



Safeguarding & Child Protection Policy

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1. Policy statement and principles

This policy is one of a series in the centre's integrated safeguarding portfolio which includes policies for child protection, staff behaviour/code of conduct, recruitment, managing allegations against staff, complaints, pupil behaviour, online safety, handheld/mobile devices and confidentiality/information sharing. This policy is available on the centre's website and is included in the staff handbook and stored electronically in the centre.

Our core safeguarding principles are:

- It is the school's responsibility to safeguard and promote the welfare of children.
- The welfare of the child is paramount.
- Safer children make more successful learners.
- Policies will be reviewed at least annually and sooner where an incident, learning from practice, new legislation or new statutory guidance indicates that an interim review is necessary.
- All children, regardless of age, gender, ability, culture, race, language, religion, sexual orientation or other characteristics, have equal rights to protection and education.
- All staff have an equal responsibility to act on any suspicion, concern or disclosure that may suggest a child is at risk of harm.
- The centre will create a culture in which children can speak out and share concerns.
- Children's wishes and feelings will be taken into account when determining action and the services provided.
- Safeguarding includes harm occurring inside and outside the home, in school and online, and includes abuse, neglect, and exploitation.
- The appropriate support will be provided for both students and staff involved in child protection and safeguarding issues.

2. Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all young people. We endeavour to provide a safe and welcoming environment where young people are respected and valued. We are alert to the signs of abuse, neglect and exploitation and follow our procedures to ensure that children receive effective support, protection and justice. At ACE, we have built a culture of safeguarding that underpins everything we do. The procedures contained in this policy apply to all staff and to relevant volunteers, contractors, visitors, supply staff and trainee teachers.

3. Policy aims

- To provide all staff with the necessary information to enable them to meet their child protection and safeguarding responsibilities.
- To ensure consistent good practice and clear, accessible systems for reporting concerns.
- To demonstrate ACE's commitment with regard to child protection to pupils, parents/carers and other partners.
- To reflect local multi-agency safeguarding arrangements and pathways.
- To ensure online safety, SEND and other additional safeguarding vulnerabilities are properly reflected in safeguarding practices.
- To contribute to ACE's wider safeguarding portfolio.

4. Safeguarding legislation and guidance

ACE will have regard to Keeping Children Safe in Education 2026 (KCSIE 2026), Working Together to Safeguard Children, and other relevant statutory guidance and legislation applicable to the centre. References in this policy to KCSIE are to the current version unless otherwise stated. This policy should be read alongside the current KCSIE 2026 Part 1, the centre's staff behaviour/code of conduct policy, online safety policy, mobile/handheld-device policy, safer recruitment policy, managing allegations procedures, attendance policy and confidentiality/information-sharing policy. All staff must read KCSIE 2026 Part 1 in full. This includes staff who do not work directly with children.

The former KCSIE Annex A condensed Part 1 has been removed; ACE will not rely on Annex A as a substitute for Part 1.

5. Key personnel

Designated Lead for Safeguarding and Child Protection:

Jessica Joseph – j.joseph@acoe.org.uk

Deputy Designated Lead for Safeguarding and Child Protection:

Helin Akir – h.akir@acoe.org.uk

6. Roles and responsibilities

The Designated Safeguarding Lead (DSL)

The DSL has lead responsibility for safeguarding and child protection and will act in accordance with KCSIE 2026 and local safeguarding arrangements. The DSL will:

- Maintain oversight of child protection and safeguarding concerns, referrals, records, and decisions.
- Ensure that child protection records are maintained securely, separately from the general pupil file, and that relevant current risk information is available to those who need it.
- Ensure robust arrangements are in place for cover when the DSL is unavailable. Deputies are trained and able to carry out the necessary functions to ensure ongoing safety and protection.
- Maintain effective links with local safeguarding partners, children's social care, police and other relevant agencies.
- Keep written records of concerns, discussions, decisions and the rationale for decisions, including decisions about whether to refer to another agency.
- Ensure staff understand the local criteria for action and relevant local safeguarding protocols.
- Ensure that safeguarding arrangements take account of online safety, child-on-child abuse, SEND, mental health and other vulnerabilities.
- Ensure that staff receive safeguarding updates at least annually and that the DSL's training is renewed at least every two years, with appropriate inter-agency training.
- Ensure that the child protection policy is reviewed annually and made publicly available.

