



Charlton Park Academy Safeguarding Policy 2026

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Reporting Process

Initial concerns, incidents or disclosure by a child must be reported to the DSL or a Deputy DSL in person, by making a log on MyConcern or by email:

safeguardingconcern@charltonparkacademy.co.uk

Keeping Children Safe in Education 2025

All staff have a statutory duty to adhere to the guidance in this document.

Policy Statement

As a school, we recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children and adults feel respected and valued. We maintain an attitude of 'it could happen here' where safeguarding is concerned and promote a culture of openness where children have a voice and are listened to. This policy provides staff, volunteers and governors with the framework required in order to keep children safe and secure in our school. Its purpose is also to inform parents and carers of how we will safeguard their children whilst they are in our care.

The procedures contained in this policy apply to all staff, volunteers and governors and are consistent with those of the Greenwich Safeguarding Children Partnership (GSCP), pan-London protocols and locally agreed procedures. This policy takes account of the 'Keeping Children Safe In Education' September 2025' (KCSIE) statutory guidance and makes frequent references to it. This policy provides information regarding different types of abuse and encompasses other statutory and non-statutory documentation and legislation (shown in Appendix 2 of this policy). The policy outlines the procedures that the school has in place to ensure all children in our care receive effective support, protection and justice. Preventative education is effective within our whole school approach and prepares children for life in modern Britain with a zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.

Charlton Park Academy is committed to maintaining the attitude that 'it could happen here.' Safeguarding

refers to the proactive steps taken to protect children and young people from harm and to promote their physical, emotional, and mental well-being. In line with best practice, we believe that safeguarding is everyone's responsibility and should be interwoven across all subjects and activities, ensuring that pupils are equipped with the knowledge and understanding to stay safe, both in school and beyond.

Explicit Learning: When safeguarding is the clear focus of a lesson, it is referred to as *explicit learning*. These lessons will be carefully planned with safeguarding as a key objective. For example:

- Teaching pupils about online safety, personal boundaries, consent, or healthy relationships within specific Relationships and Sexuality or Health Education lessons.
- In these lessons, safeguarding is directly addressed, and age-appropriate content is delivered with clear learning outcomes. Teachers will make sure to provide a safe space for pupils to ask questions and clarify any concerns related to the topic.

Implicit Learning occurs when, while the main learning objective may not be related to safeguarding, the lesson still provides opportunities for children to encounter safeguarding-related content in a subtle or indirect way. For instance:

- In an English lesson, pupils may explore themes related to bullying, power dynamics, or discrimination within a novel, leading to deeper discussions about how to identify and prevent harmful behaviours in real life.
- Although safeguarding is not the explicit focus of these lessons, teachers should be prepared to address any safeguarding issues that arise and support pupils in understanding these issues.

Incidental Learning refers to learning that happens outside the formal lesson structure, arising from everyday situations, interactions, or real-life experiences that students encounter. This type of learning is not planned but is still crucial in a child's overall development and safeguarding education. For example:

- A pupil may overhear or witness a bullying incident on the playground or in the classroom and may approach a teacher to ask questions about it.
- Teachers and support staff must remain vigilant to identify these instances of incidental learning, offering appropriate support and further discussion if necessary. They should be prepared to instigate a deeper conversation if a safeguarding issue is identified outside of lesson time or within informal settings, using the most appropriate form(s) of communication(s) for the student; including AAC, symbols, talking mats, Signed Supported English as examples.

Safeguarding in the Wider Curriculum:

Although safeguarding may not always be the main learning intention in every lesson, it is vital that teachers remain mindful of safeguarding issues that may emerge across the wider curriculum. There may be opportunities to address safeguarding topics either explicitly or incidentally in all curriculum areas. In these cases, teachers should:

- Be proactive in identifying and addressing safeguarding issues that could arise in the context of a lesson or activity.
- Provide clear, age-appropriate, and supportive information to pupils if safeguarding concerns arise.
- Prepare for further discussions that may stem from pupils' questions or reactions to content.
- Be sensitive to the cognitive and emotional maturity of pupils when responding to safeguarding issues, ensuring discussions are appropriately tailored to the developmental stage of the class.
- Follow the school's safeguarding procedures and follow up with the Designated Safeguarding Lead or one of the Deputy DSLs.

The **CEOP model** refers to the work of the **Child Exploitation and Online Protection Command, part of the UK's National Crime Agency (NCA)**. CEOP works to protect children and young people from online sexual abuse and exploitation. The CEOP model is an essential part of safeguarding practice. It empowers students with learning difficulties to understand and navigate online spaces safely, while also equipping staff and families with tools to protect and support them.

At CPA, especially when supporting students with Autism Spectrum Disorder (ASD), Severe Learning Difficulties (SLD), and other additional needs, the CEOP model will be used as part of a safeguarding and online safety education framework and will be adapted to:

- Match cognitive and communication needs.
- Build trust and familiarity with key staff (students might disclose more easily in safe, consistent environments).
- Use AAC (augmentative communication) to explain and explore online safety topics.

The CEOP model involves three core functions:

1. **Education** – Delivering age-appropriate and ability-accessible online safety education.
2. **Reporting** – Providing a platform for children and adults to report concerns about online exploitation or abuse.
3. **Intervention & Support** – Coordinating with schools, police, and social care to investigate concerns and provide support to victims.
4. CEOP works closely with **Thinkuknow**, its education arm, which provides resources tailored to different age groups and cognitive levels.

1. Online Safety Education (Thinkuknow)

Our school will be using Thinkuknow SEN-adapted resources to teach students:

- How to stay safe online (e.g., not sharing personal information).
- Recognising safe vs unsafe behaviour online.
- Understanding privacy, friendship, and consent in digital spaces.
- What to do if something makes them feel scared or uncomfortable.

For example:

- Use of visual stories, social scripts, and symbol-supported PowerPoints.
- Videos like Jessie & Friends or Lee & Kim, which are simplified and visually engaging.
- Repetitive, structured lessons for retention and understanding.

2. Safeguarding and Reporting Systems

- Staff are trained to recognise signs of online abuse, including behaviour changes or disclosures.
- CEOP's reporting button is often included on school websites or student portals.
- Students are taught that they can talk to a trusted adult, and some schools simplify the CEOP reporting message to make it accessible (e.g., using Widgit symbols or Now & Next boards).

3. Part of PSHE/RSHE Curriculum (see Appendix 7)

CEOP-aligned resources are embedded in Personal, Social, Health and Economic (PSHE) education, and statutory Relationships, Sex and Health Education (RSHE). For SEN learners, this is usually:

- Delivered at a developmentally appropriate level.
- Highly scaffolded with repetition, modelling, and role-play.
- Often revisited across year groups with spiral learning.

4. Parent/Carer Involvement

- Schools often provide CEOP/ Thinkuknow materials for home learning or run workshops.
- Helps carers reinforce safe online habits at home, especially when pupils use iPads or games

The policy is hyperlinked to relevant statutory documentation and guidance to provide easy access for additional information/clarification.

Definition of Safeguarding

As defined in statutory guidance: Working together to safeguard Children (DfE 2023)

- Providing help and support to meet the needs of children as soon as problems emerge.
- protecting children from maltreatment, whether the risk comes from within the child's family and/or outside (from the wider community)
- 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.

Legislation and statutory Guidance

Charlton Park Academy adheres to all relevant safeguarding legislation, statutory guidance and guidance from the Royal Borough of Greenwich. This includes and is not limited to:

Statutory Guidance:

- Keeping Children Safe in Education (2025)
- Working together to Safeguard Children (2023)
- Working Together to Improve School Attendance (2024)
- Children Missing Education (2016)
- The Children Act 1989 and The Children Act 2004
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015
- The Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006
- Counter-Terrorism and Security Act 2015 (and the Prevent Duty guidance, updated 2023)
- The Education Act 2002
- The School Staffing (England) Regulations 2009
- Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015
- The Human Rights Act (1998)
- The Equality Act (2010)
- The Public Sector Equality Duty (PSED)
- Guidance from the Royal Borough of Greenwich Children Partnership ([Home - Greenwich Safeguarding Children Partnership](#)) and the Royal Borough of Greenwich Safeguarding Adults Board ([Home - Greenwich SAB](#))

Aims and Values

Aims

Charlton Park Academy recognises our statutory responsibility to safeguard and promote the welfare of all students. We will endeavour to provide a safe and welcoming environment where students are respected and valued. All support for students and young will be based on their individual needs and rights, this is a student-centered approach to safeguarding (authentic safeguarding), with the student at the heart. When working to safeguard children and young people, a student-centered approach will be used which means that any procedures consider the rights, feelings and experience of the individual student. We will be alert to the signs of abuse, neglect, and exploitation, and follow our procedures to ensure that students receive effective support, protection and justice. Safeguarding is everyone's responsibility. We recognise that our

school is part of a wider safeguarding system and work closely with the Royal Borough of Greenwich Safeguarding Children Partnership / Greenwich Safeguarding Adults Board and other agencies to promote the welfare of children. We maintain an attitude of 'it could happen here' and will consider the wishes of, and at all times, what is in the best interests of each student. We understand that children and young people can be abused by adults or by other children. We are committed to creating a culture of safety, that minimises the opportunity for any form of abuse (including all forms of child-on-child abuse) through training, education and robust response procedures.

The aim of this policy is to;

- promote safeguarding and child protection and to provide information about how we work to keep children safe.
- To ensure all staff are aware of their statutory duty to safeguard the children in their care.
- To ensure staff are trained to recognise and report safeguarding concerns, ensuring appropriate action is taken in a timely manner to safeguarding and promote children's welfare
- To support the development and understanding of children in how to protect themselves from potential abuse and equip them with the skills needed to support their mental-wellbeing.

Values

- To uphold children's rights to feel safe and protected from harm
- To work effectively in partnership with other agencies for the benefit of children
- To ensure the interest of the child is paramount in all safeguarding decisions

Roles and Responsibilities

The Governing Body's Roles & Responsibilities³ (KCSIE Part 2)

Governors promote a child-centred whole school approach to safeguarding which underpins all relevant aspects of process and policy development, and promote a culture of respect, where staff and children are listened to and all concerns raised are followed up.

The Governing body has nominated a governor who will be responsible for Safeguarding and Child Protection and has ensured that all governors (including those new to the role) have a clear understanding of their statutory responsibility to safeguarding those who use the school.

The Governing Body will ensure that:

Part 2 of KCSIE (2025) sets out the responsibilities of governing bodies and our Trustees and governors will adhere to this guidance at all times. As part of these responsibilities' trustees and governors will;

- ensure that they comply with their duties under statutory guidance and legislation, including its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements.
- Trustees have a strategic leadership responsibility for Charlton Park Academy's safeguarding arrangements. The governing body will appoint a senior Governor Safeguarding Lead to monitor the implementation and effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL. The Governor Safeguarding Leads are Steve Richardson & Graham Harknett who will conduct regular monitoring of safeguarding procedures and practice both in person and online.
- Governors/Trustees will ensure that there are mechanisms in place to assist staff in understanding

and discharging their statutory safeguarding roles and responsibilities. Governors will ensure that the school is working with local safeguarding partners and that the school contributes to multi-agency working, adhering to Working Together to Safeguard Children (2023). All governors will read KCSIE (2025) and a record will be kept of this.

