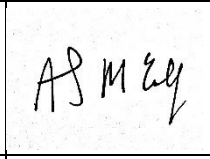
Child Protection and Safeguarding Policy

This policy is for Richmond Academy

Document Control

Description	By Whom	Date
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Latest Review	Claire Rahman (Trust Executive Leader – Safeguarding, Pupil Development & Wellbeing) Katie Jordon (Academy Principal)	September 2026
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1. Harmony Trust Policy Statement

At The Harmony Trust, a child-centred approach underpins all aspects of our practice. At Richmond Academy, we are committed to creating a safe, supportive and inclusive environment where every child is valued, listened to and protected from harm.

Safeguarding and promoting the welfare of children is everyone's responsibility. All staff; volunteers, trustees and visitors have a role in identifying concerns, sharing information and taking prompt action to safeguard children. We maintain an attitude of *"it could happen here"* and recognise that abuse, neglect, exploitation and harm can occur both inside and outside the home, including online.

The welfare and best interests of the child are at the centre of all decisions and actions. We listen to children, take their views seriously and work to ensure they receive the right help at the right time. We are committed to early identification, Early Help and effective multi-agency working to improve outcomes and keep children safe.

We promote a strong safeguarding culture where concerns are shared, professional curiosity is encouraged and all members of our community feel able to raise concerns or challenge practice without fear of reprisal.

We work in partnership with children, families, safeguarding partners and other agencies to protect children, promote their wellbeing and help them achieve their full potential. All safeguarding practice is underpinned by current statutory guidance, including *Keeping Children Safe in Education* and *Working Together to Safeguard Children.*

2. Important Safeguarding Contacts

Organisation / Role	**Name**
Designated Safeguarding Lead (DSL)	Katie Jordon
Deputy Designated Safeguarding Lead (DDSL)	Tamsin Pritchard
Deputy Designated Safeguarding Lead (DDSL)	Stephanie Costello
Deputy Designated Safeguarding Lead (DDSL)	Oliver Booth
Designated Teacher for Children in Care (DT for Children in Care)	Stephanie Costello Oliver Booth
Special Educational Needs Coordinator (SENCO)	Tamsin Pritchard Ellie Robinson (EYFS)
Mental Health Lead	Katie Jordon
Online Safety Lead (HTML)	Oliver Booth
Trust Executive Leaders for Safeguarding, Pupil Development and Wellbeing	Claire Rahman Debbie Beeston
Assistant Director – Inclusive Education	Wendy May

Safeguarding Trustee	Ian Robinson info@theharmonytrust.org

Non-Academy Contacts (Oldham Local Authority)

Organisation / Role	Name	Contact details
Local Authority Designated Officer (LADO)	Colette Morris Wendy Nicholls	Tel: 0161 770 8870 or 07583101863 Email: colette.morris@oldham.gov.uk Tel: 0161 770 0008 or 07974619094 Email: wendy.nicholls@oldham.gov.uk
Oldham Children's Social Care	Duty and Advice	Tel: 0161 770 7777 Email: child.mash@oldham.gov.uk ****only referrals made via telephone will be accepted **Out-of-hours:** Tel: 0161 770 6936 or the Police on 101 (999 in emergencies).
Safeguarding Advisor for Education	Stacey Brackenridge	Tel: 0161 770 8868 or 07753715566 Email: Stacey.brackenridge@oldham.gov.uk
Oldham Safeguarding Children's Partnership (OSCP)	Jayne Haigh (OSCP Business Manager)	Jayne.haigh@oldham.gov.uk OSCP.group@oldham.gov.uk
Prevent Co-ordinator	Nicole Lamont	Nicole.lamont@oldham.gov.uk
Early Help Partnership Officers	Central district: Aziza Khatun, Shabina Khatun and Andrea Johnson.	
NSPCC Helpline	N/A	Call: 0808 800 5000 Email help@NSPCC.org.uk.
Police	N/A	Emergency 999. Non-emergency 101

3. Legislation and Guidance

This policy should be read alongside:

- Keeping children safe in education 2026 (comes into force from 1 September 2026)
- Working together to safeguard children 2026
- Section 3 of EYFS statutory framework for group and school-based providers
- Working together to improve school attendance (applies from 19 August 2024)

It is also based on the Department for Education's (DfE's) statutory guidance:

- Section 157 and 175 of the Education Act 2022
- The School Staffing (England) Regulations 2009
- Disqualification under the Childcare Act 2006 - GOV.UK
- Childcare Act 2006
- The Education (Independent School Standards) Regulations 2014
- Academy trusts: governance guide - GOV.UK
- Children Act 1989
- Children Act 2004

- Serious Crime Act 2015
- Statutory guidance on FGM
- Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006 (Schedule 4)
- Prevent duty guidance: England and Wales (2023) - GOV.UK
- The Human Rights Act 1998
- The Equality Act 2010
- The Public Sector Equality Duty (PSED)
- Information sharing advice for safeguarding practitioners - GOV.UK
- Children's Wellbeing and Schools Act 2026
- What to do if you're worried a child is being abused
- Crime and Policing Act 2026

4. Definitions: Safeguarding and Child Protection

All staff at Richmond Academy are expected to be familiar with the wide range of policies and procedures to keep children safe and always promote their wellbeing.

Safeguarding, as defined in Keeping Children Safe in Education (2026), means:

- *providing help and support to meet the needs of children as soon as problems emerge*
- *protecting children from mistreatment, whether that is within or outside the home, including online*
- *preventing the impairment of children's mental and physical health or development*
- *ensuring that children grow up in circumstances consistent with the provision of safe and effective care*
- *taking action to enable all children to have the best outcomes*

Working Together to Safeguard Children (2026) further extends this definition to include:

- *promoting the upbringing of children within their family network, including with their birth parents or through kinship care arrangements, wherever possible and where this is in the child's best interests*
- *taking action to enable all children to achieve the best possible outcomes, in line with the outcomes set out in the Children's Social Care National Framework*

Child/ren: The legal definition of a child in the UK includes everyone under the age of 18.

Glossary of Definitions:

Term	Definition
Early Help	Support provided to children and families as soon as concerns emerge, to prevent problems from escalating and to improve outcomes through timely intervention.
Child in Need (CIN)	A child who requires additional services to maintain or achieve a reasonable standard of health or development, whose health or development may be significantly impaired without support, or who is disabled, as defined by Section 17 of the Children Act 1989.
Child Protection (CP)	The processes and actions taken to safeguard children who are suffering, or are likely to suffer, significant harm. This includes statutory enquiries under Section 47 of the Children Act 1989.

Significant Harm	The threshold that justifies child protection intervention. Harm includes ill-treatment or impairment of a child's health or development, including harm caused by witnessing abuse such as domestic abuse.
Multi-Agency Safeguarding Hub (MASH)	A partnership of professionals from agencies such as social care, police, health, and education who work together to share information, assess risk, and coordinate support for children and families.
Children Looked After (CLA)	Children who have been in the care of the Local Authority for more than 24 hours, either through voluntary arrangements or court orders.
Previously Looked After Children (PLAC)	Children who were formerly in Local Authority care and have since left care through adoption, a Special Guardianship Order, or a Child Arrangements Order.
Kinship Care	Care provided by relatives, friends, or other people with a pre-existing relationship to a child who cannot live with their birth parents.
Family and Friends Carers	Relatives or close family friends who care for a child when their parents are unable to do so. Some may hold Parental Responsibility through a legal order.
Private Fostering	An arrangement where a child under 16 (or under 18 if disabled) is cared for by someone who is not a parent or close relative for 28 days or more. The Local Authority must be notified of these arrangements. Where staff become aware that a child may be living in a private fostering arrangement, this must be reported to the DSL. The DSL will notify the Local Authority in accordance with statutory duties.
Victim	A term commonly used to describe a child or individual who has experienced abuse or harm. However, we recognise that not everyone identifies with this term and will use language that reflects the wishes and preferences of the child wherever possible.
Alleged Perpetrator/ Perpetrator	Terms used to describe a person who has allegedly caused, or is known to have caused, harm. When speaking with children and families, more child-centred language may be used, such as *"the child who has displayed harmful behaviour"* and *"the child who has experienced harmful behaviour."*

5. Equality Statement, Children with Protected Characteristics

Equality Impact Assessment

Under the Equality Act 2010 we have a duty not to discriminate against people based on their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation. This policy has been equality impact assessed and we believe it is in line with the Equality Act 2010 and it is fair, it does not prioritise or disadvantage any child, and it helps to promote and encourage equality in our academies.

In meeting our Public Sector Equality Duty, we recognise that some children may experience additional barriers, disadvantages, or vulnerabilities. We are committed to ensuring that safeguarding arrangements are inclusive, accessible, and responsive to the individual needs of children and families. We will take proactive steps to identify and remove barriers to support and protection, with particular regard for children with disabilities, special educational needs and disabilities (SEND), protected characteristics, and other identified vulnerabilities.

Our safeguarding arrangements are underpinned by the Human Rights Act 1998, which promotes and protects the rights and freedoms of every child. We are committed to treating all children with dignity, respect, and fairness, ensuring their views, wishes, and feelings are considered when decisions are made about their welfare. All safeguarding decisions will be child-centred, proportionate, and taken in the best

interests of the child, with the aim of keeping children safe, promoting their wellbeing, and enabling them to achieve their full potential.

Children with Additional Needs and Protected Characteristics

Some children are at greater risk of harm, both online and offline, and additional barriers may exist that make it more difficult for them to recognise or disclose abuse. At Richmond Academy we are committed to anti-discriminatory practice and to ensuring that all children receive the same level of protection, regardless of any additional needs, barriers, or protected characteristics they may have.

In line with the **Equality Act 2010**, we recognise the following protected characteristics that may apply to our children:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Not all protected characteristics will be relevant to all children because of age and circumstances**;** however the Academy remains committed to preventing discrimination and safeguarding all pupils.

Children with Special Educational Needs and Disabilities (SEND)

We know who our children are with special educational needs, disabilities, or additional health needs, and we recognise that they may face additional barriers to safeguarding, which can include:

- Assumptions that indicators of possible abuse—such as changes in behaviour, mood, or injury—are related to the child's impairment, without further exploration.
- Increased vulnerability to peer group isolation or bullying, including prejudice-based bullying.
- Assumptions that children with SEND may be disproportionately affected by issues such as bullying, without outwardly showing signs.
- Communication barriers and difficulties in managing or reporting concerns.
- Limited cognitive understanding, including difficulty distinguishing between fact and fiction in online content, which may lead to repeating harmful behaviours or content in academy settings.
- Reluctance to challenge carers, where professionals may over-empathise with carers due to the perceived stress of caring for a disabled child.
- Reliance on a wide network of carers to meet basic needs, which can increase the potential risk of exposure to abusive behaviour.
- Reduced understanding of choice and participation, which may limit a disabled child's ability to recognise or resist abusive situations.

Children Looked After (CLA)

The most common reason for a child becoming looked after is abuse and/or neglect. We therefore ensure that appropriate arrangements are in place to support these children and protect them from further harm. This includes:

- The **appointment of a Designated Teacher (DT)** for Children in Care.
- Ensuring that relevant staff are aware of a child's looked-after status.
- Ensuring that necessary staff have the **skills, knowledge, and understanding** of the child's individual needs.

- Maintaining accurate records that clearly set out the child's **legal status and care arrangements**, including the level of authority delegated to their carer and contact arrangements with birth parents or those holding parental responsibility.
- Keeping up-to-date **contact details** for the child's social worker, carer(s), and the **Virtual School Head** to enable effective liaison by the Designated Teacher.

Children with a Social Worker

Virtual School Heads have strategic responsibility for the educational attendance, attainment, and progress of:

- Children in care;
- Children previously in care; and
- Children with a social worker — defined as any child who has been assessed as being in need under **Section 17 of the Children Act 1989** and currently has a social worker. This also includes children who have been assessed as needing, or who have previously needed, a social worker within the past six years due to safeguarding or welfare concerns.

