'They will soar on wings like eagles …'
Isaiah 40:31

collaborate | enrich | trust | innovate | aspire | nurture

AQUILA Diocese of Canterbury Academies Trust

Multi Academy Trust Policy

Common Trust Policy, Use as Published

Child Protection and safeguarding

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Aquila, The Diocese of Canterbury Academies Trust and all schools within the MAT are committed to a strong culture of safeguarding, ensuring that all staff embrace the concept of "it could happen here" and recognise that safeguarding is everyone's responsibility. Aquila schools promote an inclusive anti-discriminatory culture. We ensure that pupils are respected, listened to and supported when raising concerns. We remain child-centred and consider the child's voice, wishes and lived experience in all safeguarding decisions. Safeguarding is embedded throughout school life, curriculum delivery, policies and decision-making.

The policy has been written for all our schools with our core values at its heart, but more specifically our values of **collaborate, nurture, trust** and **aspire.** Our schools are commited to providing safe learning environments, providing places of sanctuary and in the case of our schools with a Christian Foundation, communities of distinctiveness with God's love and the teachings of Jesus at the heart of all they do.

We are fully committed to creating a culture of vigilance. We expect everyone who works in or visits our schools to share this commitment. We encourage staff, pupils and visitors to report anything that concerns them. We will always act in the best interest of the child. Staff recognise that no single practitioner can have a full picture of a child's circumstances and therefore effective information sharing and multi-agency working are essential.

Our pupils are taught how to stay safe, including when online and to recognise when they may be at risk. We ensure our pupils know how to get help when they need it. In line with the latest Working Together to Safeguard Children, we place importance on contextual safeguarding and consider risks in our local community when assessing the safety of our pupils.

The latest version of this policy is available on the school website and upon request.

Equality Statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.
We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

Definitions

In line with Keeping Children Safe in Education 2026, we define safeguarding as:

- providing help and support to meet the needs of children as soon as problems emerge

- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Children includes everyone under the age of 18.

We are part of Kent local authority. We follow the multi- agency afegauarding arrangements established by Kent Safeguarding Children multi-agency partnership Board (KSCMP). The full KSCMP procedures and additional guidance relating to specific safeguarding issues can be found on the KSCMP website www.kscmp.org.uk.

Roles and responsibilities

5.1 Designated Safeguarding Lead (and deputies):
The DSL will:-

- take lead responsibility for safeguarding with the support of the Deputy DSLs.
- Be available during term time for staff to discuss any safeguarding concerns.
- Ensure robust cover arrangements are in place for periods when they are unavailable due to illness, leave, or other circumstances.
- Lead on referrals to local authority children's social care; the Channel Programme where there is a radicalisation concern; the DBS where relevant, in relation to allegations of abuse made against staff; and where a crime has been committed, to the Police with reference to the guidance NPCC- When to call the police.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners and share information with them as required.
- Liaise with the Headteacher to keep them informed of issues, especially police investigations and ongoing enquiries under section 47 of the Children Act 1989.
- Liaise with the case manager as required and the LADO for child protection concerns in cases which concern a staff member.
- Liaise with relevant staff in school, e.g., SENCO, Senior Mental Health Lead, attendance lead, online safety providers, etc.
- Promote engagement with parents and/or carers in safeguarding and promoting the welfare of children.
- Take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues of students and through identifying the impact these may have on attendance, engagement and achievement at school.
- Work with staff to ensure that the school knows the cohort of children who have or have had a social worker, their academic progress and attainment and maintain high aspirations for this cohort and support staff to enable these students to meet their potential.
- Ensure records are kept in line with good record-keeping practice as outlined in the latest Keeping Children Safe in Education.
- Ensure CP files are transferred to new schools within 5 days, ensuring safe transit and confirmation of receipt.

- Ensure that this policy and safeguarding procedures are accessible to all new and existing staff, that this is adopted when sent out by Aquila and is available publicly, including on the school website
- Liaise with local safeguarding partners to ensure that staff are aware of any training opportunities and the latest local policies.
- Update training every two years, covering the content outlined in KCSIE, and ensure any Deputy DSLs also renew this training.
- Update own knowledge and skills at least annually.
- Work to understand the views of students and encourage a culture of listening to students.
- Hold and share information in line with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) , the Data (Use and Access) Act 2025 and the guidance around information sharing in KCSIE.
- Embed the Aquila policy on use of restrictive interventions which outlines the procedures we follow

5.2 Governing body

- Review and approve this policy at each review and hold the Headteacher to account over its implementation.
- Appoint a safeguarding governor to oversee safeguarding compliance and the effectiveness of this policy.
- Read and understand Keeping Children Safe in Education, and review this guidance at least annually.
- Engage with safeguarding training, including training at induction, that equips the governing body with the skills to provide strategic challenge in relation to safeguarding.
- Be aware of the Data Protection Act 2018. the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025 which place duties on organisations and individuals to process personal information fairly and lawfully and to keep information they hold safe and secure. In addition, adhere to the ICO guidance, which includes information on obligations and how to comply with them.
- Review the filtering and monitoring system and processes to ensure compliance with Keeping Children Safe in Education.