- Staff will adhere to the health and safety policy which is an integral component of safeguarding, daily environmental checks will be carried out, notifying premises of concerns and required actions.
- work to facilitate a whole school approach to safeguarding, by ensuring that safeguarding and child protection underpin all relevant aspects of policy and process.
- ensure that policies, procedure and training at the school are effective and comply with the law at all times and that they allow concerns to be responded to in a timely manner.
- ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school or college safeguarding approach and wider staff training and curriculum planning
- ensure that the school takes into account local criteria for action and protocol for assessment and supply information as requested by the safeguarding partners;
- ensure that the school has an effective child protection policy, which is published on the school website and/or available by other means and review this annually;
- ensure that the school has systems in place to allow children to raise concerns, which are well-promoted, well understood and easily accessible; total communication is promoted at CPA using visual signs and symbols, AAC devices and Proloquo to ensure that all students have a voice and can communicate with staff appropriately.
- ensure that the school takes safeguarding concerns seriously and takes the wishes and feelings of students into account;
- ensure that there are systems in place for young people to safely express their views and give feedback on safeguarding practice;
- ensure that the school has a suitable behaviour and relationship policy for students and a staff Code of Conduct policy;
- ensure that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, will include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) on induction and regularly thereafter;
- consider a whole-school approach to online safety, including the use of mobile technology in school;
- ensure that there are clear systems and processes in place for identifying when children may be experiencing mental health problems;
- ensure that children are taught about safeguarding, including online safety. See section 11.6 and Appendix 6 of this policy for further information;
- ensure that appropriate safeguarding arrangements are in place to respond to children missing education and those who are absent from education, particularly on repeat occasions and/or for prolonged periods;
- appoint an appropriate member of staff from the senior leadership team to the role of Designated Safeguarding Lead and ensure that the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support;
- ensure that appropriate filters and monitoring systems are in place to keep children safe online
- regularly review the effectiveness of school filters and monitoring systems. They should ensure

that the leadership team and relevant staff are:

- aware of and understand the systems in place
- manage them effectively
- know how to escalate concerns when identified
- ensure that there are appropriate procedures in place to manage both allegations against staff (including supply staff, volunteers and contractors, and concerns that do not meet the harm threshold (low-level
- an annual review of the school's safeguarding policy procedures adheres to the Royal Borough of Greenwich guidance and locally agreed interagency procedures.
- the policy is made available publicly, on the school website or on request.
- the safer recruitment procedures as outlined in KCSIE part 3 are robustly implemented and all appropriate checks are carried out on staff and volunteers who work with children;
- There is a low-level concerns procedure in place and staff understand the importance of reporting low level concerns (including self-reporting)
- Procedures are in place for regular evaluation of the effectiveness of safeguarding systems, including adherence to safer recruitment procedures and checks on the effectiveness of online safety (including the filtering strategies⁵), as outlined in [KCSIE 2025](#) (para 14).
- With staff welfare in mind, the Governing Body will consider the necessity and appropriateness of arranging for 'Safeguarding Supervision' for the DSL and Deputy DSLs within the school.

Principal's Role and Responsibilities

In line with the statutory guidance (KCSIE 2025), the Principal will ensure that systems and procedures are in place to support all staff to understand their individual and collective roles in safeguarding and promoting the welfare of children.

The Principal will ensure:

- The policies and procedures adopted by the governing body or proprietor are fully implemented and followed by all staff.
- That the DSL has a clear and concise job description, explicitly referring to the role of taking **lead responsibility** for safeguarding and child protection (including online safety)
- Sufficient resources and time are allocated to enable the DSL and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children.

The Designated Safeguarding Lead's Role and Responsibilities

The DSL will act to meet the requirements of the role, as outlined in [2025](#) (Annex C), which includes (but is not limited to):

- Referring cases of suspected abuse, neglect, radicalisation or exploitation to the relevant statutory agencies (children's social care, the police or the Channel programme)
- Act as a source of support, advice, and expertise to staff within the school
- Liaise as appropriate with staff, including IT technician, the SENCo, the designated teacher for LAC, the virtual headteacher and the named person with oversight for children's mental health and wellbeing.
- Promote positive engagement with parents and/or carers to safeguard children and support families facing challenging circumstances
- Champion educational outcomes for vulnerable children and those who have or have had a social worker
- Have procedures in place to re-assess concerns when a child's situation fails to improve
- Ensure procedures and guidance are in place to ensure all searches of pupils are witnessed and

all searches for prohibited items are logged on to the school safeguarding reporting system, My Concern. **See guidance in Appendix 6.**

The DSL and Deputy DSLs will:

- Undertake child protection and safeguarding training at least every 2 years.
- In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- They will also undertake Prevent awareness training and online safety training, including any necessary training to support their understanding of the IT filtering and monitoring systems and processes in place.
- Be provided with supervision which will provide support to them in fulfilling their roles to promote the best interests of our students, a space to reflect and to allow for confidential and at times sensitive issues.
- Staff at CPA will be offered supervision depending upon their role and needs. Some staff will be offered regular individual supervision to manage their workload, whereas others may be offered supervision as a group or when particular issues may arise

Record keeping

- Maintain clear, concise and confidential records of the concern, action taken and outcome
- Ensuring safe and secure transfer of records when a child leaves the school.

Promoting a culture of safeguarding and training

Safeguarding encompasses health and safety and all measures that are required to keep our students safe and to protect them from maltreatment. For example and not limited to.

In order to keep students safe we:

- Use electronic entry to the school site and internal road, highly staffed with SLT.
- Swipe controlled entry points into buildings / premises/classes and specialist areas such as the swimming pool and gym.
- Environmental controls and reporting procedures using The Every system to notify premises of any health and safety concerns.
- Clear operating protocols during core hours, for example no hot drinks in classrooms or corridors.
- High ratio of staff : students to support vulnerable learners.
- Ability to 'lockdown' the site In the event that anyone has concerns about child abduction or community safety incident.
- Maintain his/her own secure and up-to-date knowledge of safeguarding developments and share as appropriate with staff in line with advice from the Greenwich Safeguarding Children Partnership (GSCP)
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes, such as the Royal Greenwich Early Help Guidance
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to and understands the school's safeguarding/child protection policy and procedures, especially new or part-time staff.
- Ensure all staff have robust induction training, covering safeguarding/child protection, and are confident to recognise and report any concerns about children's safety and welfare immediately as they arise
- Each member of staff have robust training on how CPA promotes a safe online culture and that

- online safety is a key component in explicit and implicit teaching and learning at CPA. (Section 7)
- Promote a culture of listening to children and building trusting relationships to support those children who find difficulty in approaching staff with a concern.
- Ensure all staff are aware of the additional risks that children with Special educational needs and disabilities face including online
- Ensure all staff are aware of the guidance: What to do if you are worried a child is being abused (DfE 2015)
- Ensure staff are aware of contextual safeguarding and extra-familial harm from the influence of factors outside of school or in the child's own family, including vulnerability to possible abuse, exploitation and youth violence.
- Provide feedback and reassurance to staff who have raised a child protection concern.

Staff and Volunteers

At the start of the academic year, (or commencement of employment if starting at the school during the academic year), all staff will sign a declaration to indicate that they have read and understood 'Keeping Children Safe in Education' part 1 and the school's Safeguarding/child protection policy. (Those working directly with children will also read 'Keeping Children Safe In Education' Annex B.) In signing this, staff are indicating that they understand their statutory duty to safeguard children and to report any concerns.

All staff will familiarise themselves with the signs of abuse and neglect (Appendix 1, attached) so that they are able to identify children who may be in need of help or protection.

All staff will ensure they understand and can follow the school's procedures for reporting concerns

Staff members will maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.

All staff will:

- Be aware that mental health problems can be an indicator that a child has suffered abuse, neglect or exploitation
- Recognise that a child may tell us that they are being harmed or may be at risk of harm, or the report may come from a third party, e.g., parent, friend, neighbour, other family member. Alternatively, it may be through the suspicion of staff based on a variety of signs, symptoms and knowledge of possible indicators of abuse
- Recognise that child-on child abuse (all forms, including physical and sexual violence and harassment, sexting, 'up skirting⁸', bullying and initiation/hazing) must not be downplayed and must be taken seriously and appropriately reported
- Be aware of indicators which may signal involvement with violent crime (absences from school, changes in friendship groups or relationships with older individuals/groups, decline in performance or unexplained injuries). Also, the increased likelihood of involvement of being male or permanently excluded from school.

Staff will take seriously any reports made to them by a child and provide reassurance to the child through their responses and behaviour (*without promising they will not tell anyone*). Ensuring the child or person making the report is not given the impression they are causing a problem by reporting a concern or abuse.

Staff will read carefully any documentation provided by the DSL to update their safeguarding training.

All staff and volunteers have a duty to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. Where a staff member feels unable to raise an issue or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them – see also our Whistleblowing Policy:

- The Designated safeguarding governors are Steve Richardson and Graham Harknett
- The Co-chairs of Governors: Graham Harknett and Lynda Hage
- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

4.Strategies and Procedures to Support Safeguarding

Promoting Equality

Some children have an increased risk/vulnerability to abuse. They can face additional barriers with respect to recognising or disclosing concerns. The school is committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of additional barriers they may face.

Children who may be more vulnerable include and who we provide special consideration :

- Children who are young carers
- Children who may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Those who have English as an additional language
- Children known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Children at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Children who are asylum seekers
- Those at risk due to either their own or a family member's mental health needs
- Children looked after or previously looked after (see section 7)
- Children missing from education
- A child whose parent/carer has expressed an intention to remove them from school to be home educated

The school recognises that children with special educational needs or disabilities (SEND) or those with certain health conditions can face additional safeguarding challenges. Staff recognise the need to:

- Explore the reasons for changes in behaviour, mood and injury rather than assume it is related to the child's disability
- Recognise these children as being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- Understand that children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs
- Overcome the barriers and difficulties in communication with these children.
- Through student council and class tutor groups student views are regularly sought regarding safeguarding standards.

Students who are potentially at greater risk of harm

The school recognises that some children need a social worker due to abuse, neglect, exploitation or family circumstances and that abuse and trauma can leave children vulnerable to further harm, as well

as educational disadvantage.

The DSL will hold information relating to social workers working with children at the school. This information will inform decisions about safeguarding and promoting welfare (including the provision of pastoral and/or academic support).

We will also take action to promote the educational outcomes of and to protect;

- Children missing education;
- Children missing from home or care.

There are other familial issues that can have a detrimental impact on children. We work with other agencies in line with Keeping Children Safe in Education (2025) to support children and families in the following circumstances:

- Children facing the court procedures and/or children in the court system.
- Children with family members in prison.
- Children who are homeless.
- Children who need a social worker.

Anti-Bullying

Charlton Park Academy believes that all students are entitled to learn in a safe and supportive environment; this means being free from all forms of bullying behaviour.

This policy should be read in conjunction with our Anti-Bullying policy which outlines how instances of bullying are dealt with, including the procedures to prevent occurrences of bullying. Charlton Park Academy (CPA) further believes that all staff are entitled to work in an environment that is safe and supportive and free from bullying or harassment. These strategies, such as learning about tolerance and difference as part of the school's curriculum, and work ethic aim to promote an inclusive, tolerant and supportive ethos at the school. Bullying, cyberbullying, harassment, victimisation, and discrimination of students or staff will not be tolerated at our school. We treat all of our students and their parents fairly, and with consideration, and we expect them to respect the staff, the school and each other, in return. All forms of bullying (including cyberbullying, prejudice-based bullying, and discriminatory bullying) are unacceptable at CPA and MTH and any instances of bullying will be recorded and, where appropriate, will result in disciplinary action in accordance with the Relationship & Behaviour Policy. Students can be victims of this form of cruelty for a large number of reasons, but often it is because they are perceived to be different in some ways; in terms of racial origin, gender, social class, sexual orientation, learning difficulties, size etc. Young people have a right to not be afraid. CPA and Mulberry Tree House (MTH) staff, Governors and students take the issue very seriously and will do everything in our power to deal with a problem should it ever arise. The ethos of the school is directly related to wellbeing of its pupils. Every child should feel safe in school. This policy applies to all students at CPA and MTH, whether day or boarding. The Education and Inspections Act 2006 outlines a number of legal obligations regarding the school's response to bullying. Under section 89, schools must have measures in place to encourage good behaviour and prevent all forms of bullying amongst students. These measures are part of the school's Relationship and Behaviour Policy, which is communicated to all students, school staff and parents/carers. All staff, parents/carers and students work together to prevent and reduce any instances of bullying at CPA which is fundamental to keeping students safe from harm.

Students with communication difficulties

Communication is incorporated into every area of the curriculum and is one of the essential areas of learning that permeates all aspects of life at CPA, including safeguarding.

