

# Crimson Academies

## Safeguarding and Child Protection Policy



Crimson  
Academies



CRIMSON  
GLOBAL  
ACADEMY



# Contents Page

<b>Introduction</b>	<b>5</b>
<b>Purpose and Ethos</b>	<b>6</b>
<b>Scope and Application</b>	<b>7</b>
Who the Policy Applies To	7
Where and How the Policy Applies	8
<b>Key Safeguarding Contacts</b>	<b>8</b>
<b>Definitions</b>	<b>10</b>
Child / Young Person	10
Safeguarding	10
Harm	11
Abuse	11
Neglect	11
Significant Harm	11
Forms of Abuse in Specific Contexts	11
Online Abuse	11
Peer-on-Peer Abuse	12
Contextual Safeguarding	12
Designated Roles	12
Designated Safeguarding Lead (DSL) / Child Safety Officer (CSO)	12
Deputy DSL / Deputy CSO	12
Responsible Adult	12
Third-Party Provider	13
<b>Responsibilities and Roles</b>	<b>13</b>
Designated Safeguarding Leads (DSLs) / Child Safety Officers (CSOs)	13
All Staff and Responsible Adults	14
Parents, Guardians, and Carers	14
Students	15
Legal and Compliance Team	15
External Authorities	15
Board of Governors / Governance Leadership	16
<b>Recognising Abuse and Neglect</b>	<b>16</b>
Categories of Abuse	16

Specific Risks in Digital, One-to-One, and International Contexts	17
Signs of Abuse and Behavioural Indicators	18
Cultural and Jurisdictional Context	18
<b>Prevention and Early Help</b>	<b>19</b>
Embedding Protective Factors Across the Learning Environment	19
Pastoral Support Structures	19
Wellbeing Education	19
Personalised Teaching and Learning	20
Early Identification and Targeted Support	20
Student Voice and Empowerment	21
<b>Procedures for Reporting Concerns</b>	<b>21</b>
How to Report a Concern	22
For Students	22
For Staff and Tutors	22
What Should Be Reported	22
Why Recording Matters	23
How and What to Record	23
What Happens to the Record	23
Who Can See the Record	24
Confidentiality and Escalation	24
<b>Allegations Against Staff or Contractors</b>	<b>24</b>
Reporting Allegations	25
Immediate Safety and Separation	25
Internal Investigation and External Reporting	26
Suspension and Protective Action	26
Whistleblower Protections	26
<b>Safer Recruitment</b>	<b>27</b>
Scope and Safeguarding Threshold	27
Core Safeguarding Requirements (All Roles)	27
Employment vs Contractor Pathways	28
For Employees (e.g. Teachers, Full-Time or Part-Time Staff)	28
For Contractors / Third-Party Providers (e.g. Tutors, Instructors)	28
International Jurisdiction and Vetting Compliance	29
Contractual Safeguarding Obligations	29

<b>Induction, Training &amp; Development</b>	<b>30</b>
Induction Training (Mandatory Before Working With Students)	30
Annual Refresher Training	30
Role-Specific and Advanced Training	31
International Safeguarding Training Considerations	31
<b>Policy Governance and Review</b>	<b>32</b>
Ownership and Oversight	32
Annual Review Cycle	33
Interim Reviews and Urgent Updates	33
Communication and Access	33
Version Control	33

# Introduction

Crimson Academies—which includes Crimson Global Academy, Crimson AGE School, Mt Hobson Academy, and American Infinite Academy—is a network of forward-thinking schools delivering high-quality education through both online platforms and physical campuses. We educate students from a diverse range of cultural backgrounds, time zones, and educational pathways, including full-time enrolments, part-time and/or supplementary programs, and one-to-one tuition or instruction.

At the core of our educational philosophy is a firm belief that **child safety and wellbeing are not peripheral considerations, but integral to our organisational leadership, governance, and culture**. Safeguarding is embedded into every level of our operations—from board oversight and executive leadership, to curriculum design and the daily conduct of teachers, tutors, and support staff. It is a foundational obligation that underpins our ability to deliver effective, personalised, and aspirational education to all learners.

This Safeguarding and Child Protection Policy outlines how we promote the welfare of children and young people, prevent abuse and neglect, and respond to concerns or disclosures. It applies to all students enrolled in any Crimson Academies program, regardless of their location, age, mode of instruction, or legal jurisdiction. It also applies to all staff, contractors, and volunteers who engage with students in any capacity.

We recognise that **students learn in a variety of settings**—including physical classrooms, synchronous online lessons, and one-to-one remote instruction. We are committed to ensuring that **every student, regardless of their learning environment or geography, is entitled to the same high standard of safeguarding, care, and oversight**. This includes particular attention to the distinct risks associated with online interaction, remote learning, and international delivery models.

Our approach is guided by the **legal frameworks and best practice guidance in our key jurisdictions**, including:

- **New Zealand** – Children’s Act 2014; Oranga Tamariki Act 1989
- **Australia (Victoria and New South Wales)** – Child Wellbeing and Safety Act 2005 (Vic); Child Safe Standards (Vic); Child Protection (Working with Children) Act 2012 (NSW)
- **United Kingdom** – *Keeping Children Safe in Education* (KCSIE); Children Act 1989 and 2004
- **United States** – State and federal child welfare laws, including mandatory reporting statutes, FERPA, and COPPA

We acknowledge the complexities of delivering safeguarding in a global and digitally enabled context. Where legal obligations differ between jurisdictions, **we commit to applying the most protective standard available**, consistent with our duty of care and the principles of international best practice.

This policy sits alongside other key policies, including our Anti-Bullying Policy, Online Safety Policy, and Complaints Procedure. Children and young people are to be made aware of a student-facing version of this policy: Safeguarding and Child Protection Policy (Student-Facing). Together, they reflect our commitment to creating safe, inclusive, and empowering environments in which all students can thrive.