The statutory guidance on Promoting the education of looked after and previously looked after children contains further information on the roles and responsibilities of Virtual School Headteachers.

In line with Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension - GOV.UK this responsibility has been extended to include:

- Children who have previously had a social worker — encompassing all children aged 0 to 18 who currently have or have previously had a social worker; and
- Children in kinship care arrangements — meaning any friend or family member who is not the child's parent, but who is raising them for a significant period, either temporarily or permanently

Richmond Academy ensures that our Designated Teacher receives appropriate training and takes a leadership role in this crucial area of safeguarding, working in close collaboration with the Designated Safeguarding Lead. This includes:

- Working closely with Virtual School Heads to ensure that funding is used effectively to support the child's educational achievement and development needs, as identified in their Personal Education Plan (PEP); and
- Collaborating with the Virtual School Heads to promote the educational achievement of children who were previously in care.

6. Roles and Responsibilities of staff including Leadership and Management

Role and Responsibilities of the Whole School

Safeguarding is **everyone's** responsibility at Richmond Academy. This policy applies to all staff including permanent, temporary and supply, trustees, volunteers and contractors. It also applies to safeguarding arrangements for extended school and off-site activities.

Richmond Academy plays a crucial role in preventative education. This is in the context of a whole academy approach to preparing children for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- behaviour policy
- pastoral support system
- planned programme of relationships, sex and health education (RSHE) in an age-appropriate way, which is inclusive and delivered regularly, tackling issues such as:
    - healthy and respectful relationships

- boundaries and consent
- stereotyping, prejudice, and equality
- body confidence and self-esteem
- how to recognise an abusive relationship (including coercive and controlling behaviour)
- the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, faith-based or honour-based violence such as forced marriage and FGM and how to access support
- what constitutes sexual harassment and sexual violence and why they are always unacceptable.

Role and Responsibility of all staff (permanent, temporary and supply), volunteers and contractors

All staff will be required to:

- read Part One in full of Keeping Children Safe in Education guidance, and the reviewed version of this guidance at least annually
- sign an annual declaration to state that they have read the expected sections according to their role, have understood the content and their roles and responsibilities in our whole academy approach to safeguarding
- understand the **mandatory reporting** duty for Female Genital Mutilation (FGM). Teachers have a statutory duty to report to the Police where, in the course of their professional duties, they either discover that an act of FGM appears to have been carried out on a girl under the age of 18 or a girl under 18 discloses that she has been subjected to FGM. This duty is mandatory and should be carried out in accordance with statutory guidance, while also informing the Designated Safeguarding Lead
- understand the **statutory mandatory** reporting duty for child sexual abuse under the Crime and Policing Act 2026. Where staff who undertake regulated activity with children are made aware by a child that they have been sexually abused, or they witness a child being sexually abused, they must comply with the statutory reporting duty without delay. Staff must immediately inform the Designated Safeguarding Lead, who will ensure that appropriate referrals are made to Children's Social Care and/or the Police in line with statutory guidance. This duty sits alongside, and does not replace, existing safeguarding responsibilities
- promote and raise awareness about the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they will be interacting with online)
- contribute to creating a culture for children who are lesbian, gay, bisexual, or gender questioning to speak out and share their concerns
- contribute to creating a culture for any child defined as having a protected characteristic to speak out and share their concerns (see Section 5).

All staff will be aware of:

- our academy's safeguarding arrangements and systems which is explained to staff as part of their induction and annual update training for Keeping Children Safe in Education.
- at induction, new staff/volunteers are provided with the following key guidance and information provided by our Senior Leadership Team:
  - This policy (which includes procedures to deal with child-on-child abuse)
  - The Behaviour Policy
  - The Staff Code of Conduct
  - The role of the designated safeguarding lead (including the identity of the DSL and any deputies
  - The Whistleblowing Policy
  - Online Safety Policy
  - Social Media Policy

    - IT Acceptable Use Agreement
- our expected safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
- signs of vulnerabilities to look out for in children who may benefit from Early Help support, we explain to staff the Early Help process for children and their families and what their role is in this to support DSLs in ensuring children and their families receive support as soon as problems emerge
- what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- the process for recording and sharing information internally to DSLs and on children's safeguarding records
- the process of making referrals to the Local Authority Children's Social Care and/or Police where required and the statutory processes that may follow
- the signs of specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines) *Keeping Children Safe in Education (2026)*
- how to support and speak to children when they may share their worries or make disclosures of abuse, neglect or exploitation and contribute to creating a culture where children feel able to speak with the relevant safeguarding leads
- the importance of reassuring children that they are being taken seriously and that they will be supported and kept safe
- the importance of supporting families and providing a culture of support to encourage parents/carers to seek support and engage with our academy and professionals when issues emerge or become a concern
- children can be at risk of harm inside the home (familial harm) and outside of their home (extra familial harms) and that any form of harm can happen directly or online
- children who are, or are perceived to be, lesbian, gay, bisexual, or who identify with a protected characteristic relating to sexual orientation or gender reassignment, may be vulnerable to bullying, harassment, discrimination, and child-on-child abuse
- what to look for to identify children who need help or protection in accordance with statutory procures under the children act section 17 (child in need) and section 47 (significant harm).

The Harmony Trust have appointed Trust Executive Leaders responsible for safeguarding. The Trust Executive Leaders responsible for safeguarding are Claire Rahman (North-West) and Debbie Beeston (Derby).

Please refer to the accompanying document for a comprehensive overview of roles and responsibilities related to safeguarding and the role of the Designated Safeguarding Lead: **Roles and Responsibilities - Safeguarding .docx**

Role and Responsibilities of the Designated Safeguarding Lead (DSL)

- Has lead responsibility for safeguarding and child protection across the Academy. Is supported by appropriately trained Deputy DSLs.
- Receives, assesses and responds to safeguarding concerns.
- Provides safeguarding advice, guidance and support to staff.
- Makes referrals and works with children's social care, the police and other agencies.
- Leads Early Help, information sharing and multi-agency safeguarding arrangements.
- Maintains safeguarding records and monitors safeguarding concerns, vulnerabilities and risks.
- Oversees online safety and digital safeguarding arrangements.
- Supports children who are vulnerable, have experienced harm, or may be at risk of harm.

- Promotes effective safeguarding practice and compliance with statutory guidance across the academy.

Role and Responsibilities of the Harmony Trust Board of Trustees including responsibilities delegated to the Executive Leadership Team

- Provide strategic oversight of safeguarding across the Trust.
- Ensure compliance with safeguarding legislation and statutory guidance.
- Approve and monitor the effectiveness of safeguarding policies, procedures and practice.
- Hold Academy Leaders and Designated Safeguarding Leads (DSLs) to account for safeguarding arrangements.
- Ensure appropriate safeguarding training is provided for staff and trustees.
- Ensure sufficient resources, support and challenge are in place to promote effective safeguarding.
- Monitor the effectiveness of online safety, filtering and monitoring arrangements.
- Seek assurance that safeguarding arrangements meet the needs of all children, particularly those who are vulnerable.
- Promote a culture where safeguarding is everyone's responsibility.
- Receive regular safeguarding reports, including assurance regarding online safety, filtering and monitoring arrangements,

Role and Responsibilities of the Principal

- Leads and promotes effective safeguarding and child protection across the Academy.
- Ensures staff understand and follow safeguarding policies and procedures.
- Provides the DSL with sufficient time, training, support and resources to fulfil their role.
- Acts as the case manager for allegations against staff and manages low-level concerns.
- Ensures robust safeguarding arrangements, including safer recruitment and alternative provision oversight.
- Oversees online safety, filtering and monitoring, and safeguarding within early years provision where applicable.
- Maintains a safe, supportive and secure environment for all children
- Provide regular assurance to Trustees regarding the effectiveness of safeguarding, online safety, filtering and monitoring arrangements

Role and Responsibilities of the Designated Teacher

- Promotes the educational achievement, attendance and wellbeing of children with a social worker, children in care and previously looked after children.
- Works with the Virtual School Head, DSL and other professionals to identify and address barriers to learning.
- Supports the effective use of Personal Education Plans (PEPs) and associated resources.
- Contributes to safeguarding arrangements for children subject to Child in Need (CIN) and Child Protection (CP) Plans.
- Helps ensure a coordinated approach to pupils' welfare, progress and outcomes.

The Designated Teacher will work with the Virtual School Head and relevant professionals to promote the educational progress, attendance, wellbeing and safeguarding of children in kinship care arrangements.

7. Safer Recruitment and Selection

We are committed to ensuring that all recruitment, selection and employment practices help to safeguard and promote the welfare of children. Safer recruitment is an essential part of creating a safe culture and preventing unsuitable individuals from working with children. All recruitment procedures are conducted

in accordance with Keeping Children Safe in Education (KCSIE 2026), statutory guidance, safer recruitment principles and Trust policies.

The Trust will ensure that:

- safeguarding and child protection are embedded throughout the recruitment process;
- all applicants are informed of the Trust's commitment to safeguarding;
- job descriptions and person specifications clearly set out safeguarding responsibilities;
- recruitment materials include safeguarding statements;
- candidates are assessed against safeguarding expectations throughout the selection process;
- appropriate safeguarding questions are included during interviews;
- references are obtained and scrutinised before appointment wherever possible;
- concerns arising from references or employment history are explored and resolved before appointment;
- all required pre-employment checks are completed before an individual begins work.

Pre-Employment Checks

The Trust will undertake all appropriate pre-employment and safeguarding checks for staff, volunteers, agency and supply staff, contractors, trustees and other adults working in or on behalf of our academies, in accordance with their role and statutory requirements. Checks will be completed and recorded as required before an individual commences their role. These will include, where applicable:

- verification of identity;
- verification of the right to work in the UK;
- verification of qualifications and professional status;
- verification of employment history;
- references;
- enhanced Disclosure and Barring Service (DBS) checks;
- children's barred list checks;
- prohibition from teaching checks;
- Section 128 checks, where required;
- overseas criminal record checks, where appropriate;
- online searches as part of due diligence checks; and
- medical fitness declarations, where applicable.

In accordance with Keeping Children Safe in Education, shortlisted candidates will be asked to complete a self-declaration of their criminal record and other information relevant to safeguarding. The Trust will also undertake an online search of shortlisted candidates to identify incidents or issues that are publicly available online which may be explored with the applicant at interview. Information obtained through online searches will only be considered where it is relevant to the individual's suitability to work with children.

Single Central Record (SCR)

The Trust maintains an accurate and up-to-date Single Central Record in accordance with statutory requirements.

Academy Leaders and Trustees receive appropriate assurance regarding the effectiveness and accuracy of the Single Central Record through regular monitoring, review and audit processes. Any identified actions are addressed without delay.

Safer Recruitment Training

At least one person on every recruitment panel will have completed appropriate safer recruitment training.

The Trust will ensure that designated leaders, Trustees and others involved in recruitment receive appropriate training and updates to enable them to undertake their responsibilities effectively.

Agency, Supply and Third-Party Staff
The Trust will obtain written confirmation that appropriate safeguarding and vetting checks have been completed for agency and supply staff before they work in our academies.
The identity of agency and supply staff will always be checked on arrival, and appropriate safeguarding procedures, codes of conduct and reporting arrangements will be explained as part of their induction.

Trainee Teachers
Trainee teachers will be checked either by the Trust or by the initial teacher training provider. Written confirmation will be obtained where the provider is responsible for undertaking the checks.
Where a trainee teacher is fee-funded, the training provider will be responsible for carrying out the required checks. The Trust will obtain written confirmation that the checks have been completed and that the trainee has been judged suitable to work with children.

Volunteers, Contractors and Visitors
The Trust will undertake appropriate risk assessments and checks for volunteers, contractors and visitors based on the nature of their role, level of supervision and access to children.
All visitors will be provided with safeguarding information, including guidance on reporting concerns and the identity of the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads.
From 1 September 2026, a volunteer who teaches, trains, instructs or supervises children frequently (on more than three days in any 30-day period) or overnight will be regarded as engaging in regulated activity, even where they are supervised. In these circumstances, the Trust will obtain an enhanced DBS check with children's barred list information before the volunteer begins the role. A volunteer will not undertake regulated activity until their children's barred list status has been confirmed.