CPA promotes a total communication approach through the student's environment, which includes strategies such as visual supports, objects of reference, AAC Proloquo, PECS, signing and verbal

language. The curriculum promotes children's pre intentional and intentional communication skills through approaches such as attention autism sessions, intensive interaction sessions, sensory journeys and structured play, assessed using Blanks Levels. Focused communication sessions are planned throughout the week to ensure that key areas of communication have a clear focus. These approaches serve to support our students to communicate, which is fundamental to safeguarding our students.

Trained Workforce

All staff members will receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, to provide them with relevant skills and knowledge to safeguard children effectively.

The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The designated safeguarding lead will undertake Prevent awareness training and disseminate information to staff.

Any newly appointed DSL will attend the DSL one-day training, provided by the Royal Borough of Greenwich Direct Services to Schools, or another accredited training provider, followed by the GSCP Working Together course, before taking lead responsibility for safeguarding. The deputy DSL will take a leading role on safeguarding for the short time that the DSL is waiting to receive training.

All governors will receive annual safeguarding training to support them in understanding their statutory duties. All new governors will have safeguarding training as part of their induction. The designated Governor(s) for Safeguarding and Child Protection will undertake governor safeguarding training annually.

The DSL will retain a training record indicating the attendance at safeguarding training so that absent staff can receive an update on their return. Additionally, the DSL will retain a record showing staff have read 'Keeping Children Safe in Education' (Part 1 and Annex B)

All new members of staff will receive safeguarding training as part of their induction programme. 4.2.7 At least one member of every appointment panel will have gained accreditation through Safer Recruitment training (statutory requirement).

Staff will also receive weekly updates from the National College, this will be shared with Parents and Carers on the school website ([Online Safety - Charlton Park Academy](#)).

Safer Recruitment

The statutory guidance will be followed (see KCSIE Part 3)

- Outlining the school's commitment to safeguarding and promoting the welfare of children in all advertising.
- At least one safer recruitment trained adult will undertake the shortlisting and be present on any interview panel.
- Providing a copy or link to the school's CP/ safeguarding policy to applicants.
- Requesting a self-declaration from shortlisted candidates prior to interview so any relevant information can be discussed at interview
- Seeking references prior to interview and checking employment history
- Carrying out pre-employment checks (including the applicant's online

presence) and recording required information on the school's Single Central Record.

Embedding High Standards of Behaviour

The school's Relationship & Behaviour Policy promotes positive and respectful behaviour of staff and pupils.

All school staff have been trained to challenge any child-on-child abuse in all its forms. (see Appendix 1 in this policy)

- Staff will challenge derogatory or sexualized language and inappropriate behaviours including that carried out online.
- Deliver a curriculum to educate children about appropriate behaviour and developing positive relationships
- Staff will tackle prejudice and promote empathy through awareness and acceptance of differences. A whole school approach will be adopted to tackling sexism and challenging homophobic language, banter and racist language.
- Staff will be vigilant concerning all forms of bullying physical, emotional and verbal.

Referral to Early Help

Royal Greenwich Early Help Guidance supports children and families with emerging needs and promotes a shared responsibility to facilitate significant and sustained change in children's lives, building resilience, preventing and protecting children from harm. Early help is focused on developing and breaking intergenerational cycles of poverty through working with children's parents/carers and families.

Staff are alert to the potential need for early help for a child who:

- is disabled and has specific additional needs, including certain medical needs
- has special educational needs
- is a young carer
- is showing signs of engaging in anti-social or criminal behaviour
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- Has a parent or carer in custody (previously it was 'family member in prison'), or is affected by parental offending
- Is frequently missing/goes missing from education, home or care (the word 'education' has been added).
- Go missing from school or home and are subsequently found in areas away from their own
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence
- is showing early signs of abuse and/or neglect. Further information can be found from:
 - www.greenwichsafeguardingchildren.org.uk
 - Early Help consultation line: 0208 921 4590 1-4pm
 - Early-help-refer@royalgreenwich.gov.uk
 - Early Help preventions directory available on the GSCP website

Recognising Abuse and Taking Action

All staff and volunteers must be aware that the main categories of abuse are:

- Neglect
- Physical abuse
- Sexual abuse
- Emotional abuse

All staff and volunteers must act in accordance with this policy if a child presents with indicators of abuse⁹

Staff will follow the guidance in this policy if a child tells us about abuse, neglect or exploitation or when reporting concerns (see Appendix 3)

If any member of staff has a concern about a particular child in their care, they must immediately report their concerns to, and seek advice from the Designated Safeguarding Lead, or in their absence, the Deputy Designated Safeguarding Lead. Staff must make a record of their concern on 'MyConcern'. Paper 'cause for concern' forms are available to individuals who do not have access to MyConcern.

All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children's Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow referral, along with the role they might be expected to play in such assessment.

Staff will follow the guidance in Appendix 3 if a child tells us that he/she has been abused or harmed in some way.

Staff must be aware that an incident may eventually end up as a court case and children's evidence can all too easily be compromised by leading questions or personal expressions/comments when recording the disclosure. However, it is important that staff know that, while leading questions should be avoided, they can ask a child directly whether they have been harmed, and the nature of that harm. This is particularly important for children with limited expressive language and / or who use alternative communication modes.

The DSL (or in his/her absence, the Deputy DSL) will make the decision whether or not to refer the concern to Social Care. The Multi Agency Safeguarding Hub (MASH) will be consulted when there is uncertainty about whether to refer.

- MASH Consultation Line Tel- 0208 921 2267 or contact
- RBG LADO/RBG Schools' Safeguarding Officer on 0208 921 3930

Referrals will be made as soon as possible by telephone **and the appropriate forms completed and sent at the same time.** Referrals to Children's Social Care must be made to the Multi Agency Safeguarding Hub (**MASH**) Tel 0208 921 3172

**Multi Agency Safeguarding Hub Children's
Services'
Safeguarding and Social Care, 1st Floor The
Woolwich Centre,
Wellington Street,
Woolwich, London SE18 6HQ**

Reporting Concerns and Record Keeping (see also Appendix 3)

The school uses an electronic system called 'My Concern' to record concerns. Any paper notes, cause for concern forms, etc., must be scanned and held electronically on My Concern. These documents

provide an accurate factual account of the concern and action taken by the school.

The child protection / safeguarding records will be kept for the duration of the child's school career and where a child changes school the records will be forwarded securely to the new setting.

Records will include

- Clear and comprehensive summary of the concern
 - Details of how the concern was followed up
 - Note of any action taken, decision reached and outcome, including where it was decided that no action was needed
- 4.7.4 The information contained will be regarded as confidential. Any request for access to the information by other than the three statutory agencies (police, local authority and health) (e.g., request from a parent, solicitor, investigating agent) will be referred to the Principal/DSL, who is advised to seek legal advice before acting.

All records of concern and multi-agency involvement should be kept separate from the child's academic records. They must be kept securely, with access only for the DSL, Deputy DSLs and Principal.

5. Dealing with Concerns/Allegations Made Against School Staff, Supply Staff, Volunteers and Contractors

There are two levels of concern/allegation

- Allegations that may meet the harm threshold
- Concerns that do not meet the harm threshold - 'low level concerns'.

See Allegations against Staff (including Low Level Concerns), Appendix 5.

An allegation that meets the 'harm threshold' is any information which indicates that a member of staff (including supply staff), volunteer or contractor may have:

- behaved in a way that has, or may have harmed a child
- possibly committed a criminal offence against or in relation to a child
- behaved towards a child or children in a way which indicates s/he would 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 concern and/or allegation against a member of staff must be reported using the CONFIDE function on MY Concern.

Any concern or allegation should be reported immediately to the DSL, if the allegation is about the DSL then this must be reported to the Chair Of Governors/Principal. The Principal will follow the guidance in [KCSIE 2025](#) part 4 and outlined in Appendix 4 in this policy

The Principal will assess whether it is necessary to refer to the Local Authority Designated Officer (LADO) to determine the next step.

If the concern or allegation meets any of the four criteria set out in section 5.2 (i.e., may meet the harm threshold) then the Principal shall contact the RBG LADO without delay, and provide the LADO with written confirmation of the allegation.

The Principal shall, as soon as possible, following briefing from the LADO, inform the subject of the concern or allegation. (If the concern or allegation involves a supply teacher/staff or contractor, the agency will be informed and invited to share any information relating to previous concerns or allegations)

If there is an allegation or concern raised against the Principal, then the Chair of Governors should be contacted. He/she will inform the LADO and follow guidance in [KCSIE 2025](#) (Part 4) and Appendix 4 in this policy

Following outcome of any investigation, there is a legal requirement for employers to make a referral to the DBS, where they consider whether the individual was in regulated activity with children and has engaged in conduct that harmed or is likely to harm a child, or if they pose as risk of harm to a child. Consideration must also be made, if it is appropriate, to refer to the Teacher Regulation Agency (TRA) or other relevant regulatory bodies (e.g., HCPC, Social Work England) for them to determine if the individual should be banned from teaching / professional practice.

6.Dealing with Concerns/Allegations Against Other Children – Child on Child

Abuse

This policy recognises that children are capable of abusing their peers. Any allegations will be investigated appropriately by reporting concerns to the DSL. Any form of inappropriate touching, physical abuse such as hitting, kicking, shaking, biting and hair pulling, or evidence of ‘initiation procedures’, sexting, up-skirting (or other inappropriate use of new technology) will be robustly followed up.

All staff should understand that even if there are no reports of it in their school, it does not mean it is not happening, it may be the case that it is just not being reported.

All staff understand the importance of challenging inappropriate behaviours between peers. **There will be a zero-tolerance approach to sexual violence and sexual harassment.** Staff will **not** downplay certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys,” as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

Victims (and alleged perpetrators) of child-on-child abuse or bullying will be supported as for any other form of abuse and in their best interests.

Child-on-child abuse can manifest itself in many ways. The curriculum, and in particular the RSE/RSHE curriculum, provides regular opportunities for the school to help children safeguard themselves from new technology and through learning about personal safety.

Procedures for minimising opportunities for child-on-child abuse We recognise that a crucial part of our safeguarding responsibility is to minimise the opportunity for child-on-child abuse to occur.

In order to do this, and to establish a safe environment for all children, we:

- have a robust Relationship (behaviour) policy, which makes it clear that we have a zero tolerance approach to any kind of child on child abuse;
- Have communication and safety at the heart of everything we do: ensuring our children and young people have a voice, teaching Protective Behaviours
- ensure staff understand what is meant by child on child abuse and the school policy on child on child abuse by ensuring part of annual staff safeguarding training, and regular safeguarding updates through the year;
- train staff thoroughly so that they challenge inappropriate behaviour (even if it appears to be relatively innocuous);
- train staff thoroughly so that they are confident to challenge inappropriate behaviours between peers, that are actually abusive in nature;

- never downplay certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys”, as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it; and
- recognise that sexual harassment and sexual violence, as well as other forms of child on child abuse, may be happening even if they are not reported. How we address child on child abuse within the curriculum and across the school Safety is at the heart of the curriculum for all learners in our Trust. To be successful our learners need to feel safe and build trusting relationships. Only when we enable this will our learners be able to engage in learning activities and develop the skills necessary. Our curriculum is based around 3 themes of safety:
- Of self – the ability to self-regulate and manage own emotions and so engage in learning experiences
- For self – the ability to be independent and autonomous (do things not only by yourself but for yourself)
- With others – the ability to manage and develop positive relationships PSHE and RSE are integral elements of the school curriculum aiming to give our learners the skills to develop and maintain positive relationships.

7. Looked after and Previously looked after children.

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

Appropriate staff have relevant information about children’s looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements. The DSL has details of children’s social workers and relevant virtual school heads.

We have appointed a designated teacher, Gail Tippet who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how student premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

8. Mental Health

Mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will be alert to behavioural signs that suggest a student may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse, neglect, and exploitation or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

It is key that staff are aware of how these childhood and adolescence experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a student we will respond to the concern, inform and discuss our concerns with parents/carers and seek ways to support the student in and out of school. If you have a mental health concern about a student that is also a safeguarding concern, take immediate action by informing a member of SLT. If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health concern. However, school will provide information and signposting services to children and parents and assist with the teaching of emotional health and wellbeing to children in our curriculum Refer to the Department for Education guidance on mental health and behaviour in schools for more information.