## Purpose and Ethos

The purpose of this policy is to ensure that all students within Crimson Academies are protected from harm and empowered to flourish in safe, respectful, and inclusive environments. We believe that safeguarding is not only a legal imperative but a reflection of our ethical values and educational purpose. It underpins every relationship we form, every system we build, and every lesson we deliver.

At Crimson Academies, we recognise that students thrive when they feel physically, emotionally, and psychologically secure. Our safeguarding culture is therefore proactive, not reactive. We focus on creating environments—both physical and online—where children and young people are listened to, respected, and supported to become active participants in their own wellbeing and development.

We are committed to the following core principles:

- **Child safety and wellbeing are embedded in leadership, governance, and culture.** Safeguarding is a whole-organisation responsibility, championed from the boardroom to the classroom. Leadership decisions are made with child safety as a foundational priority, not an afterthought.
- **Children and young people are empowered about their rights, involved in decisions that affect them, and taken seriously.** We foster environments that encourage student voice, enable meaningful participation, and support agency—especially in matters concerning health, safety, and learning conditions. In one-to-one and online learning contexts, we take particular care to promote transparent, respectful, and developmentally appropriate engagement.
- **Families and communities are informed and actively involved in promoting child safety and wellbeing.** We believe that safeguarding is most effective when there is open communication and shared responsibility between the school, the home, and the wider

community. We seek to partner with families to ensure consistency, trust, and shared values across settings.

- **Safeguarding is a lived ethos, not just a policy.** Whether a student is enrolled in a global online classroom, attending a physical campus or classroom, or receiving personalised tuition on a one-to-one basis, they are entitled to feel safe, supported, and understood. Every staff member, tutor, and adult in our network has a duty to uphold that right, regardless of their role or location.

This policy is informed by the best available child protection practices across our core jurisdictions, while recognising and adapting to the challenges of delivering consistent safeguarding across legal and cultural boundaries. In all cases, our guiding standard is clear: the best interests of the child come first.

## Scope and Application

This policy applies to all individuals and environments connected to Crimson Academies, regardless of geography, enrolment status, or learning mode. Its scope reflects our commitment to uphold a consistent standard of safeguarding across every part of our school network, while also recognising the practical and legal complexities of international and multi-modal education.

## Who the Policy Applies To

This policy applies to:

- **All students**, including:
  - Full-time and part-time students
  - Domestic and international students
  - Students learning online, on-site, or via one-to-one instruction
  - Students enrolled in any Crimson Academies school (Crimson Global Academy NZ, Crimson Global Academy USA, Crimson AGE School, Mt Hobson Academy, American Infinite Academy)
- **All adults involved in the delivery or support of education**, including:
  - Teachers, tutors, and learning assistants
  - Pastoral, administrative, and support staff
  - Executive and governance personnel
  - Volunteers

- Contractors and third-party providers
- One-to-one instructors (e.g. those engaged delivering tutoring or one-to-one instruction)
- Any other adult working with, supervising, or interacting with students under the remit of Crimson Academies

Every person who interacts with students through our programs bears a clear safeguarding responsibility—regardless of employment status, location, or form of engagement.

## Where and How the Policy Applies

This policy applies to **all environments in which Crimson Academies operates**, including:

- **Physical school sites and campuses** (e.g. Crimson AGE School)
- **Virtual learning environments**, including online classrooms, video conferencing platforms, and digital learning management systems
- **One-on-one learning contexts**, both online and in-person, including private instruction, mentoring, and tutoring programs
- **School-related travel, excursions, and events**, including international trips and off-site learning
- **Pastoral care and wellbeing services**, including those provided digitally or by external professionals
- **Extracurricular activities**, enrichment programs, and co-curricular offerings that occur under the school’s supervision or endorsement

Safeguarding obligations continue to apply whether students are engaging synchronously or asynchronously, on-site or remotely, in a group or as individuals.

All members of the Crimson Academies community share the responsibility of ensuring that these environments are safe, inclusive, and protective of children and young people. No context—physical, digital, or hybrid—is exempt from this duty of care.

## Key Safeguarding Contacts

Each school within the Crimson Academies network appoints a senior staff member to serve as the **Designated Safeguarding Lead (DSL)**—also referred to in some contexts as the **Child Safety Officer (CSO)**. These individuals are responsible for overseeing the implementation of child protection



practices, responding to concerns, and ensuring compliance with relevant legal frameworks and organisational safeguarding standards.

DSLs are trained in the specific legal, procedural, and cultural requirements of the jurisdictions in which their students are located. They act as the first point of contact for any safeguarding concerns, disclosures, or allegations involving students, staff, or third-party providers.

In cases involving students across multiple jurisdictions or learning modes—including virtual, one-on-one, or international arrangements—DSLs may collaborate to ensure the most protective and appropriate response is taken, consistent with applicable legal obligations.

The following table provides the current contact details of each DSL, along with their role, location, and area of responsibility.

<b>Name &amp; Role</b>	<b>Location</b>	<b>School &amp; Area of Responsibility</b>	<b>Email</b>
Mark Phillips <i>Principal, A-Level Pathway</i>	Auckland, New Zealand	Crimson Global Academy	m.phillips@cga.school
Brittanie Bates <i>Head of School, USA</i>	Oregon, United States	Crimson Global Academy American Infinite Academy	b.bates@cga.school
Stephanie Todaro <i>Academic Dean, USA</i>	South Carolina, United States	Crimson Global Academy	s.todaro@cga.school
Ronan Kearney <i>Deputy Principal</i>	Melbourne, Australia	Crimson Global Academy	r.kearney@cga.school
Kate Thompson <i>Director of Pastoral Care &amp; Student Leadership, Aoraki Campus</i>	Picton, New Zealand	Crimson Global Academy	k.thompson@cga.school

Beth Haresnape <i>Director of Pastoral Care, Greenwich Campus</i>	Cornwall, United Kingdom	Crimson Global Academy	b.haresnape@cga.school
Sarah Turner <i>Principal</i>	Auckland, New Zealand	Crimson AGE School	sturner@age.school.nz
Saira Boyle <i>Principal</i>	Auckland, New Zealand	Mt Hobson Academy	s.boyle@mthobson.school.nz
Safeguarding Team	Available throughout Crimson Academies		safeguarding@crimsonacademies.school

## Definitions

The following definitions are used throughout this policy and are based on statutory guidance and best practice across Crimson Academies' key jurisdictions. These terms help clarify the scope of responsibilities, behaviours, and risks covered by our safeguarding framework.

