United Learning – Safeguarding Children and Child Protection Policies and Procedures (Template for Academies)

Document Control	
Document Title:	Safeguarding Children and Child Protection Policies and Procedures
Summary of Changes from Previous Version:	• Updated throughout for KCSIE 2026 and current statutory guidance. • Clarified that all staff must read Part One of KCSIE. • Updated key safeguarding contacts, DSL/DDSL roles and safeguarding-team details. • Strengthened information-sharing, data-protection and record-keeping requirements. • Expanded Early Help/Family Help, statutory intervention and referral/escalation pathways. • Strengthened child-on-child abuse guidance, including harassment, violence, discriminatory harm, misogyny, harmful sexual behaviour and AI-generated/deepfake intimate images. • Expanded safer-recruitment and volunteer barred-list requirements. • Clarified allegations, low-level concerns, TRA/DBS referrals and record retention. • Strengthened DSL cover arrangements. • Enhanced online safety, filtering and monitoring, mobile-phone restrictions and generative-AI safeguards. • Updated reasonable-force guidance. • Clarified visiting-speaker identification checks and alternative-provision liaison. • Added guidance on single-sex facilities, sport and social-transition requests. • Strengthened SEND adjustments, young-carer and medical-condition safeguarding. • Expanded attendance, children missing/absent from education and overseas-travel procedures. • Added comprehensive mental-health safeguarding, urgent-response and referral guidance.
Name of Originator/Author (including job title):	Frazer Smith – Head of Safeguarding (United Learning)
Target Audience:	Designated Safeguarding Leads
Review By Date:	01.09.27
Date Issued:	03.09.26

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Contents

1. Scope 2
2. Implementation 2
3. Summary of Requirements 2
4. CHILD PROTECTION AND SAFEGUARDING POLICY 3

1. Scope

This policy applies to all United Learning academy schools.

2. Implementation

The new version of this policy must be implemented by 1st September 2026.

3. Summary of Requirements

Schools are required to amend this template policy, personalising and localising it as indicated. The policy must be approved by the Local Governing Body and published on the school website.

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CHILD PROTECTION AND SAFEGUARDING POLICY

UNITED LEARNING TRUST

Accrington Academy

September 2026

Date of last central office review:	September 2026	Review Period:	1 year (minimum)
Date of next central office review:	September 2027	Owner:	Jude Ward (Associate Assistant Principal / DSL)
Date of next school level review:	September 2026		
Type of policy:	United Learning Policy	Group Board:	Group Board approves United Learning Template Policy
		Local Governing Body:	Approves completed school policy

The Policy will be reviewed annually, as set out below:	
Policy reviewed centrally	JULY 2026
Policy tailored by individual schools	Updated Principal September 2026
Policy ratified by Local Governing Bodies	October 2026
Policy approved by the Group Board	October 2026
Implementation of Group Policy	September 2026

KEY EXTERNAL CONTACT DETAILS

Local Authority Designated Officer	Tim Booth / Donna Green / Shane Penn TEL: 01772 536 694 EMAIL: LADO.admin@lancashire.gov.uk
Local Authority Children's Social Services	TEL: 0300 123 6720 OUT-OF-HOURS EMERGENCY DUTY TEAM TEL: 0300 123 6722
Multi-Agency Safeguarding Hub	TEL: 01254 220 989 EMAIL: mash.education@lancashire.gov.uk
Support and Advice about Extremism	Lancashire Constabulary PREVENT team 01772 209830 Community Engagement Officers TEL: 01254 353638 EMERGENCY: 999

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<table>
<tr><td></td><td>NON-EMERGENCY NUMBER: 101
EMAIL:
EASTERN.CEO@lancashire.pnn.police.uk

Department for Education
NON-EMERGENCY NUMBER: 020 7340 7264
EMAIL: counter.extremism@education.gov.uk
CONTACT FORM:
https://report-extremism.education.gov.uk/

Anti-terrorist hotline: 0800 789 321</td></tr>
<tr><td>NSPCC's what you can do to report abuse dedicated helpline</td><td>TEL: 0808 800 5000
EMAIL: help@nspcc.org.uk</td></tr>
<tr><td><table><tr><td>Operation Encompass</td><td>The DSL OR DDSL receives and acts on police notifications concerning children affected by domestic abuse. Notifications are confidential, securely recorded and do not replace statutory safeguarding procedures or referrals.</td></tr></table>Disclosure and Barring Service</td><td>Disclosure Service

ADDRESS: DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF, United Kingdom
TEL: 03000 200 190
EMAIL: customerservices@dbs.gov.uk

Barring Service

ADDRESS: DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF, United Kingdom
TEL: 03000 200 190</td></tr>
<tr><td>Teaching Regulation Agency</td><td>TEL: 0207 593 5393
EMAIL: misconduct.teacher@education.gov.uk</td></tr>
<tr><td><table><tr><td>NSPCC Whistleblowing Advice Line</td><td>TEL: 0800 028 0285 (08:00–20:00 Monday to Friday; 09:00–18:00 weekends)
EMAIL:
help@nspcc.org.uk</td></tr></table>OFSTED (Concerns)</td><td>TEL: 0300 123 4666</td></tr>
</table>

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KEY SCHOOL CONTACT DETAILS

United Learning Trust (ULT)	**Chair of ULT** Dame Reena Keeble EMAIL: company.secretary@unitedlearning.org.uk **Director of Trust Safeguarding** Darren Ellison-Lee, Director of Primary Education EMAIL:Darren.Ellison-Lee@unitedlearning.co.uk **Regional Director (United Learning)** Dino Di Salvo TEL: 01254 304300 EMAIL: dino.disalvo@unitedlearning.org.uk Head of Safeguarding Frazer Smith TEL: 07826934336 EMAIL: frazer.smith@unitedlearning.org United Learning Safeguarding Officer Sara Jaber TEL: 07767222437 EMAIL: sara.jaber@unitedlearning.org
Local Governing Body (LGB)	Chair of LGB Peter Mullholland EMAIL: peter.mullholland@accringtonacademy.org Nominated Safeguarding Governor of LGB Angela Donovan EMAIL: angela.donovan@accrington-academy.org Nominated E-Safety Governor of LGB Angela Donovan EMAIL: angela.donovan@accrington-academy.org
Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs)	**Main DSL for the School** NAME: Jude Ward TEL: 01254 304300 EMAIL: Jude.Ward@accrington-academy.org