9. Technology

Online safety 134. It is essential that children are safeguarded from potentially harmful and inappropriate online material.

Our whole school approach to online safety empowers CPA to protect and educate students and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. (DFE: Para 134&135).

The breadth of issues classified within online safety is considerable and ever evolving but can be categorised into four areas of risk: content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories. contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes. conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. (UK Health Security Agency, DFE :Para 39 at risk, report it to the Anti-Phishing Working Group (<https://apwg.org/>)).

Our approach to online safety centres on addressing the 4 categories of risk as identified in KCSIE 2025

- **Content** – being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, 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 (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying;

- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

Technology, and risks and harms related to it, evolve, and change rapidly. Our annual external audit of safeguarding incorporates a review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks their students face. (DFE Para 145: 360 safe website or Judicium online safety audit)

Use of mobile phones and Smart Technology.

Online safety and use of technological devices is incorporated into curriculum planning, staff training and parental engagement. As part of our curriculum we educate students about online safety. Examples include: Keeping personal information private, the safe use of social media, the internet and technology, how to recognize unacceptable behavior online, how to report and incidents of cyber-bullying and encouraging students to report proactively as a witness rather than a victim. Given the considerable vulnerabilities that our students present, ensure that they know not to meet up with a person that they have met online without a safe adult.

At CPA we ensure that there are appropriate filtering and monitoring on school devices and school networks.

Online safety primarily monitoring and filtering considers the 4Cs (Content, contact, conduct and commerce).

At CPA we have a clear policy on the use of mobile and smart technology. Students can only access the school network on devices that are provided by CPA, students are not permitted to bring personal devices such as mobile phones into school.

By controlling and monitoring and filtering access whilst at school or college, sexual harassment, bullying, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content will be significantly reduced.

Use of Generative Artificial Intelligence (Para 143/144)

The core principles of UK GDPR apply including accountability in AI design and risk management by CPA. Transparency about how data and technology are used. Ensuring that 'Smoothwall' (Monitoring and Filtering platform) must effectively and reliably prevent access to harmful and inappropriate content, maintain robust activity logs by the AI product in addition to additional technologies, respect data protection and intellectual property laws.

Appropriate filtering and monitoring on school/college devices and networks

The Department for Education has published filtering and monitoring standards which set out that schools and colleges should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems.
- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet their safeguarding needs.

Charlton Park Academy will do all we reasonably can to limit children's exposure to online harms through Academy provided devices and networks and in line with the requirements of the Prevent Duty and KCSIE, we will ensure that appropriate filtering and monitoring systems are in place (Smoothwall system).

When implementing appropriate filtering and monitoring, Charlton Park Academy will ensure that

“over blocking” does not lead to unreasonable restrictions as to what students can be taught with regards to online teaching and safeguarding.

Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our approach to online safety and we recognise that we cannot rely on filtering and monitoring alone to safeguard our students; effective safeguarding practice, robust policies, appropriate classroom/behaviour management and regular education/training about safe and responsible use is essential and expected.

Students will use appropriate search tools, apps and online resources as identified by staff after assessing student risks and special needs.

Internet use will be supervised by staff as appropriate to students' cognitive developmental age, ability and potential risk of harm

Decision making and reviewing our filtering and monitoring provision.

When procuring and/or making decisions about our filtering and monitoring provision, our senior leadership team works closely with the DSL and the internet service providers/staff. Decisions have been recorded (IT helpdesk and web filter audit log) and informed by an approach which ensures our systems meet our Academy specific needs and circumstances, including but not limited to our student risk profile and specific technology use.

Any planned changes to the filtering and monitoring approaches will be assessed by staff with safeguarding, educational and technical experience and, where appropriate, with consent from the leadership team; all changes to the filtering policy are logged and recorded (IT helpdesk and web filter audit log).

Our Academy undertakes at least one annual review, in conjunction with relevant Trust leaders of our filtering and monitoring systems to ensure we understand the changing needs and potential risks posed to our community.

In addition, on behalf of the Academy the Trust, the IT team alongside DSLs undertake regular checks on our filtering and monitoring systems, which are logged and recorded, to ensure our approaches are effective and can provide assurance to the Academy Board that we are meeting our safeguarding obligations.

Appropriate filtering

Charlton Park Academy's education broadband connectivity is provided by Smoothwall and LGFL as a comprehensive automated filtering and monitoring system.

Our Internet provider is a member of Internet Watch Foundation (IWF).

Smoothwall has signed up to Counter-Terrorism Internet Referral Unit list (CTIRU).

Smoothwall filter is blocking access to illegal content including child sexual abuse material (CSAM).

Smoothwall filter blocks access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes content which promotes discrimination or extremism, drugs/substance misuse, malware/hacking, gambling, piracy and copyright theft, pro-self-harm, eating disorder and/or suicide content, pornographic content and violent material.

We filter internet use on all Academy owned, or provided, internet-enabled devices and networks. This is achieved by a purchased service - Smoothwall and LGFL filtering and monitoring which is installed on all devices.

Our filtering systems should allow us to identify device names or IDs, IP addresses, and where possible, individual users, the time and date of attempted access and the search term or content being blocked.

Our filtering system is operational, up to date and is applied to all users, including guest accounts, all Academy owned devices and networks, and all devices using the Academy broadband connection.

We work with our IT service providers/staff to ensure that our filtering policy is continually reviewed to reflect our needs and requirements.

If there is failure in the software or abuse of the system, for example if students or staff accidentally or deliberately access, witness or suspect unsuitable material has been accessed, they are required to turn off monitor/screen, use a screen cover widget, report the concern immediately to a member of staff, and report the URL of the site to technical staff/IT team.

Filtering breaches will be reported to the DSL and technical staff and will be recorded and escalated as appropriate and in line with relevant policies, including our child protection, acceptable use, allegations against staff and behaviour policies.

Parents/carers will be informed of filtering breaches involving their child.

Any access to material believed to indicate a risk of significant harm, or that could be illegal, will be reported to relevant senior staff as soon as it is identified to the appropriate agencies, including but not limited to the Internet Watch Foundation (where there are concerns about child sexual abuse material), Metropolitan Police, NCA-CEOP or Royal Borough of Greenwich Children's Services.

If staff are teaching topics which could create unusual activity on the filtering and monitoring logs, or if staff perceive there to be unreasonable restrictions affecting teaching, learning or administration, they will report this to the DSL and/or leadership team who will liaise with IT services.

Appropriate monitoring

We will appropriately monitor internet use on all Academy provided devices and networks. This is achieved by our Smoothwall and LGFL filtering and monitoring systems.

All users will be informed that use of our devices and networks can/will be monitored and that all monitoring is in line with data protection, human rights and privacy legislation.

If a concern is identified via our monitoring approaches:

- Where the concern relates to students, it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as child protection, acceptable use, and behaviour policies.
- Where the concern relates to staff, it will be reported to the Principal (or chair of governors if the concern relates to the Principal), in line with our staff behaviour/ allegations policy.
- Where our monitoring approaches detect any immediate risk of harm or illegal activity, this will be reported as soon as possible to the appropriate agencies; including but not limited to, the emergency services via 999, Metropolitan Police via 101, NCA-CEOP, LADO or Royal Borough of Greenwich Children's Services.

Information security and access management

Charlton Park Academy is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and students.

Charlton Park Academy will review the effectiveness of our procedures periodically to keep up with evolving cyber-crime technologies.

Mark Dale-Emberton and members of the Senior Leadership Team are responsible for ensuring that our Academy has met the DfE cyber security standards for schools and colleges.

Remote/Online learning

Charlton Park Academy will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.

All communication with students and parents/carers will take place using Academy provided or approved communication channels; for example, Academy provided email accounts and phone numbers and/or agreed systems; Microsoft 365/Teams or equivalent.

Staff and pupils/students will engage with remote teaching and learning in line with existing behaviour principles as set out in our Academy behaviour policy/code of conduct and Acceptable Use Policies.

Staff and pupils/students will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.

When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP).

Online Safety Training for Staff

Charlton Park Academy will ensure that all staff receive online safety training, which, amongst other things, will include providing them with an understanding of the expectations, applicable roles and their responsibilities in relation to filtering and monitoring, as part of induction. Ongoing online safety training and updates for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach.

Educating students

Charlton Park Academy will ensure a comprehensive whole Academy curriculum response is in place to enable all students to learn about and manage online risks effectively as part of providing a broad and balanced curriculum.

Working with parents/carers

Charlton Park Academy will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential benefits and risks and to reinforce the importance of children being safe online.

Charlton Park Academy will ensure parents and carers understand that systems are used to filter and monitor their children's online use at Academy. Clarity will be ensured in terms of what their children are being asked to do online, including the sites they will be asked to access and who from the Academy (if anyone) their child is going to be interacting with online.

Where the Academy is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE 'Harmful online challenges and online hoaxes' guidance to ensure we adopt a proportional and helpful response.

10. Staff Engagement and Expectations

All new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety, which, amongst other things, will include ensuring an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) to ensure they are aware of the Academy Internal safeguarding processes, as part of their induction. This training is regularly updated and is in line with advice from the local safeguarding partners and explores the Greenwich processes to follow. All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) that is updated at least annually, to ensure they are aware of a range of safeguarding issues and how to report concerns. Online safety training for staff will be integrated, aligned and considered as part of the whole Academy safeguarding approach and wider staff training and curriculum planning.

In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Charlton Park Academy recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis, and staff are encouraged to contribute to and shape Academy safeguarding arrangements and child protection policies.

All governors and trustees receive appropriate safeguarding and child protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenge to be assured that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. This training is regularly updated.

The DSL and Principal will provide an annual report to the Academy Governing Body detailing safeguarding training undertaken by all staff and will maintain an up-to-date record of who has been trained.

11. Confidentiality

Safeguarding in schools raises issues of confidentiality that must be clearly understood by all staff/volunteers in school. All staff/volunteers in school have responsibility to share relevant information about the protection of children with other professionals. This sharing of information is outlined in the DfE guidance (July 2025)¹². It identifies seven golden rules for sharing information. It reminds practitioners that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

If a child tells a member of staff/volunteer about harm or abuse and asks that the information is kept secret, it is important that the member of staff/volunteer tells the child in a manner appropriate to the child's age/stage of development that they cannot promise complete confidentiality – instead he/she must explain that he/she may need to pass information to other professionals to help keep the child or other children safe.

Staff/volunteers who receive information about children and their families in the course of their work shall share that information only within appropriate contexts.

12. Communication with Parents

Parents and carers will be made aware of the school safeguarding/child protection policy through published information and in initial meetings with the school. Parents and carers will be informed that in certain circumstances there may be a need to contact other agencies without first notifying them. This decision will be made in partnership between Education Services and Social Care. It will be made clear that this is a legal obligation under the GDPR UK / Data Protection Act 2018 and not a personal decision.

The Governing Body makes this Safeguarding/CP Policy available to parents, carers and children through the school website. A hard copy is also available on request.

Parents are provided with the opportunity to meet with the DSL and the Parent Liaison officer in a forum called Parent Matters. This forum provides parents with the opportunity to feedback on safeguarding standards in the spirit of co-production.

13. Monitoring and Evaluation

The responsibility for ensuring that the Safeguarding/Child Protection Policy and procedures are in place, available to parents and reviewed annually lies with the Governing Body. This policy will be reviewed in line with the timescale and details set out on the front cover.

Governors and school leaders will implement a strategy to evaluate the effectiveness of safeguarding procedures including ensuring safer recruitment procedures are robustly implemented and online protection is regularly assessed.

The DSL and deputy DSLs will ensure that all concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing. The DSL and deputies are responsible for making sure child protection files are kept up to date and that files are only accessed by those who need to see them, with any information sharing happening in line with the guidance set out in Keeping Children Safe in Education (KCSIE).

