



Safeguarding and Child Protection Policy

Policy at a glance

Related policies and information: Whistleblowing Policy; SEND Policy; SEND Information Report; Behaviour Policy; Equality Information and Objectives Policy. Please find policies attached here: <https://www.arco.academy/Policies/> Statutory guidance:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Arco Academy is an Independent Co-educational Sports Specialist School. Safeguarding and promoting the welfare of children is everyone's responsibility. All adults working with or on behalf of Arco Academy must maintain an attitude of "it could happen here", act in the best interests of the child and report concerns without delay.

Immediate concern If a child is in immediate danger or at risk of significant harm, contact emergency services and/or local authority children's social care without delay. Anyone can make a referral. Inform the DSL as soon as possible.	
DSL	Myles Burgess - DSL@arco.academy
DDSLs	Sakeelah Bangura - shs@arco.academy Roxanne Osgood
Principle	Chelsey Leighton
Southwark MASH	020 7525 1921 out of hours: 020 7525 5000
Southwark LADO	Eva Simcock 020 7525 0689 Eva.Simcock@southwark.gov.uk

What every member of staff must do

- Read and understand Part One of Keeping Children Safe in Education 2026. The previous option to read a shortened Annex A no longer applies.
- Know the identity of the DSL and deputies, how to report a concern and how to make a direct referral if necessary.
- Record concerns promptly, factually and in the child's own words where relevant. Do not investigate.
- Never promise confidentiality to a child. Explain that information will be shared only with people who need to help keep them safe.
- Recognise that safeguarding issues can overlap, and that behaviour, attendance, mental health, online activity, exploitation and peer relationships may all provide safeguarding indicators.
- Report concerns about adults to the principal; concerns about the Principal to the CEO/Chair as appropriate; and concerns about the proprietor or a conflict of interest directly to the LADO.

Contents

1. Purpose, scope and principles	4
2. Legal and statutory framework	4
3. Definitions	5
4. Arco Academy context and safeguarding priorities	5
5. Roles and responsibilities	6
6. Responding to concerns about a child	7
7. Family Help, referrals and multi-agency working	8
8. Information sharing, confidentiality and record keeping	9
9. Child-on-child abuse, harassment and violence	10
10. Harmful sexual behaviour and self-generated intimate images	11
11. Online safety, mobile phones, AI, filtering and monitoring	12
12. Attendance, reduced timetables and children absent from education	13
13. SEND, medical needs, young carers and other additional vulnerabilities	13
14. Mental health, self-harm and suicide risk	14
15. Exploitation, serious violence, weapons and modern slavery	14
16. Gender-questioning children	15
17. Concerns and allegations about adults / low-level concerns	16
18. Safer recruitment, visitors, contractors and volunteers	16
19. Off-site education, alternative provision, work experience and external providers	17
20. Training, supervision and safeguarding culture	17
21. Monitoring, quality assurance and review	18
Appendix A – Key contacts	19
Appendix B – Recognising abuse, neglect and exploitation	20
Appendix C – Specific safeguarding issues	21

1. Purpose, scope and principles

This policy sets out how Arco Academy safeguards and promotes the welfare of pupils. It applies to all staff, leaders, the proprietor, Advisory Board members, volunteers, supply and agency staff, trainee teachers, contractors, visitors and any other adult working with or on behalf of Arco Academy, including during off-site and residential activity.

1.1 Our safeguarding principles

- The welfare and best interests of the child are central to decision-making.
- Safeguarding is everyone's responsibility and concerns are acted on promptly.
- Children are listened to, taken seriously and supported to express their wishes and feelings.
- We act with professional curiosity and do not assume that concerning behaviour is simply "behaviour".
- We recognise that abuse can occur inside or outside the home, in school, in the community and online.
- We recognise that children can harm other children and that all children involved may require safeguarding support.
- We work in partnership with parents and carers unless doing so would increase risk or compromise a safeguarding response.
- We work with Southwark safeguarding partners and other relevant local authorities where a child lives outside Southwark.
- We promote a culture in which staff can report concerns about adults, including low-level concerns, without fear of reprisal.

1.2 Safeguarding definition

Safeguarding and promoting the welfare of children includes providing help and support as soon as problems emerge; protecting children from maltreatment, whether within or outside the home and including online; preventing impairment of mental and physical health or development; ensuring children grow up with safe and effective care; and taking action to enable all children to have the best outcomes.

2. Legal and statutory framework

This policy should be read with current statutory guidance and legislation applicable to independent schools in England. Arco Academy will always follow the current version where guidance changes during the life of this policy.

- Keeping Children Safe in Education 2026 (KCSIE 2026).
- Working Together to Safeguard Children 2026 and local safeguarding partnership arrangements.
- The Education (Independent School Standards) Regulations 2014, including the requirement to safeguard and promote pupils' welfare.
- Education Act 2002, section 157, as applicable to independent schools.
- Children Acts 1989 and 2004.
- Equality Act 2010 and Human Rights Act 1998.
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025.
- Counter-Terrorism and Security Act 2015 and current Prevent Duty guidance.
- Female Genital Mutilation Act 2003 and mandatory reporting duties.
- Sexual Offences Act 2003.