5.3 All staff

- Receive appropriate safeguarding and child protection training, including online safety, which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring.
- Receive safeguarding updates regularly and training at least annually that provide the relevant skills and knowledge to safeguard children effectively.
- Understand local Family Help arrangements and the distinction between school-led support and support coordinated by the local authority and other safeguarding partners.
- Be able to contribute effectively to Family Help assessments, plans and multi-agency interventions where required.
- Receive training in emerging safeguarding risks including artificial intelligence (AI), deepfakes, misogyny, online misinformation, harmful sexual behaviour and serious violence.
- Understand the process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (child protection) that may follow a referral, along with the role they might be expected to play in such assessments, for example supporting the safeguarding team with collecting information for enquiries or multi-agency meetings.

- Understand that the process for making referrals locally is to submit a request for support through the Kent Children's Portal
- Know what to do if a child tells them they are being abused, exploited, or neglected and maintain an appropriate level of confidentiality.
- Know not to promise a child that they will not tell anyone about a report of any form of abuse.
- Reassure victims that they are being taken seriously and assure them that they are not causing a problem by reporting.
- Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/ or they may not recognise their experiences as harmful. This should not prevent professional curiosity and discussions with the DSL.
- Know the indicators of abuse, neglect, exploitation and modern slavery, exercise professional curiosity and know that such issues are rarely standalone ones.
- Be aware of extra-familial and/ or contextual risks which occur outside of the families, e.g., sexual abuse, domestic abuse, criminal exploitation, serious youth violence, county lines and radicalisation.
- Be aware that technology is a significant component in many safeguarding and wellbeing issues and the risks young people face online.
- Know how to report concerns about safeguarding practices within the school via whistleblowing procedures or other means.
- Know how to report concerns if staff have a safeguarding concern, or an allegation is made about another member of staff (including supply staff, trainee teachers, volunteers and contractors) harming or posing a risk of harm to children through the following process:
    - Refer to the Headteacher, who will consider whether an onward referral to the LADO is required
    - Concerns about the Headteacher should be referred to the chair of governors, copying in the Trust CEO, and
    - Report directly to the LADO where there is a conflict of interest.

- Read and understand part 1 and Annex A of Keeping Children Safe in Education, and review this guidance at least annually.
- Read part 5 of KCSiE which covers child on child abuse
- Attend and engage with induction training, including reading and understanding our:
    - child protection policy
    - behaviour policy and the measures taken to prevent bullying, including cyberbullying, racism, prejudice-based and discriminatory bullying
    - the staff code of conduct
    - safeguarding response to children who go missing from education

Responding to and recording concerns

When staff or visitors to the school have a safeguarding concern, they should promptly contact the DSL by speaking to them and sureing concerns are recorded on Bromcom.

All staff should know what to do if a child tells them they are being abused, exploited, or neglected, and maintain an appropriate level of confidentiality. All staff should know to act upon concerns about a child's welfare immediately.

All staff should be aware of the following when responding to concerns:

- All staff should know not to promise a child that they will not tell anyone about a report of any form of abuse.
- All staff should be able to reassure victims that they are being taken seriously and assure them that they are not causing a problem by reporting.
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/ or they may not recognise their experiences as harmful. This should not prevent professional curiosity and discussions with the DSL.

If a member of staff is concerned about verbal conversations, disclosures, or signs of abuse or neglect, these should be recorded in writing and passed to the DSL immediately. If the member of staff is unsure, they should always speak to the DSL or a deputy regarding their concerns. All concerns must be recorded on Bromcom.

The DSL will then decide what action must be taken, which can include:

- Further pastoral support in school
- Referral for universal services and community based early help and / or Family help support in accordance with local safeguarding partnership arrangements
- Referral to children's social care

The school recognises the importance of identifying concerns at the earliest opportunity and providing help before issues escalate. All staff should be particularly alert to the potential need for additional support for a child who:-

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
- is a privately fostered child.

If the DSL and deputies are not available, a staff member should not wait and should consider speaking to another member of SLT or contacting local children's social care for advice or to make a referral. Any such action should be shared with the DSL as soon as is practically possible.

Parents should be aware that the school can make referrals when there is suspected abuse or neglect, and that our concerns regarding a student will be shared. The school will always seek to share these concerns and the referral with parents first, unless doing so would put the child at greater risk of harm, where we are advised not to, or where it has not been practicable to do so.

Reporting and recording concerns
In Aquila schools staff report their concerns by recording on Bromcom as quickly as possible after the disclosure / concern.

Staff will provide a first-hand summary of their concern or details of a disclosure they have received. They will use professional language and try to capture the incident as it took place or as it was described to them. They will report all concerns in a timely fashion. The safeguarding team will ensure that any action taken or outcome is accurately recorded in line with good record-keeping guidance, which should follow:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved and
- A note of any action taken, decisions reached and the outcome.
- The rationale for the action taken, including where a decision to refer, or not, to external agencies has been made.