Throughout the process of handling cases and at the conclusion of any concern raised, the DSL will review the circumstances with relevant staff (and the Local Authority Designated Officer (LADO) where appropriate), to determine whether there are any improvements to be made to the school's procedures to help prevent similar events in the future. The Safeguarding Team will consider the facts and determine whether any lessons can be learned and if improvements can be made. This reflective practice is essential to address poor practice including:

- Failing to act on and refer the early signs of abuse and neglect
- Poor record keeping
- Failing to listen to the views of the child
- Failing to re-assess concerns when situations do not improve
- Not sharing information with the right people within and between agencies
- Sharing information too slowly
- A lack of challenge to those who appear not to be taking action Keeping Children Safe in Education

The DSL will ensure that lessons learned from case reviews are shared appropriately with staff through safeguarding updates and training, and that any necessary changes to policies, procedures or practice are implemented promptly.

14. Linked Policies/Procedures

- Relationship & Behaviour
Anti-Bullying
- E-safety and acceptable use policy.
- Equality and Diversity
- Remote Learning Policy
- Curriculum Policy
- RSE Policy
- Cyber security policy
- GDPR
- Staff Handbook (mobile phones page 14)
- Whistleblowing Safer Recruitment
- Staff Code of Conduct Intimate care
- Operational Medications
- Positive Physical intervention
- Relationships and Sex Education (RSE)
- Health and Safety policy
- First Aid policy
- Complaints Policy
- SEND Policy
- Looked after and Previously looked after
policy.
- Attendance
- Health and Safety
- Curriculum

15. Complaints and Concerns against staff

Complaints against staff that are likely to require a child protection investigation, this will be handled in accordance with our procedures for dealing with low level concerns or allegations of abuse made against staff.

When responding to complaints, we aim to:

- Be impartial and non-adversarial
- Facilitate a full and fair investigation by an independent person or panel, where necessary
- Address all the points at issue and provide an effective and prompt response
- Respect complainants' desire for confidentiality
- Treat complainants with respect and courtesy
- Ensure that any decisions we make are lawful, rational, reasonable, fair and proportionate, in line with the principles of administrative law
- Keep complainants informed of the progress of the complaints process
- Consider how the complaint can feed into school improvement evaluation processes
- We will try to resolve concerns or complaints by informal means wherever possible. Where this is not possible, formal procedures will be followed.
- Charlton Park Academy will aim to give the complainant the opportunity to complete the complaints procedure in full.
- Throughout the process we will be sensitive to the needs of all parties involved, and make any reasonable adjustments needed to accommodate individuals

For more information please see Charlton Park Academy Complaints Procedures, these can be found on our website, or by contacting the school.

16. Whistle-blowing

Charlton Park Academy has a whistleblowing policy and this is to support all workers to be confident that their concerns will be taken seriously and that they will be protected from unfair treatment if they raise a concern.

The academy is committed to the highest standards of openness, probity and accountability. It encourages an open dialogue between staff, leaders, governors and trustees to ensure concerns are resolved at the earliest opportunity.

It is important to the school that any wrongdoing within the school is reported and properly dealt with. The school recognises that staff are valuable eyes and ears within the school and therefore encourages all individuals with concerns to come forward and voice these. If an individual has concerns about anything happening within the school they should read the policy, which sets out the way in which individuals may raise concerns and how they will be dealt with.

17. Use of Charlton Park Academy for non-school activities.

Charlton Park Academy is committed to working with our local community and this may include local groups / organisations using school facilities. Use of facilities will be limited to specific activities for example swimming and access to communal areas, for example the school hall or playground, and no access will be given to areas where there may be access to more sensitive information, for example classrooms or the staffroom. The school will ensure that the organisation is aware of all safety procedures, for example fire exits, and a point of contact will be given in case of emergency.

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll) we will:

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, including in any transfer of control agreement and that any agreement to use the premises would be terminated if the other body fails to comply.

In the event that the school receives an allegation relating to an incident that happened when an individual or organisation was using their premises for the purposes of running activities for children, we will follow our safeguarding policies and procedures, including informing the LADO.

18. How CPA safeguard students attending alternative provision

Some of our students may access learning off-site with other providers through alternative provision (AP), however we still retain a responsibility to ensure safeguarding of that student and we will satisfy ourselves that the placement meets the student's needs.

We will employ a checklist which sets how we aim to ensure all learners are safeguarded, including

- Pre-placement checks
- Day-to-day safeguarding responsibilities
- Monitoring of attendance

Appendix 1 Types and Indicators of Abuse

(to be read in conjunction with 'Keeping Children Safe In Education' [KCSIE 2025](#) Part 1 and Annex B)

*NB. This abbreviated guidance provides a useful reminder of the types and indicators of abuse but **MUST** be considered within the context of a comprehensive training programme and reference to relevant sections in [KCSIE 2025](#) (Part 1 and Annex B). This guidance is not a substitute for more in-depth consideration of harm.*

There are four categories of abuse, which may result in a child being placed on the Child Protection Register. They are:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

Definitions of child abuse

'Child Abuse and neglect' is a generic term encompassing all ill treatment of children, including serious physical and sexual assault as well as cases where the standard of care does not adequately support the child's health (physical or mental) or development needs. The impact of witnessing the ill treatment of others may also cause harm to the child. Children may be abused or neglected through the infliction of harm or through the failure to act to prevent harm.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Abuse can occur in families, institutions or community settings. The alleged perpetrator may be known or not known to the child. There are 4 broad categories of abuse which are used for the purposes of registration. These categories overlap and an abused child may suffer more than one type of abuse.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating or any other act of 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.

Possible indicators of Physical Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Unexplained injuries, including burns, particularly if they are recurrent
- Improbable excuses given to explain injuries
- Refusal to discuss injuries
- Untreated injuries
- Admission of punishment which seems excessive
- Bald patches
- Withdrawal from physical contact
- Arms and legs covered, even in hot weather
- Fear of returning home
- Fear of medical help
- Self-destructive tendencies

- Aggression towards others
- Running away

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. 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.
- feature 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 participating in normal social interaction.
- seeing or hearing the ill-treatment of another (including witnessing domestic violence)
- serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Possible indicators of Emotional Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Physical/ mental and/or emotional developmental lags
- Admission of punishment that appears excessive
- Over-reaction to mistakes
- Continual self-deprecation
- Sudden speech disorders
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour e.g. thumb sucking, hair twisting, rocking
- Self-mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Running away
- Compulsive stealing or scavenging

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not 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. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The

sexual abuse of children by other children is known (in education) as peer-on-peer abuse.

Possible indicators of Sexual Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Sudden changes in behaviour or in school performance
- Displays of affection in a sexual way, inappropriate to age
- Tendency to cling or need reassurance
- Regression to younger behaviour e.g. thumb sucking, acting like a baby, playing with discarded toys
- Complaints of genital itching or pain, or anal pain
- Distrust of a familiar adult, or anxiety about being left with a relative, babysitter or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Apparent secrecy
- Bedwetting, daytime wetting and/or soiling
- Sleep disturbances, nightmares
- Chronic illness, e.g. throat infection, venereal disease or other STD *
- Anorexia, bulimia
- Unexplained pregnancy
- Fear of undressing, e.g. for sport
- Phobias or panic attacks

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 as a result 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 care-givers); ensure access to appropriate medical care or treatment; or ensure a suitable education. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Possible indicators of Neglect - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Destructive tendencies
- Low self esteem
- Neurotic behaviour
- No social relationships

- Running away
- Compulsive stealing or scavenging

Additional safeguarding issues

FGM mandatory reporting duty

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover that 'FGM appears to have been carried out on a girl under 18'

Possible indicators of Female genital mutilation (FGM)

- Holiday requests made to school for significant lengths of time (Pre warning)
- Long periods of time away from the classroom during the day with bladder or menstrual problems
- Avoidance of P.E.
- Difficulty walking, sitting or standing
- Prolonged absences from school
- Noticeable behaviour changes
- Withdrawal
- Depression
- Recurrent Urinary Tract Infections (UTI) or complaints of abdominal pain

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.

The Forced Marriage Unit has published Multi-agency guidelines, with pages 75-80 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fmfco.gov.uk. See also Royal Borough of Greenwich Safeguarding Children Partnership website: www.greenwichsafeguardingchildren.org.uk

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. The abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of these can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Operation Encompass – helps police and schools to work together to provide emotional and practical help when children have experienced a domestic incident. The DSL will be notified of a domestic incident before the child arrives at school the following day and can therefore arrange appropriate support.

Children missing from Education

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. A child going missing from education is a potential indicator of abuse or neglect, which may include sexual abuse or exploitation and child criminal exploitation, including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, honour based abuse or risk of forced marriage. Staff should be aware of their school's unauthorised absence and children missing from education procedures.

The school must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

Private fostering

Private fostering is when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not their parent, a person with parental responsibility for them or a relative in their own home

If a member of school staff suspects a child may be being privately fostered without formal arrangement it is important to notify Multi Agency Safeguarding Hub (MASH) Tel 0208 921 3172

Preventing Radicalisation

Extremist ideology, radicalisation and terrorism

Children and young people can suffer harm when exposed to extremist ideology which may be social, political or religious in presentation. This harm can range from a child adopting or complying with extreme views which limits their social interaction and full engagement with their education, to children being groomed for involvement in violent actions.

Extremism: the vocal or active opposition to our fundamental British values. This also includes calling for the death of members of the armed forces.

Radicalisation: the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism: an 'action that endangers or causes serious violence to a person; causes serious damage to property or seriously interferes or disrupts an electronic system'. The use or threat must be designed to influence government or intimidate the public to advance a political, religious or ideological cause.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Background factors combined with specific influences such as

family and friends may contribute to a child's vulnerability for which an extremist or terrorist group may appear to provide an answer. Similarly, radicalisation can occur through different methods, such as social media or the internet. Staff should use their own judgement in identifying children at risk of radicalisation and report to the DSL, who may decide to make a Prevent referral.

PREVENT DUTY - Section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), places a duty on schools to have due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. Paragraphs 57-76 of the Revised Prevent duty guidance: for England and Wales¹⁶ is specifically concerned with schools (but also covers childcare). It places the requirements on schools in four general themes: Risk assessment, working in partnership, staff training and IT policies

- Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. Staff should be able to demonstrate both a general understanding of the risks affecting children and young people in the area and an understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools should have clear procedures in place for protecting children at risk of radicalisation.
- The Prevent duty builds on existing local partnership arrangements and take into account the policies and procedures of the Local Safeguarding Children Partnership. Effective engagement with parents/the family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. Schools should also discuss any concerns in relation to possible radicalisation with a child's parents in line with the individual school's safeguarding policies and procedures, unless they have specific reason to believe that to do so would put the child at risk.
- Schools need to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, schools should ensure that the DSL lead undertakes Prevent awareness training and is able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools.
- If a Prevent referral is passed to a multi-agency Channel Panel, then a member of school staff will attend (if asked) to help with any assessment of vulnerability.

Appendix 9: Prevent – Risk and Response in a SEN Secondary Setting outlines the specific vulnerabilities, contextual risks, and protective measures relating to radicalisation in CPA as a SEN secondary school.

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

Both are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, or through violence/the threat of violence. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including sexual identity, cognitive ability, learning difficulties, communication ability, etc. Children can be exploited by adult males, females, individuals or groups or by other children (who themselves may be experiencing exploitation).

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching

outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet. CSE can be a one-off occurrence and may happen without the child's knowledge, e.g. by sharing videos or images on social media.

Any child who has been coerced into engaging in sexual activities is being abused or exploited. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited, for example if they believe they are in a genuine, romantic relationship.

CCE is when children are forced or manipulated into participating in criminal activity. This can range from the transportation of drugs, weapons or money through county lines (see below) or being forced to work in the manufacture of drugs, forced to shoplift, committing vehicle crime or threatening/committing serious violence to others. Children can become trapped in a cycle of criminal activity, as perpetrators can threaten their families with violence or entrap and coerce the child into debt. The experiences of boy victims may be very different to those of girl victims.