- Safeguarding Vulnerable Groups Act 2006 and current legislation/guidance governing regulated activity and DBS checks.
- Current DfE guidance on attendance, restrictive interventions, filtering and monitoring, online safety and relationships/sex/health education.

3. Definitions

Child

Anyone under the age of 18.

Child protection

Part of safeguarding. It is the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Abuse, neglect and exploitation

Forms of maltreatment that may be caused by adults or children, known or unknown to the child, in person or online. Safeguarding issues rarely occur in isolation and often overlap. KCSIE 2026 explicitly draws attention to exploitation and modern slavery, child-to-parent/caregiver abuse, teenage relationship abuse and verbal abuse as a possible form of emotional abuse.

Staff

For this policy, “staff” includes employees and other adults working with pupils, including supply and agency staff, self-employed workers, contractors, volunteers, trainee teachers and adults on work or training placements, as relevant to their role.

4. Arco Academy context and safeguarding priorities

Arco’s safeguarding arrangements must reflect the needs of its actual pupil population. As an independent school with a small cohort and close pastoral relationships, staff may hold detailed knowledge of pupils and families. This is a strength, but it must never replace formal recording, professional curiosity, risk assessment or external referral where thresholds are met.

Arco Academy gives particular attention to pupils whose circumstances may increase vulnerability or create barriers to disclosure, including pupils with SEND, pupils with medical conditions, young carers, children with a social worker, looked-after or previously looked-after children, pupils experiencing repeated removal from lessons or suspensions, pupils on reduced/part-time timetables, pupils at risk of exclusion, pupils experiencing discrimination, and pupils showing early abusive, violent or harmful behaviour.

Safeguarding practice includes risks before, during and after school day, including travel to and from school, community locations, leisure/sports facilities, online spaces and relationships formed outside school.

5. Roles and responsibilities

5.1 All staff

Leaders will periodically evaluate staff understanding of safeguarding procedures, including how to report concerns about children and adults, referral routes and emergency procedures, rather than relying solely on confirmation that training has been completed.

- Read Part One of KCSIE 2026 in full and complete safeguarding induction and updates.
- Know Arco Academy's safeguarding systems, staff code of conduct, behaviour policy, attendance response, online safety arrangements and the identity of the DSL/DDSLs.
- Be alert to indicators of abuse, neglect, exploitation, modern slavery, mental health-related harm, serious violence, harmful sexual behaviour, online harm and child-on-child abuse.
- Act immediately on concerns and never assume another professional will act.
- Record and report concerns through Arco Academy's safeguarding system without delay (CPOMS).
- Maintain appropriate professional boundaries and report concerns about adult conduct.

5.2 Designated Safeguarding Lead (DSL)

The DSL is Myles Burgess and has lead responsibility for safeguarding and child protection. The DSL has the status, authority, time, training, funding and resources needed to carry out the role and works in accordance with KCSIE 2026 Annex B.

- Provide advice and support to staff and lead or support referrals to children's social care, police, Channel and other agencies.
- Lead safeguarding risk assessment, safety planning and multi-agency work, including for serious violence, weapons and child-on-child abuse.
- Maintain high-quality, secure safeguarding records and ensure decisions and rationales are recorded.
- Ensure safeguarding information is transferred promptly and proportionately when pupils change settings and speak directly with the receiving DSL where risk is significant or complex.
- Oversee online safety and work with leaders, the proprietor/Advisory Board and IT provider on filtering and monitoring.
- Promote educational outcomes for children with a social worker and work with the Designated Teacher for looked-after children.
- Maintain oversight of attendance-related safeguarding, reduced timetables, off-site placements and commissioned alternative provision.
- Ensure safeguarding arrangements remain effective during school closure periods, trips and other activities.

Robust DSL cover

KCSIE 2026 strengthens expectations for DSL cover. During school hours, a trained DSL or DDSL will be available. Where the DSL is absent through illness, leave or other circumstances, a named DDSL will take operational responsibility. The DSL mailbox/telephone arrangements will be monitored so that concerns are received and acted on without delay.

5.3 Principal

- Ensure this policy is implemented consistently, and safeguarding is embedded across school operations.
- Ensure staff receive appropriate induction, training and regular updates.
- Ensure the DSL has sufficient authority, time and resources and that robust cover is in place.
- Act as case manager for allegations about staff where appropriate and consider whether onward referral to the LADO is required.
- Ensure safer recruitment, the Single Central Record, site safety and external-provider arrangements meet statutory requirements.

5.4 Proprietor and Advisory Board

The legal proprietor holds ultimate responsibility for ensuring that Arco Academy's safeguarding arrangements comply with the Independent School Standards and Keeping Children Safe in Education 2026. The Advisory Board provides challenge, scrutiny and assurance within Arco Academy's governance arrangements. The Advisory Board Safeguarding Lead provides additional oversight of safeguarding effectiveness but does not replace the statutory accountability of the proprietor or the operational responsibilities of the DSL.

