

Child Protection and Safeguarding Policy 2025

Child Protection and Safeguarding policy: document provenance

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Summary of changes in this review	- The following guidance has been added to the list of documents to develop the policy: - Ethical guidelines on the use of AI and data in teaching and learning for educators (2022) - Working together to improve school attendance (2024) - Keeping Children Safe in Education (2025) - Protective Security and Preparedness for Education Settings (2025) - Terrorism (Protection of Premises) Act 2025 - AI Policy and Acceptable Use Agreement - Update to item 12.0 Prevent duty: - Annual prevent risk assessment - Addition of Terrorism (Protection of Premises) Act, more commonly known as Martyn's Law 2025 including that academies must have emergency responses in place for evacuation, invacuation and lockdown. - New item 14.0 – Child goes missing or absconds
Related policies and documents	See item 1.0

Unless there are legislative or regulatory changes in the interim, the policy will be reviewed as per the review cycle. Should no substantive change be required at this point, the policy will move to the next review cycle.



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1.0 Policy statement

The Dixons Academies Trust takes seriously its 'duty to safeguard and promote the welfare of students at the school' (Children Act 1989 and Education Act 2004). The welfare of the child is paramount and we adhere to all aspects of Keeping Children Safe in Education (September 2024) and Working Together to Safeguard Children (2023). Nothing is more important than children's welfare and we will always work in the best interests of the child. All children must have equal rights to protection. We fully understand and accept that child protection and safeguarding is everyone's responsibility and that involves preventing impairment to children's physical and mental health. We are committed to having in place procedures that will support informed and sensitive management of safeguarding and child protection issues. Our trust recognises that there are several inter-linking components which form an integrated framework to provide a protective / preventative service. These include:

- known operational policies and procedures for dealing with child protection issues
- having in place clear structures to support the child protection function (i.e. designated lead, named safeguarding advocate on the Local Academy Board (LAB) and a clear policy)
- having a Safer Recruitment policy and procedures (see policies)
- ensuring that staff understand the expected code of conduct for working with children (see Professional Conduct policy)
- having in place clear structures to continue to safeguard students who are on roll at a Dixons academy, but based at an alternative provision, on a managed move to another school, have a part-time timetable, or where there is a persistent attendance issues
- are empowered and aware of issues related to their own welfare (particularly through the Personal Development Studies / PSHCE programme and assemblies)

Our trust recognises the importance of being vigilant at all times both with regards to those we know and also those we do not, and in never believing that 'it could never happen here' (see Bichard Report 2004). In relation to this, we recognise that it is possible for staff (including supply staff, volunteers and contractors) to behave in a way that causes harm to children. We take any allegation seriously and follow local arrangements for dealing with this (see policy on dealing with allegations). All staff understand that any concerns must be reported immediately to the Designated Safeguarding Lead (DSL).

This policy has been developed in accordance with the principles established by:

- Children Acts (1989) and (2004)
- Education Act (2002), and in line with government publications
- Revised Safeguarding Statutory Guidance 2 'Framework for the Assessment of Children in Need and their Families' (2000)
- What to do if you are worried a Child is Being Abused – Advice for Practitioners (2015)
- Disqualification under the Childcare Act (2006)
- Equality Act (2010)
- Counter-Terrorism and Security Act (2015)
- Children and Social Work Act (2017)
- Working Together to Safeguard Children (2023)
- Data Protection Act (2018)
- Data Protection in Schools (2024)
- Positive Environments Where Children Can Flourish – Ofsted (2018)
- Teaching On-line Safety in Schools (June 2019)
- Ethical guidelines on the use of AI and data in teaching and learning for educators (2022)
- Meeting digital and technology standards in schools and colleges (2023)
- Working together to improve school attendance (2024)
- Keeping Children Safe in Education (2025)
- Protective Security and Preparedness for Education Settings (2025)
- Terrorism (Protection of Premises) Act aka Martyn's Law (2025)



- Safeguarding students is a core function of our trust and a whole-school approach is maintained in all our academies. As such, this policy relates to many other policies (<https://www.dixonsat.com/about/policies>) and in particular the following:
- AI Policy and Acceptable Use Agreement
- Anti-Bullying
- Behaviour
- Care and Control of Students
- Child Goes Missing or Absconds
- Child Missing in Education
- Dealing with Allegations of Abuse Against Staff
- Educational Visits
- Health and Safety
- Looked After Children (Designated Person)
- Online Safety and Acceptable Use of Information Technology
- Professional Conduct
- Relationships and Health Education (Primary)
- Relationship and Sex Education
- Safeguarding Supervision
- Safer Recruitment Selection
- Whistleblowing

Through all of the above, we operate a 'board to floor' approach to safeguarding and child protection whereby all staff (including supply staff, volunteers and contractors) are made aware and take seriously their responsibilities so that every precaution can be taken to minimise risk of harm to our students whilst they are in our academies, when being educated off-site, and in their lives outside of education.

This policy will be reviewed in light of any legislative or guidance changes, at least annually and through consultation with the Designated Safeguarding Lead cross-cutting team, principals and the executive leadership of our trust.