Possible indicators of CSE and CCE

- Having unaffordable/unexplained gifts or new possessions
- Going missing from home or care or coming home late
- Associating with other young people involved in exploitation
- Truancy, exclusion, disengagement with school, opting out of education altogether
- Changes in emotional well-being
- Drug or alcohol misuse
- Unexplained injuries

Further indicators of CSE include

- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections, inappropriate sexual or sexualised behaviour or pregnancy

County lines is where gangs and organised criminal networks transport illegal drugs, both locally and across the UK. Children and vulnerable adults are exploited to move, store and sell drugs and transport money, sometimes from urban areas to suburban and rural areas, market/seaside towns. Offenders will often use coercion, intimidation and serious violence (including sexual violence and weapons) to ensure compliance of victims. There may also be a threat of violence to the victim and their families can be used to trap the victim in continued criminality.

Possible indicators of County line involvement (in addition to some of the indicator mentioned for CSE and CCE) include

- Victim is missing from home and subsequently found in area away from home or in accommodation to which they have no connection
- As a victim or perpetrator of serious violence (e.g. knife crime)

- In possession of more than one phone and receiving multiple calls requesting movement of drugs or money

Child-on-child/ child on child abuse

Children can abuse other children. This is generally referred to as child-on-child abuse, can take many forms and can happen both inside and outside of school and online. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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 peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- 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).
- sexual violence such as rape, assault by penetration; sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence); 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
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse. Sexual harassment is likely to violate a child’s dignity, make them feel intimidated, degraded or humiliated.
- deliberately brushing against or interfering with someone’s clothes (this may cross into sexual violence)
- displaying pictures, photos or drawings of a sexual nature
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- 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

Information regarding the definitions and signs of further safeguarding issues, including homelessness, modern slavery, cybercrime, children with family members in prison and children and the court system, etc. can be found in [KCSIE 2025 Annex B](#).

Appendix 2 Statutory Guidance, Legislation and Advice & Key Responsibilities

Statutory Guidance, legislation and advice includes:

- The Children Act 1989 and 2004 amendment
- [The Education Act 2002 \(section 175\)](#)
- [The Education \(Pupil Information\) \(England\) Regulations 2005](#)
- [Keeping Children Safe In education \(2025\)](#)
- [Working Together to Safeguard Children \(2023\)](#)
- [Searching, screening and confiscation \(July 2022\)](#)
- [What to do if you're worried a child is being abused \(March 2015\)](#)
- [Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers \(May 2024\)](#)
- [Domestic Abuse Act 2021](#) updated July 2022
- [Designated teacher for looked-after and previously looked-after children \(February 2018\)](#)
- [UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people \(2017\)](#)
- [Greenwich Safeguarding Children Partnership.](#)
- [Working together to improve school attendance \(Aug 2024\)](#)
- [Children Missing Education, September 2016](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education, April 2019](#)
- [NSPCC](#)
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#)
- [The Equality Act 2010](#)
- [The Public Sector Equality Duty \(PSED\)](#)
- [Statutory guidance on the Prevent duty](#)

Other useful documents include:

- [Inspecting Safeguarding in Early years Education and Skills](#)
- [RBG Interagency referral form](#)

Key Responsibilities

The Trust, alongside the Trust Principal & DSL has overall strategic responsibility for our filtering and monitoring approaches, including ensuring that our filtering and monitoring systems are regularly reviewed. The work in close conjunction with the Deputy Safeguarding leads to ensure the leadership team and relevant staff have an awareness and understanding of the appropriate filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.

The DSL, Mark Dale-Emberton, Principal, Steve Richardson, Safeguarding governor and Lynda Hage, chair of Governors, are responsible for ensuring that our school has met the DfE Filtering and monitoring standards for schools and colleges.

Our Senior Leadership Team are responsible for:

- procuring filtering and monitoring systems.
- documenting decisions on what is blocked or allowed and why.
- reviewing the effectiveness of our provision.
- overseeing reports.
- ensuring that all staff understand their role, are appropriately trained, follow policies, processes and procedures and act on reports and concerns.
- ensuring the DSL and IT service providers/staff have sufficient time and support to manage their filtering and monitoring responsibilities.

The DSL has lead responsibility for overseeing and acting on:

- any filtering and monitoring reports.
- any child protection or safeguarding concerns identified.
- checks the filtering and monitoring system.

The IT team have technical responsibility for:

- maintaining filtering and monitoring systems.
- providing filtering and monitoring reports.
- completing technical actions identified following any concerns or checks to systems.
- working with the senior leadership team and DSL to procure systems, identify risks, carry out reviews and carry out checks.

All members of staff are provided with an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of our induction process, and in our child protection staff training.

All staff, students and parents/carers have a responsibility to follow this policy to report and record any filtering or monitoring concerns.

Appendix 3 Records and Referral

Record Keeping and Referral Guidance - The School must:

- Keep clear records based on observation and evidence, which separate fact, allegation, hearsay, opinion or unsubstantiated evidence and which clearly indicate decisions and actions taken
- Keep Child Protection information in separate files (on MyConcern) by the designated safeguarding lead and will only be discussed with staff on a need-to-know basis. Staff need to know when a child is at risk and what plan has been decided by multi-agency partners, but may not need to know all the confidential details.
- Ensure all records, notes and observations made by staff as part of ongoing monitoring of children who have a multi-agency plan or are causing concern, are scanned and uploaded to My Concern directly or by the DSL. All documents must be dated and the person completing the form named.
- Ensure all child protection conference minutes and minutes of other multi-agency meetings (e.g., child in need / s17) are stored in the confidential files kept by the Designated Safeguarding Lead.

Recording Concerns - Initial concerns, incidents or disclosure by a child must be reported to the DSL by making a log on MyConcern. Staff understand that some children may not feel confident in reporting concerns or may not have the language in which to do so. Staff need to create a safe space for the child to speak (this especially true for LGBT, EAL and SEND children who wish to share concerns)

A body map (see **Appendix 6**) should be used to record injuries/marks/bruises.

The following information must be recorded on MyConcern:

- time, date, place and people who were present
- exact details of what was said by the child and/or others (no interpretation or opinion)
- the child's emotional or physical condition
- details of the behaviour(s) causing concern and the context in which it occurred
- description of injuries, marks or bruises - provide detail including number, length of marks, description of marks, colour of marks/bruises etc.
- other relevant details - including information about previous incidents which may not have been reported but now seem relevant.

The DSL or staff as directed should continue to monitor for concerns and maintain a chronology of concern.

When a child tells us about abuse or harm – the adult should:

- Find time and, if necessary, a suitable place to listen to the child, when information about possible abuse comes to light
- Listen to what is being said without displaying shock or disbelief
- Do not make false promises which may not be able to be fulfilled and do not promise confidentiality
- Allow the child to talk freely. Do not cross examine, interview, probe or ask to see any injury that is not visible. Listen, only asking questions when necessary to clarify. Ask open questions such as “Tell me,” and “How did that happen?”
- Try to avoid leading questions but, if necessary, the member of staff **can** ask the question: ‘have you been harmed’ and ‘how’? This is particularly important when a child has limited expressive language or uses alternative communication modes
- Not criticise the alleged perpetrator

- Reassure the child that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Explain what has to be done next and who has to be told
- Find out just enough to be sure of the need to refer
- As soon as possible, record what happened and what the child told you on MyConcern. The record must be factual, accurate and relevant and avoid subjective judgements. It is not the school's responsibility to 'check out' what any child tells, nor should any abuser be questioned.
- Staff that do not have access to MyConcern should use the 'cause for concern' form which must be signed and dated
- Speak with the Designated Safeguarding Lead and, if using the 'cause for concern' form, provide him/her with the signed, dated written record, using the agreed school procedures, without delay.

Referrals (see also flow chart)

The DSL must keep detailed, contemporaneous notes of:

- discussions with staff
- discussions with the child
- discussions with parents
- information provided to social services
- decisions taken (with times, dates and signed)

The DSL will confirm verbal and telephone referrals to social services in writing within 24 hours of the referral.

NB. All safeguarding related communication via telephone will be witnessed by a school leader, who will record contemporaneous notes of the conversation and upload them on MyConcern when required.

Reports for Child Protection Conferences/Core Group Meetings

Reports for child protection conferences must be written on the agreed pro-forma. They should focus on the child's educational progress and achievements, attendance, behaviour, participation, relationships with other children and staff and, where appropriate, their appearance and concerns.

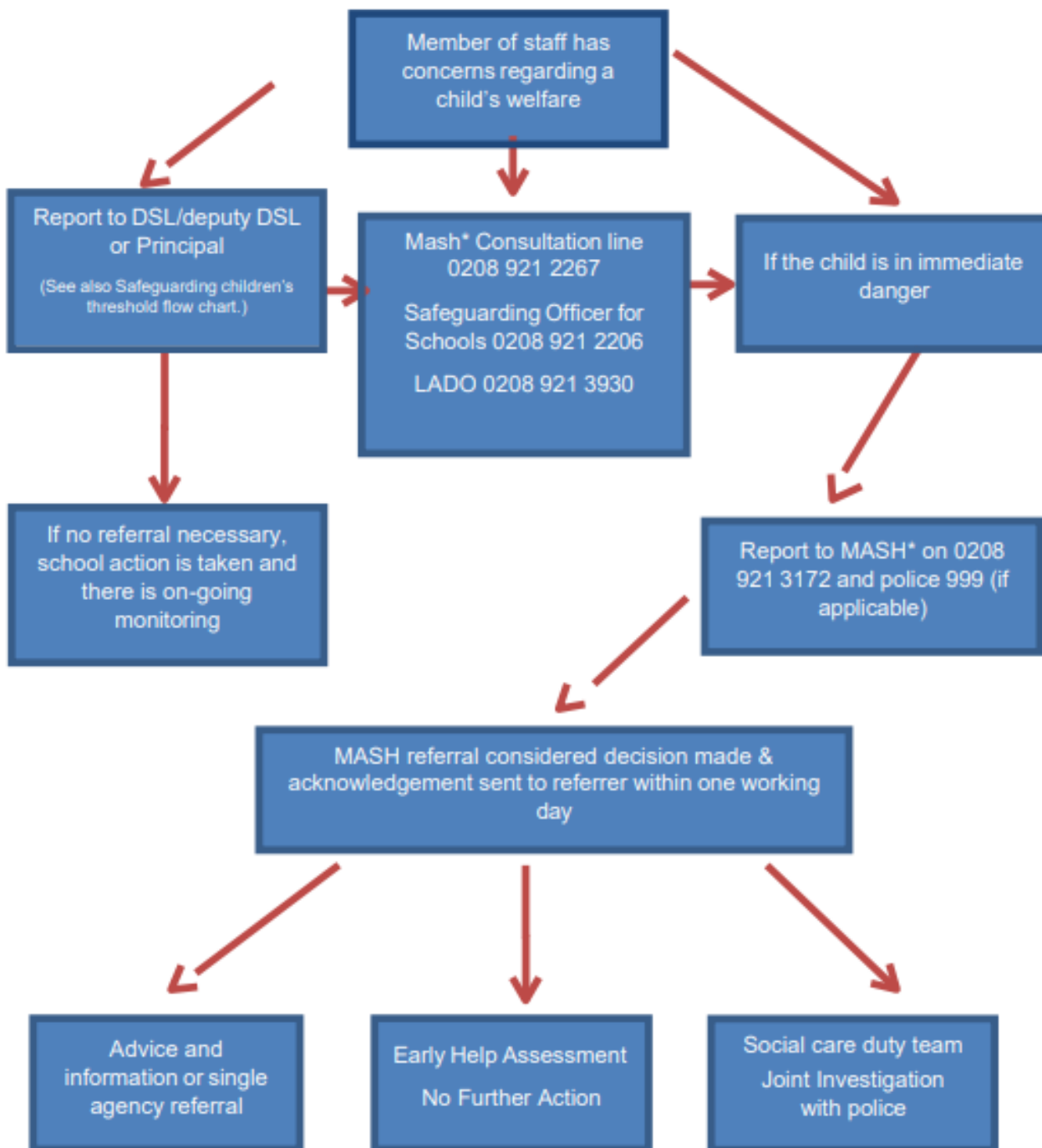
They should provide clear factual information. Staff should be aware that these reports will be made available to parents at the child protection conference.

If appropriate, the DSL should consider discussing the content of the report with the parent/carer in advance of any CP conference to help maintain a trusting and effective partnership.