- Approve and review this policy at least annually.
- Receive appropriate safeguarding and cyber-security training.
- Ensure Arco Academy has effective safeguarding, online safety, filtering and monitoring, safer recruitment and allegations-management arrangements.
- Ensure safeguarding is considered in strategic decisions, premises use, staffing and curriculum.
- Provide appropriate challenge and assurance through safeguarding reports, audits and case/pattern analysis while preserving confidentiality.

6. Responding to concerns about a child

6.1 Immediate danger or risk of significant harm

If a child is in immediate danger, is suffering or is likely to suffer significant harm, staff must act immediately. Inform the DSL/DDSL and make a referral to children's social care and/or police. Anyone can make a referral. If the DSL is unavailable, this must not delay action.

6.2 If a child discloses abuse or harm

Staff will build trusted relationships while maintaining appropriate professional boundaries. Staff will remain professionally curious where behaviour, attendance, presentation or communication may indicate that something is wrong, even when a pupil has not made a disclosure.

- Listen carefully; allow the child to speak freely.
- Take the child seriously. Do not express disbelief, shock or blame.
- Do not ask leading or investigative questions. Clarify only what is necessary to establish immediate safety.
- Explain that you cannot keep the information secret and that you will share it with people who can help.

- Reassure the child that they did the right thing by telling you.
- Record the child's words as accurately as possible, separating fact from professional observation.
- Report to the DSL immediately. Do not investigate, confront an alleged perpetrator or contact parents independently.

6.3 Concerns that do not appear immediately life-threatening

Staff should still report the concern promptly to the DSL. The DSL will consider the child's historical and educational context before deciding next steps and actions. The response may include, but limited to, internal support, community-based early help, Family Help, a children's social care referral, police involvement or another specialist service.

6.4 Parents and carers

Parents/carers will usually be informed and involved where this supports the child. The DSL must first consider whether contact could increase risk, compromise evidence or place any person at risk. KCSIE 2026 also emphasises considering parental contact when managing internal support where this can further support the child's wellbeing without increasing risk.

6.5 Professional curiosity and direct disclosures

Staff will build trusting relationships with pupils while maintaining appropriate professional boundaries. They will remain professionally curious where behaviour, attendance, presentation or communication indicates possible harm, even where a pupil has not made a disclosure. Staff must record and promptly report concerns to the DSL/DDSL and must not investigate.

6.5 Pupil Voice and Reporting Concerns

Arco Academy will ensure that all pupils know how to seek help and can identify trusted adults they can speak to if they feel worried, unsafe or concerned about themselves or another pupil. Pupils will be provided with different and accessible opportunities to raise concerns, recognising that not every pupil will feel comfortable making a direct disclosure. Staff will actively listen to pupils, take their concerns seriously and respond in a sensitive, supportive and non-judgemental manner.

Particular consideration will be given to pupils with SEND or communication difficulties, ensuring that appropriate communication methods and reasonable adjustments are in place to enable them to express their views and report concerns.

Pupil voice will be actively sought through regular discussions, pastoral support and opportunities to provide feedback. This will help the school identify emerging safeguarding concerns, understand pupils' experiences and ensure that they feel safe, listened to and supported.

All concerns raised by pupils will be recorded and reported in accordance with Arco Academy's safeguarding procedures.

7. Family Help, referrals and multi-agency working

KCSIE 2026 distinguishes universal/community-based early help from targeted early help delivered through Family Help. Arco will use the local Southwark arrangements and the arrangements of the child's home local authority where different.

7.1 Support before statutory intervention

A child may benefit from additional help as soon as a problem emerges. Staff should be particularly alert where a child is pregnant and/or a parent, is showing early abusive/violent/harmful behaviour, has repeated classroom removals or suspensions, is on a part-time timetable, is at risk of permanent exclusion, has SEND or medical needs, is a young carer, or has other indicators of vulnerability.

7.2 Family Help and children's social care

The DSL will consider the local threshold and referral pathway. A qualified practitioner who is not a social worker may, where local protocols permit, lead work with a family up to and including section 17 support. Arco Academy will contribute to assessments, plans, meetings and reviews and will escalate concerns where progress is insufficient or risk increases.

7.3 Direct referrals

All staff have a responsibility to act on safeguarding concerns. Where a member of staff believes that a child is at immediate risk of harm, or that a safeguarding concern has not been appropriately addressed, they must not delay taking action.

Any member of staff may make a direct referral to children's social care or the police where necessary. Staff should normally discuss concerns with the DSL or DDSL in the first instance; however, their absence or unavailability must never delay an urgent referral. Where a member of staff feels unable to raise a concern internally or believes that a safeguarding concern has not been adequately addressed, they may use external whistleblowing routes, including the NSPCC Whistleblowing Advice Line.

All direct referrals must be recorded on CPOMS, and the DSL must be informed as soon as possible, provided that doing so does not compromise the safeguarding response. Arco Academy will follow up referrals where an outcome has not been communicated and will use local escalation procedures if concerns remain unresolved.