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	Safeguarding Team (DSL trained) : Jordan Taylor (Deputy DSL) Nicola Keenan (Deputy DSL) Rhonda Mooney (Head of Year) Marcus Gee (Head of Year) Dominic O'Neill (Head of Year) Johanna Royle (Head of Year) Abbie Ward (Head of Year) Ebony Scammell – School Counsellor Rebecca Webb- Attendance Manager **Designated E-Safety Lead** NAME: Will Aitken TEL: 01254 304300 EMAIL: will.aitken@accrington-academy.org
Designated Teachers for Looked After Children	NAME: Mrs Rachael Kissock TEL: 01254 304300 EMAIL: Rachael.Kissock@accrington-academy.org
Head/Principal	NAME: Mr Oliver Walker TEL: 01254 304300 EMAIL: Oliver.Walker@accrington-academy.org

SCOPE

This policy applies to Accrington Academy ("the school") United Learning Trust requires the School's Local Governing Body to review and update this policy annually (as a minimum). This policy is available on the school website. This policy is ratified annually by the United Learning Group Board.

This policy has regard to the following guidance and advice, as amended from time to time (and any supplemental guidance/advice referred to therein):

- Keeping Children Safe in Education (DfE, 2026)
- Disqualification under the Childcare Act 2006 (DfE, August 2018)
- What to do if you're worried a child is being abused: advice for practitioners (HM Government, 2015)
- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (Updated 2024)
- Mental Health and Behaviour in Schools (DfE, November 2018)
- Preventing and Tackling Bullying (DfE, July 2017)
- Working Together to Safeguard Children (DfE, Current edition/publication)

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- Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE, May 2024)
- Statutory guidance on the Information Sharing Duty, together with the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025.
- Revised Prevent Duty Guidance: for England and Wales (Home Office, April 2023)
- The Prevent duty: safeguarding learners vulnerable to radicalisation (DfE, updated September 2023)
- Relationships education, relationships and sex education (RSE) and health education (DfE, 2025)
- Restrictive interventions, including use of reasonable force, in schools (DfE, 2026).
- Equality Act (2010) – Including Public Sector Equality Duty
- The Human Rights Act (1998)

POLICY STATEMENT

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the **best interests** of the child. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

All staff, including those who do not work directly with children, must read and understand **Part One of Keeping Children Safe in Education (2026)** in full. The previous shorter summary (Annex A) has been removed; therefore, all staff now follow the same statutory safeguarding expectations. The school will ensure time, training and support are provided so every member of staff can meet these requirements.

The school will ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Staff working with children should have an attitude of '**it could happen here**' and no reports in their school it does not mean it is not happening. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. Where there is a safeguarding concern the school will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback.

CONCERNS ABOUT A CHILD

The school always has a duty to consider the best interests of the student and take action to enable all students to achieve the best outcomes. Safeguarding and promoting the welfare of children is **everyone's** responsibility. Everyone has a role to play in identifying concerns, sharing information and taking prompt action in accordance with this policy.

The school has arrangements for listening to children and providing early help and processes for children to raise concerns about themselves or their peers. Details of these arrangements are outlined to students regularly via Form Tutors and Heads of Years support network.

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Students can use the school reporting system 'Tell Us' which is available via the school website at any time.

Staff should expect to support social workers and other agencies following any referral.

Definitions of safeguarding, abuse, neglect and exploitation

Safeguarding and promoting the welfare of children is defined 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 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; and taking action to enable all children to have the best outcomes.

Abuse is a form of maltreatment of a child. Somebody may abuse, exploit, or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them, by other children, or, more rarely, by others (e.g. via the internet).

Technology is a significant component in many safeguarding and well-being issues. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. In many cases abuse will take place concurrently via online channels and in daily life. They may be abused by an adult or adults or by another child or children. Abuse and exploitation can be:

- physical abuse
- emotional abuse
- sexual abuse; and/or
- neglect.

All staff should be aware of indicators of abuse, neglect and exploitation. Staff are referred to **Appendix 1** of this policy for further detail of the types of abuse and possible signs of abuse. Staff should always be vigilant and raise any concerns with the DSL or DDSL.

PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

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. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

If staff suspect or hear an allegation or concern of abuse, neglect or exploitation from a child or any third party, they must follow the relevant procedure below.

All staff should:

- listen carefully;

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- avoid asking leading questions;
- reassure the individual that the allegation/complaint will be taken seriously;
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain to the child that staff will only share the information with those who need to know to help the child. All staff should explain next steps and who the information will be passed to;
- a victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