2.0 Scope and purpose

- 2.1 To ensure that all staff understand their role as part of a wider safeguarding system for children.
- 2.2 To ensure all staff understand that safeguarding and promoting the welfare of children is everyone's responsibility and, in order to fulfil this responsibility effectively, all practitioners should consider at all times what is in the best interests of the child. Staff must never assume that a colleague or other professional will take the action needed, and must share information that might be critical in keeping children safe.
- 2.3 To ensure that all staff know that no single practitioner can have a full picture of a child's needs and circumstances and to understand the importance of taking concerns and disclosures seriously, taking prompt action, and sharing information appropriately.
- 2.4 To ensure that children with protected characteristics are not unlawfully discriminated against and that proportionate action is taken to address the disadvantages they face, in general and in safeguarding in particular.
- 2.5 To ensure that children continue to be safeguarded when being educated off-site for any reason, including non-attendance and remote learning arrangements.
- 2.6 To enable all staff to understand the 'duty of care' placed on them and their role in safeguarding and promoting the welfare of all students.
- 2.7 To ensure that all staff understand the procedures in place when dealing with potential child protection issues.
- 2.8 To demonstrate our trust's commitment and procedures with regards to child protection.
- 2.9 To contribute to the wider safeguarding portfolio of policies (see below).
- 2.10 Safeguarding and promoting the welfare of children is defined for the purposes of the guidance and this policy as:
 - providing help and support to meet the needs of children as soon as problems emerge



- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing 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

2.11 For the purpose of this policy, the term 'parent' is used to describe those with parental responsibility.

2.12 Children includes everyone under the age of 18.

2.13 At our sixth form provisions, there are students on roll who have had their 18th birthday and therefore do not fall under the definition of 'child' or within the scope of Keeping Children Safe in Education and related guidance and policies, but continue to be subject to our duty of care and general responsibility to safeguard all our students. When supporting young people over the age of 18 we will:

- provide bespoke response, signposting and support
- promote and amplify the young person's voice and wishes
- ensure we maintain the young person's rights in relation to data and information sharing
- work with colleagues within our trust e.g. academy safeguarding team and trust central team resources, to make informed shared decisions about how best to support each young person
- contact the police if we feel that the young person is at risk of serious harm
- continue to use CPOMS to log concerns and analyse patterns and themes within academies and trust-wide

3.0 Procedures and training

In order to minimise risk to students, the main elements to our safeguarding practice are as follows:

- 3.1 We practice safer recruitment in checking the suitability of staff and volunteers in every academy to work with children (see Safer Recruitment Selection policy).
- 3.2 We continually review all practices in order to establish a safe environment in which children can learn and develop (see Health and Safety policy).
- 3.3 We raise awareness of child protection issues with students and aim to equip them with the skills needed to keep them safe.
- 3.4 We ensure staff are aware of how to conduct themselves with students and give regular training on child protection and safeguarding. All staff in school have read Part 1 (or, if they do not work directly with children, Annex A) of Keeping Children Safe in Education (Sept 2025) and re-read it on an annual basis to ensure a common understanding that safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play in safeguarding children.
- 3.5 Regular updates are provided to staff via emails, bulletins and staff meetings. We adhere to the recommendation that formal training is delivered at least annually and regular updates keep safeguarding at the forefront of everyone's thinking and practice.
- 3.6 All staff are informed of the students with social workers and they understand that they have a particular responsibility for removing barriers to learning for this disadvantaged group.
- 3.7 All staff receive specific training about online safety, particularly in relation to the remote education of students and use of technology to support teaching and learning.
- 3.8 The early help ethos ensures that we provide support for our students as soon as a problem is identified. This applies to all students from early years to those in their teens. Staff discuss early help requirements with the DSL and support other agencies undertaking an early help assessment.
- 3.9 We recognise that some children are more vulnerable than others and therefore may be more at risk from abuse (see section 8 below).
- 3.10 We carry out appropriate risk assessments in all academies for all school activities (e.g. educational visits) and also for individual children as necessary.
- 3.11 We have procedures in place to continue to safeguard students who, for a period of time, are educated at alternative provision, are on a managed move to another school, on part-time timetables, have persistent attendance issues, or who are being educated remotely.
- 3.12 We raise awareness with all students of the risks of technologies through teaching about e-safety. All our schools are 'mobile phone' free as we recognise the risks posed to children from mobile technology, including excessive use.



- 3.13 We use filtering and monitoring software to ensure appropriate use and so that concerns can be responded to, and all staff receive information on how this works and how it can support their practice
- 3.14 We encourage a positive atmosphere of openness and support where students are encouraged to have the confidence to talk to familiar adults with the understanding that they will be listened to. Enough time is dedicated to the pastoral curriculum to allow for teaching of all aspects of safeguarding.
- 3.15 We operate a 'zero-tolerance' approach to child on child abuse, including bullying, cyberbullying and prejudiced-based and discriminatory bullying (see section 10 below and Behaviour and Anti-Bullying policies).
- 3.16 We have a strong emphasis on student voice through the student council, faculty reviews, policy reviews and the employment of key staff.
- 3.17 We have procedures for identifying and reporting cases or suspected cases of abuse and are ever vigilant to all concerns regarding any unhealthy opinions or behaviours a child may display.
- 3.18 We support students who have been abused in accordance with their agreed child protection plan and offer non-prejudicial support for those who make allegations.
- 3.19 We ensure all staff have training in child protection procedures at induction. These procedures follow the guidelines set out by OFSTED, Circular 10 / 95, Safeguarding Children in Education 2004 and Keeping Children Safe in Education (2025). Staff will be updated annually to ensure everyone is trained in how to respond appropriately and sensitively to child protection concerns. Staff training is tailored to the role of the individual.
- 3.20 We are committed to working with other agencies to safeguard children and setting up an interagency assessment as appropriate under the Early Help system (see Working Together to Keep Children Safe 2023).
- 3.21 In all academies, we will consider the child's wishes or feelings when determining what action to take and what services to provide to ensure every child is safe and staff do not promise confidentiality at any point. We recognise that children may not feel ready, or not know how to disclose abuse, and this is something we seek to minimise through education and strong relationships. All staff are trained to ensure that students are reassured that they are being taken seriously, and that they are never made to feel ashamed or that they are creating a problem by sharing information about their wellbeing and safety.
- 3.22 Each academy will have an identified Designated Safeguarding Lead (DSL), who is a member of the Senior Leadership Team, appropriately trained, and who has capacity to perform all aspects of the role fully.
- 3.23 The DSL and any Deputy Designated Safeguarding Leads (Deputy DSL) undertake formal re-designation training at least every 2 years with a recognised trainer.
- 3.24 Our trust commissions an external safeguarding review on a biennial basis
- 3.25 This policy applies to the whole trust community and all academies.