Students can confidently report concerns, knowing that these concerns will be taken seriously and that they can express their views and give feedback, too. This can be done through a variety of means, which include speaking to a key worker or familiar member of staff.
All staff need to be aware that children may not report directly and to look out for behavioural signs. Children can show signs or act in ways they hope adults will notice and react to

- A friend may make a report
- A member of staff may overhear a conversation
- A child's behaviour might indicate that something is wrong

Online safety

We recognise that the use of technology has become a significant component of many safeguarding issues, including child-on-child abuse. We recognise that children need to be safeguarded from potentially harmful and inappropriate online material and the school's role within this. Online harms can include exposure to misinformation, disinformation and conspiracy theories, which may contribute to safeguarding risks such as radicalisation, exploitation or emotional harm.

Schools should be alert to these risks when educating pupils about online safety and when assessing emerging safeguarding concerns. Aquila schools recognise that artificial intelligence (AI) technologies can create safeguarding risks, including online grooming, harassment, exploitation, misinformation, fraud, radicalisation, deepfake imagery and the creation or sharing of self-generated intimate images. Staff receive training to identify and respond to safeguarding concerns arising from the use of AI technologies and during the delivery of online safety education.

The schools maintain appropriate information security and access management procedures to ensure that information is safeguarded, stored securely, and accessed only by authorised personnel.

Appropriate technical and organisational security measures protect safeguarding records.

To address this, our school strives to:

- Have clear procedures in place to ensure the online safety of all staff and students
- Educate the school community in the safe and responsible use of online technology
- Set clear expectations for the use of online technology, including mobile phones

Four main areas of risk frame our approach to online safety:

- content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
- contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'
- conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI, e.g. deepfakes, sharing other explicit images and online bullying
- commerce - risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

To address the risks above, as a school, we will:

- Teach students about online safety through computing and PSHE lessons and other relevant subjects
- Inform parents about what their child is being asked to do online by the school
- Train all staff on online safety, including filtering and monitoring
- Train all staff in online safety, including at induction

We have clear guidance for our school community on the acceptable use of technology, including mobile phones and smart devices, and our behaviour policy and staff code of conduct align with this. This includes being mobile free environments, except where devices are used for monitoring of medical conditions. In these circumstances, the ability to take pictures must be disabled and a risk assessment completed. See Supporting Pupils with Medical Conditions policy.

Smart glasses.

As technology continues to evolve, new devices are reshaping the way we connect, learn, and share information. One of the latest innovations is Smart Glasses – eyewear that looks like ordinary spectacles but can include built-in cameras, microphones, and internet connectivity. These products are becoming more widely available, highlighting how accessible and affordable this technology has now become.

These glasses raise important questions about privacy and safety in a school environment. Smart glasses can discreetly record, live-stream, or share content instantlyand therefore can pose risks to pupils, staff, and visitors. In particular:

- Privacy: Images or videos can be captured without consent.
- Safeguarding: Live-streaming may inadvertently expose sensitive or identifying information about pupils.
- Data protection: Such recordings could breach UK GDPR and the Data Protectio Act 2018.

In response to this, and to ensure our community remains a safe and secure place, the use of smart glasses will not be permitted on school grounds by pupils, parents, visitors, or staff.

Filtering and monitoring
We use the DfE's 'Plan technology for your school' service to assess our filtering and monitoring arrangements and to inform our personalised approach to meeting the standards.

Scope of Online Risks
The school recognises that online safety is a critical component of safeguarding and promoting the welfare of children. In accordance with Keeping Children Safe in Education (2026), we adopt a comprehensive approach to online safety, acknowledging the full range of potential risks posed by digital platforms and online content.

The DSL has lead responsibility for understanding the filtering and monitoring systems and processes in place. The DSL and deputies monitor and record the effectiveness of this system. Exernal validation is provided by the annual safeguarding audit.

The school takes care not to 'over block ' content so that there are not unreasonable restrictions on what students can be taught regarding online safety.

The processes we have in place have been informed by our risk assessment as required by the Prevent Duty.

The DfE has published filtering and monitoring standards which set out that schools should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems
- Review filtering and monitoring provision at least annually
- Block harmful and inappropriate content without unreasonably impacting teaching and learning
- Have effective monitoring strategies in place that meet their safeguarding needs

We have done the following in relation to this:

- Assigned staff to monitor and report on these systems
- Ensured concerns are raised at DSL meetings
- Engaged in the annual Judicium safeguarding audit
- Reported to Governors

When the filtering and monitoring system detects concerning usage, we record this on Bromcom and take appropriate action, including a referral to children's social care when necessary.

For more information on filtering and monitoring, parents and carers can contact key members of staff through the school office.
We also refer to the DfE's guidance on the use of generative AI in education (2025) to support our approach to online safety, digital literacy and filtering/monitoring practices.

Whistleblowing

We recognise that adults working in a school may cause harm, including agency staff, visitors, and governors. Any concerns about a member of staff posing a risk of harm to children should be referred to the Headteacher immediately. These concerns could include where anyone working in the school has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child

- behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

Where there are concerns about the Headteacher, these should be referred to our Chair of Governors and Trust CEO

Any member of staff or volunteer with concerns about poor or unsafe practice and potential failures in our school's safeguarding regime should contact: Tracey Howard thoward@aquilatrust.co.uk
The Aquila whistleblowing policy is on the Trust website. The NSPCC whistleblowing helpline can also be contacted via telephone (0800 028 0285) or email (help@nspcc.org.uk).