### Child / Young Person

For the purposes of this policy, a **child** or **young person** is defined as any individual under the age of 18, in line with definitions in New Zealand's *Oranga Tamariki Act 1989*, the UK's *Children Act 1989*, and international conventions such as the *UN Convention on the Rights of the Child*. In some contexts (e.g. Australia or the United States), child protection laws may extend protections to individuals over 18 where they are still enrolled in school or dependent on parental care. Crimson Academies applies the protective standard most favourable to the student in any such case.

### Safeguarding

**Safeguarding** refers to the proactive measures taken to promote the welfare of children and to protect them from harm. This includes:

- Preventing abuse and maltreatment
- Promoting mental and physical health and wellbeing
- Ensuring a safe and supportive learning environment
- Taking action to enable all children to have the best outcomes

## Harm

**Harm** encompasses any detrimental effect on a child's physical, emotional, psychological, or developmental wellbeing. It may result from abuse, neglect, exploitation, or exposure to unsafe environments or relationships.

## Abuse

**Abuse** refers to any act, or failure to act, which results in actual or potential harm to a child. It can be perpetrated by adults or peers and can take several forms, including:

- **Physical abuse** – causing physical harm through hitting, shaking, burning, etc.
- **Emotional abuse** – persistent emotional maltreatment, belittling, or threatening behaviour
- **Sexual abuse** – forcing or enticing a child to take part in sexual activities (including online)
- **Neglect** – persistent failure to meet a child's basic physical or emotional needs

## Neglect

**Neglect** involves the ongoing failure to meet a child's essential needs. It can include deprivation of food, clothing, shelter, supervision, access to healthcare, or emotional nurturing.

## Significant Harm

**Significant harm** is the threshold that justifies statutory intervention. It refers to a level of harm that is serious enough to affect a child's health, development, or safety. This term is used in many legal systems (e.g., NZ, UK) to guide decisions about child protection responses.

## Forms of Abuse in Specific Contexts

### Online Abuse

**Online abuse** includes any abuse that occurs through digital platforms, such as video conferencing, messaging apps, social media, gaming, or email. It may include:

- Grooming and exploitation
- Cyberbullying
- Non-consensual sharing of images or videos
- Online radicalisation

- Emotional manipulation or coercion

### **Peer-on-Peer Abuse**

**Peer-on-peer abuse** refers to situations where children or young people harm other children. It can include:

- Bullying (including cyberbullying)
- Physical violence
- Sexual harassment or assault
- Initiation rituals or hazing
- Controlling behaviours in peer relationships

Crimson Academies recognises that all forms of peer abuse must be taken seriously and responded to in the same manner as abuse perpetrated by adults.

### **Contextual Safeguarding**

**Contextual safeguarding** refers to an approach that considers the social, cultural, and environmental factors beyond the immediate family that may pose risks to a child. These may include:

- Peer group norms
- School or online community dynamics
- Unsafe home-learning environments
- Extracurricular and third-party learning settings

### **Designated Roles**

#### **Designated Safeguarding Lead (DSL) / Child Safety Officer (CSO)**

A **DSL/CSO** is a senior staff member with primary responsibility for managing safeguarding concerns, maintaining policy compliance, and liaising with external agencies. Each school within Crimson Academies has an appointed DSL/CSO trained in the relevant laws of their jurisdiction.

#### **Deputy DSL / Deputy CSO**

Supports the DSL/CSO in their responsibilities and may act in their absence.

#### **Responsible Adult**

A **Responsible Adult** is any adult who is in a position of trust or authority over a child within the school context, including teachers, tutors, mentors, volunteers, and staff. All responsible adults are subject to the standards and expectations set out in this policy.

### **Third-Party Provider**

An individual or organisation providing services to students under the Crimson Academies umbrella. All third-party providers working with students must comply with Crimson's safeguarding standards, including appropriate vetting and conduct requirements.

## **Responsibilities and Roles**

At Crimson Academies, safeguarding is a collective responsibility shared across all levels of the organisation. Everyone who works with or around children has a duty of care to protect them from harm and to promote their wellbeing. While Designated Safeguarding Leads (DSLs) and Child Safety Officers (CSOs) hold specific roles in managing safeguarding processes, every staff member, student, and family has a role to play in creating a safe and protective learning environment.

### **Designated Safeguarding Leads (DSLs) / Child Safety Officers (CSOs)**

Each school within the Crimson Academies network appoints at least one DSL/CSO responsible for the day-to-day oversight of safeguarding and child protection matters. Some schools have more than one DSL/CSO to ensure appropriate geographical coverage. DSLs/CSOs are trained in jurisdiction-specific obligations and serve as the first point of contact for concerns, disclosures, or reports of harm.

Their responsibilities include:

- **Making referrals** to local safeguarding teams, law enforcement, or child protection agencies in accordance with the procedures of the relevant jurisdiction.
- **Maintaining detailed and secure records** of all safeguarding concerns, regardless of whether they result in an immediate referral.
- **Storing records confidentially**, separate from academic files, and in accordance with legal data retention periods (e.g. until the young person's 25th birthday). Records must be transferred, where appropriate, to the next school or educational institution.
- **Liaising with other agencies and professionals**, including social services, medical providers, and educational psychologists, as needed.