4.0 Trust commitment

We recognise that, for students, high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult promotes prevention.

Academies in our trust will therefore:

- 4.1 Establish and maintain an ethos where students feel secure, are encouraged to talk and are listened to.
- 4.2 Ensure that students know there are adults in the academy who they can approach if they are worried or in difficulty.
- 4.3 Include in the curriculum activities and opportunities for personal and social development which will equip students with the skills they need to recognise and be safe from abuse (See RHE and RSE policies and consult individual academy websites for further information on their PSHE or equivalent curriculum). Students need to recognise behaviours which are unacceptable from peers and adults.
- 4.4 Ensure that wherever possible every effort will be made to establish effective working relationships with parents whilst always putting the needs of the child first.
- 4.5 Ensure that our approach to managing behaviour is positive and that staff understand how to behave when working with children.
- 4.6 Recognise its obligation to work with and co-operate with colleagues from other agencies (Education Act 2004 and Working Together 2023).
- 4.7 Ensure all staff are aware of the school guidance for their use of mobile technology and have discussed issues around the use of mobile technologies and their associated risks.



- 4.8 Ensure that appropriate and effective filtering and monitoring software, currently Sophos (firewall) and Senso (monitoring), is in place across all academies, and staff are able to use it effectively.
- 4.9 Ensure that staff are fully aware of the different types of child abuse and signs of abuse (see appendix).
- 4.10 Recognise that staff build up expertise in dealing with concerns and safeguarding issues over time. Therefore, the trust will provide opportunities for staff to contribute to shaping the safeguarding arrangements and child protection policies.
- 4.11 To have the same high expectations for safeguarding of alternative provision and any other partner organisation being used by any of our academies, and for action to be taken to ensure this prior to use as well as on an ongoing basis

5.0 Roles and responsibilities

- 5.1 Each academy in the Trust has a 'Designated Safeguarding Lead' (DSL) who is a senior member of staff and has the responsibilities set out in Annex C of Keeping Children Safe in Education (2025). Each academy also has a named advocate for child protection, on their Local Academy Board (LAB), who is also trained on a regular basis and who has the responsibility to ensure that the academy has an effective policy and structures in place to support the safeguarding of children. Our trust has a specific job description for both the DSL and named advocate which is available on request.
- 5.2 All staff need to be aware of the signs of child abuse, neglect and exploitation; staff must inform the DSL in total confidence, and a sensitive, tactful and totally confidential investigation will then take place. If the signs are confirmed, one of the academy's trained safeguarding team will manage any potential Child Protection issue. All staff understand that child protection information is 'need to know' and confidential information about a child should not be freely shared and that neither the Data Protection Act (2018) nor UK GDPR prevent the sharing of information for the purposes of safeguarding children. The child's interests come first and their dignity must be protected.
- 5.3 The principal, working closely with the DSL, has overall responsibility for ensuring all aspects of child protection and safeguarding are paramount in the organisation. They are further supported by:
 - Trust Board safeguarding lead – Robert Keniwell
 - Local Academy Board safeguarding ambassadors
 - School and College Trust Leader – Jenny Thompson
 - Trust Director of SEND and Safeguarding – Nicole Dempsey
 - Trust Assistant Principal for Safeguarding (north west) – Sarah Linton
- 5.4 The functional leads for governance, IT infrastructure, estates and capital, employee relations, and compliance monitoring, as well as School and College Trust Leader and Director of SEND and Safeguarding, meet termly to discuss safeguarding priorities and next steps.
- 5.5 The principal should ensure that:
 - there is sufficient capacity, including having enough trained staff and that those staff are given enough time and resource, to meet the safeguarding demands of the academy
 - there is sufficient capacity to continue to respond to concerns raised (either through CPOMS, online monitoring software, or direct contact by a child, family, staff member, external organisations including Children's Social Care, or a member of the public) outside of academy hours
 - the requirements set out in the Safeguarding Supervision Policy are met
 - regular meetings take place so that they are kept up to date with all matters, and also to formally check the welfare of all academy safeguarding team members
- 5.5.1 The principal should make all referrals to the LADO for child protection concerns (all cases which concern a staff member); Disclosure and Barring Service (cases where a person is dismissed or left due to risk / harm to a child); and / or the police (cases where a crime may have been committed). If the concern is about the Principal, the referral will be managed by the relevant executive director. If the concern is about a member of the executive, the referral will be managed by the chair of our trust.
- 5.6 Designated Safeguarding Lead (DSL)
- 5.6.1 On induction, all staff are advised of the names of their Designated Safeguarding Leads (DSL) and wider safeguarding team (sometimes referred to as Deputy DSLs). Academies ensure that the DSL and deputy DSLs have a high-profile among staff and students. The responsibilities of the DSL and deputy DSLs, as described in Annex C of Keeping Children Safe in Education, cannot be delegated.
- 5.6.2 Role of the Designated Safeguarding Lead for Child Protection:
 - lead on all aspects of safeguarding and child protection including online safety