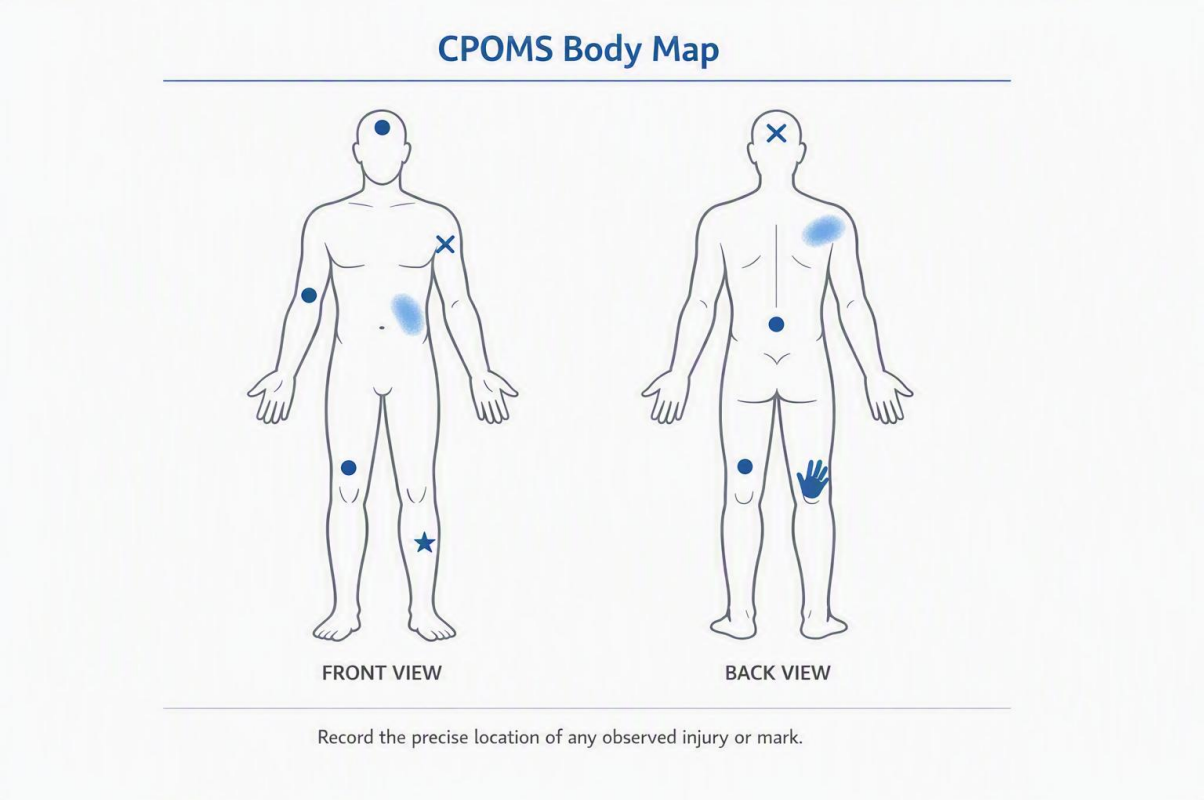
Records should include:

•a clear and comprehensive summary of the concern;

•details of how the concern was followed up and resolved;

•a note of any action taken, decisions reached and the outcome.

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing using CPOMS. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. Where a report includes online elements or the sharing of images, staff are reminded not to view or forward any illegal images of a child but note what has been reported. Further guidance can be found in the Sharing nudes and semi-nudes: advice for education settings working with children and young people.



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Where there is a safeguarding concern, the school will ensure the student's wishes and feelings are taken into account wherever possible and will work with them (and their families where appropriate) when determining what action to take and what services to provide. This is particularly important in the context of harmful sexual behaviours, such as sexual harassment and violence. The school manages this by ensuring systems are in place for children to express their views and give feedback and the provision in place to support dialogue with students with communications difficulties or vulnerabilities.

Information sharing: seven principles	
1. Necessary and proportionate	Share only information relevant to safeguarding the child and managing the identified risk.
2. Relevant	Include information that helps the receiving person or agency understand the concern, context and required action.
3. Adequate	Provide sufficient information for an informed safeguarding decision without unnecessary detail.
4. Accurate	Distinguish fact, observation, allegation and professional opinion; correct known inaccuracies.
5. Timely	Share information early enough to protect the child; do not delay because of uncertainty about data protection.
6. Secure	Use approved secure systems and confirm the identity and authority of the recipient.
7. Recorded	Record what was shared, with whom, when, the lawful safeguarding purpose and the rationale for sharing or not sharing.

Information sharing: Safeguarding information will often be special category personal data. The school will comply with the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025, collectively referred to as data protection laws, and the statutory Information Sharing Duty guidance. Staff must share relevant and proportionate information early when this is necessary to safeguard children. Data protection laws do not prevent information being shared to keep children safe, and fears about sharing information must not stand in the way of safeguarding and promoting children's welfare. Decisions to share or withhold information will be recorded, including the rationale, the information disclosed and the recipient.

When deciding what to share, staff will consider whether information is relevant to the current safeguarding risk, necessary for the receiving setting or agency, clearly presented and appropriately contextualised. Professional judgement will be used so that sharing is focused and proportionate without omitting information relevant to understanding or managing risk.

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Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. The school will ensure relevant staff comply with the relevant data protection principles when processing and sharing personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. As part of this, the school will ensure that members of staff:

- are confident of the processing conditions which allow them to process and share information for safeguarding purposes, including information which is 'special category personal data'.
- understand that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data without consent in certain circumstances.
- Do not provide pupils' personal data where the sharing does not comply with data protection law.

When sharing information staff will ensure they comply with group data protection policies and keep records of disclosures as required by these policies. These are available to staff via the United Learning Policies Portal. For further information about how the school processes pupil personal data, please see the privacy notice on the website https://www.accringtonacademy.org/about-us/policies

What staff should do if they have concerns about a child

If staff (including governors, agency staff and volunteers) have any concerns about a child's welfare they should act immediately and should speak with the School's DSL or DDSL. If, in exceptional circumstances, the DSL or DDSL is not available, this should not delay appropriate action being taken and staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as is practically possible.

The DSL will consider the appropriate action to take in accordance with the threshold document published by the school's local safeguarding partners. Options will include:

- managing any support for the child internally via the school's own pastoral support processes;
- making an early help assessment; or
- making a referral for statutory services and / or
- making a referral to the police.
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If a child's situation does not appear to be improving, the DSL (or the person that made the referral) should consider following local escalation procedures to ensure their concerns have been addressed and to ensure that the child's situation improves.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision, whether this is when problems are first emerging, or where a child is already known to local authority children's social care (such as on a child in need or child protection plan). Staff should challenge any inaction and follow this up with the DSL and children's social

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care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing (in line with this policy).

Support before statutory intervention, including community-based Early Help and Family Help

Family Help includes targeted early help and support and services delivered under section 17 of the Children Act 1989. Community-based Early Help may be provided through universal, voluntary and community services. Staff must understand the local criteria, referral routes and assessment processes, including when concerns require targeted Family Help or statutory intervention under sections 17, 20, 31 or 47 of the Children Act 1989.
Any child may benefit from early help but all staff should be particularly alert to the potential need for early help 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, or is at risk of permanent exclusion or placement in Alternative Provision or a Pupil Referral Unit

• is at risk of exploitation, modern slavery or trafficking, including criminal, financial or sexual exploitation

• is at risk of being radicalised or exploited

• 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, including Female Genital Mutilation or Forced Marriage

• is a privately fostered child.

