



RESPECT. RESILIENCE. INTEGRITY.

Safeguarding and Child Protection Policy

FINAL APPROVAL

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NEXT DOCUMENT REVIEW

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LCE ACADEMY

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1

Safeguarding Ethos and Commitment

Fresh Start competence, external training in deescalation and positive handling, and staff training on CPOMS and Arbor are complete. Smoothwall is configured, live and tested. Kathryn McAuley holds the competence, training and system records and maintains current authorisations, access, renewal and review arrangements.

LCE Academy is fully committed to safeguarding and promoting the welfare of all pupils. We recognise that pupils with Social, Emotional and Mental Health (SEMH) needs are statistically and experientially more vulnerable to harm, exploitation and abuse, and may find it more difficult to recognise risk or disclose concerns. Many pupils may also experience speech, language and communication needs, which can affect their ability to understand risk, describe events, seek help or report concerns.

Safeguarding at LCE Academy is everyone's responsibility. We believe pupils are best protected when adults:

- build safe, consistent, trusting and appropriately boundaried relationships
- recognise behaviour as communication
- act promptly and proportionately on concerns
- work effectively with pupils, families and external agencies

Our safeguarding culture is trauma-informed, relational and restorative, underpinned by the principles of Belonging, Mattering and Progression. Pupils must first feel safe and connected before they can engage, recover and thrive.

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Statutory and Legislative Framework

This policy has regard to and is informed by the following legislation, statutory guidance and relevant Department for Education guidance:

- Keeping Children Safe in Education 2026 (in force from 1 September 2026)
- Working Together to Safeguard Children 2026
- Education (Independent School Standards) Regulations 2014 (Part 3)
- Behaviour in Schools: advice for headteachers and school staff (DfE, 2024)
- Children Act 1989 and 2004
- Equality Act 2010
- Prevent Duty (Counter-Terrorism and Security Act 2015)
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025
- Children and Social Work Act 2017

Safeguarding Roles and Responsibilities

3.1 Designated Safeguarding Lead DSL Team

The DSL team provides strategic safeguarding leadership, oversight and case management, working with the Headteacher, proprietor and wider staff team. Raheemot Kaffo is appointed as the suitably senior member of the leadership team who holds lead responsibility as DSL.

Designated Safeguarding Lead - Raheemot Kaffo.

Deputy Designated Safeguarding Leads - Lindsey Drews and David Jeal.

Designated Teacher for looked-after and previously looked-after children - George Newsome.

At least one trained DSL or DDSL is always available during the school day and one is protected from routine teaching or cover so safeguarding can be prioritised. Staff are told who is available each day and have a monitored confidential route for urgent concerns when the DSL is unavailable.

School safeguarding contact - 07446 417002 | LCEAcademy@lifechangingeducation.uk.

SENDCO and Assessment Lead - Lindsey Drews, who is also a DDSL and coordinates SEND, assessment, safeguarding accessibility and multi-agency information.

Chair of the proprietor board and company - Krystian Liptrot, acting on behalf of Life Changing Education Ltd, who provides proprietor-level oversight and challenge without displacing the DSL's operational role. A concern about Headteacher Sam Gray is reported without delay to Krystian Liptrot, Chair of the proprietor board and company, who acts as case manager and consults the LADO where the threshold may be met. A concern about Krystian Liptrot is referred directly to the LADO and other appropriate external authority.

The DSL team ensures that:

- concerns are reported through the immediate verbal/emergency route without delay and recorded promptly on CPOMS afterwards
- concerns are triaged promptly and proportionately
- referrals are made in line with local authority thresholds
- staff receive appropriate training and guidance
- safeguarding records are accurate, secure and reviewed
- safeguarding systems and processes remain accessible to pupils with speech, language and communication needs

The Academy maintains appropriate arrangements to ensure that a trained DSL or deputy DSL is available during school hours and that suitable safeguarding arrangements are in place when the DSL and deputies are unavailable, including during off-site activities, Alternative Provision, transport, remote activity and relevant out-of-hours events.