- **Attending or arranging representation** at multi-agency meetings, including case conferences, planning reviews, or child protection strategy meetings.
- **Ensuring that all staff receive regular safeguarding training**, including:
  - Annual full safeguarding training for all staff
  - Refresher or targeted training during professional development days or induction sessions
  - Informal guidance and case consultation where required
- **Supporting staff and students** in understanding safeguarding responsibilities and fostering a culture of vigilance and proactive reporting.

## All Staff and Responsible Adults

Every staff member, tutor, contractor, or adult working in a Crimson Academies setting is considered a **Responsible Adult**. This includes classroom teachers, online instructors, tutors, administrative staff, extracurricular providers, and volunteers.

All Responsible Adults must:

- Prioritise the **safety and welfare of every student** in their care.
- Be aware of the signs of abuse and neglect and know how to recognise potential harm.
- Report any concerns about a student's welfare **immediately to the relevant DSL/CSO**, even if the concern seems minor.
- Follow the school's safeguarding procedures and maintain confidentiality.
- Complete all required safeguarding training and refresher sessions as directed.

No concern is too small to report. The responsibility to act lies with **every adult**, not just safeguarding specialists.

## Parents, Guardians, and Carers

Parents and guardians are essential partners in promoting the safety and wellbeing of students. Crimson Academies seeks to work openly and collaboratively with families by:

- Keeping parents informed about our safeguarding policies, procedures, and expectations.
- Involving families in relevant aspects of safeguarding planning and responses, where appropriate and safe.
- Encouraging parents to raise concerns about their child or others in confidence and without fear of reprisal.

- Supporting parents in accessing external help (e.g. counselling services or family support agencies) if needed.

## Students

Students are central to our safeguarding culture and are actively encouraged to participate in creating safe, respectful environments. All students have the right to:

- Learn in an environment free from abuse, harm, and exploitation.
- Know how to **identify unsafe situations**, both online and in person.
- Understand **their rights to safety, privacy, and participation**.
- Speak up without fear of judgment or retaliation if they feel unsafe.
- Be heard, taken seriously, and supported appropriately when they disclose a concern.

Crimson Academies supports student agency through age-appropriate safeguarding education, pastoral systems, and open dialogue.

## Legal and Compliance Team

The Legal and Compliance function provides:

- **Ongoing oversight of legal and regulatory obligations** across jurisdictions.
- **Advisory support** to DSLs/CSOs and leadership on complex or cross-border safeguarding matters.
- **Policy review and updates**, ensuring the safeguarding framework reflects current legislation and best practice.
- Liaison with external legal or government bodies in cases involving legal complexity or reputational risk.

## External Authorities

Crimson Academies cooperates fully with statutory agencies in each jurisdiction, including:

- **Child protection agencies and social services**
- **Law enforcement**
- **Health and psychological services**
- **Education regulators or ombudsmen**

DSLs/CSOs are responsible for initiating referrals, following up on actions taken, and ensuring student safety throughout external investigations.

## **Board of Governors / Governance Leadership**

The Board (or equivalent governance entity) holds ultimate accountability for safeguarding. Their responsibilities include:

- Ensuring that **safeguarding is embedded** in all aspects of strategic and operational planning.
- Reviewing and approving safeguarding policies annually, or following major incidents or legal changes.
- Appointing appropriately trained and resourced DSLs/CSOs.
- Monitoring safeguarding performance indicators (e.g. incident reports, training compliance, audit outcomes).
- Ensuring a culture of **transparency, challenge, and continuous improvement** in relation to child protection.

## **Recognising Abuse and Neglect**

Crimson Academies is committed to identifying and responding promptly to all forms of abuse and neglect. Staff and responsible adults must remain alert to potential signs of harm in every setting—whether physical, virtual, or one-on-one—and take appropriate action in accordance with this policy.

Abuse can take many forms and may be perpetrated by adults or peers. It may occur in the home, in school environments (online or physical), or in third-party learning spaces. It can also be subtle, cumulative, and hard to detect—especially in virtual contexts, where body language, physical injuries, or interpersonal dynamics may be obscured.

### **Categories of Abuse**

The following categories of harm are recognised internationally, and all apply equally in digital, physical, and one-to-one environments:

- **Physical Abuse** – The deliberate infliction of physical harm or injury. This may include hitting, shaking, burning, poisoning, or misuse of medication or restraint. It is most likely to be observed in physical school settings or disclosed by students.



- **Emotional Abuse** – Persistent emotional maltreatment such as belittling, shaming, isolating, threatening, or intimidating behaviour. In digital contexts, this can include coercive control, repeated criticism during online lessons, or exclusion from group activities.
- **Sexual Abuse** – Forcing or enticing a child to take part in sexual activities, whether or not they are aware of what is happening. This includes non-contact abuse, such as grooming, exhibitionism, or the sharing of sexual content (e.g. via messaging apps or webcam). Online abuse of this kind can occur without physical proximity.
- **Neglect** – The persistent failure to meet a child’s basic physical or emotional needs. Neglect may be harder to detect in online settings but can manifest through consistent disengagement, signs of hunger or fatigue, lack of access to a safe learning environment, or inappropriate supervision during lessons.
- **Peer-on-Peer Abuse** – Abuse perpetrated by other children or young people. This includes bullying (including cyberbullying), sexual harassment or assault, initiation rituals, and coercive relationships. Peer-on-peer abuse can happen in physical classrooms or digital spaces such as chat functions, forums, or social media.
- **Online Abuse** – Any abuse that takes place via technology. This includes:
  - Grooming or exploitation through social media or chat platforms
  - Non-consensual image sharing
  - Cyberbullying, trolling, or public humiliation
  - Identity-based harassment (e.g. racism, homophobia, misogyny)
  - Use of AI or deepfakes for harassment or manipulation
- **Institutional or Organisational Abuse** – Harm that arises from systemic failings in supervision, vetting, policies, or cultures of silence. In digital learning environments, this can include lack of oversight during 1:1 sessions, inappropriate staff-student boundaries, or the normalisation of harmful online discourse.