Children potentially at greater risk of harm

In addition to the list on p5, we recognise that children with social workers may potentially be at greater risk of harm and need further support. Children may need this support due to abuse, neglect, exploitation or complex family circumstances. Our staff are aware that these students may face additional barriers to their attendance, learning or behaviour. We take these needs into account and liaise regularly with the relevant social worker to put appropriate support in place.

We also recognise that low or erratic attendance and Children Missing Education (CME) may be an indicator of abuse or neglect. All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods. Children missing education can act as a vital warning sign of a range of safeguarding possibilities which may include abuse, neglect, sexual abuse, exploitation, child criminal exploitation, county lines involvement, mental health problems, risk of substance misuse, so called 'honour' or faith based violence.

We know that early intervention is essential to help prevent the risks of a child going missing in the future. Our pastoral teams track attendance thoroughly, address concerns without delay, and liaise with our Attendance Lead/Education Welfare Officer (EWO) where needed.

We ensure that pupils who are expected to attend the school but fail to take up their place or cannot be located are referred to the local authority in line with local procedures and statutory guidance, such as *Children Missing Education: statutory guidance for local authorities and schools* (DfE, 2025). In line with DfE statutory guidance (2025), the school will undertake appropriate reasonable enquiries to establish a child's whereabouts, working jointly with the local authority where required, before any referral or removal from roll takes place. The DSL will be aware of any students who may be considered CME and will work with the Attendance Lead/Education Welfare Officer (EWO) to ensure that any safeguarding concerns are reviewed, that the advice of external agencies is sought, and that local procedures are followed.

We also strongly encourage parents and carers to supply us with two emergency contacts for their child, update their contact details without delay if they change, and share our procedures for notifying the school of an absence with all parents. When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm; however, they can sometimes be targeted by other children. In some cases, a child who is perceived to be lesbian, gay, or bisexual can be just as vulnerable.

We recognise the importance of supporting pupils who may be questioning their gender identity. We take a cautious approach that considers the individual needs of each child, working in partnership with parents (other than in exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child). We also consider any available clinical advice and seek additional non-clinical professional advice where relevant (e.g. the SENCO), including involving the DSL to address wider vulnerabilities. We endeavour to reduce the additional barriers faced by pupils in this group and to create a culture in which all pupils feel able to speak out and share their concerns with staff.

Aquila schools have regard to current DfE guidance on children who are questioning their gender. Decisions will be made on an individual basis, taking into account safeguarding, wellbeing, educational needs, parental involvement where appropriate, privacy considerations, and relevant professional advice.

Children with special educational needs (SEN), disabilities or certain health conditions can face additional safeguarding barriers when recognising abuse and neglect for reasons including:

- assumptions that indicators of possible abuse, such as behaviour, mood and injury, relate to the child's disability without further exploration
- being more prone to peer group isolation or bullying than other children
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges, the need for intimate care and/or being more reliant on adults for care
- cognitive understanding- being able to understand the difference between fact and fiction in online content and then repeating the content/ behaviours in schools or colleges, or the consequences of doing so.

We identify students who may be more at risk of harm and take action to ensure their safety, including key workers, regular checkins, communication support.

For further details, please refer to the SEND and Inclusion policy.

Children attending Alternative Provision (AP)

When placing pupils in Alternative Provision (AP), we remain responsible for their safety and wellbeing. We undertake robust quality assurance to ensure that the AP provider has appropriate safeguarding arrangements in place. This may include an initial visit before placement. We will agree safeguarding processes and information sharing protocols. We maintain ongoing contact with the provider, monitor attendance, and remain alert to any emerging concerns. These responsibilities apply regardless of the number of hours a pupil attends the AP setting.
Letters of assurance will be obtained before the placement starts.

Records and information sharing

We recognise the importance of information sharing between practitioners and local agencies. We are proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging or when a child is already known to the local authority's children's social care. All safeguarding records are updated promptly and stored securely in Bromcom. No information may be downloaded from Bromcom and stored on personal devices.

The school is also part of Operation Encompass www.operationencompass.org This national initiative ensures the police share information with the DSL about any domestic abuse incidents to which a child has been present. This allows the DSL to provide timely support to the child as required by the start of the next school day.

Our safeguarding records include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved by School
- a note of any action taken, decisions reached and the outcome

We have due regard to the relevant data protection principles, understanding that the Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025 place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. We understand that the legislation does not prevent the sharing of information to keep children safe. We follow the relevant Aquila data protection, data management and data security policies

In line with our mandatory duty, Aquila schools will notify our local authority if we become aware of any private fostering, to allow the local authority to check that the arrangement is suitable and safe for the child. Private fostering occurs when a child under the age of 16 (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, a person with parental responsibility for them, or a relative, in their own home.