The DSL, supported by deputies and the wider safeguarding team as appropriate, provides strategic leadership and oversight of safeguarding arrangements, including:

- managing and overseeing safeguarding concerns, referrals and escalation;

- supporting and advising staff in relation to safeguarding concerns;
- working effectively with safeguarding partners and contributing to multi-agency assessments, plans and interventions;
- overseeing appropriate Family Help, child protection and other safeguarding responses in accordance with local arrangements and relevant thresholds;
- ensuring that safeguarding and child protection records are appropriately maintained, transferred and managed;
- maintaining appropriate oversight of online safeguarding, including filtering and monitoring arrangements;
- working with the designated teacher and relevant staff to support the safeguarding and welfare of looked-after and previously looked-after children; and
- promoting a child-centred approach, including ensuring that pupils' views and experiences inform safeguarding practice where appropriate.

The Academy maintains appropriate arrangements for case oversight and review. Each CPOMS case will contain sufficient information to demonstrate, where applicable, the chronology of concerns, assessment of risk and need, the child's and parents' views where appropriate and safe, actions taken, responsible persons, relevant timescales, agency involvement, decisions, professional rationale, outcomes and arrangements for review.

The DSL undertakes proportionate review and sampling of safeguarding cases, including open and closed cases, to identify delay, drift, repeat concerns, cumulative risk, emerging patterns and the impact of safeguarding interventions. Learning from case review and audit will inform safeguarding practice, training and wider improvement.

3.2 All Staff

All adults working at LCE Academy have a duty to safeguard pupils and must:

- read and understand the current KCSIE Part One; from September 2026 this applies to all staff, including those who do not work directly with children, in accordance with the school's safeguarding induction and training arrangements;
- report safeguarding concerns without delay to the DSL/deputy using the immediate verbal or emergency route and record the concern factually on CPOMS as soon as practicable. Recording must never delay action to protect a child; staff must check that the concern has been received and escalate or refer directly if a safe response is not secured
- maintain professional boundaries
- act in the best interests of the child at all times

3.3 Proprietor oversight

Krystian Liptrot, as Chair of the proprietor board and company acting on behalf of Life Changing Education Ltd, advised by the governing body, provides strategic oversight and challenge that ensures that the Academy:

- has an effective safeguarding policy and DSL structure, including an appropriately appointed and trained DSL and deputy DSL structure
- monitors safeguarding practice and compliance with relevant statutory requirements and guidance
- receives termly safeguarding reports and urgent updates when required
- holds leaders to account for the effectiveness of safeguarding arrangements, safeguarding culture and protection of pupils

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Understanding Safeguarding and Risk

Safeguarding risks for pupils with SEMH needs can be complex, interconnected and influenced by circumstances within and beyond the school and home. LCE Academy considers family, school, contextual and extra-familial risks together.

4.1 Categories of Abuse

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

4.2 Contextual and Complex Safeguarding Risks

The Academy is particularly alert to the following risks, while recognising that this is not an exhaustive list:

These risks include modern slavery and trafficking; financial exploitation; racism, misogyny and misandry; AI-generated nude or semi-nude images; child-to-parent or child-to-caregiver abuse; risks affecting young carers and pupils with medical conditions; and harm connected with temporary accommodation or housing instability.

- Child Criminal Exploitation and County Lines
- Child Sexual Exploitation
- Domestic Abuse
- Harmful Sexual Behaviour
- Child-on-child abuse, sexual harassment and sexual violence
- Radicalisation and extremism (Prevent)
- Online abuse, cyberbullying and digital exploitation
- Honour-based abuse, FGM and forced marriage
- Serious youth violence and gang affiliation

- Substance misuse and exploitation

Behaviour is always considered within a safeguarding context and explored as a potential indicator of harm or unmet need.

4.3 Prevent Duty and Radicalisation

The Academy maintains a setting-specific Prevent risk assessment and action plan, approved and reviewed by the Headteacher, DSL and proprietor at least annually and after any relevant incident, local threat change or material change to premises, curriculum, staffing, IT or external use.

Staff must report any concern about radicalisation or extremism to the DSL or deputy without delay and make a factual CPOMS record; immediate risk is reported to police or emergency services. The DSL will assess the concern, seek local Prevent advice where appropriate, use the national Prevent referral form or agreed local route, consider Channel and record the decision, rationale, referral, outcome and review on CPOMS. Information from Channel or another authority will be transferred securely with the child-protection file when a pupil moves.