- oversee staff referrals through the on-line platform (CPOMS)
- seek advice and guidance in line with the local safeguarding board's practice
- make referrals to children's social care if there is a concern that the child is suffering significant harm or is likely to do so, understanding that all referrals are child-centred and the needs of the child are paramount
- make referrals to Channel if there is a concern regarding terrorism, radicalisation or extremism
- ensure the voice of the child is heard and that the unique characteristics of the child within their family and community context is communicated
- make a referral to the National Referral Mechanism if there are any concerns that a child may be a potential victim of slavery or human trafficking
- be alert to the specific needs of children in need, for example those with special educational needs and young carers
- refer promptly all cases of suspected child abuse to the local social services department. In the case of a social worker attending an academy to see the student following a referral, if the student's parent arrives to collect the student before the social worker it must be remembered that we have no right to prevent the removal of the student. However, if there are clear signs of physical risk or threat, the police should be called
- be able to keep detailed, accurate, secure written records of concerns and referrals
- ensure written records of concerns about a child are kept even if there is no need to make an immediate referral and ensure these records are stored securely and separate to the student's curriculum file until the child's 25th birthday
- liaise with the Principal to inform him / her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- act as a source of support, advice and expertise to staff on matters of safety and safeguarding, and when deciding whether to make a referral by liaising with relevant agencies
- attend all child protection multi-agency conferences and contribute to child protection plans
- understand the role of other child protection and safeguarding agencies

5.6.3 Co-ordinate training

- Co-ordinate annual statutory training as well as regular training and information updates for all staff to keep child protection and the welfare of children paramount.
- Ensure all staff read and understand the latest version of Keeping Children Safe in Education, this policy, and related policies and guidance as signposted by the DSL and senior leadership team.
- DSLs (or deputies) should undergo the relevant Child Protection training, and ensure training is updated regularly – at least every two years in order to act as a source of support and expertise for our learning community.
- Ensure that new staff (including supply staff, volunteers and contractors) receive safeguarding children induction by their first day of working at the academies in the Trust.
- 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.
- Obtain access to resources and attend any relevant or refresher training courses.
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- Encourage a culture of listening to children, including taking any concerns or disclosures seriously and ensuring children do not feel that they are causing a problem or inconvenience, feel reassured and not shamed, and taking account of their wishes and feelings in any measures the academy may put in place to protect them.
- Be clear that early help is the most effective way of promoting the welfare of children and understand how to work with other agencies to provide this for children and families in need and be alert to the potential need for early help for children with certain characteristics (see section 8 below)

5.6.4 Raising awareness

- Ensure all staff are aware of academy processes and the role of the DSL.
- Work with the Trust's Executive Principal in reviewing the Child Protection policy annually and the procedures and implementation are updated and reviewed regularly.
- Work with the advocates in reviewing procedures and producing training and updates including an annual written report.



- Ensure the Child Protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the academy in this.
- Ensure that the school operates within the legislative framework and recommended guidance.
- Make links with the Local Safeguarding Board (see flow chart) to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Ensure the DSL attends case conferences or nominate an appropriate member of staff to attend on his / her behalf.
- Where children leave the academy, ensure their child protection file is copied for any new school or college as soon as possible but transferred separately from the main student file.
- Develop effective links with relevant statutory and voluntary agencies to support the protection of children.

5.7 The Local Academy Boards (LABs) and Safeguarding Advocate

5.7.1 The LAB has overall responsibility for ensuring that there are sufficient measures in place to safeguard the children in their establishment.

Each academy will have a nominated advocate in respect to child protection. In particular, the LAB must ensure that:

- the Child Protection Policy and procedures are in place, followed and reviewed annually
- safer recruitment procedures are in place and followed
- there is a DSL who is a member of the academy's leadership team
- the academy provides relevant safeguarding children training for school staff and volunteers
- each academy follows the process and procedure for dealing with allegations
- they work with the academy to ensure that deficiencies or weaknesses in safeguarding arrangements are remedied without delay
- they evaluate how children are being taught about safeguarding
- they check that the SCR and DBSs are in place for all advocates and staff at least annually
- they dedicate meeting time to consider child protection matters including referrals (see annual agenda)
- the chair is responsible in the event of an allegation of abuse being made against the principal
- this policy is ratified by the Trust Board and made public on the academy's website

5.7.2 All advocates will receive safeguarding and child protection training at induction and at regular intervals thereafter. This training will provide them with the knowledge and skills required to ensure all of the above.