Site safety

All staff members are responsible for ensuring the buildings and school site are secure and for reporting any concerns that arise.

The identities of all visitors and volunteers entering the school are checked. Visitors are expected to sign in and out and to display a visitor's badge while on the school site. Any individual who is unknown or not identifiable will be challenged by our staff for clarification and reassurance.

The school will not accept the behaviour of any individual, parent, or anyone else who threatens the school's security or makes others, children, or adults feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site and advice being sought from our local safeguarding partners.

Child-on-child abuse

In line with our strong commitment to safeguarding, we believe that all children have a right to learn in a safe environment and take a whole-school approach to child-on-child abuse, which includes preventative work, appropriate responses and a zero-tolerance approach to abuse.

Our staff recognise that children of any age or gender can be capable of abusing other children, which can happen both inside and outside of school and online. This behaviour will be dealt with in line with our Behaviour Policy.

This child-on-child abuse can include, but is not limited to:

- bullying (including cyberbullying)
- racism, prejudice-based and discriminatory bullying and harm
- abuse in intimate personal relationships between children (also known as teenage relationship abuse)
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- serious physical assault and harm, or the threat of harm with a weapon
- harmful sexual behaviour, including misogyny, sexual violence and sexual harassment.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual creation or sharing nudes or semi nude images and/or videos, including AI-generated images, manipulated images and deepfakes.
- upskirting, which is a criminal offence
- initiation/hazing-type violence and rituals

All the above are examples of abuse and should never be tolerated or passed off as “banter,” “just having a laugh”, “boys will be boys” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.
We recognise that the gendered nature of child-on-child abuse makes it more likely that girls will be victims and boys perpetrators, but all reports will be taken seriously. All concerns should be passed on to the DSL (or a deputy).

The school recognises that misogyny may contribute to harmful sexual behaviour, sexual harassment, sexual violence, online abuse and coercive behaviour. Staff will actively challenge misogynistic attitudes, language and behaviour and respond through safeguarding and behaviour procedures. The school educates pupils about respectful relationships, consent, equality and the impact of discriminatory and misogynistic behaviour.

We minimise the risk of child-on-child abuse through our extensive PSHE curriculum and pastoral programmes, including assemblies/ Collective Worship and other key messages. Our Relationships and Health Education (primary) and Relationships, Sex and Health Education (secondary) are aligned with current DfE guidance. Our policy is on our website. All staff understand the importance of challenging inappropriate behaviours between peers and their role in preventing and responding to child-on-child abuse. Our staff understand that even if there are no reports of child-on-child abuse in our school, it does not mean child-on-child abuse is not happening-it may be the case that it is just not being reported. Children can report any child-on-child abuse by speaking to any adult who record the information on Bromocm and notifiy the DSL.

Any cases of child-on-child abuse will be thoroughly investigated, with the victim always being taken seriously and both the victim and alleged perpetrator given appropriate support. Support will take the child’s wishes into account and may include increased nurture or pastoral support, a mentor, access to counselling and a referral to external services. We will liaise with the police and children’s social care as necessary. Where there has been a report of sexual violence, an immediate risk assessment will be made, considering the needs of the victim, the alleged perpetrator, and our other pupils. All allegations of child-on-child abuse will be recorded in our safeguarding files.

In cases where self-generated intimate images and/or videos, including those generated using AI, e.g., deepfakes, have been shared, we follow the guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (March 2024).

Our school recognises that some children and young people may feel worried about their own or someone else's sexual thoughts or behaviours. In such cases, schools will consider whether it would be appropriate for pupils to access confidential advice and support through the Lucy Faithfull Foundation's Shore Space service: https://www.shore.space.

We record these incidents in line with our normal record-keeping process. Staff must record their concern or the disclosure using Bromcom.

Appendix 1: Types of abuse and safeguarding concerns

KCSIE splits abuse into four main categories:

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet another person's needs. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions beyond a child's developmental capabilities, as well as overprotection, limiting exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing, causing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Victims are more likely to know their abusers than not. Under 13s can never legally consent to sexual activity.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

There are a number of other safeguarding concerns that ALL staff need to be aware of. These are detailed further in Annex A of KCSIE, which all staff should read:

Child Criminal Exploitation (CCE): where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE can also occur through the use of technology.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late
- regularly miss school or education, or do not take part in education

County lines: a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas, using dedicated mobile phone lines or other forms of "deal line". Exploitation is an integral part of the county lines offending model, with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence towards victims (and their families) if they attempt to leave the county lines network.

Serious violence: where children are involved with serious violent crime, which may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Indicators may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. There is a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Staff must immediately report concerns regarding a child carrying, possessing, displaying or expressing an intention to use a weapon to the DSL or Deputy DSL. The DSL will assess risk and determine appropriate safeguarding action, including partnership working with police and other agencies where required.

Child Sexual Exploitation (CSE): can be a one-off occurrence or a series of incidents over time and ranges from opportunistic to complex organised abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Indicators can be similar to the indicators of CCE, as well as:

- referring to older children or adults as 'boyfriends' or 'girlfriends'; and
- children who suffer from sexually transmitted infections or become pregnant.