## Specific Risks in Digital, One-to-One, and International Contexts

Crimson Academies recognises that online-first and globally distributed learning environments create unique safeguarding risks:

- **Reduced visibility** – Staff may have fewer physical cues (e.g. bruising, non-verbal distress) to identify abuse. This makes tone of voice, demeanour, and consistency of engagement critical indicators.

- **Private online interactions** – One-to-one learning may involve sessions where students are alone with a tutor or teacher in a virtual space. Safeguarding protocols, including recording, supervision, and professional boundaries, are essential.
- **Cross-jurisdictional misunderstandings** – Legal and cultural norms around discipline, privacy, and family roles vary across countries. While Crimson Academies respects local customs, we are guided by universal principles of child protection and apply the **most protective standard available** when concerns arise.
- **Online disinhibition** – Students may experience increased peer conflict, inappropriate disclosures, or exposure to harmful content in unmoderated online settings.

## Signs of Abuse and Behavioural Indicators

Staff should be vigilant for **patterns of behaviour** or **changes in presentation** that could indicate abuse or neglect. Indicators may include:

- Sudden withdrawal from online classes or extracurriculars
- Consistent lateness or absenteeism without explanation
- Regression in academic performance or participation
- Visible distress, anxiety, or fearful behaviour
- Inappropriate clothing, language, or topics in class discussions
- Disclosures (direct or indirect) of mistreatment
- Unexplained injuries (in physical settings)
- Excessive control or monitoring by adults during online sessions
- Evidence of cyberbullying, grooming, or unsafe digital activity

Staff should be particularly alert to changes over time, patterns of concern across contexts, or behaviours that seem inconsistent with the student's usual profile.

## Cultural and Jurisdictional Context

When identifying or responding to possible abuse, staff must consider the **cultural norms, legal definitions, and child protection guidance in the jurisdiction** where the student resides. A behaviour that is considered inappropriate or harmful in one context may not be interpreted the same way elsewhere. However:

**Where staff are unfamiliar with local expectations, they are encouraged to report any behaviour that appears concerning in light of this policy and international child**

**protection standards.** The guiding question should always be: *“Would a reasonable observer, acting in the best interests of the child, consider this behaviour harmful or unsafe?”*

Ultimately, the **student’s experience of harm is central**, not whether an adult intends or perceives harm. Cultural sensitivity must never override the duty to protect a child from abuse, neglect, or exploitation.

## Prevention and Early Help

At Crimson Academies, safeguarding begins with a proactive culture of prevention, inclusion, and early support. We believe every student deserves to feel safe, respected, and supported—not only when harm occurs, but through the ongoing relationships, structures, and learning environments that protect them before problems escalate.

We take a whole-community approach to prevention, combining wellbeing education, inclusive practices, and early help pathways to ensure that every student—regardless of background, circumstance, or learning profile—has the support they need to thrive.

## Embedding Protective Factors Across the Learning Environment

Protective factors are integrated throughout our schools, particularly within the online-first model of most of the schools in the Crimson Academies network. We promote emotional safety, relational trust, and student agency through:

### Pastoral Support Structures

- Each student belongs to an **academic House**, led by a **Pastoral Dean**, who provides individualised oversight and connection.
- Weekly **Form Time** and **Assemblies** cover topics such as wellbeing, peer relationships, digital safety, and resilience.
- Students can access multiple pathways for support, including their Dean, teacher, or the **“I need help”** feature on **CGA Home**.

### Wellbeing Education

- Core wellbeing principles are embedded into Form Time, tutor sessions, and advisory curricula. Topics include mental health, emotional regulation, identity, and safe decision-making.
- **Student leaders**, peer forums, and pastoral feedback loops foster positive peer interaction and community values.

### **Personalised Teaching and Learning**

- Our teachers get to know their students well, enabling proactive engagement with emerging difficulties.
- Learning environments tend to feature small class sizes and curriculum pacing tailored to student readiness rather than rigid age expectations.
- Teachers collaborate closely with Deans, families, and the Inclusion Manager to support students with individual educational needs and abilities.

### **Early Identification and Targeted Support**

We understand that early signs of difficulty—academic, emotional, or social—can be the first indicators of risk. Crimson Academies offers structured, responsive support, coordinated by our **Inclusion Manager** and wider support team.

### **Individual Educational Needs and Abilities (IENA)**

Crimson Academies recognises and supports the broad spectrum of **Individual Educational Needs and Abilities (IENA)**. This inclusive term reflects our belief that every learner brings unique strengths, challenges, and ways of engaging with the curriculum.

IENA includes:

- Specific learning differences (e.g. dyslexia, autism, ADHD)
- Emotional, sensory, or physical support needs
- Circumstantial factors affecting learning (e.g. transitions, family dynamics)
- Gifted and twice-exceptional learners needing differentiated provision

### **Inclusion Manager**

Our Inclusion Manager (formerly, SENCo), coordinates:

- Assessment and review of students requiring additional support

- Development of Individualised Education Plans (IEPs)
- Liaison between families, teachers, tutors, and external specialists
- Ongoing monitoring and support to ensure effective adjustments are in place

### **Learning Support Assistants (LSAs)**

LSAs work one-to-one with students to:

- Support with organisation, study skills, and task completion
- Build confidence in academic contexts
- Provide a consistent, encouraging presence for students with IENA

### **Counselling Services**

Our qualified school **counsellor**, with a background in teaching, offers:

- Individual therapeutic support for students facing personal, emotional, or social challenges
- Coordination with Deans and the Inclusion Manager
- A non-judgmental, confidential space to help remove emotional barriers to learning

### **Student Voice and Empowerment**

We actively promote student participation in safeguarding and personal development. Across our schools:

- Students are taught about **their rights, boundaries, and how to ask for help** through structured wellbeing sessions
- The “**I need help**” feature on CGA Home is prominently available to all students for self-referral
- Multiple adult touchpoints (teachers, tutors, Deans, LSAs) mean students can choose who they feel most comfortable speaking with
- Students are engaged through surveys, peer initiatives, and student-led forums to help shape a safer, more inclusive school culture

## **Procedures for Reporting Concerns**

At Crimson Academies, safeguarding is everyone’s responsibility. We expect and encourage all members of our community—students, staff, tutors, contractors, and volunteers—to raise concerns

when they believe a child may be at risk of harm. This includes suspected or disclosed abuse, neglect, peer-on-peer harm, wellbeing issues, or any circumstance that raises concern about a student's safety.