Ongoing Suitability
Safeguarding is an ongoing responsibility. All staff are expected to maintain high standards of professional conduct and are required to inform their Principal of any matters that may affect their suitability to work with children. Concerns regarding suitability will be managed in accordance with Trust policies, KCSIE, allegations management procedures and low-level concerns procedures.

The Principal will ensure that relevant staff are aware of the requirements relating to disqualification under the Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) Regulations 2018, where these apply to their role, including their obligation to disclose relevant information.

The Trust Executive Lead for Safeguarding, Human Resources Team and Academy Leaders work collaboratively to monitor compliance with safer recruitment requirements through audits, safeguarding reviews, Single Central Record checks and quality assurance processes across all Academies within Harmony Trust.

8. Working with Families

Alongside Keeping Children Safe in Education, Richmond Academy adopts the fundamental principal of working in a child-centred approach within a whole family focus as promoted in Working Together to Safeguard Children 2026.

This principle is underpinned by the findings and recommendations within the Government's 2023 publication Children's Social Care: Stable Homes, Built on Love in response to the recommendations of

the Independent Review of Children's Social Care. The strategy sets out how children's social care is to be committed to supporting every child to grow up in a safe, stable and loving home. For most children this means growing up within their family. The strategy also emphasises the importance of having stronger expectations of support through early help and family networks.

At Richmond Academy our principles align to the above. We endeavour to work in partnership and collaboration with children and their families so that they are supported from an early stage by being a part of and leading the conversations about change and aims for their children. We support families in a strength and solution-based approach, encouraging motivation and confidence to improve their own agency to make safe and positive decisions for themselves and their children.

Our principles include, but are not limited to:
Promoting effective partnership working with parents and carers e.g. build strong, positive, trusting, and co-operative relationships by:

- approaching families and their wider family networks and communities with empathy, respect, compassion, and creativity;
- avoiding reinforcing family shame, suffering, and blame;
- making efforts to understand the impact of the parental trauma influencing the dynamics and experiences of the family;
- using strength-based approaches, working with parents and carers to identify what is working well and how their strengths could support them to effect positive change;
- ensuring we work sensitively with parents, carers, and children, to identify and understand the impact of adversity and trauma in their lives; seeking to understand how adversity and trauma might manifest and affect children and parent's engagement and use their expertise to adapt their response with care and compassion;
- adapting our responses to meet the diverse needs of parents and carers, including fathers and male carers, and the specific challenges being faced, including parents and carers of disabled children, and where harm is outside the home;
- understanding a family's circumstances and the needs of parents of children with additional needs and/or disabilities and consider this when establishing their ability to care for the child;
- ensuring we understand the family's background, ethnicity, religion, financial situation, ability, education, sex, ages and sexual orientation, and potential barriers these create in seeking and accessing help and support;
- being alert and recognising where parents or carers may not be acting in the best interest of the child or where children may be experiencing abuse, neglect, and exploitation as a result of actions by parents, carers, or other individuals in their lives. Practitioners use their skills and expertise to adapt their response to secure engagement;
- being mindful of negative stereotypes when making decisions which might lead to false assumptions;
- being aware and recognising when parents have mental health problems and work with them to assess parents' awareness of their child's needs.

Communicating effectively verbally and non-verbally by:

- communicating with respect, being clear, curious and inclusive and adapting to parent's and carer's needs;
- providing materials to children, parents, carers, and families which are jargon free, developmentally appropriate and in a format that is easily understood;
- ensuring any materials, such as minutes or reports, capture the Academy's contribution, but also those from the children, parents and carers which must include their views and wishes;
- supporting families to access support to translate information where English is not their first language. Richmond Academy will access interpreters where needed, including British Sign Language.

Empowering our parents and carers to participate in decision-making to help, support and protect children by:

- creating a safe culture which is an open and accepting forum free from discriminatory or prejudicial judgements;
- ensuring the open culture is one which still provides reflection and challenge where the information has the potential to be a risk or influencing factor which may impact on a child's safety and wellbeing;
- asking families for their perspective on a situation or issue that arises, ensuring we consider their point of view and factor this in when thinking about support;
- promote families' rights to support through use of advocates, family members or a supporter;
- ensuring parents and carers are fully aware of who will attend meetings and discussions, if the child will be invited to participate, and the format of the meeting or discussion;
- giving parents and carers adequate preparation at every stage, relevant information, a safe and appropriate environment for participation, and suitable access arrangements;
- signposting parents and carers to sources of help and support available locally or through the Local Authority;
- provide opportunities for feedback and review to ensure acknowledgement of positive progress but also reviewing and discussion of any new or increasing issues to adapt a family's plans;
- being transparent about our concerns and why we may need to request support from an outside agency; and the potential actions should our concerns increase for the children;
- helping parents and carers to understand what the issues are and how this impact on the child, what decisions could be made, what changes need to be made, why and how, timescales and possible outcomes;
- providing information about different types of support, what it involves and expects from parents and carers so they can make an informed choice and decision about which support pathways will be more helpful and effective for them.

All staff and volunteers understand the importance of recognising that a child may benefit from Early Help intervention, and it is integral to our whole academy approach to look and listen out particularly for children:

- who have a special educational need and/or disabilities (SEND) or health conditions;
- who are a young carer;
- who could experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- have English as an additional language;
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence;
- are at risk of FGM, sexual exploitation, faith-based as well as honour-based abuse, forced marriage, or radicalisation;
- are asylum seekers;
- are at risk due to either their own or a family member's mental health needs;
- are in care or were previously in care (see Section 11);
- who have ongoing unexplainable and/or persistent absences from education;
- whose parent/carer has expressed an intention to remove them from academy to be provided with elective home education (EHE).

9. Confidentiality and Sharing Information

At Richmond Academy trusted relationships are at the heart of our work with children and families. We aim to work openly and transparently with children, parents and carers, listening to their views and

explaining how and why information may need to be shared to safeguard and promote a child's welfare. Effective information sharing is essential to safeguarding. No single practitioner can have a complete picture of a child's needs and circumstances, and relevant information must be shared appropriately and promptly so that children and families receive the right help at the right time. Data protection legislation does not prevent the sharing of information where this is necessary and lawful for safeguarding purposes.

Information Sharing Duty
From 30 September 2026, Section 16LA of the Children Act 2004, as amended by the Children's Wellbeing and Schools Act 2026, places an information sharing duty on relevant organisations for the purposes of safeguarding and promoting the welfare of children. The Academy will have regard to the statutory Information Sharing Duty Guidance (September 2026) when making information-sharing decisions.

Where the duty applies, relevant information must be shared where the statutory requirements are met. Information sharing is not limited to situations where a child is already at risk of significant harm and may support early identification of need, prevention, Early Help and timely intervention.

When deciding what information to share, staff will use professional judgement and ensure information is:

- relevant to safeguarding or promoting the welfare of the child;
- necessary and proportionate to the purpose for which it is being shared;
- accurate and appropriately contextualised;
- shared promptly and securely; and
- limited to what the recipient needs to understand the child's circumstances, assess need or risk, make decisions, provide support or take safeguarding action.

Information may be summarised or omitted where it is not relevant, but information necessary to understand, assess or manage a child's needs or safeguarding risk must not be omitted.

Consent, Transparency and Working with Families
Where it is safe and appropriate to do so, the Academy will be open and transparent with children and families about information sharing, including what information may be shared, with whom and why. Their views will be listened to and considered as part of a child-centred approach.
Consent is not always required to share information for safeguarding purposes, and a lack of consent must not prevent lawful information sharing. Staff must distinguish between consent to share information and consent to access or receive a particular service.

Where appropriate, we will seek the cooperation and understanding of parents and carers. However, information may be shared without their consent where there is a lawful basis to do so, including where seeking consent may:

- place a child or another person at increased risk of harm;
- prejudice the prevention, detection or investigation of a crime; or
- cause unnecessary delay in providing safeguarding support or protection.

Where it is safe and appropriate, children and families will be informed about information that has been shared. Transparency should not be confused with requiring consent before information can lawfully be shared.

Confidentiality and Data Protection
Safeguarding information is confidential and will only be shared with those who need it for a legitimate safeguarding or welfare purpose. The Data Protection Act 2018 and UK data protection requirements do not prevent lawful and proportionate information sharing to safeguard children.
Staff must never promise a child absolute confidentiality. Children should be reassured that information will only be shared with people who need to know in order to help, support or protect them.

Where special category personal data is shared, the Academy will ensure there is an appropriate lawful basis and processing condition.

Recording Decisions
Information-sharing decisions must be appropriately recorded. Records should identify:

- what information was shared, or the decision not to share;
- with whom it was shared;
- the reason for the decision;
- the lawful or safeguarding basis where appropriate; and
- any action or outcome arising from the information shared.

Where there is uncertainty, staff should seek prompt advice from the DSL, Principal, a senior leader or Data Protection Officer. Uncertainty about information sharing must not lead to unnecessary delay where sharing is required to safeguard or promote the welfare of a child. The September 2026 guidance is designed specifically to address barriers and support more confident and consistent information sharing.

Child-on-Child Abuse and Criminal Investigations
Where information relates to child-on-child abuse, the DSL will consider the welfare and safeguarding needs of all children involved. Parents and carers will normally be informed unless doing so would place a child at greater risk, prejudice an investigation or otherwise be contrary to the child's best interests. Where a child is at risk of harm, has been harmed or requires statutory intervention, the Academy will make appropriate referrals to Children's Social Care. Where a crime may have been committed, the DSL will consider referral to the Police in accordance with KCSIE 2026 and local safeguarding procedures. Where criminal proceedings are involved, the Academy will take reasonable steps to protect the privacy and anonymity of children and will carefully consider who needs access to information.

10. Recognise and Respond to Abuse, Neglect and Exploitation (what all staff must know and do if they have concerns)

Abuse, neglect and exploitation

All our staff are aware of what abuse, neglect and exploitation is and understand the different types of indicators which could suggest a child is suffering or likely to suffer harm.
We encourage staff to be professionally curious about what to look out for as this is vital for the early identification of abuse, neglect and exploitation so that we can identify children who may be in need of help or protection at the earliest opportunity.

Abuse is a form of mistreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children 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.

Our staff are aware that children may be abused by an adult or adults or by another child or children.

Physical Abuse

Physical abuse is a form of abuse which may involve:

- hitting
- shaking
- throwing

- poisoning
- burning or scalding
- drowning
- suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (Fabricated Induced Illness).

Emotional Abuse

The persistent emotional mistreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve:
conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction
a child seeing or hearing the ill-treatment of another
serious bullying (including cyberbullying)
causing a child to feel frightened or in danger
exploitation or corruption of children.

Some level of emotional abuse is involved in all types of mistreatment of a child, although it may occur alone. It can be difficult to recognise emotional abuse, and children may not always realise they are experiencing it. However, there may be indicators in the way a child behaves and reacts to certain situations.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether the child is aware of what is happening. The activities may involve:

- **Physical contact:** including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing
- **Non-contact activities:** such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse
- **Online abuse:** sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males, women can also commit acts of sexual abuse, as can other children. The CSA Centre Pathway is designed to support professionals in identifying and responding to child sexual abuse and empower them to learn more about the role they, and their colleagues, can play to best protect and support children. The Response Pathway sets out how to respond to concerns of child sexual abuse at key points: from first concerns and early help safeguarding through to child protection and criminal justice responses. Throughout, it focuses on meeting the needs of children and their families.

Mandatory Reporting of Child Sexual Abuse

Under the Crime and Policing Act 2026, a statutory duty requires certain individuals undertaking regulated activity with children, including school staff, to make a report where they are made aware by a child that they have been sexually abused, or where they witness a child being sexually abused. Failure to fulfil this duty without a reasonable excuse may constitute a criminal offence.