Prevent is embedded in safeguarding, online safety and curriculum practice. The Academy will check that visiting speakers, lettings, commissioned provision, educational visits and school-managed IT are not used to promote radicalisation. Teaching will build pupils' resilience to extremist narratives while respecting equality duties, freedom of speech and political impartiality; SEND, SLCN and SEMH needs will be considered in assessment and response.

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Family Help and Continuum of Need

LCE Academy adopts local authority Continuum of Need frameworks and intervenes early to prevent escalation of risk.

Support is provided through a graduated approach:

- Universal - strong relationships, consistent routines and pastoral support
- Targeted - community-based Family Help, mentoring and SEMH-informed support
- Specialist - coordinated multi-agency involvement including social care and health services

The Academy uses Oldham's current children's social care routes and thresholds. MASH/Duty Officer: 0161 770 7777 and child.mash@oldham.gov.uk. Emergency Duty Team outside office hours: 0161 770 6936. Police: 101, or 999 where there is immediate danger. Referrals, decisions, rationale and follow-up are recorded.

The Academy will use the current local arrangements, referral pathways and thresholds when seeking additional support or making safeguarding referrals. Local MASH, children's social care and out-of-hours contact details will be maintained through the Academy's safeguarding procedures and staff guidance.

Safeguarding referrals, decisions, actions, professional judgements, rationale, outcomes and review dates will be recorded on CPOMS by the DSL team. The referring member of staff must check that the concern has been received; CPOMS is a record and workflow tool, not a substitute for immediate protective action.

Reporting Safeguarding Concerns

All concerns must be taken seriously and acted upon without delay. Communication difficulties must never be a barrier to reporting or responding to safeguarding concerns. Staff recognise that pupils may communicate distress, abuse or risk through their behaviour, fragmented disclosures, changes in presentation, non-verbal communication, visual methods or supported communication.

Procedure:

1. Observe or receive a concern, disclosure or information that may indicate a safeguarding risk
2. Alert the DSL/deputy or emergency service without delay; then make a factual, dated and timed CPOMS record using the pupil's own words where possible
3. Confirm that the concern has been received and understood; escalate or refer directly if a safe response is not secured
4. DSL assesses risk and determines next steps
5. The DSL records the risk assessment, decision, rationale, actions, agency contacts, outcome, named owner and review date on CPOMS

Parents are informed unless this places the child at further risk.

Under Independent School Standards paragraph 7 and current safeguarding guidance, all staff must identify, report and respond to concerns, including those arising through first aid provision.

Safeguarding concerns may include, but are not limited to:

- Unexplained, repeated, or patterned injuries
- Injuries inconsistent with the explanation given
- Indicators of neglect, abuse, exploitation, or self-harm
- Concerns arising from a pupil's emotional presentation or behaviour during first aid intervention

All staff, including first aiders, have a duty to act immediately where a safeguarding concern is identified.

Internal Reporting Procedures

Where a safeguarding concern is identified through first aid provision:

- The concern must be reported without delay to the Designated Safeguarding Lead (DSL) or Deputy DSL
- The concern must be recorded accurately on CPOMS; the first-aid record remains the clinical record and is cross-referenced where necessary
- First aid records are not used in isolation but are considered alongside wider safeguarding information

Staff understand that they must not investigate safeguarding concerns themselves and must follow school procedures.

External Referrals and Professional Liaison

Where concerns meet the threshold for external intervention, the DSL is responsible for making timely referrals to appropriate external agencies. This may include:

- Children's Social Care
- The Local Authority Designated Officer (LADO)
- Health professionals or emergency services
- The police, where a criminal offence may be suspected

The DSL maintains and checks the current external routes. Oldham MASH: 0161 770 7777 and child.mash@oldham.gov.uk; Emergency Duty Team: 0161 770 6936; Greater Manchester Police: 101, or 999 where there is immediate danger. The DSL also maintains the current Oldham LADO, CME and Prevent referral routes in accessible staff guidance.

Where pupils attend off-site provision or Alternative Provision, LCE Academy retains responsibility for safeguarding oversight and ensures that concerns are escalated appropriately through agreed reporting arrangements.

Staff Training and Awareness

All staff receive safeguarding training that includes:

- Understanding the link between first aid, injuries, and safeguarding
- Knowing when and how to escalate concerns
- Awareness of contextual safeguarding risks relevant to SEMH and Alternative Provision

This ensures that first aid provision contributes effectively to the school's safeguarding culture and statutory duties.