All staff should be aware that behaviours linked to drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

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Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

Lancashire County Council Early Help pathway

Concern or additional need is identified
Listen to the child and family, consider strengths, needs, risks and existing support, consult the DSL or DDSL, and record the concern.

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Is there immediate danger or reasonable cause to suspect significant harm?

YES

Follow safeguarding procedures immediately.
Call 999 where necessary and refer without delay to Lancashire Children's Social Care. Do not use Early Help to delay statutory action.

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NO

Discuss Early Help with the family.
Explain the purpose of the Early Help Assessment and Plan and obtain informed consent to begin the process and share information, unless safeguarding duties require information to be shared without consent.

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Complete Lancashire's Early Help Assessment and Plan
Work with the child and whole family to identify what is working well, what support is needed, what is worrying, the impact on the child, desired outcomes, actions, responsible persons and timescales. Reflect the child's and family's voice.

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Agree a lead professional and coordinated plan
The family should be involved in choosing the lead professional, who acts as the main point of contact, coordinates support and ensures agreed actions are progressed.

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Convene Team Around the Family meetings where required
Bring together the family and relevant practitioners to review what is working, what remains difficult or worrying, progress against outcomes and any changes needed to the plan. Provide the family with a copy of the agreed information.

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Are outcomes improving and needs being met?

YES

Continue, step down or close.
Review regularly. When outcomes are achieved, agree closure with the family and practitioners, record the reasons

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NO / RISK INCREASES

Review and escalate.
Revise the plan, seek additional services, consult the DSL or DDSL and consider referral to Lancashire Children's Social Care for section 17

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and any ongoing universal or community support.

Child in Need support or section 47 child-protection enquiries where thresholds are met.

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Record throughout
Keep the assessment, consent, plan, Team Around the Family minutes, reviews, decisions, rationale, referrals, outcomes and closure arrangements secure and up to date.

In the first instance, staff who consider that a student may benefit from early help should discuss this with the School's DSL or DDSL. If early help is appropriate, the DSL will generally lead on liaising with relevant agencies and setting up inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under constant review and consideration given to a referral to children's social care if the student's situation does not appear to be improving or is getting worse.

What staff should do if a child is suffering, or is likely to suffer from harm

If staff (including governors, agency staff and volunteers) believe that a child is suffering, or is likely to suffer from harm, or is in immediate danger it is important that an **immediate** referral to Lancashire's children's social care (and the Police if appropriate) is made in accordance with the Lancashire referral process. Anyone can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important to provide as much information as possible as part of the referral process, to enable a contextual approach (see further below re Contextual Safeguarding).

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Safeguarding concern and referral workflow

Staff have concerns about a child's welfare

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Act immediately and speak to the DSL or DDSL

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Is the DSL or DDSL available?

YES **NO**

DSL considers the appropriate action to take in accordance with the threshold document published by the school's local safeguarding partners.

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Do not delay appropriate action. Speak to a member of the senior leadership team and/or take advice from local children's social care. Share any action taken with the DSL or DDSL as soon as is practically possible.

↓

Options include:
- managing any support for the child internally via the school's own pastoral support processes;
- making an early help assessment; or
- making a referral for statutory services and / or
- making a referral to the police.

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Is the child suffering, or likely to suffer from harm, or in immediate danger?

↓

Make an immediate referral to Lancashire's children's social care and the Police if appropriate, in accordance with the Lancashire referral process. Anyone can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made.

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Children's Social Care decision and rationale following referral
The social worker should confirm the outcome of the referral and the rationale for the decision, including the assessed level of need and risk and the proposed next steps. The outcome may

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include:
• **Community-based Early Help:** needs can be met through universal, voluntary, community or coordinated non-statutory support; the lead professional, plan and review arrangements should be identified.
• **Section 17 Child in Need assessment/support:** the child is unlikely to achieve or maintain a reasonable standard of health or development without local-authority services; the child's health or development is likely to be significantly impaired without such services; or the child is disabled. Children's Social Care will assess need and determine appropriate services under section 17 of the Children Act 1989.
• **Section 47 child-protection enquiries:** there is reasonable cause to suspect that the child is suffering, or is likely to suffer, significant harm. Children's Social Care must make, or cause to be made, enquiries to decide what action is required to safeguard and promote the child's welfare.
• **No further action by Children's Social Care / signposting:** the statutory threshold is not met; the reasons, advice, identified support and any escalation or review arrangements should be stated. Where the referrer disagrees with the decision or the child's situation does not improve, the DSL or referrer should seek clarification, challenge the decision and use the local escalation procedure.

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Record
All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing in line with this policy.

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Review and escalate
If the child's situation does not appear to be improving, the DSL or the person who made the referral should consider following local escalation procedures. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate.

The school's local safeguarding partners are the Local Authorities of Blackburn with Darwen, Blackpool and Lancashire, The Lancashire and South Cumbria Integrated Care Board and the Chief of Police for Lancashire Constabulary and the locally agreed safeguarding arrangements can be found on the Lancashire Safeguarding Portal

https://www.safeguardingpartnership.org.uk

The school liaises closely with alternative provision providers who provide daily attendance and punctuality information and weekly behaviour information. Any welfare concerns are communicated immediately through liaison between the provider's DSL and the school's DSL/DDSL.

What staff should do if a child is seen as at risk of radicalisation

Staff should follow the school's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a

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referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism, they must call 999 or submit a referral form to MASH or call them directly. Advice and support can also be sought from children's social care.

The school, in recognition that students may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL and governors responsible for safeguarding to ensure the school's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

See further below for more information on radicalisation. Further guidance can be found in the Revised Prevent duty guidance: for England and Wales April 2021.

What staff should do if they discover an act of Female Genital Mutilation ('FGM')

All staff should speak to the DSL or DDSL about any concerns about FGM. Teaching staff have a separate duty to report to the Police cases where they discover that an act of FGM appears to have been carried out on a girl under the age of 18. All staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect or discover that a student may be at risk of FGM.