CSE and CCE can be commited or facilitated by an organised network or gand and the victim may identify as being part of this group.

Modern Slavery and the National Referral Mechanism: modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

The National Referral Mechanism (NRM) is the UK's framework for identifying and supporting victims of exploitation and modern slavery. Whatever form it takes, exploitation and modern slavery are child abuse, and relevant child protection procedures must be followed if modern slavery or trafficking is suspected.

Child abduction and community safety incidents: child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members, by people known but not related to the victim (such as neighbours, friends and acquaintances) and by strangers.

Cybercrime: criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber-dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example, accessing a school's computer network to look for test paper answers or change grades awarded
- Denial of Service (DoS or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Domestic abuse: the Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

(a)physical or sexual abuse;
(b) violent or threatening behaviour;
(c) controlling or coercive behaviour;
(d) economic abuse (adverse effect on the victim to acquire, use or maintain money or other property; or obtain goods or services); and
(e) psychological, emotional or other abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. Exposure to domestic abuse can have a serious, long-lasting emotional and psychological impact on children and therefore, children are now classified as victims and not merely witnesses where domestic abuse occurs. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Children may also cause harm to other family members, often referred to as child-to -parent or caregiver abuse.

Homelessness: being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears,

domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. It should also be recognised 16-that, in some cases, 16- and 17-year-olds may be living independently of their parents or guardians, for example, through their exclusion from the family home, and they will require a different level of intervention and support.

Honour or faith-based abuse (including female genital mutilation and forced marriage): encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Forced marriage: forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Schools and colleges can play an important role in safeguarding children from forced marriage.

Since February 2023, it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Female Genital Mutilation (FGM): comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a **statutory duty** upon teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students. If a victim discloses that FGM has been carried out on them, teachers must personally report to the police.

The duty does not apply to at-risk or suspected cases; these should be discussed with the DSL in line with our referral process.

We recognise that potential risk factors may include when:

- a female child is born to a woman who has undergone FGM
- a female child has an older sibling or cousin who has undergone FGM

- a woman/family believe FGM is integral to cultural or religious identity
- a parent or family member expresses concern that FGM may be carried out on the girl
- a girl talks about FGM in conversation, for example, a girl may tell other children about it
- a child is taken on a long holiday to a country where FGM is prevalent

Radicalisation: We recognise that children may be susceptible to extremist ideology and radicalisation. As with other safeguarding risks, staff should be alert to changes in children's behaviour that could indicate they may need help or protection.

Our school adheres to the Prevent duty, and we have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". We build pupils' resilience to radicalisation by providing a safe environment for debating controversial issues, and promoting fundamental British values.

Staff should be alert to changes in children's behaviour that could indicate they may need help or protection. Staff should use their judgement in identifying children who might be susceptible to radicalisation and act proportionately, which may include the designated safeguarding lead (or deputy) making a Prevent referral.

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying or advocating violence, especially to other faiths or cultures
- intolerance of difference, including faith, culture, gender, race or sexuality

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk and prevent people from becoming terrorists or supporting terrorism and to challenge extremist ideas. https://www.support-people-susceptible-to-radicalisation.service.gov.uk/

If the school needs to make a Prevent referral, we record concerns, notify the DSL and use the Prevent notification form. All DSLS will have completed Prevent trainning

As part of managing the risk of radicalisation, we have clear protocols for ensuring that any visiting speakers, whether invited by staff or by children themselves, are suitable and appropriately supervised. In England, the Prevent duty complements schools' other responsibilities to ensure that speakers do not undermine the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. Our protocols include checking visitors view

Mental health: all staff are aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where staff have a concern about a child's mental health that is also a safeguarding concern, they should contact the DSL or a deputy DSL and report and record their concerns in line with this policy (see section 5).

Staff should be alert to indicators including:

- significant changes in behaviour

- persistent anxiety or distress
- withdrawal from social situations
- ongoing difficulties sleeping
- self-harm
- neglect of personal care
- expressions of hopelessness or suicidal ideation

Where staff believe a child is at immediate risk of harm, emergency services will be contacted straight away by either calling 999 or seeking urgent medical assistance.

Appendix 2-Safer recruitment

Our single central record (SCR) records information on the checks carried out on staff and volunteers. Copies of these checks, where appropriate, will be located in individuals' personnel files. We follow the guidance from Keeping Children Safe in Education and best practice, as outlined below.

New staff

When appointing new staff, we will:

- verify a candidate's identity, including checking the name on a birth certificate where this is available
- obtain (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity)
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- verify the candidate's mental and physical fitness to carry out their work responsibilities
- verify the person's right to work in the UK
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate
- verify professional qualifications, as appropriate
- ensure a candidate to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State using the GOV.UK website
- (for independent schools, free schools and academies) check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State. This check is completed using the guidance on GOV.UK
- Seek two references, including from the current employer, before interview and ask specific questions about the suitability of the candidate to work with children
- (For schools with pupils aged under 8 years old) ensure that appropriate checks are made to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2018
- Conduct a search (via an online search engine)on shortlisted candidates, reviewing publicly available material for any incidents or issues and notify applicants of this process

Where concerns arise through searches or other vetting checks, these will be explored proportionately and fairly as part of the recruitment process and recorded appropriately.