In accordance with this duty, all staff must immediately report any disclosure or witnessed incident of child sexual abuse to the Designated Safeguarding Lead (DSL). The DSL will ensure that an immediate referral is made to Children's Social Care and/or the Police, as appropriate, and that all concerns are recorded accurately in line with statutory guidance and local safeguarding procedures. Staff must not promise confidentiality to a child making a disclosure and should always act in the child's best interests to ensure they receive appropriate protection and support.

The mandatory reporting duty sits alongside, and does not replace, existing safeguarding responsibilities. All concerns relating to child sexual abuse or suspected child sex offences must be reported immediately to the Designated Safeguarding Lead (DSL), who will ensure that appropriate referrals are made to Children's Social Care and/or the Police in accordance with statutory guidance and local safeguarding procedures.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.
Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Exploitation

Exploitation in relation to children refers to the use of children for someone else's advantage, gratification, or profit often resulting in unjust, cruel, and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimization, oppression or ill-treatment.
Our staff are aware that there are several types of child exploitation, including, but not limited to:

- **Child Sexual Exploitation (CSE):** this is a type of sexual abuse where children are sexually exploited for money, power, or status. It can involve contact and non-contact activities and can occur without the child's immediate recognition; this is due to their grooming by the abuser.
- **Child Labour Exploitation:** this involves the use of children in work that is harmful to their physical and mental development. It deprives them of their childhood, potential, and dignity.
- **Child Trafficking:** children are recruited, moved, or transported and then exploited, forced to work, or sold. They are often used for forced labour, sexual exploitation, or illegal activities.
- **Child Criminal Exploitation (CCE):** this is where children are involved in activities of a criminal nature, often in gangs. They may be forced or manipulated into committing crimes, such as selling drugs or stealing.

Safeguarding Issues and Specific Forms of Abuse

All our staff understand that children can be at risk of abuse or exploitation in situations outside their families. They are aware that extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), drug taking and/or alcohol misuse, criminal exploitation, child sexual exploitation, serious youth violence, county lines, radicalisation, consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as youth produced sexual imagery) and can put children in danger.

Staff are aware that Extra Familial Harms can present online, in a child's environment/neighbourhood, academy and any place/space that children occupy or access such as:

- Child abduction
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- County Lines
- Children and the Court system
- Children absent from education
- Children with family members in prison
- Cybercrime
- Domestic abuse
- Homelessness
- Mental Health
- Modern Slavery and the National Referral Mechanism
- Preventing radicalization
- The Prevent Duty
- Channel
- Sexual violence and Sexual harassment between children in schools
- Serious Violence
- FGM and the mandatory reporting duty for teachers
- Forced marriage

Further advice and guidance for staff can be found in KCSIE 2026 the Harmony Trust Safeguarding Handbook: Safeguarding Handbook 26.27.pptx

Child-on-Child Abuse

At Richmond Academy we know that children can cause harm to other children. We have a zero acceptance of child-on-child abuse and create a culture of keeping an open mind and attitude that "it could happen here." Our staff are aware that even if no reports are being made in our academy, it does not mean it is not happening.

Our staff understand that it is important to challenge inappropriate behaviours between children that are abusive in nature, and we have clear expectations that incidents are not downplayed or should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys", as this can lead to a culture of unacceptable behaviours and unsafe environments for children and young people.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- physical assault and harm, or the threat of harm with a weapon
- harmful sexual behaviour, sexual violence, sexual harassment which may include misogyny/misandry. More about this is in Part five of Keeping Children Safe in Education
- consensual and non-consensual sharing of nude and semi-nude images and/or videos, including those generated using AI
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Residential Visits and Overnight Accommodation

As part of our arrangements to prevent child-on-child abuse and protect the safety, privacy and dignity of all pupils, the school will ensure that overnight accommodation on residential visits and other overnight activities is allocated appropriately. Children will not share overnight accommodation with a child of the opposite biological sex. Where a child is unwilling to share accommodation with another child of the same biological sex, the school will consider appropriate alternative arrangements where reasonably practicable, provided these do not compromise the safety, privacy, dignity or wellbeing of any child. Decisions will be made on a case-by-case basis, taking account of the school's safeguarding responsibilities and relevant legal duties.

Concerns about child-on-child abuse

Most incidents of children hurting other children will be managed through the Academy's Behaviour Policy. However, safeguarding procedures will be followed where the behaviour:

- Causes, or is likely to cause, significant harm.
- May constitute a criminal offence.
- Involves sexual violence, sexual harassment, sexual abuse, consensual and non consensual making or the sharing of nudes or semi-nudes.
- Is physically violent, coercive, or threatening.
- Involves exploitation, including the misuse of drugs or alcohol.
- Places a child or children at ongoing risk of harm.

Where an allegation or concern about child-on-child abuse is raised:

- Staff must record the concern on CPOMS and report it immediately to the DSL.
- Staff must not investigate the incident themselves.
- The DSL will assess the concern and determine appropriate action, which may include:
    - speaking with the children involved and their parents/carers;
    - seeking advice from relevant agencies;
    - making referrals to Children's Services, the Police, CAMHS, or other support services where appropriate.
- The DSL will consider the need for a risk assessment and/or safety and support plan for all children involved.
- Children will be supported, protected, and listened to throughout the process.
- Where a criminal offence may have occurred, the Academy will work closely with the Police and other agencies while ensuring ongoing safeguarding arrangements are in place.

We are committed to maintaining a culture where children feel safe, respected, and confident to report concerns. We:

- Promote respectful relationships and appropriate behaviour through the curriculum.
- Challenge abusive, discriminatory, sexualised, or derogatory language and behaviour.
- Teach children about consent, boundaries, healthy relationships, and online safety.
- Provide safe and accessible ways for children to report concerns.
- Take all reports seriously and ensure victims are supported.
- Monitor patterns and trends to identify any wider safeguarding concerns within the academy.

All staff are expected to:

- Maintain an attitude of **"it could happen here"**.

- Recognise and respond appropriately to signs of child-on-child abuse.
- Act immediately on any concern and seek advice from the DSL when required.
- Be professionally curious and alert to indirect disclosures, changes in behaviour, or information shared by others.
- Consider any additional barriers a child may face in reporting abuse.
- Recognise that children displaying harmful behaviour may themselves be vulnerable or experiencing harm.

All concerns of child-on-child abuse will be taken seriously, managed proportionately, and responded to in line with safeguarding procedures, keeping the welfare of all children at the centre of decision-making.

Domestic Abuse

The Domestic Abuse Act 2021 introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. They may also experience it within their own intimate relationships.

Our staff understand that these experiences can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.

Our staff are aware that domestic abuse can include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse and that anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

The academy participates in Operation Encompass, the national information-sharing scheme between the police and education settings. Under the statutory duty introduced in November 2025, the police will notify the school when they have reasonable grounds to believe that a child has been affected by a domestic abuse incident. This enables the school to provide timely and appropriate support, taking account of the child's individual needs.

The Designated Safeguarding Lead (DSL) will receive and manage Operation Encompass notifications, ensuring information is handled confidentially, recorded securely and used to inform appropriate safeguarding support. Operation Encompass does not replace existing safeguarding procedures, and where there are concerns about a child's welfare, referrals to Children's Social Care will be made in accordance with local safeguarding procedures.

Female Genital Mutilation (FGM)

Keeping Children Safe in Education explains that FGM includes *'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.'*

FGM is illegal in the UK and is considered as a form of child abuse that has significantly harmful and long-lasting consequences. It can also be referred to as 'female genital cutting,' 'circumcision' or 'initiation.'
Staff are aware of their mandatory reporting duty and the requirement to immediately contact the Police if they are informed by a girl under 18 that an act of FGM has been carried out on her or observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 (and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth).

The duty for teachers above does not apply in cases where a child is *at risk* of FGM or FGM is suspected but is not known to have been carried out. In these circumstances, teachers know they must report to the DSL who will follow local safeguarding procedures.

Our members of staff who are not teachers, are aware that if they suspect a child is at risk or that FGM has been carried out, they should report this to the DSL immediately.

Prevent and concerns about extremism

Richmond Academy is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of our functions, to have "*due regard to the need to prevent people from becoming terrorists or supporting terrorism*" (known as the Prevent duty).

The Prevent duty is one of our wider safeguarding obligations. Our DSLs and senior leaders are aware of the revised Prevent duty guidance: England and Wales (2023) for England and Wales, especially paragraphs 141-210, which focus on education and childcare. The guidance covers 3 general themes: leadership and partnership, capabilities, and reducing permissive environments.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, which aims to:

- negate or destroy the fundamental rights and freedoms of others; or
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve the results in (1) or (2)

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to Children's Services or Channel, the Government's programme for identifying and supporting individuals at risk of being drawn into terrorism.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which all staff and trustees can call to raise concerns about extremism for a child. In non-emergency situations DSLs can also email counter.extremism@education.gov.uk. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321.

If you are a practitioner and want to make a safeguarding referral because you have concerns that someone you work with or know is being drawn into terrorism or extremism, you can have an initial discussion with the Duty and Advice Team.

Concerns about mental health

Mental health difficulties can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Poor or deteriorating mental health can also be a safeguarding concern. Our staff know to be alert to behavioural signs that suggest a child may be experiencing mental health or be at risk of developing one**.**

If a staff member has a concern about a child's mental health, no matter the level of the child's emotional difficulties, they must speak to the Academy's DSL who will evaluate if the child is at risk of immediate harm, and if so, will escalate to the appropriate level of support which includes speaking to the Academy's Mental Health Lead. Staff should not attempt to diagnose mental health conditions but should identify concerns and refer them through safeguarding procedures.

If a child is experiencing low moods, low self-esteem and general anxiety, our Mental Health Lead will be able to provide some advice about some self-accessed support through relevant approved wellbeing websites and apps. If, however, the child is presenting with a concerning level of low mood and anxiety for

a period of time then our mental health lead in partnership with the DSL will discuss with the child and their parents/carer to explore options of support.

If, however, a child/young person is at immediate risk the Academy will recommend they need to be sent to A&E or dial 999.

What all staff need to do to respond if abuse, neglect and exploitation is suspected or been disclosed.

At Richmond Academy we adopt a whole academy approach and safeguarding is everyone's responsibility. Staff and volunteers, and trustees must comply with our safeguarding procedures as set out below:

If a child makes a disclosure to a member of staff or volunteer

All staff are aware they should always be prepared as children can disclose spontaneously to anyone anywhere.

Richmond Academy is situated within a rich and diverse population. We cannot, and do not, assume that all children and their families have the ability, understanding, language and resilience to convey any difficulties they may experience. It is key to recognise the needs of children and their families and to recognise and provide support where English may not be their first language and/or the children or family members have special educational needs; and without doing so may impede their ability to represent their voice, wishes and feelings.

Staff understand the 'voice of the child' is a phrase that is used to describe the real involvement of children and young people. It does not only refer to what children say directly but it refers to many other aspects of their presentation. It means seeing their experiences from their point of view and taking into account the child's daily lived experience. Staff will use the acronym '**VOICE'** when working with a child or young person:

- **V**alue the views and opinions of children by listening to them
- **O**pen, friendly and non-judgemental in our engagement, developing trusting relationships
- **I**nvolve children in the planning, design and delivery of services
- **C**ommunication through a wide range of methods in a manner that is understood
- **E**nsure that views are captured through different mediums so that children and young people know that we take the approach 'nothing about me, without me'.

All staff know that we place the voice and interests of children at the centre of everything we do. Staff are encouraged to be curious by speaking and listening to children whilst respecting any protected characteristics. We hope our children have confidence and trust in our staff, believing they will be taken seriously and be supported with their issues or concerns sensitively.

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

At Richmond Academy staff have a concern about a child, they follow our procedures for reporting concerns. These procedures are reflected in the flowchart in Appendix B.