The deputy designated person(s)

Deputies are appropriately trained and, in the absence of the DSL, carry out the functions necessary to ensure the ongoing safety and protection of pupils. ACE will maintain a robust arrangement for DSL cover rather than relying solely on an informal handover.

The Headteacher

- Ensures the safeguarding/child protection policy and procedures are implemented and followed by all staff.
- Allocates sufficient time, training, support, resources and cover to enable the DSL and deputies to carry out their roles effectively.
- Ensures staff can raise concerns about poor or unsafe practice and that such concerns are handled sensitively.
- Ensures pupils receive opportunities throughout the curriculum to learn about safeguarding, including online safety.
- Liaises with the LADO/local authority designated officer where an allegation is made against a member of staff.
- Ensures that required referrals to the DBS are made where the relevant legal criteria are met.

9. Children who may be particularly susceptible

Some children may have an increased risk of abuse or neglect because of societal attitudes, discrimination, isolation, communication barriers, additional needs or safeguarding arrangements that do not recognise their circumstances.

The following list is illustrative and not exhaustive.

- children with SEND or medical conditions, including children who have communication barriers or depend on adults for intimate care;
- young carers;
- children affected by parental substance misuse, domestic abuse or parental mental health needs;
- children living away from home, in temporary accommodation or in unstable/chaotic circumstances;
- children who are frequently absent or missing from education, home or care;
- children experiencing poverty or financial exploitation;
- children at risk of child criminal exploitation or child sexual exploitation, including county lines and exploitation by organised networks;
- children vulnerable to bullying, harassment, racism, prejudice or discrimination;
- children questioning their gender or sexual orientation;
- looked-after children and previously looked-after children;
- children involved in or affected by serious violence, gangs or criminal activity;
- children at risk of FGM, forced marriage, modern slavery or trafficking;
- children who have experienced or are experiencing teenage relationship abuse, stalking or other extrafamilial harm;
- children who do not have English as a first language;
- children whose parents/carers are in custody or who are affected by parental offending.

10. Child protection procedures

Staff should maintain an attitude of 'it could happen here'. Staff are responsible for reporting concerns; they are not responsible for investigating or deciding whether abuse has occurred. In an emergency, staff should take the action necessary to protect the child, including calling 999 where appropriate. Concerns should be reported to the DSL as soon as possible and recorded in accordance with ACE procedures. If a member of staff believes that a referral is necessary and the DSL or senior leaders have not acted, the member of staff may contact children's social care directly. When a child speaks about harm, staff should listen, remain calm, avoid leading or investigative questions, explain that the information cannot be kept secret, record the child's

words as accurately as possible and pass the concern to the DSL without delay. Parents/carers will normally be informed where appropriate. However, the DSL will not automatically inform parents/carers if doing so may increase the risk of harm, compromise a police/social-care investigation or otherwise be contrary to the child's best interests. Advice will be sought from children's social care where necessary.

11. Other forms of abuse

11.1 Domestic abuse

Children can be victims of domestic abuse. They may see, hear or experience the effects of domestic abuse at home and/or experience abuse in their own intimate relationships. Domestic abuse can have a detrimental and long-term impact on health, wellbeing, development and ability to learn.

11.2 Children with sexually harmful behaviour / harmful sexual behaviour

ACE recognises that children may harm other children and that harmful sexual behaviour can be an indicator of a child's own experience of abuse or other vulnerability. Safeguarding procedures will be followed where behaviour presents a safeguarding concern. The response will consider the needs and safety of the child who has been harmed, the child who has caused harm and other children who may be affected.

11.3 Making or sharing nudes and semi-nudes

ACE will use the terminology 'making or sharing nudes and semi-nudes' rather than relying on the term 'sexting'. This includes images or videos created or shared by children and may include AI-generated or manipulated imagery.