7.4 Staff support and escalation

Staff will receive sufficient information and training to understand local Family Help arrangements, referral routes, thresholds and escalation processes. Staff are not expected to determine statutory thresholds independently and should seek advice from the DSL/DDSL. Staff who are unsure how to respond to a concern should seek advice from the DSL or DDSL. Where statutory thresholds are unclear or immediate advice is unavailable, staff may contact children's social care for advice. A lack of certainty must never delay action to protect a child. Where a referral is not progressed and concerns persist, the DSL will use local escalation procedures and record the rationale and outcome.

Any member of staff may make a direct referral where necessary. They must inform the DSL as soon as possible. Arco Academy will follow up referrals if an outcome is not provided and use local escalation procedures if concerns remain unresolved.

8. Information sharing, confidentiality and record keeping

Where a concern is urgent or involves immediate risk, staff must speak directly to the DSL/DDSL in addition to recording the concern on CPOMS. Entering information on CPOMS must never delay immediate safeguarding action.

Timely, proportionate information sharing is essential to safeguarding. Data protection law is not a barrier to sharing information to keep children safe. Staff must not promise confidentiality and should seek DSL advice where uncertain.

8.1 What we record

- The concern or disclosure, including the child's own words where relevant;
- Dates, times, locations and people involved;
- Actions taken, referrals and advice received;
- Decisions made and the rationale for those decisions;
- Parent/carer contact or the rationale for not contacting;
- Risk assessments, safety/support plans and review dates;
- Outcomes and follow-up.

8.2 Transfer to another setting

Child protection records will be transferred securely, separately from the main pupil file and within the timescales required by KCSIE. Where information indicates a risk to the pupil or others, Arco's DSL will speak directly with the receiving DSL. Information shared will be relevant, focused, proportionate and contextualised. The receiving school is responsible for assessing risk and putting appropriate safety and support planning in place.

Records will be stored securely, with access limited to those with a professional need to know. Arco Academy will have regard to the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025. Where a concern is urgent or involves immediate risk, staff must speak directly to the DSL/DDSL in addition to recording the concern on CPOMS. Entering information onto CPOMS must never delay immediate safeguarding action.

8.4 Pupil voice and reporting concerns

Arco Academy will ensure pupils know how to seek help and can identify adults they trust if they feel worried, unsafe or concerned about themselves or another pupil. Pupils will have accessible opportunities to raise concerns, including confidential conversations, written or supported communication and other routes appropriate to their communication needs. Staff will recognise that pupils may not feel comfortable making a direct verbal disclosure and will respond sensitively to indirect communication and changes in presentation.

Records will be stored securely with access limited to those with a professional need to know. Arco Academy will have regard to the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025.

9. Child-on-child abuse, harassment and violence

Arco recognises that children can abuse other children. Child-on-child abuse is preventable, is a safeguarding issue for all children involved and may include serious physical harm or threats involving weapons. It will never be dismissed as "banter", "just having a laugh", "part of growing up" or an inevitable feature of adolescence.

- Bullying, including cyberbullying and prejudice-based/discriminatory bullying;
- Physical abuse, assault, fighting or threats, including threats involving weapons;
- Sexual violence, sexual harassment and harmful sexual behaviour;

- Abuse within teenage relationships, including physical, sexual or emotional abuse and stalking;
- Consensual or non-consensual sharing of self-generated intimate images, including ai-generated/deepfake intimate imagery;
- Upskirting;
- Initiation/hazing-type violence or rituals;
- Coercion, exploitation or pressure involving drugs, money, criminal activity or sexual behaviour;
- Misogyny, misandry, sexism, racism, homophobia, biphobia and other derogatory or discriminatory behaviour where it creates or signals safeguarding risk.

9.1 Response

Staff must record and report concerns to the DSL and must not investigate. The DSL will assess immediate safety, consider police and children's social care involvement, and put proportionate risk assessment and support arrangements in place for the child who has been harmed, the child alleged to have caused harm and other affected children. Arco Academy will avoid automatically criminalising children where coercion or exploitation may be present.

9.2 Whole-school prevention and patterns

During school hours, the DSL or DDSL will be available to discuss safeguarding concerns. Where the DSL is absent, a DDSL will assume operational responsibility. Staff will be informed of DSL cover arrangements for off-site activities and school trips. The absence of the DSL/DDSL must never delay appropriate safeguarding action.

Arco Academy takes a whole-school approach to preventing child-on-child abuse. Through curriculum, PSHE, pastoral support and consistently applied expectations appropriate behaviour, consent, personal safety and how to seek help.

Sexism, misogyny, misandry, racism, homophobia, biphobia, sexual harassment, discriminatory behaviour and violence will be challenged consistently. Incidents will be considered through both safeguarding, behaviour and SEND lens, so that underlying vulnerability, abuse, exploitation or harm is not overlooked.

Arco Academy will monitor patterns of incidents to identify emerging concerns involving individual pupils, peer groups, locations or wider school culture and will take preventative action where necessary.

10. Harmful sexual behaviour and self-generated intimate images

KCSIE 2026 describes a continuum from harmful sexual behaviour (HSB) through sexual harassment to sexual violence. Arco Academy will consider age, developmental stage, SEND, power imbalance, coercion, consent, frequency, context and impact. All incidents involving nude or semi-nude/self-generated intimate images require a safeguarding response, whether described as consensual or non-consensual.