Safeguarding Assurance

Clear reporting, competent DSL oversight, current external referral contacts and evidence of effective practice are required to meet ISS paragraph 7; the existence of this policy alone is insufficient.

LCE Academy recognises that effective safeguarding depends on the implementation and impact of its safeguarding arrangements, not simply the existence of a safeguarding policy. The Academy maintains effective reporting and referral arrangements, appropriate DSL oversight, accessible and up-to-date safeguarding procedures, and evidence that safeguarding practice is monitored, reviewed and continually improved.

Krystian Liptrot, as Chair of the proprietor board and company acting on behalf of Life Changing Education Ltd, will provide appropriate oversight and ensure that safeguarding arrangements are effective and that the Academy meets its statutory safeguarding responsibilities. The governing body will provide recorded advice and challenge without displacing the proprietor's legal accountability.

Record Keeping and Information Sharing

- CPOMS is the Academy's designated system for pupil safeguarding concerns, chronologies, DSL decisions, referrals, actions and outcomes. Adult allegation, low-level concern and personnel records are kept separately and are not placed in a pupil's CPOMS file unless there is distinct child-protection information that must be recorded there.
- CPOMS access is role-based, least-privilege, reviewed and auditable. If CPOMS is unavailable, staff immediately alert the DSL and use the secure dated contingency form; the DSL transfers and verifies the record on CPOMS when service is restored and disposes of the temporary copy in line with the retention schedule.
- Behaviour and attendance data are cross-referenced via Arbor - Relevant information from behaviour, attendance and other school systems may be considered alongside safeguarding information where this is necessary and proportionate to understand a pupil's circumstances, identify patterns or assess risk.
- Necessary, proportionate information is shared securely under current data protection law; consent is not a prerequisite where protection requires sharing

From 30 September 2026, staff and leaders apply the statutory information-sharing duty proactively: relevant information is shared when it is necessary to safeguard or promote a child's welfare, not only in response to a request. The DSL records what was shared, with whom, why, the lawful basis, the outcome and any decision not to share.

Records are retained in accordance with statutory guidance.

When a pupil transfers, the child-protection file is transferred securely and separately from the main pupil file as soon as possible: within five days for an in-year transfer or within the first five days of a new term. The DSL confirms receipt and records the transfer.

Raheemot Kaffo is the Academy's Operation Encompass Key Adult, supported by the DDSLs. Notifications are received through a secure safeguarding route, reviewed without delay, recorded with appropriately restricted access on CPOMS and used to plan support. An Operation Encompass notification does not replace a referral to children's social care or the police where one is required. When the Academy receives notification that a pupil has been placed in temporary accommodation, the DSL records and assesses the information, considers immediate welfare, attendance and safeguarding needs, liaises with the housing authority and the pupil's home local authority, and shares information internally only on a need-to-know basis.

Necessary, proportionate and secure information sharing protects children; data protection law is not a barrier. The DSL will record on CPOMS what was shared, with whom, why, the lawful safeguarding purpose and the outcome. Consent will be sought where appropriate but is not required where seeking it would place a child at risk, cause unreasonable delay or undermine protection.

Training and Supervision

- All staff receive safeguarding and child-protection induction before or at the start of work, with ongoing safeguarding updates and training appropriate to their role and responsibilities, including Prevent training where applicable
- Safeguarding updates are provided regularly and at least termly
- New staff complete safeguarding induction before unsupervised contact and receive the policies, KCSIE Part One, DSL routes and system practice
- The DSL and deputy DSLs receive appropriate safeguarding training and undertake regular updates to maintain and develop the knowledge and skills required for their roles.

Reflective safeguarding supervision and professional support are provided to the DSL team and, where appropriate, to staff whose roles involve significant safeguarding responsibilities. The frequency and nature of supervision will reflect role, responsibility, case complexity and professional need.

All staff, including those who do not work directly with children, read KCSIE Part One. The Part One overview is a supplementary quick reference and does not replace Part One. Safeguarding and child-protection induction - including this policy, the Staff Code of Conduct, child-on-child abuse, attendance, online safety and filtering and monitoring, DSL identity, Prevent, whistleblowing and practical CPOMS reporting - takes place before or at the start of work and before unsupervised contact. A formal refresher is completed at least annually; brief updates are provided at least termly and whenever risks or guidance require them.