- Any incident involving the making or sharing of nudes or semi-nudes must receive a safeguarding response. The nature and proportionality of that response will be determined case-by-case.
- Staff must report incidents immediately to the DSL.
- Staff must not view, copy, print, screenshot, forward, store or otherwise distribute the imagery, or ask a pupil to send or download it.
- If imagery has been viewed accidentally, staff must report this to the DSL and must not circulate it.
- Staff must not shame, blame or threaten children involved.
- The DSL will assess the circumstances, including consent, coercion, age/development, power imbalance, threats, distribution, wider sexual harassment/violence and any risk of exploitation.
- Where appropriate, the DSL will seek advice from children's social care, police and/or other relevant safeguarding professionals.

11.4 Child-on-child sexual violence and sexual harassment

ACE has a zero-tolerance approach to sexual violence and sexual harassment. These behaviours may occur in person, online, inside or outside the centre. The safeguarding response will consider sexual violence, sexual harassment, misogyny and misandry, unwanted sexual comments or messages, upskirting, coercion, forced sexual activity, hazing and the making or sharing of nudes/semi-nudes. Children should not be told that behaviour is 'banter', 'just a joke'. Reports will be taken seriously and risk assessments, support and protective action will be considered.

11.5 Child-on-child abuse

Child-on-child abuse can happen inside and outside school and online. It may include bullying, cyberbullying, prejudice-based or discriminatory bullying, abuse in teenage relationships, physical abuse, sexual violence, sexual harassment, coercive or controlling behaviour, upskirting, harmful sexual behaviour, sharing abusive or pornographic material, non-consensual sharing of nudes/semi-nudes, and violence or threats involving weapons. ACE recognises that child-on-child abuse may be taking place even where it has not been reported.

Staff will challenge inappropriate behaviour and report concerns to the DSL. Support will be considered for victims, children who have caused harm and other affected children.

12. Child sexual exploitation and child criminal exploitation

Child sexual exploitation (CSE) and child criminal exploitation (CCE) are forms of child abuse. Exploitation may involve an exchange for something a child wants and/or for the financial advantage or increased status of a perpetrator or facilitator. Exploitation may involve organised networks, trafficking, modern slavery and county lines. Children who are exploited may also be involved in offending or serious violence. ACE will treat exploited children as victims and will consider safeguarding referrals, including the National Referral Mechanism where relevant. Indicators may include missing episodes, unexplained gifts or possessions, sudden changes in friendships, contact with older individuals, unexplained travel, debt, weapons, serious violence, sexualised behaviour, or a significant change in attendance or wellbeing.

16. Radicalisation and terrorism

ACE recognises that children may be susceptible to radicalisation into terrorism. Staff will remain alert to concerns relating to radicalisation and will follow the Prevent duty and current local procedures. Concerns will be discussed with the DSL and, where appropriate, referred through the current local Prevent/Channel pathway. Staff should not attempt to investigate radicalisation concerns themselves.

17. LGBTQ+ and gender-questioning children

ACE does not tolerate homophobic, biphobic or other discriminatory bullying or harassment. Children should be able to raise safeguarding concerns without fear of ridicule or dismissal. Where a child is questioning their gender, ACE will take a careful, case-by-case safeguarding approach. Decisions will consider the child's broader needs, their wishes and feelings, the views and involvement of parents/carers unless involving them would create a significant risk of harm, any available clinical advice, SEND considerations, and risks such as bullying or other vulnerabilities. The DSL will be involved in safeguarding decisions and relevant decisions will be recorded. ACE will comply with applicable legal duties and will assess the impact of arrangements on all pupils. In particular, the centre will follow current KCSIE 2026 requirements relating to toilets, changing facilities, boarding/residential accommodation where applicable, and single-sex sport.

18. Serious violence, criminal exploitation and contextual safeguarding

ACE will remain alert to indicators of serious violence, including unexplained injuries, increased absence, changes in friendships or relationships with older individuals or groups, a decline in performance or wellbeing, self-harm, unexplained gifts or possessions, involvement in gangs or criminal networks, and children being victims or alleged perpetrators of serious violence. Contextual safeguarding will be used to understand risks beyond the family, including peer groups, school, neighbourhoods and online environments. Referrals and multi-agency work will be used where appropriate.