We have multiple, clearly defined channels to make reporting straightforward, accessible, and responsive to the range of contexts in which our schools operate—physical campuses, virtual classrooms, and one-on-one learning environments.

## How to Report a Concern

Concerns should be reported through one of the following channels:

### For Students

- Speak directly with your **teacher, tutor, or instructor**
- Speak with your **Pastoral Care Dean** or another trusted adult
- Use the **“I need help”** feature on **CGA Home**, accessible to all students
- Send an email to **safeguarding@crimsonacademies.school** (monitored by the full safeguarding team)
- Use the **“Report Message”** function in **Microsoft Teams** if a safeguarding concern arises during a chat or discussion

### For Staff and Tutors

- Speak to or email the relevant **DSL/CSO** listed in the table in [Section 4: *Key Safeguarding Contacts*]
- If in doubt, email **safeguarding@crimsonacademies.school**, which is continuously monitored by the core safeguarding team
- Submit a safeguarding concern using the **standard online reporting form** (link: <https://form.jotform.com/252657552904059>), which collects:
  - Your name and contact details
  - Basic information about the concern
  - Who is involved
  - A description of what was seen, heard, or disclosed

## What Should Be Reported

Concerns may include, but are not limited to:

- Suspected or confirmed **abuse or neglect**
- Unsafe or inappropriate behaviour by an adult or peer
- **Emotional distress**, self-harm, or mental health concerns
- **Online grooming**, cyberbullying, or exposure to unsafe digital content
- Changes in behaviour, mood, or attendance that raise concern
- Any situation where a child appears to be **at risk of harm**, regardless of certainty

Remember: **you do not need proof to report a concern**—only a reasonable belief that something may not be right.

## Why Recording Matters

Recording safeguarding concerns is essential because it:

- Provides a **clear and objective record** of events or disclosures
- Allows the DSL/CSO to monitor **patterns of behaviour over time**
- Enables appropriate and timely follow-up with students, families, and external agencies
- Ensures that **legal, regulatory, and duty of care obligations** are met

A written record often becomes the starting point for further assessment, protection planning, or external referral.

## How and What to Record

Reporters must:

- Record the concern **as soon as possible** after becoming aware of it
- Use clear, **factual, and objective language**
- Include:
  - Date, time, and method of disclosure or observation
  - Names of those involved
  - Exact wording of any disclosure (use quotation marks)
  - Actions taken (e.g. support offered, contact with parents)

Avoid speculation or assumptions. Focus on what was seen, heard, or said.

## What Happens to the Record

- Once submitted, the report is reviewed by the appropriate **DSL/CSO**
- The concern is logged in a **secure digital safeguarding system**, separate from academic records
- Only authorised members of the safeguarding team can access these records
- Reports are retained in line with legal and regulatory requirements, typically until the student's **25th birthday**
- Records may be transferred to a student's next school or college where required for continuity of care and legal compliance

## Who Can See the Record

- **Only members of the safeguarding team** (DSL/CSO and relevant leadership) can access concern records
- **Parents, carers, and mentors do not automatically see safeguarding reports**, but:
  - May be informed when appropriate, unless doing so would put the student at further risk
  - Will be involved in follow-up actions when it is safe and in the child's best interests
- In cases involving external agencies (e.g. child protection, police), relevant information may be shared in line with law and best practice

## Confidentiality and Escalation

- All concerns are handled with **professional discretion and confidentiality**
- Staff cannot promise to keep information secret if a child may be at risk
- When in doubt, staff must **report the concern**—the DSL/CSO will assess whether further action is needed
- Where required, the DSL/CSO will escalate the concern to:
  - Local child protection authorities (based on the student's jurisdiction)
  - Law enforcement or social services
  - Internal leadership for support or coordination

## Allegations Against Staff or Contractors



Crimson Academies takes all allegations of misconduct, harm, or inappropriate behaviour by staff, contractors, tutors, or volunteers extremely seriously. Any concern that an adult working within the organisation may have:

- Harmed a student
- Behaved in a way that could indicate they pose a risk to children or young people
- Violated professional boundaries or safeguarding expectations
- Acted in a manner that is incompatible with working in a child-safe environment

...must be treated as a safeguarding matter and addressed through the same channels and procedures as any other safeguarding concern.

## Reporting Allegations

Students, staff, or any member of the Crimson Academies community may report an allegation of concern using the same channels outlined in [*Procedures for Reporting Concerns*]:

- Email: [safeguarding@crimsonacademies.school](mailto:safeguarding@crimsonacademies.school)
- Click the “I need help” button at CGA Home and fill out the form available there
- Speak to a trusted staff member (who must escalate immediately)
- Use the Report Message function in Slack or Microsoft Teams

*There is no separate form or process for allegations against staff or contractors. This consistency is deliberate—to minimise confusion and reduce barriers to reporting.*

If the concern involves a Designated Safeguarding Lead (DSL) or Child Safety Officer (CSO) themselves, the report should be made directly to:

- The Chief Executive Officer at [p.barton@cga.school](mailto:p.barton@cga.school)
- The Legal and Compliance Team at [legal@crimsonacademies.school](mailto:legal@crimsonacademies.school)

These individuals will manage the concern independently of the DSL/CSO implicated.