Staff recognise that a child or young person may seek a trusted adult out to share information about abuse or neglect or talk spontaneously individually or in a group when a member of staff is present. In these situations, staff know that they need to:

Listen to children by:

- showing patience regardless of a child's age as we know they can find it hard to find the words to express themselves
- encouraging children to tell their account in their own words

- avoiding the use of leading questions or suggesting what may have happened, instead we maintain genuine curiosity, and only ask open-ended questions/prompts
- giving the child the necessary time needed to give them a voice and ensure they are listened to without being judged

Reassure children by:

- making sure a child does not feel they are in trouble and that they have done the right thing in speaking to staff
- ensuring the child knows it is not their fault, as children are often made to feel blame by those harming them
- never promising confidentiality and being transparent about our obligations to share information if we are concerned that they are at risk of harm
- helping children to understand how we plan to support them and their family and let them know what action we will need to take next to support them.

It is important that staff are sensitive to giving children with additional needs a 'voice'. Therefore, staff need to be aware of subtle indicators of abuse and neglect, especially where children have complex needs or multiple disabilities. Research and national guidance make it clear that for some children it is not yet possible to prescribe techniques for communicating about possible harm that they have experienced, that are reliable and evidentially safe. We should consider the following when seeking to give children with additional needs and disabilities a 'voice':

- if possible, involve someone that knows the young person well and who has a good overview of their level of understanding so that they can communicate with them;
- think about the environment where the disclosure is taking place or where the child is based if you are carrying out direct work to ascertain what has happened. Unfamiliar, noisy or busy places create added distractions and/or anxiety;
- more time may be needed for any prompts, questions or information to be processed;
- language and symbols need to be clear and specific as possible. Questions or prompts shouldn't be rephrased for any questions that you need to ask to find out the child's lived experience to understand the harm or risk they have been exposed to;
- if you are able to, use visual supports to help reinforce what you are saying or to help when asking questions. This could be symbols or a communication system (Widgets or Picture Exchange Communication System), pictures, writing or other tools that a child uses to communicate with others

Professional curiosity

Staff recognise their responsibility to remain vigilant and to monitor children who may be at risk or who are experiencing neglect closely and holistically. For example, at lunchtime, before and after school as well as in the classroom. Professional curiosity is about enquiring more deeply, using proactive questioning and challenge. Staff will use their skills to understand what is happening within a family rather than making assumptions or accepting things at face value. We acknowledge that curious professionals engage with individuals and families through visits, conversations, observations and asking relevant questions to gather historical and current information. This does mean potentially asking difficult and challenging questions with parents and other professionals involved with the family.

Professional curiosity is key to safeguarding children and young people and staff at **Richmond Academy** receive training to triangulate information that they receive, seek independent confirmation of individual accounts and evaluate the details provided from a range of sources.

Recording concerns

Reporting concerns is a fundamental safeguarding responsibility and all staff must act promptly to safeguard and promote the welfare of children.

All staff must:

- Record all safeguarding concerns on CPOMS as soon as possible.
- Ensure records are factual, accurate, and include the child's own words wherever possible.
- Avoid assumptions, personal opinions, or unsubstantiated conclusions.
- Report concerns to the DSL without delay.
- Report immediately where a child is at risk of harm or makes a disclosure.

Visitors and Volunteers must report any safeguarding concerns immediately to a member of staff, the DSL, or a Deputy DSL, who will ensure the concern is recorded and managed in line with academy procedures.

Staff must understand that:

- Safeguarding information is confidential and should only be shared on a **need-to-know** basis.
- Concerns must be shared through the academy's safeguarding reporting process and not discussed with colleagues unless directed by the DSL.
- The DSL may hold additional information that is critical to assessing risk and determining appropriate action.
- Timely reporting enables concerns to be assessed effectively and helps ensure children receive the right support at the earliest opportunity.
- DSLs and DDSLs have elevated access to CPOMS.
- Teaching staff and allocated middays and office staff have access to add incidents to CPOMS.
- Visitors and volunteers do not have access to CPOMS. If a visitor or volunteer has a safeguarding concern, they must report this to their appointed mentor in the first instance and/or report this to the DSL or the DDSL on the same day. A written account of concerns will be requested from the visitor or volunteer, which should be signed and dated before being copied to CPOMS.

What staff should do if they have concerns about a child

Richmond Academy is committed to ensuring that all children feel safe and comfortable to share and report any concerns and/or allegations about their personal experiences at home, in the community, online or regarding a member of staff or other children. All our staff are clear on the importance of listening to and supporting children when making disclosures, and the need to reassure them.

Our staff are aware that children can share information with anyone in our Academy but there are clear reporting processes when such information sharing raises concern about their welfare. Children may talk about worries and anxieties around friendships and life which they need to support with, but on other occasions they may share information about their family life which indicates that the children and their family may be in need of help and/or fear or experiences which cause staff to be concerned about whether they have been harmed or are at risk of being harmed. Where such a situation arises, our staff are clear on the reporting processes.

Any member of staff, including supply teachers, contract workers, volunteers, trustees and visitors at Richmond Academy who has any concerns about a child's welfare should:

- maintain an attitude of 'it could happen here' where safeguarding is concerned and always act in the best interests of the child. Never promise a child confidentiality;
- reassure the child they have done nothing wrong and if appropriate explain to them how they will be supported and who you will need to share information with;

- record what the child or others have disclosed using their language - or describe what you have seen or suspect and your rational for this. Also ensure you make a note of any injuries observed or described by the child (*if it is the latter two*);
- consider if the child needs medical attention and if so, prioritise ensuring they receive this;
- you must never delay reporting your concerns about the welfare of a child and always act immediately by reporting/speaking to the academy's DSL/deputies;
- record what the child or other has disclosed in their language or describe what you have seen or suspect and your rationale for this (*if it is the latter two*).

The DSL or deputy will:

- assess the concerns raised and consider the impact on the child's welfare, at the same time their safety. They will also review the child's record in order to establish if there has been any previous concerns (records help to establish relevant history and risk factors for example even if a concern appears low level on the surface, a series of incidents can highlight patterns of ongoing abuse and neglect.) The DSL will use the Continuum of Need to support their analysis and rationale for any decision;
- DSL or deputy will speak to the child to verify their wishes and feelings, contact the child's parents or carers to either inform them of the concerns and also to gauge their view (it will be at the discretion of the DSL team to carefully consider if this action may place a child at further risk, e.g. if the child has disclosed abuse and neglect caused in the family home);
- if it is immediately apparent that a child has suffered significant harm or is at risk of harm e.g. suffered abuse, neglect and/or exploitation, the Academy's DSL will make a referral to Children's Social Care to request support at the earliest opportunity; consent will be gained where appropriate. If there has been a crime committed within the circumstances of the abuse, they will also report this to the Police.

What will the Local Authority Children's Social Care do?

Following a referral, Children's Social Care should acknowledge receipt within one working day and decide the appropriate response. This may include determining whether:

- Immediate protection or urgent action is required.
- Early Help or additional support services are needed.
- The child should be assessed as a Child in Need under Section 17 of the Children Act 1989.
- Section 47 enquiries are required where there is reasonable cause to suspect significant harm.
- Further specialist assessments are needed to inform decision-making.

The DSL will follow up with Children's Services if a response is not received within expected timescales.

Any person working or volunteering with children can make a referral to Children's Social Care. If a child is at immediate risk of harm and a DSL or Deputy DSL cannot be contacted without delay, staff must make a referral directly and inform the DSL as soon as possible thereafter.

Making a referral to Children's Services and/or requesting support

The Academy promotes a culture of openness where children are encouraged to speak to a trusted adult about any concern, no matter how small.

Children can expect that:

- They will be listened to carefully and treated with respect.
- They will be given a safe and private space to talk.
- Their views, wishes, and feelings will be considered.
- Staff will be honest about when information must be shared to keep them safe.
- Appropriate support will be provided for them and, where needed, their family.

- A trusted adult will be available to provide ongoing support.
- Their welfare, safety, and education will remain a priority.
- If there are concerns that a child is experiencing abuse, neglect, exploitation, or is at risk of harm, information may need to be shared with other agencies to ensure they receive the right help and protection.

Children can:

- Speak to any member of staff they trust.
- Speak directly to a DSL or Deputy DSL.
- Use the Academy's reporting and support systems.
- Staff will ensure concerns are passed promptly to the safeguarding team so that appropriate support and action can be considered.

Support Outside the Academy

- Children's Services: Children can contact Children's Social Care if they are worried about their own safety or the safety of another child.
- Police: In an emergency, or if someone is in immediate danger, call 999.
- NSPCC Helpline: Call 0808 800 5000 or email help@nspcc.org.uk for confidential advice and support.

Risk Management Following Child-on-Child Abuse Concerns

Where concerns of child-on-child abuse are identified, the DSL or Deputy DSL will lead the assessment and management of risk. The Academy recognises that children who display harmful behaviour may also require support and safeguarding intervention. The aim is not to label or vilify children, but to ensure the safety and welfare of all those involved while maintaining high standards of behaviour.

The DSL will consider whether a risk assessment and/or safety plan is required for the child who has experienced harm, the child alleged to have caused harm, and any other children affected. Measures will be proportionate, regularly reviewed, and designed to:

- Safeguard all children involved.
- Manage any identified risks.
- Provide appropriate support and intervention.
- Minimise disruption to education wherever possible.

Risk management measures may be implemented while investigations by the Police, Children's Services, or other agencies are ongoing. The Academy will undertake its own safeguarding assessment and put appropriate protective measures in place, informed by advice from partner agencies.

Decisions will be made on a case-by-case basis, taking account of:

- The welfare and safety of all children involved.
- Advice from external agencies.
- Whether Academy action could prejudice a criminal investigation or prosecution.
- Whether it is appropriate to reach findings while external investigations remain ongoing.

11. Attendance, Children Missing Education and Elective Home Education

Good attendance is a protective factor in safeguarding and promoting the welfare of children. Children who are absent from education, particularly repeatedly or for prolonged periods, may be at increased risk of abuse, neglect, exploitation, radicalisation, child criminal exploitation, child sexual exploitation, mental health concerns and other safeguarding risks.

All staff are expected to consider attendance as a potential safeguarding indicator and to maintain professional curiosity where attendance patterns cause concern. Safeguarding concerns must not be viewed in isolation, and attendance information will be considered alongside wider information known

about the child and family. The Harmony Trust recognises severe absence (children attending less than 50% of sessions) as a significant safeguarding indicator and will consider whether additional safeguarding interventions are required.

Academy Responsibilities

The Academy will:

- monitor attendance daily and identify emerging patterns of concern;
- follow up all unexplained absences in line with Trust attendance procedures;
- work proactively with children, parents/carers and external agencies to improve attendance;
- identify children who may benefit from Early Help or additional safeguarding support;
- share information appropriately with safeguarding partners where concerns arise;
- ensure attendance concerns are recorded and reviewed through safeguarding processes where appropriate;
- consider whether poor attendance may indicate that a child is at risk of harm either within or outside the home.

Children Missing Education

All children are entitled to an efficient, full-time education suitable to their age, ability, aptitude and any special educational needs.

A child going missing from education, particularly repeatedly, can be an indicator of abuse, neglect, exploitation or other safeguarding concerns. Where a child becomes missing from education, the academy will follow local authority procedures and will work closely with the Local Authority, Children's Social Care and other professionals where appropriate.

Persistent and Prolonged Absence

Where attendance concerns arise, the Designated Safeguarding Lead and attendance leads will work together to:

- identify underlying barriers to attendance;
- consider whether safeguarding concerns may be contributing factors;
- assess whether Early Help intervention is required;
- engage with parents/carers and children to understand concerns;
- seek support from external agencies where appropriate;
- monitor the effectiveness of intervention and support plans.

Elective Home Education

Where parents/carers express an intention to remove a child from school to provide Elective Home Education (EHE), the Academy will work with the family and relevant agencies to establish the reasons for the decision.

The Designated Safeguarding Lead will consider any known safeguarding concerns, vulnerabilities, attendance concerns or involvement from external agencies and will share information with the Local Authority where appropriate and in accordance with statutory guidance.