Self-generated intimate images include images created or altered using artificial intelligence, including deepfakes. Staff must not ask a pupil to send, download or display intimate imagery and should not intentionally view it unless the DSL determines that viewing is necessary and lawful for safeguarding purposes in line with current guidance.

- Report immediately to the DSL.
- Do not copy, print, forward or save imagery.
- Do not blame or shame any child involved.
- Preserve evidence where police involvement may be required; do not instruct deletion without DSL/police consideration.
- Complete a proportionate safeguarding and risk assessment and consider referral thresholds.

11. Online safety, mobile phones, AI, filtering and monitoring

Online safety is integral to safeguarding. Arco will address content, contact, conduct and commerce risks and recognise that online and offline harms frequently overlap.

11.1 Mobile phones

Arco Academy operates a mobile-phone-free environment during the school day. Pupils hand in mobile phones on arrival and they are returned at the end of the school day. Exceptions will only be made where individually agreed for a medical, SEND or safeguarding reason and will be appropriately recorded.

KCSIE 2026 expects schools to be mobile-phone-free environments during the school day. Arco will maintain a separate mobile phone policy and procedures that make clear how pupil access is restricted throughout lessons, transitions, break and lunch, with proportionate arrangements for individual medical, SEND or safeguarding needs where required. Students at Arco are expected to hand in their phones at the beginning of the school day, which are then returned to them at the end of the day.

11.2 Generative AI

Where generative AI is used by staff or pupils, Arco Academy will consider safeguarding, privacy, data protection, accuracy, age-appropriateness, harmful content, image manipulation, deepfakes and the risk of pupils disclosing personal or confidential information. AI must not be used in a way that bypasses Arco Academy's filtering, monitoring or professional safeguarding responsibilities.

11.3 Filtering and monitoring

Filtering and monitoring systems do not replace staff vigilance. Staff remain responsible for reporting online safeguarding concerns even where technical systems have not generated an alert. The DSL, senior leadership and IT provider will establish and review how alerts are received, triaged and acted upon, including whether the current monitoring system meets Arco's needs.

- The proprietor/Advisory Board will ensure appropriate systems are in place and understand their effectiveness.
- A named SLT lead, the DSL and IT provider will have clear responsibilities for filtering and monitoring.
- All staff will understand their role in reporting harmful content, system failures, over-blocking and attempts to bypass controls.
- Filtering and monitoring will be reviewed at least annually and whenever risk, technology or working practice changes.

- The annual review will include checks that filtering works appropriately on all internet-connected devices and Arco Academy will retain a record of checks, decisions and actions.
- Monitoring reports and alerts will be reviewed and acted on proportionately, with safeguarding concerns recorded through the safeguarding system.

12. Attendance, reduced timetables and children absent from education

Attendance is a safeguarding issue. Persistent or unexplained absence, repeated missing episodes, changes in attendance patterns and failure to attend agreed provision may indicate abuse, neglect, exploitation, mental health difficulty, criminal/sexual exploitation or other risk. KCSIE 2026 specifically identifies children who have repeated classroom removals or suspensions, are on a part-time timetable, are at risk of permanent exclusion or are in alternative provision/PRU as potentially needing additional support. At Arco, any reduced or part-time timetable must therefore be time-limited, regularly reviewed, supported by a clear rationale and risk assessment, and must not be used simply to manage behaviour or unmet need.

- Daily attendance concerns are escalated in line with the Attendance Policy.
- Safeguarding and attendance information are considered together, not in separate silos.
- The DSL is involved where absence is unexplained, repeated, high-risk or linked to known vulnerability.
- Where a pupil has a social worker, Arco Academy works with relevant professionals and recognises attendance as a key safeguarding factor.

13. SEND, medical needs, young carers and other additional vulnerabilities

13.1 SEND

Arco Academy recognises that pupils with SEND may face additional safeguarding challenges and may experience barriers to recognising, understanding or reporting abuse. Staff must not assume changes in behaviour, mood, attendance, injury or communication are solely attributable to SEND without further consideration. Safeguarding responses will account for each pupil's communication needs, cognitive ability, developmental stage, sensory needs and known vulnerabilities; reasonable adjustments will be made to help pupils understand safeguarding information, express concerns and access trusted adults.

Where appropriate, information will be presented through accessible communication methods. Staff will remain alert to bullying, peer abuse, exploitation, online harm, social isolation and dependence on adults experienced by some pupils with SEND. The DSL will work closely with the SENCo, pastoral staff, parents/carers and relevant external professionals to understand how a pupil's SEND may affect their vulnerability, presentation or ability to disclose.

Pupils with SEND may face additional safeguarding challenges. Staff must avoid attributing changes in behaviour, mood, injury or communication solely to a disability. Barriers can include communication difficulty, isolation, greater dependence on adults for care, intimate care needs, difficulty recognising abuse and disproportionate impact from bullying or peer abuse.

13.2 Medical conditions

A medical incident is not automatically a safeguarding matter. A safeguarding response may be required where circumstances suggest increased risk of abuse, neglect or exploitation because

of a medical condition, for example where essential medical information is withheld, or a child is repeatedly sent to school without essential medication.