## Immediate Safety and Separation

Where an allegation involves **immediate risk to a student**, the first priority is the **safety and protection of the student**. Appropriate steps may include:

- Separating the student from the adult involved

- Reassigning supervision or teaching responsibilities
- Providing pastoral care and support for the student(s) affected
- Notifying relevant authorities without delay (e.g. local safeguarding agency, police)

The DSL/CSO or senior leader receiving the report must assess the level of risk and take immediate action to prevent further harm.

## **Internal Investigation and External Reporting**

Once a report is received:

- The DSL/CSO (or the CEO or Legal Team, if appropriate) will conduct a preliminary safeguarding assessment
- Depending on jurisdiction and severity, the matter may be referred to:
  - Police or law enforcement
  - Child protection services
  - Other regulatory bodies or independent investigators as required

If the concern does not meet the threshold for external referral but still raises serious questions about professional conduct, the case will be managed under the organisation's disciplinary procedures, with support and oversight from the Legal and HR teams.

## **Suspension and Protective Action**

The decision to suspend a staff member or contractor during an investigation is made on a case-by-case basis, balancing:

- The need to protect students from potential harm
- The rights of the staff member under employment law and procedural fairness
- The impact on the learning environment and operational continuity

This decision is taken by the Executive Leadership in consultation with the CEO, Legal Team, and—where appropriate—external safeguarding authorities.

If the allegation is against a member of the executive team, including the Principal or Head of School, the CEO will assume direct oversight and decision-making responsibilities.

## **Whistleblower Protections**

Crimson Academies supports a culture of transparency and accountability, and protects any individual who raises a safeguarding concern in good faith from:

- Retaliation or victimisation
- Professional disadvantage or discrimination
- Legal consequences for reporting (provided the report is honest and non-malicious)

Whistleblower reports will be treated with confidentiality and investigated with impartiality. Staff and students are encouraged to speak up without fear, knowing that their concern will be addressed with seriousness and integrity.

## Safer Recruitment

Crimson Academies is committed to ensuring that only individuals who are safe, suitable, and well-prepared to work with children are engaged in any role that involves student contact. Whether through formal employment or contracted instruction, we apply a consistent safeguarding threshold to all adults in our learning environment.

*While employment structures may differ, **safeguarding standards do not.** Every person working with students at Crimson Academies—whether teacher, tutor, instructor, coach, or mentor—must meet our expectations of suitability, vetting, and conduct.*

## Scope and Safeguarding Threshold

This section applies to:

- Employees (e.g. full-time and part-time teachers, pastoral staff, academic managers)
- Third-Party Providers (see Section 5), including contractors, instructors, and tutors delivering learning or support services to students
- Volunteers or casual facilitators involved in direct student contact

Regardless of contractual status, the following minimum requirements must be met before engaging with students.

## Core Safeguarding Requirements (All Roles)

All individuals working with students must:

- Hold a valid criminal background or police check, compliant with relevant legal standards in their jurisdiction
- Provide evidence of identity and, where applicable, right to work
- Complete safeguarding induction training before commencing student-facing work
- Sign a declaration of suitability to work with children
- Agree to and uphold Crimson Academies' Safeguarding and Child Protection Policy and Code of Conduct

These are the minimum standards required. A higher standard of safety check may be required in certain jurisdictions or circumstances. Crimson Academies adheres to the higher standard.

No individual—regardless of role, status, or location—may begin working with students until all minimum requirements are met and approved by the Safeguarding and HR teams.

## **Employment vs Contractor Pathways**

Crimson distinguishes between employees and third-party providers (contractors) in terms of who initiates and provides the required documents, while holding all roles to the same protective standards.

### **For Employees (e.g. Teachers, Full-Time or Part-Time Staff)**

- Crimson initiates and verifies police vetting and background checks via authorised agencies
- Crimson requests two professional references, including one from a recent manager
- Crimson retains and monitors compliance records centrally
- Employment contracts contain explicit safeguarding clauses, covering:
  - Reporting duties
  - Vetting consent
  - Training requirements
  - Professional conduct standards

### **For Contractors / Third-Party Providers (e.g. Tutors, Instructors)**

- The contractor is responsible for providing a valid police or criminal background check, dated within the past 12 months and issued by the relevant jurisdiction
- At least one professional reference must be supplied (additional may be requested based on role or risk level)

- Contractors must complete Crimson’s online safeguarding induction and sign a Declaration of Suitability
- Contractors may not be engaged until all documents have been received, verified, and approved
- Each contractor agreement includes binding safeguarding clauses requiring:
  - Adherence to reporting obligations
  - Consent to monitoring and audits
  - Completion of training
  - Maintenance of professional boundaries in all contexts (including online and one-to-one settings)

Crimson reserves the right to suspend or terminate engagement with any contractor who fails to meet or maintain safeguarding requirements, or whose conduct presents a risk to students.

## **International Jurisdiction and Vetting Compliance**

As a global organisation, Crimson Academies operates in multiple legal jurisdictions. We recognise the differences in terminology, procedure, and documentation, and ensure compliance as follows:

- New Zealand – NZ Police vetting and Ministry of Justice records
- Australia – State-based Working with Children Checks (WWCC) and relevant disqualification lists
- United Kingdom – Enhanced Disclosure and Barring Service (DBS) checks and barred list screening
- United States – State-level and, where required, FBI background checks, sex offender registry checks

If a staff member, tutor, or instructor resides in a jurisdiction outside these core regions, Crimson will assess their documentation against the most protective equivalent standard available, and will request international vetting equivalents or declarations from national authorities.