6.0 Prevention through education

The Dixons Academies Trust recognises that taking action to enable all children to have the best outcomes is a key part of safeguarding and promoting the welfare of children, and that providing a high quality education that is equitable and accessible to all learners is what underpins this. Academies in the Trust will therefore ensure that:

- 6.1 Each student's provision enables them to achieve their best and become confident individuals living rewarding lives, fulfilling our trust mission to challenge educational and social disadvantage in all its forms.
- 6.2 All students are supported to make successful transition between phases and then into adulthood, whether into employment, further / higher education or training, and to enjoy and achieve throughout their time at our academies.
- 6.3 Sufficient time, including planning and opportunities for responsive intervention, will be dedicated to a carefully structured PSHE or equivalent curriculum, including RSE and RHE (see separate policies), careers and specific age-appropriate teaching of child protection themes.
- 6.4 Wherever possible, curriculum links will be made explicit and maximised as opportunities for children to learn about different aspects of safeguarding and child protection in different contexts.
- 6.5 Opportunities to teach about safeguarding, including online safety, should be personalised and contextualised to take into account children's individual needs as well as making content appropriate for those who have pre-existing vulnerabilities including having been the victim of abuse.

7.0 Respond and report procedures

7.1 All staff should be aware of indicators of abuse, neglect and exploitation, understanding that children can be at risk of harm inside and outside of their academy, inside and outside of home, and online. Exercising professional curiosity and



knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.

- 7.2 All staff receive training on what to look out for at least annually, with regular updates throughout the year, as well as training to understand the particular dangers of extra-familial harms, online and technology based harms, and specific contextual factors that have been identified by individual academies.
- 7.3 All staff receive training on how and when to report a concern, including how to distinguish between general concerns and when a child is at immediate risk of harm, and specific details relating to their own academy, including but not limited to: who is the named DSL; who is on the wider safeguarding team; how to access and use CPOMS; contacts and resources specific to their locality.
- 7.4 All staff receive training on how to appropriately respond to a child making a disclosure, including but not limited to:
- making listening to the child their priority
 - not expressing their own views and feelings
 - never offering to keep a secret
 - reassuring them that they have done the right thing by sharing information
 - never claiming that they can fix things
 - explaining what will happen next to the child
- 7.5 All staff are responsible for being observant of the children, exercising professional curiosity at all times, and sharing information according to this policy and their academy's procedures.
- 7.6 Dixons has Trust-wide aligned categories and protocols for recording information on CPOMS, including the facility to identify concerns of malicious intent, disguised compliance, and false reporting. All staff receive training on how to write concise, objective accounts of their concerns and this is monitored by the DSLs and their teams, and moderated by the DSL cross-cutting team.
- 7.7 The DSL and, when deputising for the DSL, members of the wider safeguarding team are responsible for making decisions about how to respond to all concerns raised, including when to refer to Children's Social Care (see Appendix 2 – respond and report flow chart)
- 7.8 The DSL is responsible for being responsive to social workers requests, continuing to review the support and provision available within the academy for children who have social worker involvement, and for keeping an accurate record of social worker contact, meetings and actions taken
- 7.9 The DSL is responsible for working with parents to ensure the safety and wellbeing of children, including when there is a concern, unless communicating with parents is believed to bring an increased risk of harm to the child; in these cases, working with parent can be waived and the decision and reason for doing so recorded
- 7.10 The DSL is responsible for being vigilant to and responding appropriately when an external referral, such as to the police or to Children's Social Care, is unsatisfactory. In the first instance, this is likely to be timely professional challenge directly to the decision maker and, if that is not sufficient, escalation through the relevant complaint's procedure.

8.0 Children who are looked after by the Local Authority, including those previously looked after

- 8.1 LABs must ensure that the Principal has appointed a designated teacher to promote the educational achievement of children who are looked after and to ensure that this person has appropriate training (see LAC policy).
- 8.2 The most common reason for children becoming looked after is as a result of abuse and / or neglect or increasingly because they are a refugee. Appropriate academy staff will have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility; the levels of authority delegated to the carer by the authority looking after him / her; details of the child's social worker and the name of the virtual school head in the authority that looks after the child.
- 8.3 The DSL will ensure that responsible staff are aware of the information they require in relation to the student's status, for example, access rights for birth parents or those with parental responsibility. We recognise that in some cases students will not be from the geographical local authority and will ensure that liaison takes place with the relevant professionals from the appropriate authority.

9.0 Children who are at greater risk of harm and children with increased potential need for Early Help

- 9.1 Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child that falls into any of the categories listed below:



- is disabled or has certain health conditions and has specific additional needs
 - has special educational needs (whether or not they have an EHCP)
 - has a mental health need
 - is a young carer
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
 - is frequently missing / goes missing from care or from home
 - has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
 - is at risk of modern slavery, trafficking, sexual or criminal exploitation
 - is at risk of being radicalised or exploited
 - has a parent or carer in custody, or is affected by parental offending
 - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
 - is misusing drugs or alcohol themselves
 - has returned home to their family from care
 - is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
 - is a privately fostered child
 - is persistently absent from education, including persistent absences for part of the school day
- 9.2 For children who need a social worker (Child in Need and Child Protection Plans), the DSL should hold and use the information provided by the Local Authority and use this information to make decisions in the best interests of the child. This may be, for example, through an accelerated response to non-attendance or punctuality, or by prioritising them for pastoral and / or academic support.
- 9.3 All staff should understand that children with protected characteristics may be more at risk of harm than their peers and take proportionate action to address the disadvantages they may face. This could be, for example, making reasonable adjustments for a child with a disability or providing extra support for girls if there is evidence they are being disproportionately affected by sexual violence and / or harassment.
- 9.4 Children with special educational needs or disabilities, or certain medical or physical health conditions, can face additional safeguarding challenges both online and offline. This may include:
- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
 - being more prone to peer group isolation or child on child abuse than other children, including prejudice-based abuse
 - not showing the typical signs that might alert others to possible abuse
 - communication barriers and difficulties in managing or reporting
 - cognitive understanding challenges, including being unable to understand the difference between fact and fiction in online content and
 - then repeating the content / behaviours in school or the consequences of doing so
- 9.5 A child being lesbian, gay, bi or trans (LGBT) is not in itself an inherent risk factor, however, children who are LGBT (or perceived to be, whether this is accurate or not) can be targeted by other children. These risks are compounded if a child lacks a trusted adult with whom they can be open. It is therefore vital that all staff endeavour to reduce the social barriers faced by the LGBT community and provide a safe space and opportunities for children who are or may be LGBT to share their concerns.
- 9.6 All staff need to be aware that mental health problems can, in some cases, be an indicator that the child is at risk of suffering abuse, neglect or exploitation and, in other cases, be a pre-vulnerability to abuse. All staff must be aware that diagnosis can only be made by trained professionals, however, we must all be aware of the signs and symptoms that would suggest that a child is developing or is experiencing mental health issues. Historic trauma, for example, adverse childhood experiences, can have a lasting impact and this can impact on the child's mental health and possibly vulnerability to safeguarding risks. Any indication of mental health issues should be referred to the DSL in the usual way. Mental health