Alternative Provision

Harmony Trust recognises that the Academy retains overall responsibility for the safeguarding and welfare of pupils placed in Alternative Provision (AP), commissioned provision or other off-site educational settings. The Academy maintains oversight of safeguarding, attendance, welfare and educational progress for any pupil accessing alternative provision and will undertake regular monitoring visits and safeguarding assurance checks.

The Academy will:

- undertake appropriate safeguarding and quality assurance checks before placing a pupil in Alternative Provision;

- ensure safeguarding information is shared appropriately with the provider and updated where circumstances change;
- maintain regular communication with the provider regarding the pupil's attendance, wellbeing, behaviour and progress;
- monitor attendance closely and follow up any unexplained absence or safeguarding concerns without delay;
- undertake welfare checks and review arrangements regularly to ensure the placement continues to meet the pupil's needs;
- seek assurance that the provider has appropriate safeguarding policies, procedures, training and safer recruitment arrangements in place;
- work collaboratively with parents/carers, Alternative Provision providers and other professionals to promote the pupil's safety, wellbeing and educational outcomes;
- ensure safeguarding concerns arising within Alternative Provision are communicated promptly and managed in line with the Academy's safeguarding procedures.

12. Online Safety and Filtering

Richmond Academy recognises that safeguarding includes both online and offline behaviour. Technology is a significant factor in many safeguarding and wellbeing concerns, and the Academy is committed to protecting children from harmful or inappropriate online content and experiences.

The Academy will:

- Maintain effective filtering and monitoring systems to safeguard pupils, staff, volunteers, and trustees.
- Promote the safe, responsible, and respectful use of technology, including mobile and smart devices.
- Establish clear expectations for the use of technology across the academy community.
- Ensure effective procedures are in place to identify, respond to, record, and escalate online safety concerns.
- Take appropriate steps to meet cyber security standards and manage risks associated with emerging technologies, including generative AI.

In line with Keeping Children Safe in Education 2026, the Academy's approach addresses the four areas of online risk:

- **Content** – exposure to illegal, inappropriate, or harmful content, including pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – online behaviour that increases the likelihood of, or causes harm, for example: making, sending and receiving explicit images, including those generated using AI and online bullying
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams. These can be reported to the Anti-Phishing Working Group

To promote online safety, the academy will:

- Deliver age-appropriate online safety education through the curriculum.
- Teach pupils how to stay safe online, protect personal information, recognise risks, and report concerns.

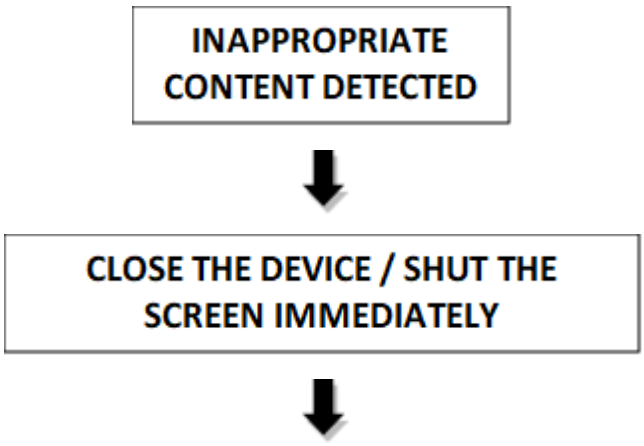
- Ensure all staff receive online safety training as part of induction and regular safeguarding updates, including their responsibilities for filtering and monitoring.
- Provide parents/carers with information and guidance to help keep children safe online and understand how to raise concerns.
- Ensure all members of the academy community adhere to acceptable use expectations for technology and ICT systems.
- Prohibit the use of personal devices to take photographs, videos, or recordings of pupils.
- Follow statutory guidance on searching, screening, and confiscation where concerns arise regarding a child's safety or welfare.
- Review online safety arrangements, including filtering and monitoring, regularly as part of safeguarding monitoring and annual policy review processes.

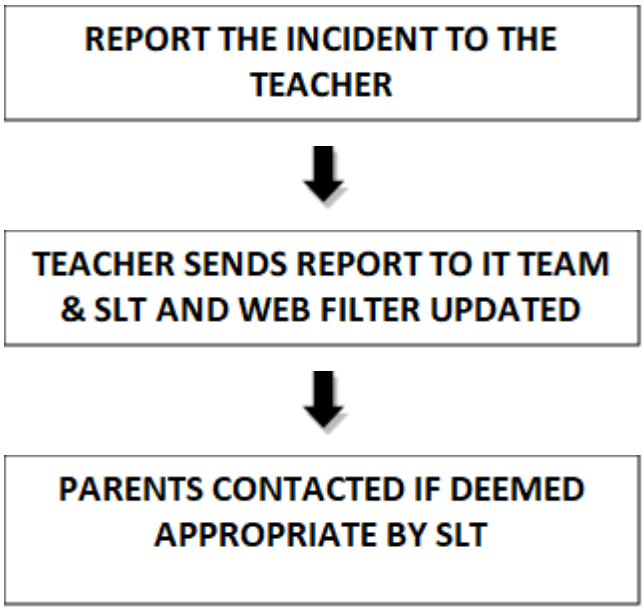
The Academy will ensure that:

- Staff comply with expectations regarding the professional use of personal devices and social media.
- Personal devices are not used to capture, store or share images or recordings of pupils.
- Pupils, staff, volunteers and trustees comply with Acceptable Use Agreements.
- Breaches of online safety, ICT or mobile device policies are addressed in accordance with academy procedures.
- Searches of electronic devices are undertaken in line with statutory guidance on searching, screening and confiscation where safeguarding or welfare concerns arise.

Further information about online safety is available in the Trust's Online Safety Policy, which can be accessed via the academy website.

- Name of ICT lead: Oliver Booth
- Name of Northwest Hub Network Manager: Paul Barnett
- Name of Head of IT: David Taylor
- Web Filtering system in place: Virtue technologies, using Sophos (web filter, spyware, anti-virus and firewall)
- Devices available which have online access: iPads
- Security of devices: Web filtering Sophos software provided by the Trust
- Filtering and monitoring system for KS2 iPads: Lightspeed
- Do your pupils have individual logins? Yes, in KS2
- If yes, are these password protected? Yes
- Do all children know the procedure to follow if they come across content which is inappropriate? Yes - through computing & in assembly what to do if they come across inappropriate content by accident.





We ensure that our children are safeguarded from potentially harmful and inappropriate online material. We have an effective whole trust approach to online safety to protect and educate pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. We also involve parents and carers regarding online safety, providing awareness raising, access to short courses/ webinars and advice to support them.

Mobile Phones

At Richmond Academy we operate a mobile phone-free environment to support pupil safety, wellbeing and learning. We follow the Department for Education's statutory guidance on Mobile phones in schools and have implemented a policy which prohibits the use of mobile phones throughout the school day, including during lessons, transition periods, breaktimes and lunchtimes. Our approach is consistent with the behaviour in schools guidance, which supports the academy in creating calm, safe and supportive environments that are conducive to learning. It also reflects our commitment to safeguarding and promoting the welfare of all pupils by reducing the risks associated with mobile phone use, including online harms, cyberbullying, inappropriate content and distractions from learning.

Filtering and Monitoring

As part of our responsibility to safeguard and promote the welfare of children and provide a safe learning environment, Richmond Academy has appropriate filtering and monitoring systems in place across all school-owned devices and networks. Our filtering and monitoring arrangements are informed by the Department for Education's filtering and monitoring standards and are further supported by risk assessments undertaken as part of our wider safeguarding responsibilities, including those required under the Prevent Duty.

The effectiveness of our filtering and monitoring systems is reviewed regularly and at least annually. Records of these reviews are maintained securely and are used to inform senior leaders and relevant staff of the safeguards in place. This ensures that filtering and monitoring arrangements remain effective, proportionate and responsive to emerging risks. Any concerns, incidents or weaknesses identified through monitoring activities are reported and escalated appropriately in accordance with the school's safeguarding procedures.

13. Managing Safeguarding Concerns or Allegations made about staff, including supply teachers, volunteers and contractors

Section 11 of the 2004 Children's Act places an expectation on Richmond Academy to have a clear policy in line for dealing with allegations against staff who work with children. All staff will be considered to be in either a position of trust or working with children.

A 'position of trust' is one in which a teacher or other member of staff/volunteer is in a position of power or influence over a child, by virtue of the work or nature of activity being undertaken. The Sexual Offences Act 2003 (ss.16-24) and/or Crown Prosecution Service Website sets out detailed definitions and a range of criminal offences associated with abuse of such a position.

A person aged 18 or over is said to be in a position of trust in relation to children at Richmond Academy if they:

- look after children at the Academy. "Looking after" is defined as regularly involved in caring for, training, supervising or being in sole charge of such persons;
- a professional who has power and authority in a child's life and may have a key influence on their future is regarded as being in a 'position of trust';
- such a person will have regular contact with the child and may be acting in loco parentis.

The Police, Crime, Sentences and Court Act (August 2022) extended the roles which fall into the definition of 'Position of Trust' within the Sexual Offences Act (2003). The new legislation makes it an offence for anyone who coaches, teaches, trains, supervises or instructs a child under 18, on a regular basis, in a sport or a religion to engage in inappropriate relationships with those children/young people.

On receipt of any information which raises a concern about any of our staff, the Principal or Chair of Trustees, will consider whether the information suggests it is the following:

Allegation is a claim or assertion that someone has done something illegal or wrong, typically one made without proof. The threshold for an allegation that is considered by the LADO is wider than those in which there is reasonable cause to suspect a child is suffering, or likely to suffer, harm. The LADO threshold is, in respect of all people working or volunteering with children in a position of trust, where they have:

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

Any information or concern which meets the above threshold should be referred to the LADO service prior to the academy taking any action.

Concern about the Quality of Care/Practice is an accusation, not of a child protection nature, that the care/practice provided to a child does not meet the standards expected and is about the level of value provided by any care/practice resource, as determined by some measurement. As with quality in other fields, it is an assessment of whether something is good enough and whether it is suitable for its purpose.

These types of concerns should be addressed internally using performance management and HR processes.

Complaint is a statement that something is unsatisfactory or unacceptable. A concern may be defined as 'an expression of worry or doubt over an issue considered to be important for which reassurances are sought.' A complaint therefore can be defined as 'an expression of dissatisfaction however made, about actions taken or a lack of action.'

These issues must be addressed through internal complaints policy and procedures.

When concerns/allegations meet the harm threshold, Richmond Academy are required to comply with both Part Four of Keeping Children Safe in Education and also the LADO referral process.

All staff and volunteers at Richmond Academy are required to immediately report any level of concerns about behaviour and/or conduct of adult working/volunteering with children towards a child to leadership and management. This includes reporting adults who are providing out of hours activities/leasing Richmond Academy facilities.

What happens next

The Principal may undertake initial inquiries to gather key information. They will assess whether the allegation meets the LADO threshold, if it does, they will make a referral to LADO and consider the staff code of conduct. If necessary, they will compete a LADO referral within one working day.

Role of LADO

- **Case management -** oversee the process and ensure it is working, not to investigate.
- **Consultation -** provide advice and guidance to employers and voluntary organisations
- **Monitoring -** the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process.
- **Liaison -**with the Police, Children's Services and other partner agencies (managers of the subject of allegation).

Role of Richmond Academy Case Manager, includes:

- clarify facts of the concerns/allegation (not investigate) before contacting the LADO
- take part in Strategy Meetings to liaise with other partner agencies
- undertake internal planned inquiries/fact finding
- take part to review the progress of the case in which there is a Police officer investigation
- operate a thorough disciplinary process when appropriate
- ensure a properly managed conclusion and outcome to process.