Elective Home Education

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school will try to work together with the local authority and key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. The school will inform the local authority of all deletions from the admissions register when a child is taken off roll.

What staff should do if they have concerns about another staff member (including supply staff, volunteers and contractors)

If staff have safeguarding concerns, or an allegation is made about another staff member posing a risk of harm to children, then this should be referred to the Principal. Where there are concerns/allegations about the Principal this should be referred to the Chair of the LGB and Head of Safeguarding. In the event of concerns/allegations of abuse being made, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, volunteers and contractors).

What staff should do if they have concerns about safeguarding practices in the school

Where staff have concerns about poor or unsafe practices and potential failures in the school's safeguarding regimes, these should be raised in accordance with the school's whistleblowing procedures which can be found on the school website. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

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If staff and volunteers feel unable to raise an issue with the school, feel that their genuine concerns are not being (or have not been) addressed or are concerned about the way a concern is being handled, they may use other whistleblowing channels, such as the NSPCC whistleblowing helpline. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

CHILD-ON-CHILD ABUSE (INCLUDING HARASSMENT AND VIOLENCE)

Safeguarding issues can manifest themselves via child-on-child abuse. Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between two or more children and within children's relationships (both intimate and non-intimate). All staff working with children are advised to maintain an attitude of "it could happen here". Staff should recognise that even if there are no reports, it does not mean that child-on-child abuse is not happening, it may be the case that it is just not being reported

This is most likely to include, but may not be limited to:
Child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator. Staff must recognise prejudice-based harm and discriminatory behaviour, including racism and faith-targeted abuse, and consider its impact on a child's welfare, wellbeing, mental health, sense of safety and willingness to seek help. Staff should also be alert to times and locations where children may be at heightened risk, including immediately after school.

Misogyny, incel-aligned beliefs and other forms of gender-based hostility are recognised as harmful sexual behaviours. Staff must treat these as safeguarding concerns, record incidents, and escalate patterns of behaviour to the DSL for assessment and intervention.

- Abuse in intimate personal relationships between children;
- Bullying (including cyberbullying);
- Discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents;
- Physical abuse such as 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;
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, jokes and online sexual harassment, or misogynistic messages which may be stand alone or part of a broader pattern of abuse;
- Consensual and non-consensual making or sharing of nudes and semi-nudes, including images digitally altered or generated using artificial intelligence, deepfakes or 'deep nudes';

Child-on-child abuse includes the **creation, possession or sharing of self-generated intimate images**, whether consensual or non-consensual, including **AI-generated or deepfake intimate images**. These behaviours are recognised as harmful sexual behaviour and will be responded to through safeguarding, behaviour and criminal thresholds where appropriate.

- 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;

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- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element); and
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

The school recognises the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be "victims" and boys "perpetrators"). Even if there are no reports in their school it does not mean it is not happening, it may be the case that it is just not being reported. As such, if staff have **any** concerns regarding child-on-child abuse, they should speak to their designated safeguarding lead (or deputy).

Child-on-child abuse can be associated with factors outside the school and can occur online and face-to-face between two or more children of any age or gender. The school therefore takes a contextual safeguarding approach to managing child-on-child abuse.

Child-on-child abuse is abuse and is never acceptable. The school takes a zero-tolerance approach. It should never be passed off or dismissed as "banter", "part of growing up", "just having a laugh" or "boys being boys".

The school takes the following steps to minimise the risk of child-on-child abuse:

All staff are trained to recognise the signs of child-on-child abuse and to follow robust reporting procedures.

Student assemblies, tutorial time and PSHE sessions refer to information about child-on-child abuse and what to do if they are involved or aware of someone involved with this.
Students are encouraged to talk to a trusted member of staff, their parents/guardians or a strong friend within their friendship group.

The school's approach to pupil's sharing nudes and semi-nudes images and or videos (also known as sexting or youth produced sexual imagery) is that all concerns are immediately discussed with a students' Head of Year and recorded on CPOMS (Head of Year will then inform the DSL or DDSL). Students are also referred to United Learning E-Safety policy.

Where an issue of student behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies in the first instance:

What to do if staff suspect that a child may be at risk or hears a report of child-on-child abuse

For detailed statutory guidance on harmful sexual behaviour, sexual harassment and sexual violence, including prevention, responding to reports, risk and needs assessment, support and ongoing action, staff must refer to Keeping Children Safe in Education (2026), Part five.

The procedures set out below have been developed following consultation with students, staff and parents and will be reviewed, at least annually, in light of an assessment of the impact and effectiveness of the policy.

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The school's initial response to a report from a child is important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online should not be downplayed and should be treated seriously. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have **any** concerns about a child's welfare, they should act on them immediately rather than wait to be told.

All staff are trained to manage a report. Effective safeguarding practice includes:

- if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible;
- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising that a child is likely to disclose to someone they trust: this could be **anyone** on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident, and that trauma can affect memory, so children may not be able to recall all details or the timeline of abuse;
- keeping in mind that certain children may face additional barriers to telling someone because of their disability, sex, ethnicity and/or sexual orientation;
- listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;

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• considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;

• only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation;

• where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCIS guidance on Sharing nudes and semi-nudes: advice for education settings working with children and young people.

• informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

If a staff member has a concern that a child may be at risk of or experiencing abuse by another child, or that a child may be at risk of abusing or may be abusing other children, they should discuss their concern with the DSL or DDSL without delay so that a course of action can be agreed.

The school recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

All concerns/allegations of child-on-child abuse will be handled sensitively, appropriately and promptly and will be investigated including consideration of the wider context in which it may have occurred (as appropriate). The school treats all children involved as being at potential risk and ensures a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it. **Immediate** consideration will therefore be given as to how best to support and protect all children involved/impacted.

