGM. Orion Education academies will educate pupils about healthy relationships and consent so that pupils recognise abuse and know they can seek help. If there is a risk of immediate serious harm to a child, a referral must be made to Children's Social Care immediately.

12.19 Private Fostering

Private fostering arrangements are arrangements made without the involvement of the LA for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative.

Privately fostered children are a potentially vulnerable group.Signs to look out for:

- A child being collected from school by someone new on a regular basis
- A child mentioning they are staying somewhere else or that their parents/carers have gone away
- Something unusual or unclear in the child's administration file

Staff should notify the DSL where they become aware of private fostering arrangements. The safeguarding lead should speak to the family of the child involved to check that they are aware of informing the LA.

12.20 Trafficking

Any child transported for exploitative reasons is considered to be a trafficking victim. Exploitation includes prostitution or other sexual exploitation, forced labour or services, slavery, or servitude. Signs include:

- A history with missing links and unexplained moves
- Indication of physical or sexual abuse.

12.21 Child abduction and community safety incidents

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

As children get older and are granted more independence, it is important they are given practical advice on how to keep themselves safe.

12.22 Cybercrime

Cybercrime is a criminal activity committed using computers and/or the internet. Cyber-dependent crimes include unauthorised access to computers (illegal 'hacking')

- 'Denial of Service' (Dos or DDoS) attacks or 'booting' making a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans.

12.23 Serious Violence

Serious violence is a continuing safeguarding concern. It may involve:

- physical assault
- carrying, threatening with, or using weapons, often in the context of peer conflict or bullying,
- and it can also be associated with criminal exploitation.

Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL (or a deputy). The DSL should assess the risk to both the individual pupil and others in the academy, considering wider information or concerns, and take appropriate action.

Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict.

Staff should be alert to signs that a child may be at risk of or involve in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending.

See Annex A of KCSIE 2026 for further information on indicators, risk factors, and protective actions relating to serious violence.

Appendix 1 - Recognising Signs of Abuse, neglect and exploitation

Categories of Abuse:

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse
- Neglect
- Exploitation and modern slavery

1.1 Signs of Abuse in Children

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age-inappropriate sexual behaviour
- Child Sexual Exploitation

Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated/named/ lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and/or referral to Children's Social Services

The absence of such indicators does not mean that abuse or neglect has not occurred. In an abusive relationship, the child may:

- Appear frightened of the parent
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

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

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

The parent or carer may:

- Persistently avoid child health services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic abuse

Staff should be aware of the potential risk to pupils when individuals, previously known or suspected to have abused pupils, move into the household.

1.2 Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury
- Parents/carers are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries.

Bruising

Pupils can have accidental bruising, but the following must be considered as non-accidental unless there is evidence, or an adequate explanation provided:

- Bruising in or around the mouth, which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, handprints, or a hairbrush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescentshaped. Those broadly over 3cms in diameter are more likely to have been caused by an adult or older child. **A medical opinion should be sought where there is any doubt over the origin of the bite.**

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds andwill always require an experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water on his/her own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint. Grounds for concern if:

- The history provided is vague, non-existent, or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life.

Scars

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

1.3 Recognising Emotional Abuse

Emotional abuse[4] may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The indicators of emotional abuse are often also associated with other forms of abuse. The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, in discriminate or non-attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scapegoat within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others.

1.4 Recognising Signs of Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anythingdue to guilt and/or fear. This is particularly difficult for a child to talk about, and full account should be taken of the cultural sensitivities of any individual child/family. **Recognition can be difficult unless the child discloses and is believed.** There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child’s age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation, and suicide attempts

[4] May include verbal abuse (e.g., criticism, belittling, name-calling)

- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties).

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia, or clothing.

1.5 Recognising Neglect

Evidence of neglect is built up over a period and can cover different aspects of parenting.

Indicators include:

- Failure by parents/carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene, and medical care
- A child seen to be listless, apathetic, and irresponsive with no apparent medical cause
- Failure of the child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods.

Appendix 2 - Child-on-Child Abuse

Orion Education is committed to ensuring that all pupils feel safe and know how to seek help if they are worried about themselves or others. Students are encouraged to report concerns to any trusted adult in school, including their class teacher, pastoral staff, or directly to the Designated Safeguarding Lead (DSL) or Deputy DSL. The academy provides clear guidance to pupils on where and how to access support. All safeguarding concerns, disclosures, and allegations are recorded on the Safeguard platform, which provides a secure and auditable system for monitoring and follow-up.

Allegations are investigated promptly and in line with statutory guidance and the academy's safeguarding procedures, with appropriate action taken to protect the child and support all those involved. Outcomes are recorded, and where necessary, external agencies are engaged to ensure the safety and wellbeing of pupils.

Orion Education takes a safeguarding approach to all individuals involved in concerns or allegations about child-on-child abuse, including those who are alleged to have been abused, and those who are alleged to have abused their peers. Research has shown that many children who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers. We have a zero-tolerance approach to abuse. We recognise that all forms of improper behaviour are abuse, and will never be passed off as
'banter', 'just having a laugh', or 'part of growing up' or 'boys being boys'.

All academy staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the individual academies and/or can occur between children outside of these environments. Extra-familial harms take a variety of forms and children can be vulnerable to multiple harms outlined below.

The response to a report of abuse and sexual violence

The initial response to a report from a pupil is important. It is essential that all victims are reassured that they are being taken seriously and they will be kept safe and supported. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. A victim should not be made to feel ashamed for making a report. Please see the flowchart below for dealing with allegations of sexual violence and sexual harassment and supporting victims, alleged perpetrators, and other children.