19. Mental health

Mental health problems can be a safeguarding concern and may increase a child's vulnerability to abuse, neglect or exploitation, or be an indicator that abuse has occurred. Staff are not expected to diagnose mental health problems. They should observe, identify concerns, record and report them, and support appropriate early help or referral. Where concerns include self-harm, eating disorders, suicidal ideation or suicide risk, staff must follow safeguarding and mental-health procedures immediately. The DSL will consider whether information should be shared with parents/carers, taking account of risk and the child's best interests.

19A. Young carers

ACE recognises that being a young carer can affect attendance, attainment, behaviour and wellbeing. Staff will remain alert to the possibility that caring responsibilities may contribute to a child's vulnerability. Concerns will be discussed with the DSL and, where appropriate, relevant support services.

19B. Safeguarding children with medical conditions

Children with medical conditions may have additional safeguarding vulnerabilities. A medical incident does not automatically indicate a safeguarding concern; however, repeated failure to provide essential medication, appropriate care or necessary support may increase safeguarding risk. Staff will follow medical-condition, first-aid and safeguarding procedures and report concerns to the DSL.

20. Missing children, attendance and children missing education

Attendance, absence and suspensions are closely monitored. Unexplained or persistent absence from education can be a safeguarding indicator. ACE will follow its attendance and children-missing-education procedures and local authority requirements. Where a pupil's name is deleted from the admission register, ACE will make the required return to the local authority in accordance with current attendance regulations and safeguarding requirements.

21. Helping students to keep themselves safe

Learners are taught to understand and manage risk through PSHE, relationships and sex education and other aspects of the curriculum. This includes online safety, consent and respectful relationships, harmful sexual behaviour, sexual harassment, exploitation, misinformation/disinformation, scams, generative AI, image-sharing, mobile-phone risks, bullying, prejudice and how to seek help. ACE will create a culture in which pupils can speak out or share concerns with a member of staff they trust.

25. Allegations against staff

ACE will follow KCSIE 2026 Part 4 and its Managing Allegations procedures whenever there is an allegation or concern that a member of staff, volunteer, supply teacher, trainee teacher, contractor or other person working with children has behaved in a way that has harmed a child, may have harmed a child, may pose a risk of harm, or otherwise meets the relevant safeguarding threshold. Concerns about the Head of Centre will be reported in accordance with the LADO/local authority procedure. Staff who are subject to an allegation will be treated fairly, quickly and consistently. Suspension is not the default and alternatives will be considered where appropriate. Low-level concerns about adults working with children will be dealt with under the staff behaviour/code of conduct and low-level concerns procedures. A low-level concern will be recorded and reviewed so that patterns can be identified and escalated where necessary. Historical allegations and allegations concerning people who no longer work at ACE will be handled in accordance with current KCSIE 2026, local authority/LADO procedures and any relevant police requirements.

26. Staff training

- All staff receive safeguarding training that is regularly updated and receive safeguarding updates at least annually.
- The DSL and deputies receive appropriate training, with DSL training updated at least every two years and appropriate inter-agency training.
- All staff, including those who do not work directly with children, are required to read KCSIE 2026 Part 1.

- Induction covers this safeguarding policy, the staff behaviour/code of conduct policy, reporting and recording arrangements, online safety and the identity/contact details of the DSL and deputies.
- Supply staff, visiting staff and trainee teachers receive appropriate safeguarding information before or at the start of their work with pupils.
- Training addresses the increased vulnerability of children with SEND, disabilities, medical conditions, young carers, looked-after children and other relevant groups.

27. Safer recruitment

ACE will follow its Safer Recruitment policy and KCSIE 2026 Part 3. Recruitment checks will be proportionate to the role and include the required identity, qualification, employment-history, reference, right-to-work and DBS checks. For teaching roles, ACE will carry out the required teacher prohibition and other relevant checks. Where a trainee teacher is supplied by a training provider, ACE will obtain written confirmation of the checks completed by the provider and will ensure safeguarding responsibilities are clear. ACE will maintain a Single Central Record in accordance with KCSIE 2026.