The DSL and deputies will complete formal role training at least every two years and receive knowledge/skills updates at least annually. Safer recruitment, LADO case management, Prevent, online safety, AP/visits and pupil-specific competence will be role based. Training must be tested through scenarios and practice, with failed checks retrained and retested. Reflective supervision will support DSL and high-risk roles without replacing decision accountability. Safeguarding training includes awareness of speech, language and communication needs, barriers to disclosure and the impact of distress and dysregulation on communication.

Safer Recruitment

LCE Academy follows safer-recruitment procedures at all times to help ensure that adults working with pupils are suitable to do so and that appropriate safeguarding checks are completed before appointment and throughout employment, where required.

This includes, as applicable to the role:

- Enhanced DBS and barred list checks
- Identity and qualification verification
- Right to work checks
- Prohibition from teaching checks

- Section 128 checks are completed and recorded where required for Krystian Liptrot as Chair of the proprietor board and company acting on behalf of Life Changing Education Ltd and for every person who takes part in the management of the Academy. The evidence date and checker are recorded accurately on the SCR. From 1 September 2026 the former volunteer-supervision exemption no longer applies; regulated-activity decisions and DBS/barred-list checks for volunteers follow the current statutory definition and are recorded.

For a fee-funded trainee teacher, the Academy obtains written confirmation from the initial teacher training provider that it has completed all pre-appointment checks that the Academy would otherwise be required to undertake and has judged the trainee suitable to work with children.

- Maintenance of a compliant Single Central Record

Two satisfactory references, including the most recent employer where appropriate, are obtained and scrutinised before appointment and normally before interview; any exception is risk assessed, authorised and resolved before work begins.

A proportionate online search is completed for shortlisted candidates as part of due diligence, candidates are informed that it may occur, and only role-relevant findings are considered and recorded.

Overseas criminal-record or professional checks are completed where relevant, with any gap addressed through documented risk assessment; agency and supply staff are admitted only after written confirmation of all required checks and identity is checked on arrival.

At least one member of each appointment panel has completed current safer-recruitment training. Recruitment records and the Single Central Record are quality-assured against the separate Safer Recruitment Policy.

10 Multi Agency Working

LCE Academy recognises that effective safeguarding depends on collaborative working with pupils, families and relevant agencies within the wider safeguarding system.

The Academy works closely with relevant partner agencies, including:

- local authority safeguarding and referral services;
- Children's Social Care and Family Help services;
- the police and health services;
- CAMHS and other specialist providers; and
- other agencies and services relevant to the needs and circumstances of individual pupils.

Information sharing is timely, lawful and in the child's best interests.

11 Monitoring Review and Governance

- Safeguarding practice is monitored and reviewed by the DSL team as part of the academy's ongoing safeguarding procedures

- Termly safeguarding assurance reports are provided to Krystian Liptrot, Chair of the proprietor board and company, with recorded advice and challenge from the governing body.
- Annual safeguarding reviews examine policy and implementation. The review record identifies the actual date, scope, reviewer, findings and action closure. An independent review is identified separately from an internal review.
- This policy is reviewed annually in July and after serious incidents, material changes or guidance updates

The Headteacher and DSL maintain an implementation-assurance record covering: named DSL and deputy competence and availability; current internal and external routes; approved role descriptions and cover; tested CPOMS and contingency arrangements; local thresholds and referral routes; child-on-child abuse, body-map, referral, chronology, transfer, allegation and low-level-concern records; Prevent and filtering and monitoring assurance; alternative-provision and visits controls; and staff training and rehearsal. Any failed control is escalated to the proprietor and corrected before the affected activity proceeds.

Krystian Liptrot, as Chair of the proprietor board and company acting on behalf of Life Changing Education Ltd, advised by the governing body, will receive at least termly anonymised analysis of referrals, repeat concerns, timeliness, attendance/missing patterns, child-on-child abuse, online incidents, allegations/low-level concerns, AP/visit issues, equality/SEND themes, training and action closure. An annual independent safeguarding audit and action plan will be completed. Policy approval alone is not evidence of implementation.

The approved policy is supplied free of charge in paper, translated or communication-accessible form on request. The Headteacher ensures that the current policy is published on the Academy website and checks publication after each revision. Staff receive the current controlled version at induction and following revision.