13.3 Young carers

Staff will be alerted to caring responsibilities that may affect attendance, attainment, behaviour, emotional wellbeing or access to support. Early identification and appropriate referral/support are important.

13.4 Other vulnerabilities

Arco Academy also considers the additional needs of looked-after and previously looked-after children, children with a social worker, children in temporary accommodation, children experiencing domestic abuse, pupils affected by parental imprisonment, pupils who are pregnant or parents, pupils experiencing discrimination and pupils who may have difficulty accessing a trusted adult.

14. Mental health, self-harm and suicide risk

Mental health difficulties can become safeguarding concerns. Staff are not expected to diagnose mental illness. Their role is to promote wellbeing, notice warning signs, ensure early targeted support and liaise with or refer to specialist services when needed.

- Any disclosure or indication of self-harm, suicidal ideation, eating disorder risk or immediate mental health-related harm must be taken seriously and reported to the DSL.
- Immediate safety takes priority. Emergency medical or police support will be sought where required.
- Support offered by Arco Academy should be evidence-informed, safe, appropriate to need and suitable for the pupils' phase of education.
- Parents/carers will normally be involved unless this increases risk.
- Safeguarding records will clearly distinguish observed facts, the child's account, professional advice and decisions.

15. Exploitation, serious violence, weapons and modern slavery

15.1 CCE/CSE and financial exploitation

Child criminal exploitation (CCE) and child sexual exploitation (CSE) may be carried out by an individual or organised network/gang. A child may identify with the group exploiting them. Children may not recognise themselves as victims and may be criminalised for actions taken under coercion. Exploitation can constitute modern slavery. Financial exploitation may include fraud, scams and financially motivated sexual extortion.

15.2 Serious violence and weapons

Serious violence is an ongoing safeguarding concern and may include physical assault, carrying or using weapons and criminal exploitation. Any concern that a child is carrying, using or intending to use a weapon must be reported to the DSL. The DSL will complete or oversee a risk assessment and consider police, children's social care and targeted intervention such as mentoring or therapeutic support.

15.3 County lines and extra-familial harm

Arco Academy will consider risk outside the home, including travel routes, peer groups, community locations and online spaces. Referrals will include relevant contextual information so that assessments can consider where and how harm is occurring.

16. Gender-questioning children, single-sex spaces, sport and residential activity

Arco will support children who are questioning their gender with dignity and respect in line with our wheel of culture whilst also following KCSIE 2026 update changes.

16.1 Requests for social transition

Decisions will be made on an individual basis, taking account of safeguarding, the child's best interests, the rights and safety of other pupils, the Equality Act 2010, the Human Rights Act 1998 and current statutory guidance. Decisions and the rationale for them will be appropriately recorded and reviewed.

- Staff must not independently implement changes relating to social transition. Requests are considered through a documented school decision-making process.
- The child's thoughts, feelings, vulnerabilities and best interests will be understood carefully.
- Parents/carers will normally be actively involved. If involving them may place the child at greater risk, the DSL will determine the safeguarding response before contact.
- If a child talks about feelings but does not request changes, information will not be shared more widely unless there is a related safeguarding reason.
- Decisions and reviews will be recorded.

16.2 Toilets, changing and showers

Arco Academy will follow KCSIE 2026 requirements for single-sex toilet and changing provision. A child will not be permitted to use facilities designated for the opposite biological sex. Where a gender-questioning child does not wish to use facilities designated for their biological sex, Arco Academy will consider an appropriate alternative without compromising single-sex provision and will record and review the arrangement.

16.3 Sport and PE

Where safety or fairness requires single-sex sport, Arco Academy will apply the relevant legal exception and KCSIE 2026 guidance. Individual requests will be considered carefully where no safety issue arises, taking account of the child's best interests, the impact on others and the need for safe and fair participation.

16.4 Residential trips

For residential activity, sleeping arrangements will follow KCSIE 2026. Children will not share overnight accommodation with a child of the opposite biological sex. Alternative arrangements will be considered sensitively where a child does not wish to share with children of the same biological sex.

17. Concerns and allegations about adults / low-level concerns

17.1 Allegations that may meet the harm threshold

An allegation may meet the harm threshold where an adult working with children has harmed or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved in a way that indicates they may pose a risk of harm to children; or behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Concerns about staff, supply staff, trainee teachers, volunteers or contractors must be reported immediately to the Principal. Concerns about the Principal must be reported to the CEO/Chair in accordance with governance arrangements. Concerns about the proprietor, or where there is a conflict of interest, should be referred directly to the LADO. The case manager will consider without delay whether onward referral to the LADO is required.

Where the person works for a third-party agency, Arco retains responsibility for gathering safeguarding facts and managing the safeguarding process while working closely with the employer/agency, which will usually lead any employment disciplinary process.