issues may still carry a stigma for some families in the communities that we serve and therefore all communication must be extremely sensitively handled.

- 9.7 Appropriate safeguarding responses to children who are absent from education settings are in place, particularly on repeat occasions, to help identify any risk of abuse, neglect and exploitation including sexual abuse or exploitation and to help prevent the risks of their going missing in future. All schools have staff dedicated to following up on children's absence and a system of early contact (see CME policy).
- 9.8 Elective Home Education (EHE) can mean some children become less visible to the services that are there to keep them safe and supported in line with their needs. For this reason, our trust will never suggest or recommend EHE and, if suggested or recommended by a parent or other professional, will work proactively and supportively with them to consider all options for what is in the best interests of the child.
- 9.9 Whilst all staff should speak to the DSL with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers that if, in the course of their work in the profession, they discover that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. Further information, resources, training and support can be found at: <https://nationalfgmcentre.org.uk/fgm/>
- 9.10 Appropriate safeguarding responses to children who are absent from education settings are in place, particularly on repeat occasions, to help identify any risk of abuse, neglect and exploitation including sexual abuse or exploitation and to help prevent the risks of their going missing in future. All schools have staff dedicated to following up on children's absence and a system of early contact (see CME policy).
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10.0 Contextual and extra-familial harm

DSLs will be particularly mindful of contextual safeguarding (Firmin 2017). Young people's experiences and relationships beyond the family may mean that they are more or less likely to experience significant harm. This is particularly the case for adolescents who may have access to influences beyond the family, for example, on-line, peer-group, criminal subcultures. This influence occurs at a time when they are particularly vulnerable and suggestible to influence. Peer relationships are increasingly influential and may undermine familial relationships. It is for this reason that schools must be safe spaces where staff are hyper-vigilant to negative peer influences including those that challenge school and social norms. Staff must be wary of potentially exploitative peer to peer relationships, particularly where there is an imbalance of power. Staff must never underestimate the weight of peer influence and must report this as a safeguarding concern where they witness it occurring.

- 10.1 CSE and CCE occur where an individual or group take advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity, often referred to as grooming. The abuse may take various forms, including enticement and or violence. The victim may believe that their involvement is consensual, however, by nature of the power imbalance, this is not the case. In the areas that we serve, CSE and CCE is a prevalent contextual safeguarding issue e.g. sexual exploitation and 'County Lines'. See Annex B of Keeping Children Safe in Education for more information.
- 10.2 All staff must be aware and trained on the indicators that young people are at risk of, or involved in, serious violent crime. As we know, the context in which our academies are based can mean that our children are vulnerable to being exploited by criminal networks or gangs.

11.0 Child on child abuse

All staff should be aware that children can abuse other children, this can happen both inside and outside of school, as well as online, and that no reports being made does not mean that child on child abuse is not taking place. In light of this, the Dixons Academies Trust is committed to:

- 11.1 Ensuring all staff are able to recognise the indicators and signs of child on child abuse and know how to identify and respond to it.
- 11.2 Ensure all staff are knowledgeable about the different forms of child on child abuse, which includes (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)



- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and / or encourages physical abuse)
 - sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - consensual and non-consensual sharing of nudes and semi-nude images and / or videos (also known as sexting or youth produced sexual imagery)
 - upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- 11.3 Ensuring we create a culture of safety by challenging inappropriate behaviours between peers and not downplaying or dismissing behaviour that is actually abusive in nature by saying things like "it's just banter", "just having a laugh", "part of growing up" or "boys will be boys".
- 11.4 By having a 'zero tolerance' approach to managing child on child abuse in any form.
- 11.5 By following the statutory guidance set out in Part 5 of Keeping Children Safe in Education (2025) regarding response to all reports and concerns of child on child sexual violence and sexual harassment.