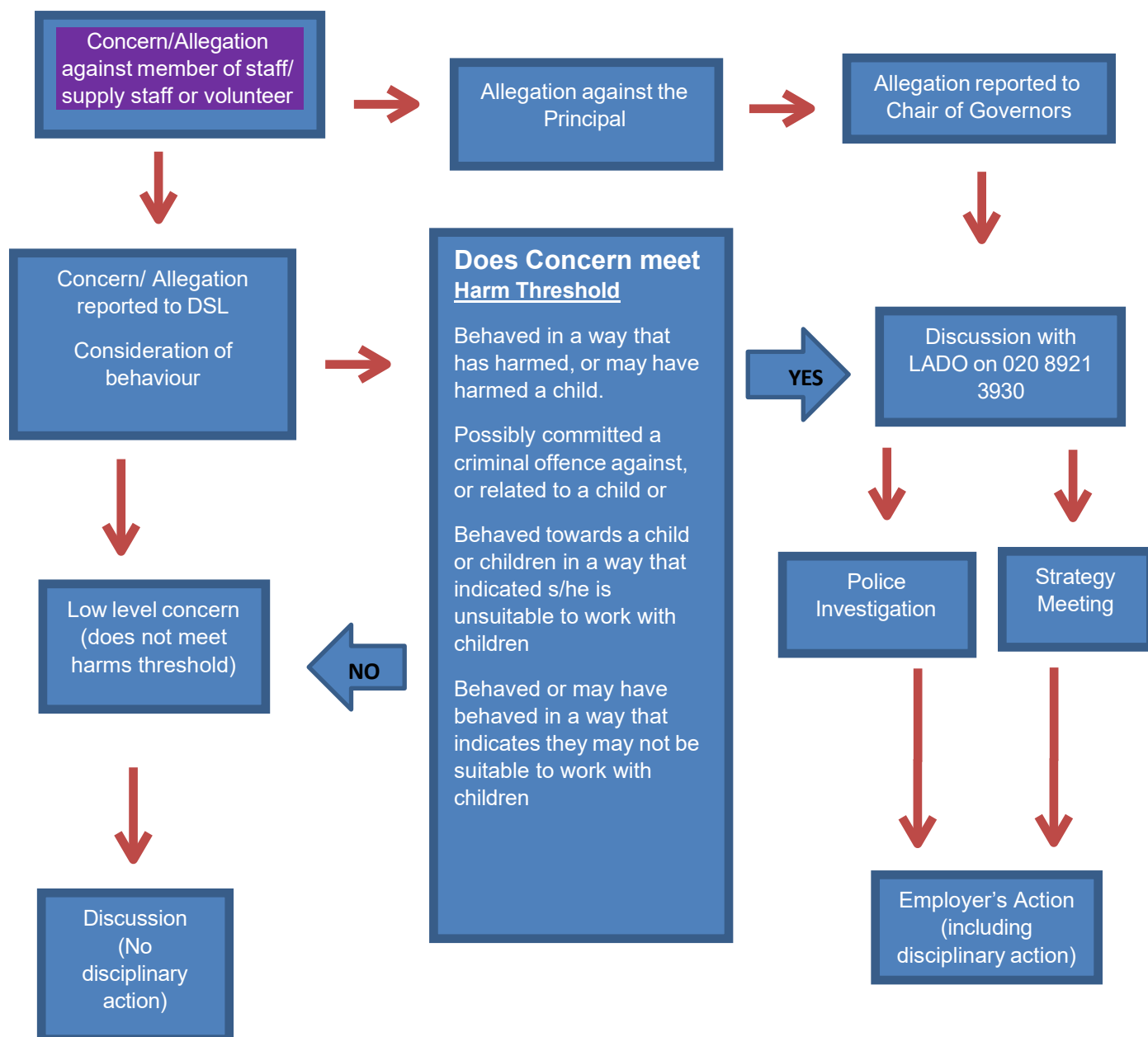
Appendix 3 continued: Reporting concerns about a child

Flow Chart for Reporting Concerns

*Children living outside Greenwich boundary will be referred to children's social care in the relevant LA



Appendix 4: Managing and Reporting Concerns or Allegations Against School Staff, Supply Staff, Volunteers and Contractors



Appendix 5: Allegations against Staff (including Low Level Concerns)

Section 1: allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we are in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Principal, or the chair of governors where the Principal is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

If in doubt, the case manager will seek views from the school's personnel adviser and the LADO, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the LADO. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the LADO – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the LADO as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the LADO to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.
- **Provide effective support for the individual facing the allegation or concern**, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. The individual who has been accused may seek advice and guidance from their Union and/or request that a union representative or colleague is present when discussing the allegation.

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern is working in regulated activity and has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

If the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the LADO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If an allegation against a person who is working in regulated activity is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services or the person is otherwise removed from regulated activity, the school will make a referral to the DBS for consideration of whether inclusion on the barred list(s) is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

If the individual is in another regulated position, the school will refer the matter to the relevant regulatory body; e.g., HCPC, NMC, Social Work England

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

We will retain all records of allegations at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, ensuring that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: Concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Observation by a senior member of staff
- Safeguarding concern from another member of staff
- Information provided by a child or their family member
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door without the agreement / knowledge of senior staff
- Failing to comply with a risk assessment or care plan

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring 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
- Empowering staff to share any low-level concerns as per section 5 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system.
- Provide staff with the opportunity to share concerns via My Concern and/or verbally with the DSL or Principal.

Responding to low-level concerns

If the concern is raised via a third party, the Principal will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff behaviour policy. The Principal will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Please refer to the Charlton Park Academy Low Level Concerns Policy.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in Section 1 of this policy, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 6: Online Safety

Teaching students to stay safe online and keeping children safe online in school is a crucial part of safeguarding. It is essential that children are safeguarded from potentially harmful and inappropriate online material. We take a whole school approach to online to protect and educate students, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. Our approach to online safety runs through every aspect of our work with children and the community, including (but not limited to):

- having robust processes (including filtering and monitoring systems) in place to ensure the online safety of students, staff, volunteers and governors
- protecting and educating the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- setting clear guidelines for the use of mobile phones for the whole school community
- establishing clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.
- curriculum planning and RSHE;
- teacher training;
- the role and responsibilities of the designated safeguarding lead; and
- parental engagement;

This appendix complements, and should be read alongside our Online Safety policy. Staff must read the Online Safety Policy in conjunction with our Code of Conduct in relation to personal online behaviour. All staff receive online safety training at induction, with regular updates and formal annual training thereafter. The Designated Safeguarding Lead (DSL) takes lead responsibility for online safety and understanding the filtering and monitoring systems and processes in place. The DSL attends training regularly to ensure that they understand the unique risks associated with online safety and to ensure that they are confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school. Risks to children

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. We refer to these four areas of risk when planning our approach to online safety and ensuring that we are safeguarding children against a broad spectrum of potential online harms.

Charlton Park Academy, Child Protection and Safeguarding Policy and Procedures September 2025 71 Filtering and monitoring Our filtering and monitoring procedures, including our review process, are informed by the DfE guidance manual 'Meeting digital and technology standards in schools and colleges' 22 .

For more information about the filtering and monitoring standards we adhere to, see 'Filtering and monitoring standards for schools and colleges' (March 2022).²³ In order to keep children safe when using school IT equipment,

we

- Educate students about online safety as part of our curriculum. For example:

The safe use of social media, the internet and technology

Keeping personal information private o How to recognise unacceptable behaviour online o How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they're a witness rather than a victim

- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems:

Internet filtering via Smoothwall

Device monitoring via Smoothwall Monitoring

- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings, and access to National Online Safety. We will also share clear procedures with them so they know how to raise concerns about online safety
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyberbullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Ensure acceptable use of ICT via filtering and alerting systems:

Smoothwall internet filtering

Device monitoring via Smoothwall Monitoring.

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to noncontact time when students are not present

Staff will not take pictures or recordings of students on their personal phones or cameras

Make all students, parents/carers, staff, volunteers and governors / trustees aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones

Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the DfE's guidance on searching, screening and confiscation 22 <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges> 23 <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring> <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>

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- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly This section summarises our approach to online safety and

mobile phone use.

Remote learning, CPA takes its safeguarding responsibility seriously and therefore whether learning remotely or at home seeks to ensure student safety at all times. The school maintains an additional register for students who are accessing remote learning so that monitoring is rigorous. Attendance in activities is registered and absences are followed up as if the student were in school, with phone calls and home visits as necessary. For those students accessing remote learning online, individual usernames and passwords are provided to access Teams via the school's secure platform on Microsoft.

CPA uses a range of internet and device monitoring software and students are taught online safety as part of their RSE curriculum. Please see the school remote learning policy for further details. How to report online safety concerns If students, parents or staff have any concerns about online safety, or need to make a disclosure, they should speak to the Designated Safeguarding Lead or deputy without delay. The contact details for these members of staff can be found on the front of this policy.

Charlton Park Academy, Child Protection and Safeguarding Policy and Procedures September 2025. Cybersecurity We ensure that we have the appropriate level of security protection procedures in place in order to safeguard systems, staff and children and we review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. This is informed by the DfE document 'Cyber security standards for schools and colleges'. Regular review of our approach to online safety We recognise that technology, and risks and harms related to it evolve and changes rapidly. We carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face. This is informed by local and national training, regular updates and the DfE guidance 'Meeting digital and technology standards in schools and colleges'. 25 More information For more information about online safety, please see Part 1 of Keeping Children Safe in Education (2025) 24 <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for><https://www.gov.uk/guidance>.

Appendix 7 Relationship and Sexuality Education (RSE)

At Charlton Park Academy we believe that the teaching of RSE is of the upmost importance to help safeguard our students now and as they Prepare for Adulthood (PfA), although we recognise that they may need more specialist help than their mainstream peers. Our pupils are likely to be more vulnerable than others at their age and some have issues in building and maintaining positive relationships. A number of students are coming to terms with their disabilities and the impact this potentially could have on the quality of their relationships with others. Some of the students at Charlton Park Academy will always be highly dependent on others, needing physical care and constant support to communicate and let their needs be known. Through the teaching and learning of RSE at COMMUNICATE, PERSEVERE AND ACHIEVE Charlton Park Academy, our students will have opportunities to develop skills in building and maintaining relationships and an increased awareness and knowledge of themselves, their bodies and being resilient; leading to a reduced risk of exploitation, now and in the future. ([CPARSEPolicy.pdf](#))

Curriculum and Delivery

The academic year is planned and differentiated for each Key Stage within the academy so that all areas of the curriculum are covered.