Agency and third-party staff

For agency and third-party staff, we will obtain written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and sought the appropriate certificates, the date the confirmation was received and whether an enhanced DBS certificate check has been provided.

Where we place a pupil with an Alternative Provision (AP) provider, we retain responsibility for the safeguarding of that pupil. As part of our due diligence, we require written confirmation from the AP provider that appropriate safeguarding checks have been completed on all individuals working at the AP setting, consistent with those we would undertake for our own staff. We apply the same expectations to AP providers as we do to any external provider engaging with our pupils.

Trainee/student teachers

Where applicants for initial teacher training are salaried by the school, we will carry out all necessary checks. Where trainee teachers are fee-funded, we will ensure that the training provider has carried out the necessary checks and that we obtain written confirmation of these checks.

Existing staff
If we have any concerns about an existing member of staff's suitability to work with children, we will carry out the relevant checks as if the member of staff were a new member of staff. If a member of staff moves from a post that is not in regulated activity to a post in regulated activity, we will ensure the relevant checks for that regulated activity have been carried out.

We will follow our legal duty to refer to the DBS if a member of staff has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left

Volunteers
We will never leave an unchecked volunteer unsupervised or working in a regulated activity. We will obtain an enhanced DBS check before a volunteer is able to come in to th school. We will ensure a barred list check for all volunteers who are new to working in regulated activity.

Governors
All governors/trustees will have an enhanced DBS check without barred list information. A barred list check will be completed if a governor is in regulated activity. All governors will also have a Section 128 check.

Contractors
We will ensure that any contractor whose work provides them with the opportunity for contact with children will have the appropriate checks. Those contractors engaging in regulated activity will have an enhanced DBS check, including barred list information.
For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check will be required.

Appendix 3- Statement of procedures for dealing with allegations of abuse against staff

This appendix applies to all cases where it is alleged that a staff member, supply teacher or volunteer has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children 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

We will deal with any allegation of abuse against a member of staff or volunteer quickly, in a fair and consistent way that provides effective protection for the child and supports the person who is the subject of the allegation. We recognise our duty of care to our employees and will provide effective support for anyone facing an allegation, including a named contact if the person is suspended. We will advise staff to contact their trade union representative. Staff are able to access confidential counselling services through Staff Care Services.

Allegations of abuse against staff should be reported to the Headteacher without delay. Where the concern is about the Headteacher, this should be reported to the Chair of Governors and CEO. If a member of staff perceives a conflict of interest, they can refer directly to the LADO.

The following definitions will be used when determining the outcome of any investigation:

- **Substantiated**: there is sufficient evidence to prove the allegation
- **Malicious**: there is sufficient evidence to disprove the allegation, and there has been a deliberate act to deceive
- **False**: there is sufficient evidence to disprove the allegation
- **Unsubstantiated**: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Initial consideration when dealing with an allegation

The Headteacher or (where the Headteacher is the subject of an allegation) the Chair of Governors, (the 'case manager'), should discuss the allegation immediately with the local authority designated officer. This discussion will consider the nature, content and context of the allegation and agree on a course of action. There may be situations when the case manager will want to involve the police immediately, for example, if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager will discuss the allegations with the designated officer to help determine whether police involvement is necessary. The case manager will inform the accused person about the allegation as soon as possible after consulting the designated officer. Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

If the initial sharing of information leads to a decision that no further action is to be taken regarding the individual facing the allegation or concern, this decision and a justification for it will be recorded by both the case manager and the designated officer, and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager will then consider with the designated officer what action should follow both in respect of the individual and those who made the initial allegation. If the allegation is about physical contact, the strategy discussion or initial evaluation

will take into account that school staff are entitled to use reasonable force to control or restrain children in certain circumstances.

Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the designated officer will discuss the next steps with the case manager. In those circumstances, the options open to the school or college depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension will not be the default position: an individual should be suspended only if there is no reasonable alternative.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the case manager will discuss with the designated officer how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of our staff. In other circumstances, the allegation will require an independent investigator.

Parents or carers of the child or children involved will be informed of the allegation as soon as possible if they are not already aware of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager will not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers will be kept informed about the progress of the case. Parents will be reminded of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing. If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice. In managing allegations, the DSL (or a deputy) is responsible for looking after the child's welfare, ensuring that they are not at risk and referring case sof suspected abuse to the local authority children's care as required.

If the accused person resigns or ceases to provide their services, this will not prevent an allegation from being followed up. We will ensure that a referral to the DBS is made if the four criteria at the start of this appendix are met. We will also consider whether a referral to the Secretary of State is appropriate.

Following a criminal investigation or prosecution, the police should inform the school and the designated officer immediately when the investigation and any subsequent trial are complete, or if it is decided to close the investigation without charge or to discontinue prosecution after the person has been charged. In those circumstances, the case manager will discuss with the designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed.