LADO Principles and Response

Timeliness - any allegation of abuse must be dealt with fairly, quickly and consistently in accordance with the safeguarding and child protection procedures, this is best practice to provide immediate safety for child/ren and make safe arrangements for the person who is the subject of the allegation. It is crucial that employers make a referral to LADO within one working day.

Objectivity - it is not permissible for a member of staff to conduct (though their involvement may still be required) an enquiry about suspicion or allegation of abuse with respect to a:

- relative
- friend
- colleague, supervisor/supervisee or someone who has worked with her/him previously in any of these capacities.

If, following the conclusion of child protection processes, further enquiries are pursued for the purpose of disciplinary, regulatory or complaint investigation, they should be arranged in a way that avoids the repeated interviewing of children or other vulnerable witnesses.

Confidentiality - information about an allegation must be restricted to those who have a need to know in order to:

- protect children
- facilitate enquiries
- avoid victimisation

- safeguard the rights of the person about whom the allegation has been made and others who might be affected
- manage disciplinary/complaints aspects.
- A media strategy should be developed with no improper or inadvertent releases of information to the media, in accordance with the Association of Chief Police Officers (ACPO) guidance (now known as The National Police Chiefs' Council (NPCC)

Following the conclusion of a safeguarding allegation or relevant employment process, the Academy and Trust will consider and make all required statutory referrals. This includes a referral to the Disclosure and Barring Service (DBS) where the legal referral criteria are met and consideration of a referral to the Secretary of State, via the Teaching Regulation Agency (TRA), where a teacher has been dismissed or their services have ceased because of serious misconduct, or where they may have been dismissed or their services ceased had they not left first. Referrals will be made promptly and in accordance with statutory guidance.

Concerns that DO NOT meet the harm threshold - Low-Level Concerns (LLC)

The Harmony Trust has a system in place which outlines the relevant processes and procedures for dealing with concerns raised to them that do not meet the LADO threshold. These concerns are referred to as low-level concerns. The term low-level does not seek to minimise the seriousness of any concerns, it indicates that it a concern that is lower than the LADO threshold, but they are still practice concerns that need to be considered with a safeguarding lens and require suitable action through internal procedures. It is important these are managed robustly as a repeated low-level concern or a pattern of concerns which may not meet the LADO threshold individually may together indicate a concern about the person's suitability and potential risk to children in the capacity of their role.

The Principal has overall responsibility for managing low-level concerns, supported where appropriate by senior leaders, Human Resources and the Trust Executive Lead for Safeguarding, Pupil Development and Wellbeing. If it is considered a member of staff has breached the Trust's code of conduct, depending on the seriousness and impact on a child, we will also liaise with our Human Resource team to:

- ensure staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- empower staff to share any low-level safeguarding concerns
- address unprofessional behaviour and supporting the individual to correct it at an early stage
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised
- help identify any weakness in the Harmony Trust's safeguarding system.

Recording, Reviewing and Managing Low-Level Concerns

All low-level concerns relating to adults working in or on behalf of the academy will be taken seriously, recorded appropriately, and managed in accordance with Part Four of Keeping Children Safe in Education (KCSIE 2026).

Who records the concern?

Any member of staff, volunteer, contractor, trustee, agency worker, pupil or parent/carer who raises a low-level concern should report it to the Principal (or CEO or Director of Education where the concern relates to the Principal). The Principal is responsible for ensuring that all low-level concerns are formally recorded, reviewed and managed appropriately. Administrative support may be provided by another senior leader where required.

Staff may also self-report where they believe their own conduct may have fallen below expected professional standards.

Where is it recorded?
All low-level concerns will be recorded securely on the Trust's approved low-level concerns recording system and retained in accordance with Trust procedures**.**
Records must:

- Include factual details of the concern.
- Record the date, time and context of the concern.
- Include any witnesses and supporting information.
- Record action taken and outcomes.
- Be stored separately from personnel files but with secure and restricted access.

Where appropriate, a cross-reference may be retained on the staff member's personnel file in accordance with Trust procedures.

Who reviews low-level concerns?
The Principal and Trust Executive Lead for Safeguarding will regularly review low-level concern records to identify recurring themes, patterns of behaviour, organisational learning and potential safeguarding risks. Information from this monitoring will be used to inform safeguarding practice, supervision, policy development and staff training.

The Principal will:

- Assess each concern individually.
- Identify any emerging patterns or trends.
- Consider whether the behaviour indicates a wider safeguarding risk.
- Determine whether additional action, support, training or management intervention is required.

Where concerns relate to the Principal, responsibility transfers to the CEO in consultation with Human Resources and, where appropriate, the Local Authority Designated Officer (LADO). Where the concern relates to the CEO or a Trustee, the Chair of Trustees would be contacted and would work with the LADO to determine the appropriate course of action.

Retention of records
Low-level concern records will be retained in accordance with the Trust's Records Management and Retention Schedule. Low-level concern records will be retained and disposed of in accordance with the Trust's Records Management and Retention Schedule and relevant employment and safeguarding legislation. Where concerns later form part of a substantiated safeguarding allegation or disciplinary matter, records will be retained in line with statutory guidance and Trust procedures.
Escalation Threshold
A low-level concern may be escalated to a formal safeguarding allegation where:

- Further information becomes available.
- Additional concerns are identified.
- A pattern of behaviour emerges.
- The behaviour indicates a potential risk of harm to children.
- The concern may meet one or more of the LADO criteria.

This includes situations where an adult may have:

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

Where this threshold is met, the concern will immediately cease to be managed as a low-level concern and will be managed under the Academy's allegations management procedures, including consultation with the LADO within one working day where appropriate.

Low-level concerns may arise from a range of situations including observations of behaviour, complaints, disclosures made by children, parents or staff, safeguarding concerns, information identified through supervision, or concerns arising from recruitment and vetting processes. All staff should know that they are encouraged to have the confidence and trust to confide in leadership if they have concerns about adults working or volunteering with children.

We share information responsibly and understand this is on a need-to-know basis.

We apply our protocols for recording and storing information confidentially.

We encourage an open and transparent culture, to identify concerning, problematic or inappropriate behaviour early so that we are able to minimise the risk of abuse; and ensure that adults working in or on behalf of the academy are clear about professional boundaries and in accordance with the ethos and values of the institution.

Whilst low-level concerns do not meet the harm threshold, they will be managed in accordance with the same safeguarding principles of timeliness, objectivity, confidentiality, accurate recording and professional accountability that apply to allegations management.

If we are uncertain of threshold criteria for either LADO referral or a lower-level concern, we consult with the HR team and the LADO. At Richmond Academy we have clear codes of conduct and processes in place to deal with any concerns or allegations which do not meet the LADO threshold. Such concerns may arise from suspicion, complaint, safeguarding concerns, or allegation from another member of staff, disclosure made by a child, parent or another outside of the academy or pre-employment vetting checks.

After-school clubs, community activities and tuition: safeguarding guidance for providers

Richmond Academy have a legal duty of care to ensure we maintain a safe environment for children. If we receive an allegation or concern relating to an incident that has happened when an outside individual or organisation are using our premises, we will ensure that we follow our safeguarding and child protection procedures, which includes reporting allegations to the LADO, Children's Social Care and Police if a crime has been committed.

It is the role of Richmond Academy's Board of Trustees to ensure any organisation that hires the premises is compliant with the guidance set out in Out-of-school settings: safeguarding guidance for providers - GOV.UK In particular we have embedded within our lease agreement with external organisations the standards and expectations for them to provide evidence and assurance of their safeguarding and child protection procedures.

Other complaints

If any of our stakeholders are not satisfied with any aspects of how we implement and comply with safeguarding policies and procedures, our Complaints Procedures can be found on our academy website.

Whistleblowing

At Richmond Academy we strive to create a culture of openness, trust and transparency to encourage all staff to confidentially share any concerns they have about poor or unsafe practice, concerns or allegations against staff or the Academy's safeguarding practice and arrangements so they can be addressed appropriately.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the academy's safeguarding procedures and arrangements.

Examples where Whistleblowing may apply:

- children's or staff member's health and safety are being put in danger

- failure to comply with a legal obligation or statutory requirement
- attempts to cover up the above, or any other wrongdoing that is in the public/academy interest

At Richmond Academy staff concerns will be taken seriously and investigated, and your confidentiality respected.

Staff are encouraged to report their concern to the Principal and if the concerns are about the Principal this should be reported to the CEO.

If, for any reason, there are difficulties with following the above procedure, you can whistle blow directly to Children's Services and/or the Police on 999, or to the NSPCC Whistleblowing Helpline 0800 028 0285 help@nspcc.org.uk

14. Record Keeping

Richmond Academy will hold records confidentially, safely, securely and in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached, and the outcome and reasons for these

Concerns and referrals will be kept in a separate child protection file for each child (either paper recorded or electronically).

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to know/access them.

Safeguarding records relating to an individual child will be retained for the student until they reach their 25th birthday or 31st birthday if there is an EHCP in place (Information Records Management Society 2022).

Safeguarding records which contain information about allegations of sexual abuse were being retained for the Independent Inquiry into Child Sexual Abuse (IICSA). This has now concluded and the Home Office sent a letter to academies advising that files no longer needed to be kept indefinitely. However, the recommendations from the inquiry have stated:

Recommendation 17: Access to records The UK government should direct the Information Commissioner's Office to introduce a code of practice on keeping and accessing records which relate to child sexual abuse. The code should require records about child sexual abuse and allegations of child sexual abuse to be kept for 75 years, with appropriate review periods. Richmond Academy will follow the Recommendation 17.

Receiving in and transferring pupil records to other education provision

If a child for whom the academy has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding information file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school to have support in place when the child arrives, this should be within:
5 days for an in-year transfer, or the **first 5 days** of the start of a new term.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the wellbeing and safety of the child.

Retention, archiving and destruction of records

For records that are not transferred to another school, for example the child leaves the country or is going to be home educated, we have:

- a clear retention policy
- secure and appropriate system to archive with restricted access
- we have a written assurance from our providers of our electronic recording systems that all records are maintained securely which includes any archived records.

Storage, retention, and destruction of our child protection files is also made clear in our data management police.

Data Protection Statement

The procedures and practice created by this policy have been reviewed in the light of our Data Protection Policy.
All data will be handled in accordance with the academy/Trust's Data Protection Policy.

What?	Probable Content	Why?	Who?	Where?	When?
Data Protection Policy	**Any personal information including personal sensitive and confidential information**	**Required to be retained as part of education, statutory process**	**Principal / SLT, Trust central team, staff or other representative as required as part of the relevant process**	**Kept on file at academy (and Trust central where appropriate with only restricted access.**	**Held on file following relevant retention periods (dependent on nature of personal information)**

As such, our assessment is that this policy:

Has Few / No Data Compliance Requirements	Has A Moderate Level of Data Compliance Requirements	Has a High Level Of Data Compliance Requirements
		✓

Appendix A: Professional Boundaries

General principles of staff conduct - there is a full version which is given to all staff.

1. Staff should provide a good example and be a positive role model to pupils.
2. Staff should behave in a mature, respectful, safe, fair and considered manner.
3. Staff may use appropriate positive touch where it is necessary, reasonable and in the best interests of the pupil, for example to provide comfort, reassurance, guidance or support. Any physical contact must be age-appropriate, non-intrusive, culturally sensitive and in accordance with Trust policies and safeguarding guidance.
4. Staff must not discriminate favourably or unfavourably towards any pupil.
5. Staff should not give or receive (other than token) gifts.
6. Staff must ensure that relationships with pupils and their families remain professional at all times. Staff must not develop 'personal' relationships with pupils and their families.
7. Staff must not behave in a way that could lead a reasonable observer to question conduct, intentions or suitability to care for other people's children
8. Staff must not make arrangements to contact, communicate or meet with pupils outside work including by mobile phone or other forms of modern technology
9. Personal social media accounts such as Facebook should not be used to communicate with parents or pupils. Staff should be vigilant and continue to fulfil their professional responsibilities when there is a pecuniary or personal interest and/or they are related/known socially by a parent or pupil. If they communicate with parents or pupils via social media Staff should act prudently with regard to privacy settings and should not identify the Trust or Academy in their dialogue or personal profile.
10. Personal mobile phones should not be used in the classroom and mobile phones with cameras should not be in areas where children are vulnerable to any invasion of their privacy.
11. Staff should be considerate to pupils' right to confidentiality and not discuss personal matters in inappropriate ways or in public places.
12. Staff should understand that unacceptable behaviour or activity, illegal or otherwise, in their personal life may impact on their suitability to work with children, e.g., becoming subject to Child Protection enquiries in relation to children in their own care, viewing online images of children, etc.