28. Regulated activity

Regulated activity is defined by the relevant legislation and KCSIE 2026. In broad terms, it includes specified work involving teaching, training, instructing, caring for or supervising children, as well as certain specified-place activities. The relevant frequency threshold includes work undertaken more than three days in any period of 30 days or overnight; personal care is treated separately. Most staff working regularly with children will require an enhanced DBS check with barred-list information where the role is regulated activity. Where a person starts work before the required DBS certificate is received, ACE will follow the current KCSIE 2026 rules on supervision and barred-list checks. EYFS requirements will be applied where relevant. Where an individual has subscribed to the DBS Update Service, ACE will make the required checks and obtain the individual's consent in accordance with current guidance.

29. Volunteers

Volunteers will be assessed according to their duties and contact with children. Where their role constitutes regulated activity, the required enhanced DBS/barred-list arrangements will apply. Where a volunteer is not in regulated activity, ACE will apply the checks and supervision arrangements required by KCSIE 2026.

30. Contractors and third parties

ACE will check the identity of contractors and apply DBS and barred-list requirements where appropriate. Contractors who have not undergone the required checks will not undertake work that exposes children to inappropriate risk. For supply staff and other third-party staff, ACE will obtain written confirmation from the supplying organisation that required checks have been completed and will follow KCSIE 2026 arrangements for allegations and concerns involving third-party staff.

32. Extended school, off-site arrangements and alternative provision

All extended and off-site activities are subject to safeguarding risk assessment. Where another organisation provides activities on ACE premises, ACE will check that appropriate safeguarding arrangements are in place. Where a pupil is placed in alternative provision, ACE remains responsible for the safeguarding of that pupil. ACE will carry out appropriate checks on the provider, establish written safeguarding arrangements, know where the pupil is receiving education, record relevant provider/subcontractor/site information, and review

the placement at least half-termly. Any safeguarding concern will trigger an immediate review and, where necessary, termination of the placement. Work experience placements will be managed in accordance with KCSIE 2026 Part 3 and ACE's work experience procedures.

34. Online safety

Online safety is a safeguarding matter and forms part of this policy. ACE will consider the full range of online risks, including content, contact, conduct and commerce risks; cyberbullying; sexual harassment and exploitation; scams and financial exploitation; misinformation and disinformation; harmful or extremist content; pornography; image-sharing; online gaming; and generative AI and manipulated imagery. The Online Safety Policy provides the detailed operational arrangements. This safeguarding policy must be read alongside it. ACE will ensure that leaders and relevant staff understand the filtering and monitoring systems, manage them effectively and know how to escalate concerns.

34.1 Filtering and monitoring

- Roles and responsibilities for filtering and monitoring are identified.
- The effectiveness of filtering and monitoring is reviewed at least annually.
- The review is led by the senior leader responsible for filtering and monitoring, working with the DSL and IT staff.
- The review considers all internet-connected devices and relevant locations, not only classroom computers.
- Harmful and inappropriate content is blocked without unreasonably impacting teaching and learning.
- Monitoring strategies are effective and proportionate to safeguarding risks.
- Checks, reviews, decisions and actions are recorded and followed up.

34.2 Mobile phones and personal devices

ACE continues to be mobile phone free. ACE's arrangements prevent pupil access to mobile phones throughout the school day, including lessons, between lessons and break/lunch periods. The detailed operational rules, permitted exceptions, storage arrangements, and sanctions are set out in the centre's mobile/handheld-device policy.

36. Confidentiality and information sharing

Child protection information will be handled in accordance with the Data Protection Act 2018, UK GDPR, the Data (Use and Access) Act 2025 and other applicable law and guidance. Information sharing decisions will be necessary, proportionate, relevant, adequate, accurate, timely and secure. Data protection legislation does not prevent the sharing of information where this is necessary to safeguard a child. The DSL will record significant concerns, discussions, decisions and the rationale for decisions, including decisions about whether or not to make a referral. Consent will not be treated as an absolute precondition to safeguarding information sharing. Where information needs to be shared to protect a child, ACE will use the appropriate lawful basis and record the decision-making. Child protection records will be stored securely and separately from the general pupil file, with the main file appropriately flagged where required. When a child moves school, child protection records will be transferred securely in accordance with KCSIE 2026; in-year transfers should be completed within five days and transfers at the start of a new term within the first five days. Requests for access to safeguarding records will be handled in accordance with data-protection law and ACE's information-rights procedures, with safeguarding considerations taken into account.