The school will take into account the views of the child/children affected. Unless it is considered unsafe to do so, the DSL should discuss the proposed action with the child/children and their parents following appropriate liaison with children's social care. The school should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

All children affected by child-on-child abuse will be supported by the DSL, DDSL and the wider Pastoral Team and support from external agencies will be sought, as appropriate. "Victims" will be reassured that they are being taken seriously and that they will be supported and kept safe. The school recognises that children with special educational needs and disabilities or certain health conditions can be more prone to peer on peer group isolation than other children and will consider extra pastoral support for those children from a member of the Learning Support Team.

A student against whom an allegation of abuse has been made may be suspended from the school during the investigation. The school will take advice from relevant local safeguarding

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partners on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged "victim" and "perpetrator". If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the school will ensure that, subject to the advice of the relevant local safeguarding partners, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the school and advice will be sought as necessary from the relevant local safeguarding partners, such as children's social care and/ or the Police as appropriate.

Reports concerning harmful sexual behaviour (including sexual violence and sexual harassment)

Consideration of safeguarding all those children involved in the safeguarding report will be immediate. Following a report of sexual violence and/or sexual harassment the DSL will therefore consider the appropriate response. Important considerations will include:

- The wishes of the victim in terms of how they want to proceed;
- The nature of the alleged incident, including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children (e.g. is/are the alleged
- perpetrator(s) significantly older, more mature, confident and well known social
- standing? Does the victim have a disability or learning difficulty);
- If the alleged incident is a one-off or sustained pattern of abuse (NB. sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- That sexual violence and sexual harassment can take place within intimate personal relationships between children;
- Any ongoing risks to the victim, other children, adult students, or school/college staff;
- Importance of understanding intra familial harms and any necessary support for siblings following incidents;
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

When there has been a report of sexual violence, the DSL (or a deputy DSL) should make an immediate risk and needs assessment in respect of each child affected by the abuse. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the "victim";
- the alleged "perpetrator"; and
- the other children (and, if appropriate, staff) at the school.

The DSL will consider as part of the school's response, the context within which such incidents and/or behaviours occur and the importance of anonymity. Risk assessments will be recorded

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(either written or electronic) and kept under review. The DSL will consider the risks posed to all students and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the "victim" and alleged "perpetrator" and considerations regarding shared classes, sharing school premises and school transport. Any professional risk assessment will inform the school's approach.

The police will be informed of any harmful sexual behaviours including sexual violence and sexual harassment which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. A report to the police will generally be made in parallel with a referral to children's social care.

If the DSL decides to make a referral to children's social care and/or a report to the police against a "victim's" wishes, the reasons should be explained to the student and appropriate specialist support offered. The DSL or DDSL will also work closely with children's social care and other agencies as required to ensure any action taken under this policy does not jeopardise any statutory investigation and to discuss how the alleged "perpetrator", staff, parents and others will be informed of the allegations and what information can be disclosed, bearing in mind the need to protect those involved and their anonymity.

Regardless of the outcome of any criminal process, including where a child is subject to bail, the DSL will liaise with the police and children's social care to ensure the welfare and safety of all children and update the risk assessments and ensure relevant protections and measures are in place for all children.

The school will consider whether disciplinary action may be appropriate for any child/children involved. Before deciding on appropriate action the school will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it.

The DSL will ensure that where children move to another educational institution following an incident of child-on-child abuse, the new institution is made aware of any ongoing support needs and, where appropriate, any potential risks to other children and staff.

The school recognises that good record-keeping and monitoring of sexual violence and sexual harassment reports is essential and assists the school in meeting its Public Sector Equality Duty.

Contextual Safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

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SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS

The school's procedures for managing concerns/ allegations against staff who are currently working in the school follows Department for Education statutory guidance and local safeguarding partners' arrangements and applies when staff (including supply staff, volunteers and contractors) have (or are alleged to have):

- Behaved in a way that has harmed a student, or may have harmed a student; and/or
- Possibly committed a criminal offence against or related to a student; and/or
- Behaved towards a student in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour that may have happened outside school, that might make them unsuitable to work with children "transferable risk". Advice can be sought from the LADO in assessing transferable risk).

Non-recent allegations

Allegations against an adult that is no longer working/volunteering with children should be referred to the Police. Where it is known that the adult is still working/volunteering with children, all allegations (including historical/non-recent allegations of abuse) should be referred to the Police and the LADO in the local authority that the adult is working/volunteering.

Where an adult makes an allegation to a school that they were abused as a child, they should be advised to report the allegation to the police. Non-recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. Abuse can be reported no matter how long ago it happened.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' (LADO) or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the school may discuss informally with the Local Authority 'designated officer' (LADO) on a no-names basis (if local safeguarding procedures allow).

All allegations should be investigated as a priority to avoid any delay.

Allegations that may meet the harms threshold

1. All allegations which appear to meet the above reporting criteria are to be **reported straight away to the 'case manager'**, who is the Principal. Where the Principal is absent or is the subject of the allegation or concern, reports should be made to the Chair of the LGB and Head of Safeguarding. Where the Principal is the subject of the allegation or concern, the Principal must not be informed of the allegation prior to contact with the Chair of the LGB, Head of Safeguarding and LADO and, if appropriate, children's social care and the police.

2. **Welfare of the child:** Where the case manager deems that a child has been harmed, or there to be an immediate risk of harm to a child, or if the situation is an emergency, the

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DSL (or DDSL) should contact Children's Social Care and, as appropriate (e.g. if there is evidence of a possible criminal offence), the Police immediately.

3. **Investigating and supporting the person subject to the allegation:** Before contacting the LADO, schools should conduct basic enquiries in line with local procedures to establish the facts and help determine if there is any foundation to the allegation, being careful not to jeopardise any future police investigation, such as:
    - Was the individual in the school at the time of the allegation?
    - Could they have come into contact with the child?

    Schools should establish what initial information the LADO will require, and if in doubt check with the LADO before undertaking any initial enquiries, to ensure not to prejudice the position.

4. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. The designated officer should be informed within one working day of all allegations that come to the school's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.

5. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed with the Police/LADO. The case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

6. **Suspension:** The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the LADO, their HR adviser, as well as the police and children's social care if relevant when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the school and shall provide them with their contact details.