## **Contractual Safeguarding Obligations**

All individuals working with students—whether employees or contractors—are required to sign a binding agreement that includes clear safeguarding obligations and acknowledgements. These obligations include, but are not limited to:

- Mandatory reporting of concerns using designated channels

- Agreement to be vetted and to update documentation as required
- Commitment to ongoing safeguarding training and compliance with internal procedures
- Acknowledgement of the right of Crimson to audit or review conduct and take disciplinary or contractual action where necessary

These agreements form a core part of Crimson’s safeguarding infrastructure, ensuring that standards are enforceable and transparent from the outset of every engagement.

## **Induction, Training & Development**

At Crimson Academies, safeguarding is most effective when every adult in the organisation understands their role, responsibilities, and the context in which they operate. As such, we provide structured and ongoing training for all staff, contractors, and third-party providers to ensure they are fully prepared to protect and promote the welfare of our students.

Safeguarding training is mandatory and adapted to the learner’s role, jurisdiction, and level of contact with students.

### **Induction Training (Mandatory Before Working With Students)**

All staff and third-party providers—whether employees or contractors—must complete safeguarding induction training before beginning any work with students.

This training includes:

- An introduction to Crimson Academies’ Safeguarding and Child Protection Policy
- The legal duties and child protection frameworks relevant to the staff member’s jurisdiction (e.g. NZ, AUS, UK, USA)
- An overview of the reporting procedures, including how to recognise, record, and report concerns
- Expectations around professional boundaries, communication, and student relationships
- Safe practices for working in online and one-to-one environments
- Information about how to escalate concerns, including what to do if a concern involves a colleague or supervisor

Induction training may be delivered online or in person and is tracked by the Safeguarding and HR teams.

## Annual Refresher Training

All staff and third-party providers must complete safeguarding refresher training annually. This training:

- Reinforces core safeguarding principles
- Updates staff on changes in law, policy, or procedural expectations
- Introduces emerging risks (e.g. online abuse trends, use of generative AI in student communications)
- Reaffirms reporting obligations, contact points, and escalation protocols

Annual refresher training may be delivered as part of ongoing professional development, and is recorded in staff compliance logs.

Staff who fail to complete required refresher training may have their access to student-facing work suspended until training is complete.

## Role-Specific and Advanced Training

Certain roles within Crimson Academies require additional or advanced safeguarding training:

- **Designated Safeguarding Leads (DSLs) / Child Safety Officers (CSOs)**
  - Must complete a recognised DSL training programme relevant to their jurisdiction
  - Attend refresher or update training **at least every two years**, with additional case consultation and scenario review as needed
- **Pastoral care staff and Deans**
  - Receive extended training on student mental health, trauma-informed practice, and managing disclosures
  - May receive interagency coordination training for referrals and collaborative care
- **IT and platform moderation teams**
  - Are trained in monitoring for inappropriate digital content, safeguarding risks in communication tools, and reporting/escalation responsibilities
- **Administrative staff**

- Are trained to recognise signs of concern in their role (e.g. irregular attendance, concerning communications) and understand confidentiality boundaries

## International Safeguarding Training Considerations

Because Crimson Academies operates across multiple legal jurisdictions and cultural contexts, safeguarding training is adapted to address:

- Jurisdiction-specific legal obligations, such as:
  - Mandatory reporting in VIC and NSW (Australia)
  - KCSIE compliance in the UK
  - Oranga Tamariki guidance in New Zealand
- Cultural sensitivity and contextual safeguarding, including:
  - Recognising that signs of harm or abuse may present differently in different communities
  - Knowing when to escalate concerns that may not be recognised as harmful in a student's local context
  - Guidance to report concerns based on Crimson Academies' policy and global best practice, even when uncertain about local interpretation

Training materials are reviewed regularly by the Safeguarding, Legal, and Education teams to ensure compliance with evolving standards and to reflect the diversity of our student body and workforce.

## Policy Governance and Review

Crimson Academies is committed to maintaining a dynamic and responsive safeguarding framework, one that evolves alongside legal developments, educational innovation, and the lived realities of our diverse school communities. This Safeguarding and Child Protection Policy is a cornerstone of that framework and must be regularly reviewed, updated, and reapproved to ensure it remains effective and compliant.

## Ownership and Oversight

- The policy is owned by the **Executive Leadership Team**, with operational responsibility delegated to the **Designated Safeguarding Leads (DSLs)** and the **Legal and Compliance Team**.



- Each school within the Crimson Academies network is responsible for **implementing this policy in its local context**, under the guidance of its own DSL/CSO.
- The **Board of Governors** (or equivalent governing body) provides strategic oversight and formally approves the policy on an annual basis.

## Annual Review Cycle

This policy is reviewed at least once every academic year to ensure that it reflects:

- Changes in local, national, or international safeguarding law
- Updates in best practice (e.g. statutory guidance such as *Keeping Children Safe in Education* or *Oranga Tamariki protocols*)
- Lessons learned from safeguarding cases, audits, or serious incidents
- Internal changes to organisational structure, leadership, or delivery model
- Feedback from students, families, staff, or external safeguarding partners

## Interim Reviews and Urgent Updates

An interim review may be initiated at any time if:

- A significant safeguarding incident occurs that reveals policy or procedural weaknesses
- There is a material change in legal obligations, particularly across Crimson's key jurisdictions (NZ, AUS, UK, USA)
- Feedback from staff, students, or auditors identifies systemic issues or recurring gaps
- New delivery models are introduced (e.g. an expanded one-to-one tutoring stream or platform changes)

Urgent updates may be published as policy addenda while the full review process is underway.

## Communication and Access

- The most current version of this policy is published on each school's public website and in other locations readily accessible by staff, students, and families (e.g., CGA Home)
- Any updates or changes are:
  - Communicated to staff via internal bulletins and safeguarding briefings
  - Included in annual safeguarding training
  - Flagged to contractors and third-party providers through updated onboarding documentation

## Version Control

Policy No.:	CS-01
Approval Date:	30 September 2025
Previous Review Date:	N/A
Next Review Date:	30 September 2026