12 Immediate Action Escalation and Direct Referral

A child's safety takes priority over internal process. Staff must act without delay when they identify a safeguarding concern. Staff must alert the DSL or deputy directly without delay, take reasonable action to protect the child, call 999 where there is immediate danger or a medical emergency, and then create a factual CPOMS record. A CPOMS entry or notification must never be assumed to have been read where urgent action is needed.

Safeguarding concerns must be recorded promptly and factually on CPOMS. The staff member records what was seen, heard or disclosed, the child's exact words where possible, immediate action and who was alerted; the DSL records decisions, rationale, referrals, outcomes and review. Recording must never delay action to protect a child.

Where no DSL or deputy DSL is available, staff must use their professional judgement and, where necessary to safeguard the child, contact the appropriate external agency directly, including Children's Social Care, the police or another relevant service. The DSL should be informed as soon as practicable following any direct referral.

Any member of staff may make a safeguarding referral where they consider this necessary to protect a child. Staff should not assume that reporting a concern internally removes their responsibility to act. Where a member of staff believes that a concern has not been appropriately responded to, remains unresolved, or that the child's circumstances or level of risk have deteriorated or failed to improve, they must escalate the concern through the Academy's safeguarding escalation arrangements and, where necessary, make a direct referral to the appropriate external agency.

Professional disagreement about safeguarding decisions should be managed through appropriate escalation and recorded with the relevant rationale and actions. Professional disagreement must not delay or reduce the protection provided to a child.

Current local routes are maintained in the Academy's safeguarding procedures and displayed for staff: Oldham MASH/Duty Officer 0161 770 7777, child.mash@oldham.gov.uk and the online referral form; Emergency Duty Team 0161 770 6936; LADO referrals through the current Oldham Safeguarding Children Partnership LADO page and referral form, using the contact block in the adult-allegations section of this policy; Prevent/Channel through Oldham's online referral route or MASH for initial advice; Police 101 or 999 in an emergency. The Academy will also maintain clear arrangements for DSL and deputy DSL availability and cover.

13 Receiving a Disclosure and Making a Record

Staff will listen, remain calm, take the child seriously, use the child's preferred communication and avoid leading questions. They recognise that pupils may not be able to provide a complete, chronological or detailed narrative. Difficulties with language, memory, emotional regulation or communication do not reduce the importance or credibility of a disclosure. Where appropriate, pupils may be supported to communicate using visuals, symbols, AAC, drawing, scaling tools, written methods or other communication supports. Such support must facilitate communication and must not be used to lead, prompt or influence the content of a disclosure. Staff will not promise confidentiality, investigate, confront an alleged person, ask the child to repeat the account unnecessarily or delay action to obtain a complete narrative. The child will be told what will happen next and reassured that reporting was the right thing to do.

The CPOMS record will use the child's own words where possible and include date, time, place, people present, observations, injuries, context and immediate action. The DSL adds decisions, rationale, referrals, outcomes and review arrangements. Opinion will be identified as such. Body maps may record visible injury but staff will not take intimate photographs. Potential digital or physical evidence will be preserved without viewing, forwarding or deleting illegal content.

Where FGM appears to have been carried out on a girl under 18, a teacher will follow the mandatory police-reporting duty and also inform the DSL. Suspected risk of FGM, forced marriage, honour-based abuse, exploitation, radicalisation, modern slavery or other harm follows the normal immediate safeguarding route.

Child on child Abuse HSB Sexual Harassment and Violence

The Academy has a zero-tolerance approach to abuse, harassment and violence between children. Such behaviour must never be dismissed as “banter”, “just having a laugh”, part of growing up or inevitable.

It may be physical, sexual, emotional, discriminatory or financial; include bullying, coercive control, abuse within intimate relationships, exploitation, initiation, image-sharing, AI-generated sexual imagery or online/off-site conduct; and may occur even when no reports have been made.

Every report will receive an immediate safeguarding response and a CPOMS record linked to each relevant pupil with carefully controlled visibility. The DSL will separately consider the needs and safety of the child harmed, the child alleged to have caused harm and other children; preserve educational access; consult social care/police as required; and complete recorded risk and needs assessments. Contact, timetable, transport, devices, AP and site arrangements will be adjusted without placing the burden on the child harmed. Parents will be involved where safe and appropriate.