17.2 Whistleblowing and safeguarding practice

All staff are responsible for raising concerns about poor or unsafe safeguarding practice and potential failures in the school's safeguarding arrangements. Concerns should ordinarily be raised through Arco Academy's Whistleblowing Policy. If staff feel unable to raise a concern internally, or believe a safeguarding concern is not being addressed, they may use external whistleblowing routes, including the NSPCC Whistleblowing Advice Line. Staff must not be penalised for raising genuine concerns in good faith.

A low-level concern is any concern, no matter how small, that an adult may have acted in a way that is inconsistent with the staff code of conduct, including conduct outside work, but does not appear to meet the harm threshold. Low-level does not mean insignificant.

- Staff are encouraged to self-refer and to report concerns about others early.
- Low-level concerns are recorded securely and reviewed for patterns.
- Where a pattern emerges, or the threshold may be met, the principal will consider LADO advice/referral and employment action as appropriate.
- Concerns are managed confidentially and in accordance with data protection requirements.

18. Safer recruitment, visitors, contractors and volunteers

Arco will maintain a Single Central Record and follow KCSIE 2026 safer recruitment requirements for independent schools. Recruitment processes will include identity, right-to-work, references, qualifications, prohibition checks where relevant, appropriate DBS/barred-list checks, section 128 checks for relevant management roles and additional overseas checks where appropriate.

18.1 Regulated activity – KCSIE 2026 change

The KCSIE 2026 checklist records changes to regulated activity following the Crime and Policing Act 2026, including removal of the previous supervision exemption in specified circumstances. Arco's Safer Recruitment Policy and volunteer risk-assessment process must therefore be

updated in parallel with this policy and must use the current KCSIE 2026 definition rather than wording carried forward from earlier editions.

18.2 Volunteers

Where a volunteer role falls within regulated activity under the current definition, Arco Academy will obtain the required enhanced DBS and barred-list check. Where a volunteer does not fall within regulated activity, Arco Academy will complete a written risk assessment and use professional judgement to determine appropriate checks. Existing volunteers will be reviewed against the 2026 definition.

18.3 Self-employed contractors and visitors

Arco Academy will ensure self-employed workers and contractors have the level of DBS check required for their role, either obtained by Arco Academy or verified in accordance with current KCSIE requirements. Visitors will be identified, signed in, appropriately supervised and subject to proportionate checks based on their purpose and access to children.

19. Off-site education, alternative provision, work experience and external providers

19.1 Alternative provision

If Arco commissions alternative provision for a pupil, Arco remains responsible for the pupil's safeguarding. Arco Academy will undertake due diligence, confirm safeguarding arrangements, share relevant information, maintain regular contact, monitor attendance and welfare and review the placement. Safeguarding concerns must be shared promptly between DSLs.

19.2 Work experience

Work experience arrangements will include proportionate safeguarding checks and risk assessment. Adults supervising pupils will be considered under the current KCSIE 2026 regulated-activity framework.

19.3 External providers / hired premises

Where external organisations use premises or facilities connected with Arco Academy, Arco will obtain appropriate safeguarding assurances and include safeguarding requirements in agreements. Allegations about adults working for external providers will be managed under safeguarding procedures, including LADO contact where appropriate.

19.4 Leisure centre / shared facilities

Where pupils use shared leisure or sports facilities, Arco Academy will clarify supervision, changing arrangements, emergency procedures, information sharing and responsibility for CCTV or other site systems. Arco staff remain responsible for pupils in their care and must report concerns through Arco's safeguarding procedures.

20. Training, supervision and safeguarding culture

20.1 Induction of temporary and visiting staff

Supply, agency, temporary and visiting staff will receive safeguarding information proportionate to their role before having unsupervised access to pupils. This will include the DSL/DDSL contacts, how to report concerns, expected professional conduct, emergency safeguarding procedures and any pupil-specific information needed to keep children safe.

- All staff receive safeguarding and child protection training at induction and regular updates at least annually.
- All staff read Part One of KCSIE 2026 in full. Staff with safeguarding leadership responsibilities read the guidance required for their role.
- Training includes local Family Help/referral arrangements, child-on-child abuse, online safety, filtering and monitoring, AI-related safeguarding risk, exploitation, serious violence, mental health, attendance, SEND and concerns about adults.
- DSLs and DDSs complete role-specific training at least every two years and update knowledge and skills at least annually.
- The proprietor/Advisory Board receive safeguarding training appropriate to governance and oversight, including online safety/cybersecurity.
- At least one member of every recruitment panel has appropriate safer recruitment training.
- Staff have access to safeguarding supervision, case discussion and professional support proportionate to role and need.

21. Monitoring, quality assurance and review

21.1 Pupil voice and assurance

Pupil voice will be used periodically to evaluate whether pupils feel safe, know how to report concerns and can identify trusted adults, and how they believe concerns are taken seriously. Consideration will be given to pupils who experience communication or SEND-related barriers. Feedback will inform the DSL's safeguarding review and school improvement actions.

Safeguarding effectiveness will be reviewed throughout the year, not only when this policy is renewed. The DSL will provide appropriate assurance information to the Principal, CEO/proprietor and Advisory Board while protecting pupil confidentiality.