7. **Support for the member of staff:** whilst the welfare of the child is paramount, appropriate welfare support should also be made for the member of staff. Information is confidential, and should not ordinarily be shared with other staff, children or parents not directly involved. See further guidance in KCSIE.

8. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.

9. **Further investigation:** where further investigation is required, the LADO and case manager will agree how and by whom the further investigation will be undertaken.

10. The case manager will discuss with the designated officer whether a referral to the **Disclosure and Barring Service (DBS) and/or Teaching Regulation Agency (TRA)** should be made, noting the requirements of KCSIE. For instance:
    a. If: 1) the allegation is substantiated; and 2) the person is dismissed (including by an agency) or the school (or agency) ceases to use their services, or the person

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resigns or otherwise ceases to provide their services, then the employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

b. The employer has a legal requirement to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:
    i. engaged in relevant conduct in relation to children and/or adults,
    ii. satisfied the harm test in relation to children and/or vulnerable adults; or
    iii. been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

c. In a case involving serious professional misconduct by a teacher, the case manager must consider whether to make a referral to the TRA. In certain cases, the TRA will consider whether to prohibit the individual from teaching.

11. Where the initial discussion leads to no further action, the case manager and the LADO should record the decision and justification for it; and agree on what information should be put in writing to the individual concerned and by whom.

12. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the school's safeguarding procedures or practices to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The designated officer and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

13. For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the designated officer) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

14. **Settlement:** Compromise or settlement agreements **should not** be used where there are allegations which indicate the person poses a risk of harm or may not be suitable to work with children and will not prevent police and/or school investigation, or referral to the DBS or TRA where the criteria are met. Failure to do so is a criminal offence. The school will continue its investigation if the person leaves, resigns or ceases to provide their services. Schools should check the relevant provisions of KCSIE.

Information sharing

Staff should be mindful of the guidance set out in KCSIE in relation to sharing information between safeguarding partners during the course of the process of managing allegations against staff. The school will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

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Allegation outcomes

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. Substantiated allegations should be included in references, provided that the information is factual and does not include opinions (KCSIE). Low level concerns (see below) should not be included in references unless they relate to issues which would normally be included in a reference such as misconduct or poor performance (KCSIE).

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager should consider whether the child and/or person who made the allegation is in need of help or may have been abused by someone else, in which case a referral to children's social care may be appropriate.

If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a student who made it in accordance with the school's behaviour policy; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a student.

Supply teachers and all contracted staff

Where the school has to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as 'the agency'), they will ensure allegations are dealt with properly. They will liaise with the local authority designated officer (LADO) to determine a suitable outcome and discuss with the agency whether it is appropriate to suspend the supply teacher or redeploy them to another part.

Agencies should be fully involved and cooperate with any enquiries from the LADO, police and/or children's social care. The school will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.

When using an agency, the schools will inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Governors

If an allegation is made against a governor, schools should follow their own local procedures. Where an allegation is substantiated, they should follow the procedures to consider removing them from office.

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Organisations or individuals using school premises

Schools and colleges may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO.

CONCERNS THAT DO NOT MEET THE HARM THRESHOLD/LOW – LEVEL CONCERNS POLICY

As part of their whole school approach to safeguarding, the school will ensure that they promote an open and transparent culture in which **all** concerns about all adults working in or on behalf of the school (including supply teachers, volunteers (including governors) and contractors) are dealt with promptly and appropriately.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.
- 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 their mobile phone;

•engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,

•humiliating children.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately.

Sharing/reporting a concern

Low-level concerns about a member of staff should be reported to the designated safeguarding lead or Principal. Where a low-level concern is raised about the designated safeguarding lead, it should be shared with the Principal. If someone is unclear who they should share their concern with, they should share it with the United Learning Safeguarding Lead, who is part of the Central Office Team. Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO or meets the threshold of an allegation.

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The Principal should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some schools/colleges, the Principal may wish to consult with the DSL and take a more collaborative decision-making approach.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school or college, that concern should be shared with the designated safeguarding lead (or deputy), and/or headteacher, and recorded in accordance with the school's low-level concern/staff code of conduct policy, and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the staff member sharing the concern does not wish to be named the school will respect this person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example where it is necessary in order to carry out a fair disciplinary investigation) and, for this reason, anonymity can never be promised to members of staff who share low-level concerns.

If schools and colleges are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

Self-Reporting

Occasionally an adult may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, an adult may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

How should a low-level concern be responded to

The DSL/Principal should:

- speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided;
- review the information and determine whether the behaviour (i) is entirely consistent with the school's Code of Conduct and the law, (ii) constitutes a low-level concern, (iii) is serious enough to consider a referral to the LADO, or (iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO/other relevant external agencies;
- where the DSL/Principal is in any doubt whatsoever, they should seek advice from the LADO;
- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);

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Any investigation of low-level concerns should be done discreetly and, on a need-to-know basis.

Advice should be sought from Human Resources and legal services (where necessary) about next steps.

There are a number of potential outcomes e.g.

- If it is decided that the low-level concern in fact amounts to behaviour which is entirely consistent with the organisation's Code of Conduct and the law it will still be important for the DSL/Principal to inform the individual in question what was shared about their behaviour, and to give them an opportunity to respond to it; In addition, the DSL/Principal should speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the organisation's Code of Conduct and the law.
- Some will not give rise to any ongoing concern and, accordingly, will not require any further action;
- Others may be most appropriately dealt with by means of management guidance and/or training;
- A low-level concern may require a conversation with the individual about whom the concern has been raised. This should include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate;
- Some low-level concerns may also raise issues of misconduct or poor performance;
- Some concerns may trigger the organisation's disciplinary, grievance or whistleblowing procedures, which should be followed where appropriate;
- A referral to the LADO as the school believes the threshold has been met.
- The school should exercise their professional judgement and, if in any doubt, they should seek advice from other external agencies including the LADO.

The DSL/Principal should review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews should be made.

Recording concerns

All procedures for recording and storing of records should comply with United Learning's Data Protection Policies.