Staff will not mediate sexual violence or use restorative practice as a substitute for safeguarding or criminal investigation. SEND, communication, age, developmental stage, power imbalance, coercion, discrimination and repeated patterns will shape the response. The DSL will review prevalence and patterns, including sexist, misogynistic, homophobic, transphobic, racist and disablist behaviour, and ensure prevention through curriculum, supervision and culture.

SEND SEMH Equality and Anti discriminatory Safeguarding

Pupils with SEND may face additional barriers to disclosure, may show distress through behaviour, and may experience assumptions that injury, absence or mood is part of their disability. Staff will use communication aids, SaLT advice, advocacy, sensory/regulation adjustments and sufficient time while maintaining urgency. A concern must not be dismissed as SEMH or behaviour. Staff recognise that communication difficulties may affect how a pupil discloses information, describes events, understands questions or participates in safeguarding processes. Where speech, language and communication needs are identified or suspected, reasonable adjustments will be made to ensure safeguarding processes remain accessible and effective.

Safeguarding decisions will consider protected characteristics, racism, discrimination, poverty, family context, care experience and prior mistrust of services. Practice will be anti-discriminatory and culturally informed without stereotyping. Reasonable adjustments apply to reporting, interviews, plans, curriculum and participation. Lindsey Drews, as SENDCO, Assessment Lead and trained Deputy DSL, advises on accessibility, provision and safeguarding and shares deputy-DSL coverage with David Jeal.

Children questioning their gender and social transition

Questions about gender are approached with dignity, calm curiosity and safeguarding-led, child-centred assessment. Staff do not make assumptions, diagnose or initiate social transition. Parents or carers are involved in nearly all cases unless there is a recorded reason to believe this would place the child at

significant risk. Any request to change names, pronouns, uniform, facilities or records is considered individually by the DSL, Headteacher and SENDCO, with the child's views, age, communication, mental health, SEND, family context, equality duties, privacy, peer impact and current guidance taken into account. The decision, rationale, review date and any safeguarding or reasonable-adjustment plan are recorded; immediate risk follows the usual safeguarding route.

17 Mental health and safeguarding

Mental-health distress may be a safeguarding indicator as well as a clinical or pastoral need. Staff recognise changes in mood, presentation, attendance, self-care, sleep, eating, self-harm, suicidal ideation, risk-taking or behaviour and alert the DSL without delay where harm or significant risk may be present. Immediate danger is referred to emergency services. The DSL coordinates family and multi-agency action, CPOMS recording, safety planning and review; pastoral, SaLT, CBT or educational-psychology input complements and does not replace NHS or emergency care.

18 Attendance Missing Pupils and Children Missing Education

Absence is a safeguarding indicator. The Academy will follow the Attendance and Engagement Policy for twice-daily registers, day-one contact, repeated/prolonged absence, severe absence, unexplained code resolution, welfare checks, children missing education and lawful deletion from roll. The DSL will review patterns alongside exploitation, abuse, mental health, SEND, transport, bullying, part-time timetables and AP attendance.

Off-site attendance must be confirmed for every expected session. If a pupil cannot be located or their welfare established, staff will escalate without delay under the pupil's risk profile and missing-child procedure. No pupil will be removed from roll or placed on reduced hours to manage safeguarding, behaviour or unmet need.

19 Online Safety Filtering and Monitoring

Online safety is integral to safeguarding and the curriculum. The DSL has lead safeguarding oversight and the proprietor assigns strategic responsibility. Smoothwall is the Academy's confirmed filtering and monitoring provider. BluRock IT provides technical IT support but is not the filtering and monitoring provider and does not own safeguarding decisions. The Academy implements its Digital Technology, Young Person's Internet, Acceptable Use and Cyber Security Policy with clear alert triage, response times, escalation, privacy, incident and business-continuity controls.

Filtering is appropriate to age and risk and does not block access to essential safeguarding or SEND content. Monitoring identifies concerning searches, messages and activity on school-managed systems. Sam Gray, Headteacher, is the named senior leader for the filtering and monitoring review, working with Raheemot Kaffo as DSL and BluRock IT as technical support. The review takes place at least once each

academic year and after a material change, incident or identified weakness, covers every internet-connected device and relevant location, and records tests, exceptions and action closure. Staff understand that technical controls do not replace supervision.