37. Reporting directly to child protection agencies

Staff should normally report concerns to the DSL. However, any member of staff may contact children's social care, the police or another relevant safeguarding agency directly where they reasonably believe that doing so is necessary to protect a child, particularly where internal arrangements have not resulted in appropriate action or where delay would increase risk.

Local Authority Designated Officer (LADO): Cathy Phelan safeguardingservice@enfield.gov.uk

MASH: Enfield 020 8379 5555

Emergency: Call 999

38. Related safeguarding portfolio policies

- Staff behaviour/code of conduct
- Low-level concerns
- Physical intervention and reasonable force
- Behaviour
- Complaints
- Anti-bullying
- Physical contact / safe working practice
- Whistleblowing
- SEN / SEND
- Medical conditions
- Missing children / attendance
- Recruitment and selection
- Managing allegations
- Grievance and disciplinary
- Online Safety
- Mobile phones / handheld devices
- Confidentiality and information sharing
- Alternative Provision
- Educational visits / off-site activities

39. Special circumstances

39.1 Looked-after children and previously looked-after children

ACE will ensure appropriate staff have the information needed to safeguard looked-after and previously looked-after children, including relevant care arrangements, social-worker details and virtual-school information where applicable.

39.2 Private fostering arrangements

ACE will remain alert to private fostering arrangements and will refer concerns to children's services in accordance with local arrangements and the law.

39.3 Work experience

ACE has procedures to safeguard pupils undertaking work experience. These arrangements will comply with KCSIE 2026 Part 3 and will include appropriate checks and risk assessment of providers and supervisors.

39.4 School premises, toilets, changing facilities and sport

ACE will ensure its safeguarding and premises arrangements reflect KCSIE 2026 and applicable equality and education requirements. In particular, the centre will review arrangements for toilets, changing rooms/showers, boarding/residential accommodation where relevant, and sport. ACE will not permit pupils to use toilets, changing rooms or residential accommodation designated for the opposite sex where KCSIE 2026 requirements apply. The centre will ensure that facilities and arrangements are safe, lawful and proportionate and will document any relevant risk assessment or policy decision.

39.5 Young carers and medical conditions

Safeguarding assessments will take account of caring responsibilities and medical needs where these create additional barriers, vulnerabilities or risks.

Appendix A

The main KCSIE 2026 changes relevant to this policy are:

- KCSIE 2026 is now the current statutory guidance; references to KCSIE 2025 have been updated.
- The former Annex A condensed Part 1 has been removed; all staff, including non-child-facing staff, should read Part 1.
- Family Help terminology and early-help arrangements have been updated.
- Child-on-child abuse is expanded to include harassment/violence, racism and prejudice, teenage relationship abuse, physical violence, HSB, misogyny/misandry and nudes/semi-nudes including AI generated imagery.
- The nudes/semi-nudes section has been renamed and modernised; all incidents require a safeguarding response, with the response proportionate to circumstances.
- Mental health, serious violence, CCE/CSE and SEND vulnerabilities have been expanded.
- Young carers and safeguarding children with medical conditions have been given clearer treatment.
- Gender-questioning guidance has been updated and premises/sport arrangements need to reflect current KCSIE 2026 requirements.
- Online safety now expressly covers generative AI and related risks; filtering/monitoring review arrangements have been strengthened.
- A mobile-phone policy section has been added, reflecting the mobile-phone-free-by-default expectation.
- Information-sharing wording has been updated for the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025.
- Child protection file transfer arrangements have been updated, including the five-day expectation.
- Regulated activity and volunteer provisions have been rewritten; the former supervision exemption has been removed.
- Trainee teachers, supply/third-party staff and allegations involving those groups are expressly addressed.
- Alternative provision responsibilities and monitoring have been strengthened.
- The Part 5 approach to sexual harassment, sexual violence, harmful sexual behaviour and image sharing has been substantially updated.