12.0 Prevent duty

All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act (2015), in the exercise of functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. As such, our trust is committed to ensuring:

- 12.1 Each academy will complete a Prevent risk assessment at least annually.
- 12.2 All DSLs will also be trained in Prevent and related safeguarding issues.
- 12.3 Statutory training on the Prevent duty will be delivered in all academies at least annually.
- 12.4 The DSL is responsible for making referrals to Channel where appropriate.
- 12.5 PSHE or equivalent curriculum, as well as wider curriculum links where they can be made, will explore themes relating to the Prevent duty so that children are informed and equipped with the knowledge to recognise early signs of radicalisation and links to extremism.
- All schools are subject to duties as listed in the Terrorism (Protection of Premises) Act, more commonly known as Martyn's Law, 2025 and related guidance. This law received Royal Assent on 3 April 2025, marking the start of a 24-month implementation period, meaning that full implementation will be statutory as of April 2027. As such, our trust is committed to ensuring:
- 12.6 Each academy to complete a 'protective security and preparedness self-assessment' at least annually.
- 12.7 Each academy will have procedures in place to ensure effective and swift communication alerting staff and students to danger within or around the premises.
- 12.8 Each academy will have procedures in place for three types of emergency response:
- Evacuation – getting people safely out of the premises
 - Invacuation – bringing people safely into, or to safe parts within, the premises
 - Lockdown – securing the premises by locking doors etc.

13.0 Online Safety

The Dixons Academies Trust is committed to leveraging the benefits of technology, online resources, and AI and data technologies to enhance teaching and learning but also recognise that it is essential that children are safeguarded from potentially harmful and inappropriate materials and uses, and are taught to be able to keep themselves safe online and when using technology. In response to this, they are committed to:

- 13.1 Ensuring a whole academy approach to online safety that protects and educates both staff and students in their use of technology, including artificial intelligence, and establishes mechanisms to identify, intervene in and escalate concerns where possible.



- 13.2 Ensuring awareness of the 'four Cs' of online risk – content, contact, conduct and commerce – amongst both staff and students and having policies and procedures in place to address all areas of risk.
- 13.3 Where children are being asked to learn online at home, to have regard to the DfE advice regarding remote education as well as advice provided by the NSPCC and PSHE Association, as reflected on the Online Safety and Acceptable Use of Technology policy.
- 13.4 For each academy to have appropriate filtering and monitoring technology on all devices used by staff and students in school, and for the effectiveness of this to be regularly reviewed by the Trust and fully understood by the academy leadership teams
- 13.5 For each academy to have appropriate levels of e-security / cybersecurity protection procedures in place for staff and students and for these to be regularly reviewed in order to keep up with changes in the sector.
- 13.6 For each academy to communicate with families about the systems in place to filter and monitor their child(ren)s online use, what children are being asked to do online, and who from the academy (if anyone) they will be interacting with online.
- 13.7 For all aspects of online safety to be regularly reviewed in order to keep up with the latest changes to technology, risk and potential harms in this rapidly evolving sector. The 360 degree safe website is a free online self-review resource that can support with this.

Refer to the Online Safety and Acceptable Use of Technology policy, and the AI policy and Acceptable Use Agreement, for further information.

14.0 Child goes missing or absconds

- 14.1 All our academies have in place a coherent system of rigorously monitoring student attendance. Class teachers, subject tutors, form tutors / advisors, middle leaders, senior leaders, home link officers and the education welfare officer all play key roles in this system and our MIS is used to manage this information.
- 14.2 Each academy maintains a secure site perimeter as far as is possible, with the use of CCTV, duties and site risk assessment to manage vulnerable times and spaces, and has procedures in place for checking, repairing and reviewing both routinely and in response to an event.
- 14.3 Each academy also has in place a protocol for effectively communicating that, and timely response if a student is found not to be in the expected location at any given time during the school day. This may include, but is not limited to, use of Teams for communication and the timetabling of staff to be on call in the event of an issue or emergency.
- 14.4 Response to a child being missing or having absconded will vary in relation to the age and needs of the child and contextual factors, ranging from routine arrangements for lateness and truancy through to urgent responses for students with particular vulnerabilities such as being very young, having identified SEND, or known safeguarding concerns.
- 14.5 Where there is known risk or vulnerability, this should be managed proactively through the use of a thorough risk assessment and preventative measures being put into place. This may include, but is not limited to, higher staffing ratios or one-to-one supervision, or additional training and information for all staff.
- 14.6 In the event of a student being deemed to be missing within the academy site, including if they are believed to have absconded, the academy should follow its procedures for alerting key staff, searching and responding, including following any additional risk assessments that may be in place. If the student cannot be found within a reasonable timeframe (this will vary depending on the age of the child and other factors, but within ten minutes for primary phase and any additionally vulnerable student, and by the beginning of the next lesson for secondary phase and otherwise not considered to be additionally vulnerable, can be used as a rough guide) the search should be expanded and intensified, including considering whether the child may have left the academy site.
- 14.7 If, in the course of making a routine absence phone call, it is discovered that a student left for or was dropped off at the academy as normal, this should be managed as any other missing or absconds incident. The response should consider whether the student could have entered and be missing within the academy site. The response should take into account the extended timeframe and geographical range alongside the age and needs of the child and any contextual factors, and it may be appropriate to expedite the process and involve police at an earlier stage.
- 14.8 If it is believed that a student may have left the academy site, staff should:
 - Continue to search / investigate within the academy building unless the student is known to be off-site
 - Assign one or more staff to check CCTV and any known perimeter vulnerabilities
 - Assign one or more staff to extend the search into the area around the academy site
 - Inform the student's parent / carer (including social worker for any child with one allocated), and ascertain if they know the child's whereabouts



- Once parent / carer is informed, other potential destinations can also be contacted e.g. the home of a family member or friend and, if the student has one, their personal mobile phone be called
- If parent / carer cannot be contacted, this should not cause delay to further action being taken and further attempts to contact parent / carer should take place alongside utilising additional contacts and continuing to search

- 14.9 If the above has been exhausted, and sooner if the missing student has any additional vulnerability, the police should be contacted and a missing person report made – police advice and guidance on how to proceed should be followed.
- 14.10 In all cases, if initial attempts to locate the child are not successful, the parent / carer should be informed and involved in decision making and response – if it is believed that involving the parent / carer places the child at additional risk of harm, Children’s Social Care should be involved at this stage instead and their advice and guidance followed.
- 14.11 All incidents must be recorded on CPOMS.
- 14.12 Following any incident, the principal and key staff who were involved should meet to discuss learning opportunities and any actions relating to the individual and to the academy’s routines and processes in general.