Safeguarding and supporting victims and alleged perpetrators

Victim	Alleged Perpetrator	Other children
• needs and wishes of victim are paramount • not made to feel they are the problem • consider proportionality of response • aim for victim to carry out normal routine • recognise that they may struggle in class and may need time out (if they wish) • be aware that they may not disclose the whole picture immediately • prepare for support over a long period and consider who is involved (internal and external) • if victim moves school, the Designated Safeguarding Lead (DSL) informs the new school of the need for continued support	• possible tension between discipline and support (these are not mutually exclusive) • consider age/ developmental stage/any SEND • proportionate response • consider unmet needs (for example, harmful sexual behaviours (HBV) in younger children may be a sign or abuse or trauma) • if (alleged) perpetrator moves school, the Designated Safeguarding Lead (DSL) informs the new school of the issues and transfers the child protection file	• witnesses may need support (especially in cases of sexual violence) • avoid allowing pupils to 'take sides' • minimise potential for bullying or victimisation in school and on school transport • be aware of any social media use and inappropriate or even illegal posts (especially in cases of criminal investigation where anonymity is legally guaranteed) • develop safeguarding culture • constantly review reporting procedures and responses • consider potential for systematic and environmental weaknesses

Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration.

The presence of exploitation in terms of:

- **Equality** – consider differentials of physical, cognitive, and emotional development, power and control and authority, passive and assertive tendencies
- **Consent** – agreement including all the following:
  - Understanding what is proposed based on age, maturity, development level, functioning and experience
  - Knowledge of society's standards for what is being proposed
  - Awareness of potential consequences and alternatives
  - Assumption that agreements or disagreements will be respected equally
  - Voluntary decision
  - Mental competence.
- **Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality, or the threat of these regardless of victim resistance.

The DSL will be aware of the local response to sexual violence and sexual harassment and know what local specialist support is available to support all children involved (victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

Safeguarding issues can manifest themselves via child-on-child abuse. This is any form of physical, sexual, emotional, and financial abuse, and coercive control, exercised between two or more children and within children's relationships (both intimate and non-intimate). All staff working with children are advised to maintain an attitude of "it could happen here". Staff should recognise that

even if there are no reports, it does not mean that child-on-child abuse is not happening, it may be the case that it is just not being reported.

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

- bullying (including cyberbullying);
- abuse in intimate personal relationships between children (also known as teenage relationship abuse - including physical, sexual, emotional abuse, and stalking)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or causingphysical harm;
- harmful sexual behaviour, sexual violence, including criminal offences under the Sexual Offences Act 20023, such as rape, assault by penetration and sexual assault (note that the starting point for such offences is that the matter should be passed to the police);
- sexual harassment – which may include misogyny/misandry, such as sexual comments, remarks, jokes, and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party.
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; this is a criminal offence Voyeurism Offences Act April 2019.
- Consensual and non-consensual making or sharing of nude and semi-nude images, including those generated using AI[5] and/or videos Sending indecent images via device (also known as 'sexting' or youth produced sexual imagery) (*please refer to paragraph 12.7 of this policy for the academy's approach to this*); and
- initiation/hazing type violence and rituals.

Further guidance can be obtained within the Anti-Bullying policy.

We recognise that it is more likely that girls will be victims and boys perpetrators, but any pupil can be vulnerable to child-on-child abuse, and it is unacceptable in any circumstance and will be taken seriously. Staff will be alert to signs of such abuse amongst all pupils, and individual and situational factors can increase a pupil's vulnerability to abuse by their peers.

We also ensure that we are educating pupils about the nature and prevalence of child-on-child abuse, the positive, responsible, and safe use of social media, and the unequivocal facts about consent, via PSHE and the wider curriculum.

Pupils are regularly taught and reminded what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including the vulnerability of those who inflict such abuse. They are informed about the academy's approach to such issues, and educating pupils about consent includes teaching them basic facts about consent and the law on sexual activity.

Risk Reduction Assessments and Safety Plans

The academy will always carry out a risk assessment to develop a safety plan in respect of:

- any pupil who is alleged to have behaved in a way that is considered to be abusive or violent,

[5] Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive, but children still need to know it is illegal, whilst non-consensual is illegal and abusive.

- any pupil who has reportedly been abused or affected by the alleged abusive or violent behaviour by another pupil, or
- any pupil who may be at risk due to the alleged abusive or violent behaviour by another pupil as deemed appropriate by the DSL.

Appendix 3 - Local Contextual Safeguarding Concerns

The academy reviews local safeguarding risks annually in consultation with safeguarding partners, local authority guidance, attendance and behaviour data, safeguarding records, and local intelligence. Identified contextual safeguarding concerns are used to inform staff training, curriculum planning, risk assessments, and safeguarding procedures.

	Academy	**Notes**
Bullying (including cyberbullying)	✓	
Child Criminal Exploitation (County lines/gangs/knife crime/trafficking/modern-day slavery)	✓	
Child Sexual Exploitation	✓	
Children as witnesses in court		
Children Missing from Education	✓	
Domestic Abuse	✓	
Fabricated or induced illness		
Faith abuse (Forced Marriage/HBV/FGM/spirit possession/breast ironing)		
Homelessness	✓	
Mental health issues (Parental or child)	✓	
Child-on-child abuse	✓	
Preventing Radicalisation/Extremism	✓	
Private Fostering		
Relationship abuse (physical/emotional/sexual/neglect/DV/ sexual abuse/harassment)	✓	
Substance misuse (drugs & alcohol)	✓	
Artificial Intelligence (AI)-related abuse	✓	
Online harms and deepfakes	✓	
Child-on-parent/carer abuse	✓	
Serious violence	✓	
Family Help vulnerabilities	✓	