See 'Guidance for safer working practice for those working with children and young people in education settings' (SR consortium / DfE February 2022) for more information about acceptable and unacceptable professional conduct.

Staff should also see the Trust Staff code of Conduct and the Social Media Policy so that they are fully aware of conduct expectations, reasons for this and consequences if these policies are not adhered to.

Safe Touch and Use of Reasonable Force

There are occasions when appropriate physical contact with a child is necessary and, in the child's, best interests, including to provide comfort, reassurance, first aid, personal care, guidance or to maintain safety.

Staff must ensure any physical contact is age-appropriate, non-intrusive, culturally sensitive and in accordance with Trust policies and safeguarding practice. We aim to minimise physical intervention with pupils, please see the guidance Minimising Restrictive Intervention January 2026.

Different Types of Touch

Safe touch occurs in a safe environment, where there are other members of staff. It is always for the benefit of the child. All touch should be age appropriate and with verbal consent.

There are different types of touch and physical contact that may be used, these include:

1. Incidental Touch

Staff may use touch infrequently with pupils as part of a normal caring relationship, for example, comforting a child, giving reassurance and congratulating. This typically might include taking a child by the hand, shaking hands, patting them on the back or putting an arm around the shoulders.

2. General Reparative Touch

This is used by staff working with children who are having difficulties with their emotions and in particular those who are dysregulated. Healthy emotional development requires safe touch as a means of calming, soothing and containing distress for a frightened, angry or sad child.

Use of Reasonable Force

Some pupils may require planned physical support interventions as part of an agreed behaviour support, risk assessment or individual regulation plan. Such interventions will only be undertaken by appropriately trained staff in accordance with Trust procedures.

The Trust recognises the legal power of school staff to use reasonable force in accordance with Section 93 of the Education and Inspections Act 2006 and DfE guidance: Use of reasonable force and other restrictive interventions guidance (2026)

Further guidance regarding the use of reasonable force can be found in the Behaviour Policy and the Positive Handling policy.

Restrictive Interventions and the Use of Reasonable Force

The term 'reasonable force' covers a range of actions involving physical contact with a child where it is necessary to prevent harm, maintain safety, prevent serious disruption, or protect property. This may include passive physical contact, such as standing between pupils or blocking a pupil's path, as well as more active interventions, such as guiding a child away from danger. Any use of force must be lawful, reasonable, proportionate, and use the minimum intervention necessary to achieve a legitimate aim. Physical intervention will only be used as a last resort, when other preventative and de-escalation strategies have been unsuccessful or where immediate action is required to maintain safety.

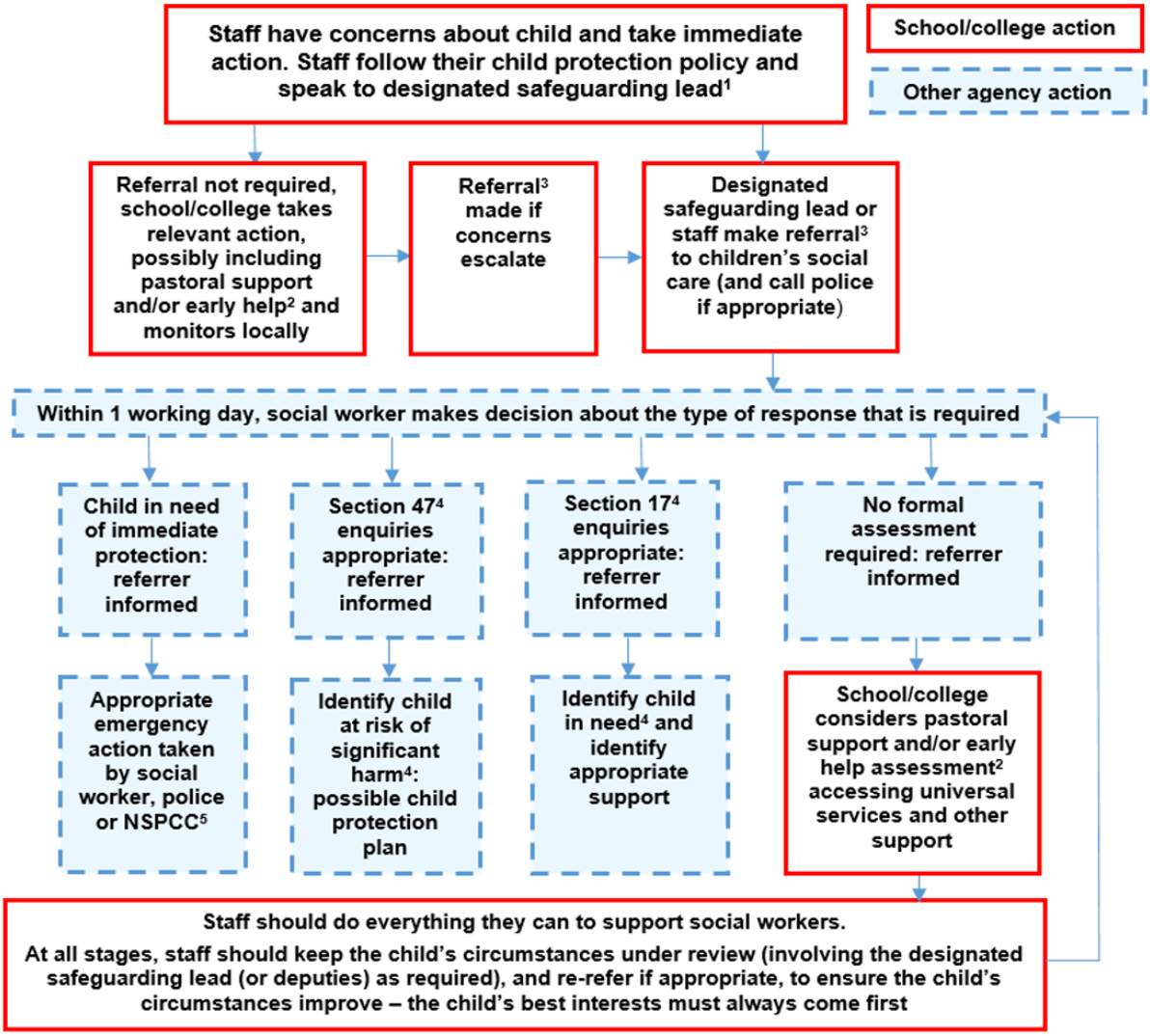
The Trust is committed to reducing the need for restrictive interventions through positive relationships, proactive behaviour support, effective communication, environmental adaptations and de-escalation strategies. When responding to incidents involving children with SEND, social, emotional and mental health needs, disabilities or medical conditions, staff will carefully consider the child's individual needs, vulnerabilities and any agreed support plans. In line with the Equality Act 2010, reasonable adjustments

will be made where appropriate. Individual risk assessments, behaviour support plans and other personalised approaches will be used to support children effectively, minimise distress and reduce the likelihood of restrictive interventions being required.

All incidents involving the use of reasonable force will be recorded and reported in accordance with Trust procedures, and significant incidents will be shared with parents/carers. Physical intervention must never be used as a punishment, nor in a manner that is degrading, humiliating or likely to cause harm. Staff required to undertake restrictive interventions will receive appropriate training and act in accordance with their professional responsibilities and Trust procedures.

Appendix B: A flowchart setting out the actions taken where there are concerns about a child

Keeping Children Safe in Education (2026) has the following flowchart for staff and Designated Safeguarding Leads to use:



1. In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.
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. 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. See 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 Working Together to Safeguard Children.
5. This could include applying for an Emergency Protection Order (EPO).

Appendix C: Safeguarding Training Requirements

All New Staff

What	When	Who is responsible for organising this	Where training can be accessed
STAGE 1	Before employment commences or on day 1	Staff member's line manager	Induction checklist
STAGE 2	Within first few weeks of employment commencing	Staff member's line manager – HR organise sessions.	Trust Safeguarding Induction Training – HR Intranet

All staff who work directly with children

What	When	Who is responsible for organising this	Where training can be accessed
Annual updates & refresher – new KCSIE & policy updates	In September every year	Principal Trust Executive Leaders for Safeguarding, Pupil development and wellbeing	In-house training sessions iHasco – KCSIE update
Appropriate safeguarding training	Every 2 years	Principal	Trust Safeguarding Team Training iHasco L2 LA training
Prevent awareness	Every 2 years	Principal	Home Office
Sexual Violence and harassment	Every 2 years	Principal	In house toolbox talk
Proact Scipr	Every 2 years	Principal	Proact Scipr Training
Online Safety (appropriate to role)	Every 2 years	Principal	iHasco Online Safety module
**Intimate Care & nappy changing (staff who work in EYFS / children who require intimate care)	Annually	Principal/ Early years lead	Use of policy & refresher of protocols & procedures

Executive Leadership Team, Central and Infrastructure staff plus Academy (Office, site, cleaning and catering staff)

What	When	Who is responsible for organising this	Where training can be accessed
Annual updates & refresher – new	In September every year	Principal	In-house training sessions iHasco – KCSIE update

KCSIE & policy updates		Trust Executive Leaders for Safeguarding, Pupil development and wellbeing	
Appropriate safeguarding training	Every 2 years	Heads of Teams/ Line Manager	Trust Safeguarding Team Training iHasco LA training
Prevent awareness	Every 2 years	Heads of Teams/ Line Manager	Home Office
Sexual Violence and harassment	Every 2 years	Heads of Team/ Line Manager	In house toolbox talk
Proact Scipr	Every 2 years	Heads of Teams/ Line Manager	Proact Scipr Training
Online Safety (appropriate to role)	Every 2 years	Heads of Service/ Line Manager	iHasco Online Safety module

Trustees

What	When	Who is responsible for organising this	Where training can be accessed
Appropriate safeguarding training - ALL trustees	Every 2 years	Trust Executive Leaders for Safeguarding, Pupil development and wellbeing	NSPCC or other appropriate training
Prevent awareness All Trustees	Every 2 years	Trust Executive Leaders for Safeguarding, Pupil development and wellbeing	Home Office
Online Safety (appropriate to role)	Every 2 years	Trust Executive Leaders for Safeguarding, Pupil development and wellbeing	iHasco Online Safety module
Safer Recruitment Appropriate Trustees	Every 3 years	Trust Executive Leaders for Safeguarding, Pupil development and wellbeing	iHasco NSPCC

DSLs/DDSLs, Assistant Director for Inclusive Education, and Pupil and Family Engagement Teams

What	When	Who is responsible for organising this	Where training can be accessed
DSL or DSL refresher	Every 2 years	Principal/ Trust Executive Leaders for Safeguarding, Pupil development and wellbeing	Via Adele Gladman LA course

Safer recruitment	Every 3 years	Principal/ Line Manager	iHasco NSPCC LA
Early Help	Every 3 years	Principal/ Line Manager	LA course
Prevent for DSLs	Every 2 years	Principal/ Line Manager	Home Office - referrals course
Managing Allegations	Every 3 years	Principal/ Line Manager	LA course Trust HR Training
Online Safety for DSLs	Every 2 years	Principal/ Line Manager	iHasco Online Safety module
Other training • CME • CSE • FGM • Forced Marriage • Honour based abuse • County lines • Domestic Abuse • Parental substance misuse • Parental mental health • Private Fostering • Working Together • Sexual Abuse	Complete and refresh as needed	Principal/ Line Manager	LA course iHasco Toolbox Talks