15.0 Record keeping

- 15.1 All concerns, discussion and decision made, and the reasons for those decisions, are recorded in writing on CPOMS.
- 15.2 CPOMS provides a confidential and secure storage environment, with separate files for each child, that allows for tailored categorisation, reporting and, where appropriate, secure sharing of information.
- 15.3 All staff receive training on how to record a clear and comprehensive summary of their concern.
- 15.4 The DSL and, when deputising for them, the wider safeguarding team, are responsible for ensuring there is a clear timeline of how each concern was followed up and resolved, including notes of any actions taken, decisions reached, and outcomes.
- 15.5 Timely and appropriate information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children’s welfare, including in relation to their educational outcomes.
- 15.6 Information is shared with other agencies, including transferring a child’s safeguarding file if they move to another setting, proactively and as a matter of routine. Files are transferred within 5 days for an in-year transfer and within the first 5 days of the start of the new term for standard school transitions. Records are kept of files transferred, either in the CPOMS log history or, where a paper or other non-CPOMS file is shared, in the form of a receipt.
- 15.7 When a child leaves and there is no subsequent setting to receive a file transfer, a child’s file will be stored securely for 25 years from their date of birth, and then securely disposed of.
- 15.8 All staff are informed at least annually that the Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe, and that fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
- 15.9 All personal information is stored and transferred fairly and securely, in line with the Data Protection Act 2018 and UK GDPR.

16.0 Allegations, concerns and whistleblowing

- 16.1 All staff are trained in how to respond if they have a concern or allegation about another member of staff, or about the safeguarding practices within the academy or our trust. This includes concerns or allegations that meet the harms threshold set out in Part Four of Keeping Children Safe in Education (2025) as well as low level concerns, both of which are always taken seriously and lessons are learned regardless of the outcome (also see the Dealing with Allegations of Abuse Policy)
- 16.2 All staff and volunteers should be able to raise concerns should they consider there to be poor or unsafe practice and potential failures in the safeguarding regime and know that concerns are taken seriously by the leadership team. Whistleblowing procedures are in place across the academy trust and are available on request or on academy websites. The NSPCC whistleblowing helpline is available for staff who feel unable to raise concerns directly on 0800 028 0285 or help@nspcc.org.uk (also see the Whistleblowing Policy).



Appendix 1 – Academy specific details

Name of academy	Dixons McMillan Academy
Address	Trinity Road, Bradford, BD5
Telephone	01274 089880
Email office	info@dixonsma.com

	Name	Email
Executive Principal	Emma Steele	Esteel@dixonsta.com
Principal / Head of School	Kat Lang	klang@dixonsma.com
Designated Safeguarding Lead	Kellie Wilby	kwilby@dixonsma.com
Deputy Designated Safeguarding Lead	Paul Murray	PMurray@dixonsma.com
Deputy Designated Safeguarding Lead	Kat Lang	klang@dixonsma.com
Senior Mental Health Lead	Kellie Wilby	kwilby@dixonsma.com
Trust Board – Safeguarding Lead	Robert Keniwell	RKeniwell@dixonsat.com
Local Area Board – Safeguarding Ambassador		

Local Authority	Bradford
LA Emergency Contact (concern about a child)	01274 433999 01274 431010 - out of hours
Local Safeguarding Children Board Website	https://www.saferbradford.co.uk/
National advice helplines	Childline: 0800 1111 NSPCC Helpline: 0808 800 5000
National advice websites	https://www.gov.uk/report-child-abuse https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/report/

NB – if you have an immediate and / or serious concern about the safety of a child, you should call 999



Safeguarding Team



Mrs. K Lang
Principal



Mrs. K Wilby
**Designated
Safeguarding Lead
Senior Vice Principal**



Mr. P Murray
**Vice Principal
Deputy Designated
Safeguarding Lead**



Mrs. P King
**Deputy Designated
Safeguarding Lead**



Mrs A Butterfield
Academy Nurse



Mr J Wilson
SENDCO

If you are worried or have a concern, please speak to one of the members of staff below or email: dma_safeguarding@dixonsma.com

Safeguarding at DMA

Be Safe.... Tell Someone

**It is important to us that all students at DMA
feel safe...**

**If you are worried about yourself, or another student being at risk of
harm, you must inform a member of the safeguarding team.
The Safeguarding Team are shown on the poster nearby.**

**If you are unable to find a member of the Safeguarding Team, speak to
any member of staff you are happy to talk to. They will make sure that
someone is alerted.**

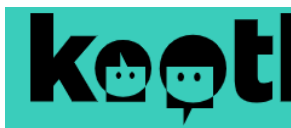
**If you have a concern outside of school, you can send any concerns to:
dma_safeguarding@dixonsma.com**



Childline Helpline 0800 1111 NSPCC Helpline 0808 800 5000



help@NSPCC.org.uk



Appendix 2 - Respond and report flowchart