Online harms include grooming, exploitation, cyberbullying, extremist content, pornography, self-harm content, fraud, image abuse, AI-generated nudes and misuse of generative AI. Staff will preserve evidence safely, avoid viewing or forwarding illegal imagery, and follow the DSL route. Smoothwall alerts with safeguarding significance will be triaged by the DSL team and the risk decision, action and outcome recorded on CPOMS; technical tickets remain in the IT system. Signed staff and pupil AUPs, supplier configuration, test results, alert records and governance review are required evidence.

20

Educational Visits and Commissioned Alternative Provision

LCE Academy is a single-site school. The Soccer Factory, Hyde facility, external salon, external gym and similar external locations are not school sites. Their use will be either an approved educational visit or separately commissioned alternative provision, each with distinct safeguards.

Visits require EVC approval, venue and activity due diligence, pupil-specific risk/medical plans, attendance, transport, communication, emergency and missing-pupil arrangements, trained supervision and post-visit reporting. AP requires provider status and safeguarding checks, staff suitability assurance, premises/H&S review, a written agreement, curriculum and outcomes, daily attendance, incident/disclosure routes, regular visits and quality assurance. Any safeguarding concern received during a visit or from an AP provider is alerted immediately to the LCE DSL and recorded on CPOMS. The Academy retains oversight and will act on concerns rather than relying on provider assurance.

21

Concerns or Allegations About Adults and Low level Concerns

Any concern or allegation about an adult working for or on behalf of the Academy - including an employee, supply worker, trainee teacher, volunteer or contractor - follows the Staff Code of Conduct, Whistleblowing Policy and KCSIE Part Four. A concern meeting or potentially meeting the harm threshold is reported to the Headteacher immediately and discussed with Oldham LADO within the same working day. An allegation about Headteacher Sam Gray is reported to Krystian Liptrot, Chair of the proprietor board and company. An allegation about Krystian Liptrot is reported directly to Oldham LADO without first alerting him, and a conflict-free independent case manager is appointed in accordance with LADO advice. The Academy checks the official route at Source information before referral and at least termly. The current LADO team telephone routes are 0161 770 8870 or 0161 770 0008 and the published team email is allegation.management@oldham.gov.uk; the current online referral form is used where available.

The allegations procedure applies equally to trainee teachers and other adults working for or on behalf of the Academy. Where police interview a child who is entitled to an Appropriate Adult, staff cooperate with police and ensure the child receives that safeguard; school staff do not assume the role unless it is lawful, suitable and agreed.

The case manager will consult the LADO, protect the child, preserve evidence and make proportionate risk decisions. The Academy remains responsible for the safeguarding process involving agency/contract staff. Resignation or ending a placement does not end the process or statutory referral consideration.

Where the Academy removes a person from regulated activity, or would have removed the person had they not left, because the statutory harm or risk-of-harm conditions are met, it will make a prompt referral to the Disclosure and Barring Service in accordance with its statutory duty. The Academy will also make a referral to the Teaching Regulation Agency where the applicable serious-misconduct criteria are met. Resignation, settlement, non-renewal, agency withdrawal or the end of a placement does not remove either referral duty. The case manager records the threshold decision, advice, referral date and outcome separately from the pupil's CPOMS record.

Every low-level concern, however small, and every self-referral is recorded and considered by the Headteacher, with conflict-free proprietor handling where the Headteacher is involved. If the threshold is uncertain, the LADO is consulted. Records are reviewed for patterns and cultural or system weaknesses. Adult personnel-case files are kept separately from pupil CPOMS records. Staff may also obtain independent whistleblowing advice from the NSPCC on 0800 028 0285 or help@nspcc.org.uk.

22

Teaching Safeguarding Pupil Voice and Complaints

The curriculum will teach age- and developmentally appropriate safeguarding, relationships, consent, online safety, exploitation, healthy relationships, prejudice, help-seeking and reporting. Content will be adapted for SEND and communication needs, use approved resources and allow pupils to ask questions or disclose safely.

Pupils will know named trusted adults and how to report in person and through accessible alternatives. The Academy will provide multiple methods for seeking help or reporting concerns, recognising that some pupils may find verbal disclosure difficult.

Leaders review whether pupils feel safe and whether groups experience barriers or discrimination. Complaints do not replace safeguarding action; a complaint containing a safeguarding concern will be routed immediately under this policy while the complaints process is managed separately.