Topics covered by all students are as follows:

- Myself and Others
- Public and Private
- Puberty
- Types of Touch
- Being Safe; recognise, react, report Additional topics covered by select students identified according to readiness are:
- Sexual Relationships
- Sexual Wellbeing and Checks
- Pregnancy and having a child

Methodology

As part of a comprehensive RSE curriculum within the academy it is important that all staff are using the same terminology and explanations in regards to each topic. This is so that COMMUNICATE, PERSEVERE AND ACHIEVE students are able to make progress in their knowledge and understanding, without needing to learn differing vocabulary for similar terms. When referring to body parts it is important that all staff are using correct medical terminology for all parts of the body and encourage students to use these within lessons also. At the beginning of every lesson it is vital that the 4 RSE rules are shared and explained alongside the students so that they are always reminded that they are allowed to ask questions, feel embarrassed and be private about themselves. 5(a). Equal Opportunities and Inclusivity Throughout the teaching of RSE we will promote equal opportunities for all regardless of race, language, religion, culture, disability, gender, sexual orientation, class or age. Furthermore this should be embedded into all RSE lessons including the use of resources, which should demonstrate as fair and non-biased. We

Appendix 8: Concern Form completed on 'My Concern' proforma

Please complete this form if you have any concerns about a pupil.
(Pastoral, Medical or Safeguarding)

Pupil Name:		
Date:	Class	
Member(s) of staff noting concern:		Job/Role:
Concern (Please describe as fully as possible)		
Body Map attached Yes/ No		

Form passed to Designated Safeguarding Lead

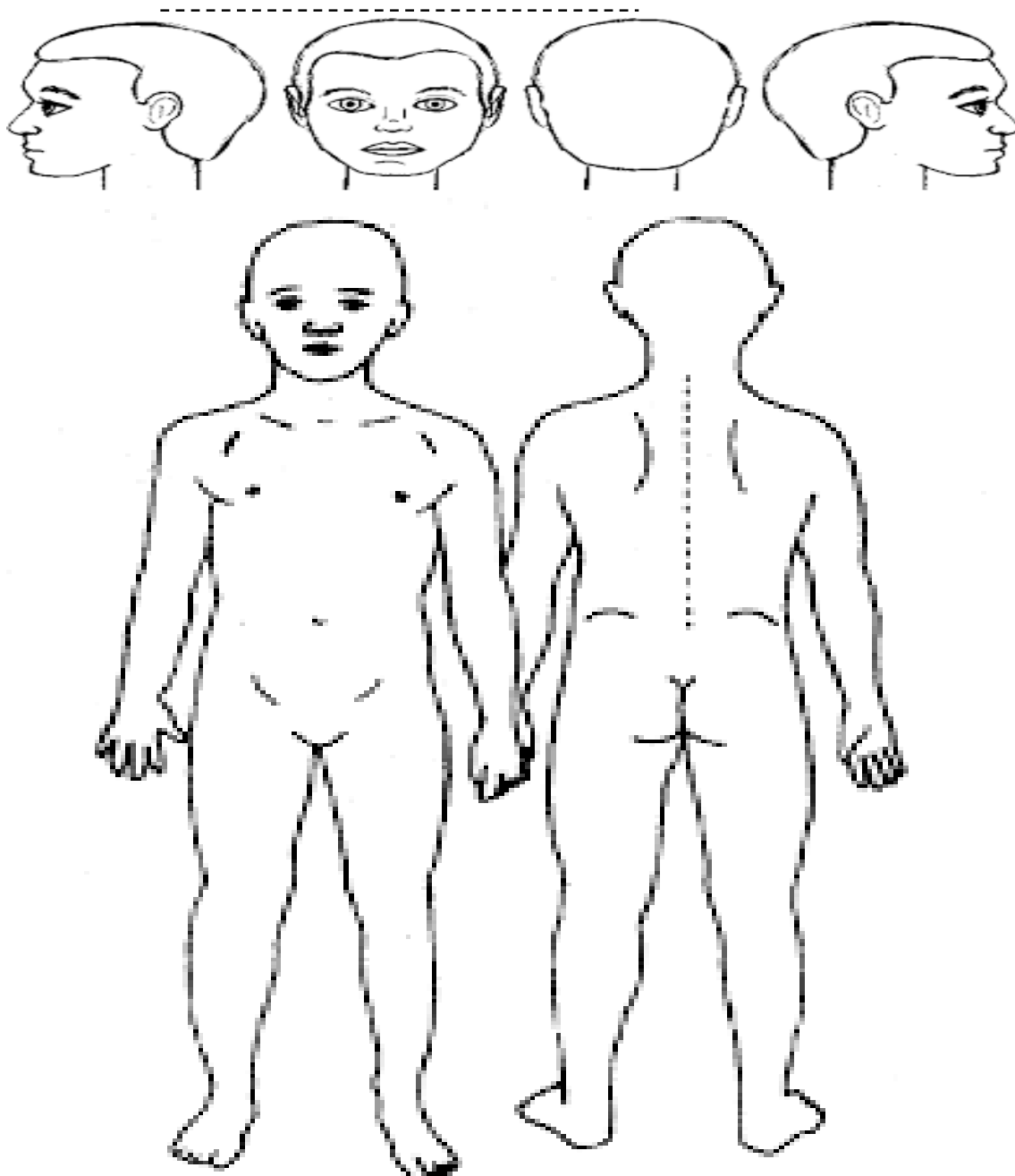
Date/time:

Date	Further Action

Body Chart

Once completed attach this body chart to the Concern Form

This chart must be used together with the Concern Form Show clearly the location of your concern and label with a number and a brief description, e.g. '1. Burn about 4cm.' On the Concern Form refer to the injury using the same number and description.



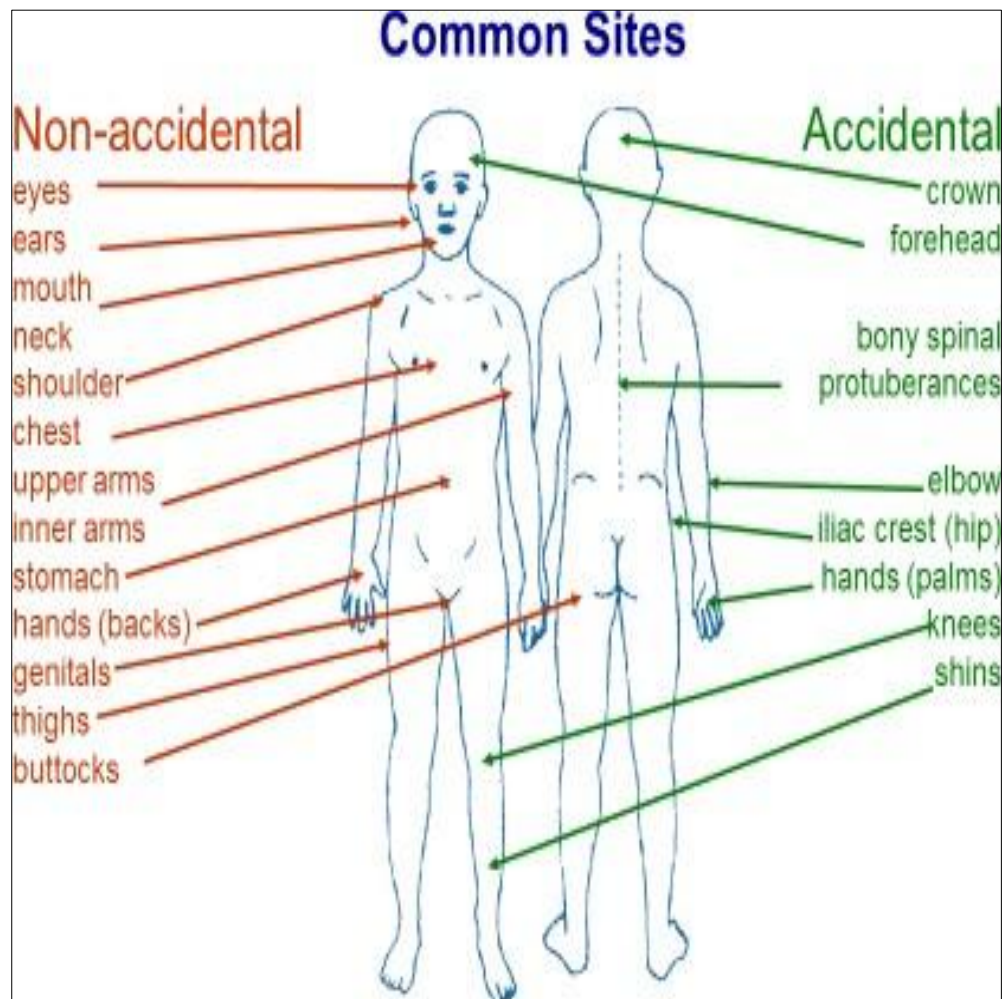
Child's Name

Observations made by:

Signed:

Date:

Signs and symptoms of physical injury can be indicators of abuse, however there may be other reasons they are not fail safe mechanisms. Red indicates a possible non-accidental injury. Green is the more usual sites for accidental injuries.



Appendix 9: Prevent – Risk and Response in a SEN Secondary Setting

1. Purpose

This appendix outlines the specific vulnerabilities, contextual risks, and protective measures relating to radicalisation in CPA as a SEN secondary school.

It supports staff in:

- understanding how radicalisation risk may present in pupils with SEND
- recognising early signs of concern
- responding appropriately in line with the school's safeguarding procedures

This appendix should be read alongside:

- Keeping Children Safe in Education (KCSIE)
- Working Together to Safeguard Children
- The Prevent Duty statutory guidance

2. Key Principles

- Radicalisation is a **safeguarding issue**, not a disciplinary issue
- Pupils with SEND are **not inherently vulnerable**, but some may require **additional support to recognise and respond to risk**
- Staff must take a **proportionate, non-discriminatory approach**, in line with the Equality Act 2010
- Concerns must be addressed through **existing safeguarding systems**, led by the Designated Safeguarding Lead (DSL)

3. Potential Vulnerabilities in a SEN Context

Some pupils with ASD, SLD, or complex needs may require additional support in the following areas:

- **Understanding intent and manipulation** - Pupils may find it more difficult to recognise when information or individuals are attempting to influence or exploit them.
- **Interpreting information critically** - Some pupils may interpret information literally and may need support to understand bias, persuasion, or misinformation.
- **Social understanding and relationships** - Difficulties in forming or maintaining peer relationships may increase reliance on online communities or unfamiliar individuals.
- **Communication and expression** - Some pupils may find it difficult to articulate concerns or report uncomfortable situations.
- **Emotional regulation** - Pupils may require support to manage strong emotions, which can be exploited by harmful narratives.
- **Online safety awareness** - Pupils may need structured teaching and support to recognise safe and unsafe online content and interactions.

These factors do not indicate risk in isolation but may increase vulnerability **where appropriate support is not in place**.

4. Contextual Risks

4.1 National Context

Schools should be aware of broader risks, including:

- online radicalisation through social media and gaming platforms
- exposure to extremist ideologies (including far-right, Islamist, and other forms of extremism)
- use of conspiracy theories or simplified narratives to influence vulnerable individuals
- increasing influence of peer networks and online communities

4.2 Local Context

The school recognises that local factors may include:

- diverse communities and potential for social division if not supported positively
- varying levels of socioeconomic challenge
- increased online engagement among young people
- potential exposure to harmful influences within peer or community networks

The school works in partnership with local safeguarding teams and Prevent leads to remain informed about emerging risks.

5. School Response and Protective Measures

The school takes a proactive and preventative approach through:

5.1 Staff Training

- All staff receive safeguarding training, including Prevent awareness
- Training includes understanding how vulnerabilities may present in pupils with SEND

5.2 Curriculum and Education

- Age-appropriate teaching of:
 - online safety
 - critical thinking
 - respectful relationships
 - understanding diversity and inclusion

Content is adapted to meet pupils' communication and cognitive needs.

5.3 Safe and Supportive Environment

- Pupils are supported to:
 - develop positive relationships
 - express views safely
 - seek help when concerned

Staff provide structured opportunities for discussion where appropriate.

5.4 Monitoring and Early Identification

- Staff remain vigilant to changes in:
 - behaviour
 - language
 - interests
 - online activity

Concerns are recorded and shared in line with safeguarding procedures.

5.5 Individualised Support

- Where appropriate, pupils may receive:
 - targeted pastoral support
 - personalised risk assessments
 - input from specialist staff (e.g. SaLT, therapists)

5.6 Partnership with Parents and Carers

- The school works with families to:
 - promote safe online behaviour
 - share concerns
 - provide consistent support

5.7 Multi-Agency Working

- The school works with:
 - local safeguarding partnerships

- Prevent teams
- external professionals

Where concerns meet threshold, referrals may be made through appropriate safeguarding channels.

6. Reporting and Referral

All concerns relating to potential radicalisation must be:

1. Reported immediately to the **Designated Safeguarding Lead (DSL)**
2. Recorded in line with school safeguarding procedures

The DSL will:

- assess the concern
- consider whether it meets threshold for Prevent/Channel referral
- liaise with relevant external agencies

Staff must **not attempt to investigate concerns independently**.

7. Safeguarding and Equality Considerations

The school ensures that:

- no pupil is treated unfairly or stigmatised due to their SEND
- all actions are proportionate and evidence-informed
- support is tailored to individual need

This approach reflects the school's duties under:

- the Equality Act 2010
- safeguarding legislation and guidance

8. Review

This appendix will be reviewed annually, or sooner if:

- national guidance changes
- local risk profiles change
- safeguarding reviews identify the need for updates