If the allegation is substantiated and the person is dismissed or the person's services are no longer used, or the person resigns or otherwise ceases to provide their services, the designated officer will discuss with the case manager and their personnel adviser whether the school or college will decide to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. In the case of a member of the teaching staff, the case manager and the personnel officer will discuss with the designated officer whether to refer the matter to the TRA for consideration of prohibiting the individual from teaching.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager will consider how best to facilitate this and consider how the person's contact with the child or children making the allegation can best be managed.

Allegations against a teacher who is no longer teaching will be referred to the police. Historical allegations of abuse will also be referred to the police.

Confidentiality
The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is under investigation or being considered.

The case manager will take advice from the designated officer, police and children's social care services to agree the following:

- who needs to know and, importantly, exactly what information can be shared
- how to manage speculation, leaks and gossip
- what, if any, information can be reasonably given to the wider community to reduce speculation
- how to manage press interest if, and when, it should arise.

Record keeping and references
Details of allegations found to be malicious will be removed from personnel records. For all other allegations, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached are kept in the confidential personnel file of the accused, and a copy is provided to the person concerned. Records will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Cases in which an allegation was proven to be false, unsubstantiated or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

Timescales
Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.
If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.
If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

Suspension
Suspension will not be an automatic response to an allegation; all options to avoid suspension will be considered before taking that step. Suspension will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal.

Based on an assessment of risk, the following alternatives will be considered by the case manager before suspending a member of staff:

- redeployment within the school so that the individual does not have direct contact with the child or children concerned
- providing an assistant to be present when the individual has contact with children
- redeploying to alternative work in the school so the individual does not have unsupervised access to children
- moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted; or

temporarily redeploying the member of staff to another role in a different location, for example, to an alternative school or work for the local authority

If immediate suspension is deemed necessary, the rationale and justification for this course of action will be agreed upon and recorded by both the case manager and the designated officer.

Supply staff, trainee teachers and contracted staff
We will ensure that any allegations against individuals not employed by the School, such as supply teachers, trainee teachers, or contracted staff, are properly dealt with. We will not decide to stop using a supply teacher or trainee teacher due to safeguarding concerns without first finding out the facts and liaising with our Local Authority Designated Officer (LADO) to determine a suitable outcome. We will discuss with the agency or teacher training provider whether it is appropriate to suspend the teacher. We will inform the agency or teacher training provider of our process for managing allegations and invite their Human Resources Manager or equivalent to meetings as appropriate.

Learning lessons
At the conclusion of a case in which an allegation is substantiated, we will review the circumstances with the designated officer to determine whether any improvements are needed to the school's procedures or practices to help prevent similar events in the future.

Non-recent allegations
Abuse can be reported no matter how long ago it happened. Where an adult makes an allegation to our school that they were abused as a child, the individual will be advised to report the allegation to the police. We will report any non-recent allegations made by a child to the LADO.

Low-level concerns
In line with Section Two of Part Four of Keeping Children Safe in Education, we recognise the importance of creating a culture of openness, trust, and transparency to encourage all staff to share low-level concerns with the right person so that they can be addressed appropriately. The purpose of our approach to low-level concerns is to ensure that our values are constantly lived, monitored, and reinforced by staff. Our values are outlined in more detail in our Staff Code of Conduct.

The term 'low-level' concern does not mean that the concern is insignificant; it means that a staff member, supply teacher or volunteer does not seem to have:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children 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

A low-level concern covers any concern, no matter how small, even if it is no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and;
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over-friendly with children;
- having favourites;
- taking photographs of children on a personal mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating pupils.

Such behaviour can exist on a spectrum. Our school's response to low-level concerns is an extension of our Code of Conduct. Staff can share their concerns confidentially in a simple, easy way. It is imperative that, where staff have concerns, they share them as outlined in this policy to support the development of a culture of expected behaviour and to promote our school values.

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the Headteacher who will record the information in the low level concerns section of SignIn Central Record (formerly SCRTracker).
The Headteacher will have oversight of all recorded concerns and has ultimate decision-making power in respect of all low-level concerns.

Any concerns about the Headteacher should be reported to the Chair of Governors and CEO.

All low-level concerns will be recorded in writing. Each record will include details of the concern, the context in which it arose, and the action taken. The name of the individual who raised the concern should be noted. Still, if that individual wishes to remain anonymous, that will be respected to the extent reasonably possible.

Records will be kept confidential, held securely, and will comply with the Data Protection Act 2018 and the UK General Data Protection Regulation and Data (Use and Access) Act 2025.

Records will be reviewed to identify potential patterns of concerning, problematic, or inappropriate behaviour. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or by referring to the LADO, where a pattern of behaviour moves from a low-level concern to meeting the harm threshold. We will also consider whether wider cultural issues exist in the school that may have enabled the behaviour to occur. If this is found to be the case or a contributory factor, we may review our policies and deliver additional training where we consider this will minimise the likelihood of the events happening again.

Links to other policies:
- SEND nad Inclusion Policy
- Staff Code of Conduct
- Online Safety Policy
- Anti-Bullying Policy
- Behaviour Policy – which includes Reasonable Force
- Data management policies