- Safeguarding records are quality-assured for chronology, clarity, action and rationale.
- Patterns are reviewed across attendance, behaviour, suspensions, reduced timetables, peer incidents, online concerns and safeguarding referrals.
- Filtering and monitoring is reviewed and recorded at least annually.
- DSL cover arrangements are reviewed for resilience.
- External placements/providers are reviewed for safeguarding quality.
- Low-level concerns and allegations are reviewed for patterns and organisational learning.
- This policy is reviewed at least annually and sooner following statutory guidance, local safeguarding changes, a serious incident or identified weakness.

Appendix A – Key contacts

Contact details must be checked and updated regularly by DSL. The current KCSIE guidance is available at <https://www.gov.uk/government/publications/keeping-children-safe-in-education-2>.

Role / organisation	Name	Contact
Designated Safeguarding Lead	Myles Burgess	DSL@arco.academy
Deputy DSL	Sakeelah Bangura	shs@arco.academy
Vice Principle/ Deputy DSL	Roxanne Osgood	Internal school contact
Principal	Chelsey Leighton	Internal school contact
Southwark LADO	Eva Simcock	Eva.Simcock@southwark.gov.uk 020 7525 0689
CEO	Dr Jeffery Quaye OBE	jquaye@arco.academy
Chair of Advisory Board	Dr Verena West	vwest@arco.academy
Advisory Board Safeguarding Lead	Sandie Quinn	squinn@arco.academy
Southwark MASH		020 7525 1921 out of hours: 020 7525 5000
NSPCC		0800 800 5000

Other emergency / specialist contacts should be maintained on Arco Academy safeguarding contact sheet and checked regularly. In an emergency call 999.

Appendix B – Recognising abuse, neglect and exploitation

Staff should be alerted to changes in behaviour, presentation, attendance, relationships, online activity and emotional wellbeing. Indicators should be considered in context and cumulatively; a single indicator may not prove abuse, while the absence of visible signs does not mean a child is safe.

Physical abuse

May include hitting, shaking, throwing, poisoning, burning/scalding, drowning, suffocating or otherwise causing physical harm. Consider unexplained or inconsistent injuries, repeated injuries, delay in seeking treatment and fear of adults or returning home.

Emotional abuse

Persistent emotional maltreatment causes severe and adverse effects on emotional development. KCSIE 2026 clarifies that this may include verbal abuse such as persistent criticism, belittling or name-calling. It may also include humiliation, intimidation, silencing, serious bullying or developmentally inappropriate expectations.

Sexual abuse

Includes forcing or enticing a child to take part in sexual activity, whether the child understands what is happening, including contact and non-contact abuse, online abuse, grooming and the production or sharing of sexual images. Most sexual abuse is committed by someone known to the victim. Children can also sexually abuse other children.

Neglect

Persistent failure to meet a child's basic physical and/or psychological needs. Indicators may include inadequate food, clothing, shelter, supervision, medical care or emotional responsiveness; persistent lateness/absence; poor hygiene; or a child being left with unsafe carers.

Exploitation and modern slavery

Exploitation may be sexual, criminal, financial or otherwise and may be facilitated by individuals, peers, organised networks or gangs. Children may be coerced into activity and may be treated as offenders rather than recognised as victims. Staff must consider modern slavery and trafficking where relevant.

Appendix C – Specific safeguarding issues

The following issues may require specific action. Staff do not need to become experts: they must recognise concerns, report promptly and follow DSL/local procedures.

Female genital mutilation (FGM)

Teachers who discover that FGM appear to have been carried out on a girl under 18 have a personal mandatory duty to report to police. Staff must not examine pupils.

Forced marriage / honour-based abuse

Treat as safeguarding concerns and seek DSL/specialist advice before contacting family where this could increase risk.

Domestic abuse / Operation Encompass

Children may be victims of domestic abuse in their household or their own teenage relationships. Information received through Operation Encompass is handled by the DSL and used to support the child.

Prevent / radicalisation

Report concerns to the DSL/Prevent Lead. The DSL considers local procedures, Channel and police information-sharing as appropriate.

Cybercrime

Concerns may include unauthorised access, malware, denial-of-service activity or other Computer Misuse Act-related behaviour. Consider whether a child is at risk, being exploited or requires specialist intervention.

Temporary accommodation

Housing instability can increase safeguarding vulnerability. The DSL will act on relevant notifications and work with local services.

Child-to-parent/caregiver abuse

Children may cause harm to parents/caregivers or other family members. Consider the safety and needs of all family members and the child's own vulnerabilities.

Teenage relationship abuse

May include physical, sexual or emotional abuse, coercive control and stalking.

Financial exploitation / sexual extortion

May involve fraud, scams, demands for money or threats to share intimate material. Treat coercion and blackmail as safeguarding concerns.

Private fostering/trafficking/modern slavery

Refer concerns to the DSL and local authority in line with statutory/local procedures.

Approval statement

The proprietor/Advisory Board confirms that this policy has been reviewed against KCSIE 2026 and Arco Academy's local safeguarding arrangements, and that associated operational policies and procedures have been updated where identified in the implementation checklist.

Approved by: _____ Date: _____

Next review: September 2027, or earlier if statutory guidance, local arrangements or school circumstances change.