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All low-level concerns should be recorded in writing by the DSL/Principal. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

The name of the individual sharing the low-level concern, and their role, should be stated, as should the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised. If the latter individual has an opposing factual view of the incident, this should be fairly recorded alongside the concern. The record should include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record should be signed, timed and dated.

There should be appropriate records of:

- all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses;
- all external conversations – for example, with the LADO/other external agencies;
- the rationale for decisions;
- any action taken.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

Adults about whom a low-level concern has been raised may have rights of access to such records, provided of course that this would not also unreasonably disclose information of children concerned.

The school should retain the record in accordance with United Learning's Data Protection policies. The school should retain all records of low-level concerns (including those which are subsequently deemed by the DSL/Principal to relate to behaviour which is entirely consistent with the Code of Conduct) in a central low-level concerns file (either electronic or hard copy). Where multiple low-level concerns have been shared regarding the same individual, these should be kept in chronological order as a running record. These records should be kept confidential and held securely, with access afforded only to a limited number of individuals, such as the DSL/Principal and the individual they report to (e.g. Regional Director); and a senior HR officer and the individual they report to (e.g. Head of HR). The DSL/Principal may store the central low-level concerns file with their other safeguarding and child protection records.

Some low-level concerns may also involve issues of misconduct or poor performance, or they may trigger the disciplinary, grievance or whistleblowing procedures. Where these issues would ordinarily require records to be made and retained on the staff member's personnel file, this should be done in the normal way, in addition to the records of the low-level concern(s) being retained in a central low-level concerns file.

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If a low-level concern in and of itself is deemed to be serious enough to consider a referral to the LADO and, perhaps following consultation, a referral is made to them, then records relating to the low-level concern should be placed and retained on the staff member's personnel file.

If a low-level concern (or group of concerns) is reclassified as an allegation, all previous records of low-level concerns relating to the same individual should be moved from the central low-level concerns file to the staff member's personnel file and retained in accordance with Part 4 of KCSIE.

When a staff member leaves and/or takes up new employment, that creates a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore necessary to keep.

Low-level concerns should not be referred to in references unless they relate to issues which would ordinarily be included in a reference, for example, misconduct or consistent poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. Where a low-level concern (or group of concerns) has met the threshold for referral to LADO and found to be substantiated, it should be referred to in a reference. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

The school will refer to Part Four, Section Two of KCSIE for further advice and guidance.

STAFF BEHAVIOUR POLICY / CODE OF CONDUCT

The school's code of conduct can be found on the school website. The aim of the staff code of conduct is to provide clear guidance about behaviour and actions and responses to low level concerns in order not to place students or staff at risk of harm or of allegation of harm to a student.

SAFER RECRUITMENT

The school is committed to safer recruitment processes and ongoing safer working practices. Members of the teaching and non-teaching staff at the school including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role.

For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. Under no circumstances will an individual commence work unsupervised in sole charge of, or in unaccompanied contact with, children without a cleared DBS check. In this case, the individual will have a separate Barred List check and the school will undertake a written Risk Assessment exercise in relation to the proposed work. All other safeguarding checks will be completed and the individual will be appropriately supervised. Please refer to Section C and Appendix 5 of the 'Safeguarding Children – HR Procedural Guidance' available on the United Learning Hub for further guidance.

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The school's safer recruitment procedures will also cover trainee teachers, contractors, agency staff and volunteers explicitly. Relevant prohibition, direction, restriction, qualification and barred-list checks will be recorded and verified through the Department for Education's "Check a teacher's record" service where applicable.

For volunteers who teach, train, instruct, care for or supervise children frequently, on more than three days in any 30-day period, or overnight, the school will obtain an enhanced DBS check with children's barred list information because this is regulated activity from 1 September 2026. Existing volunteers brought within regulated activity by the Crime and Policing Act 2026 must have their barred-list status checked. Volunteers outside regulated activity will be subject to a written, recorded risk assessment and appropriate checks.

Full details of the school's safer recruitment procedures for checking the suitability of staff, members of the School LGB and Trustees of ULT and volunteers to work with children and young people is set out in

- United Learning / the School's Recruitment and Selection Policy;
- United Learning's Safeguarding Children – HR Procedural Guidance;
- United Learning's LGB Handbook; and
- United Learning's guidance: Trustees - Recruitment, Appointment, and Removal Process

These documents are available on the United Learning Hub.

The school's protocols for ensuring that any visiting speakers, whether invited by staff or students themselves, are suitable and appropriately supervised is set out in the School's Recruitment and Selection Policy.

MANAGEMENT OF SAFEGUARDING

The School's DSL is Jude Ward who is a member of the leadership team.

Nic Keenan and Jordan Taylor are the DDSL are the people to whom reports should be made in the absence of the DSL. This ensures there is always the required cover for the role.

The DSL and DDSL's contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the school. The DSL's responsibility is to maintain an overview of safeguarding within the school (including online safety and understanding the filtering and monitoring systems and processes in place), to open channels of communication with local statutory agencies, to liaise closely with safeguarding partners (such as children's social care and the police), support staff in carrying out their safeguarding duties children's social care and the police), support staff in carrying out their safeguarding duties and to monitor the effectiveness of the school's policies and procedures in practice. The DSL (and DDSL) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on a response to a safeguarding concern.

The DSL works with the LGB to review and update the school's safeguarding policy. Where a student leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main student file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt. The DSL will also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For

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example, information that would allow the new school to continue supporting victims of abuse, who have a social worker, or who are receiving support through the Channel programme, and have that support in place for when the child arrives. The school will ensure that key staff, such as the SENCO, are also aware of these arrangements, as required.

The DSL should be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

The DSL will inform the safeguarding partners of any incident which they think should be considered for a child safeguarding practice review.

The DSL regularly reviews the school's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in their absence, to a member of the senior management team or directly to local children's services.

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL or DDSL will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. For out of hours/out of term activities, the school's arrangements will be posted on the school's website.

To ensure continuity when the DSL is unavailable because of illness, leave or other circumstances, the school will maintain robust cover arrangements, including a confidential shared safeguarding mailbox or equivalent system that is monitored so concerns are received and acted upon without delay.

The school will ensure **robust DSL cover arrangements** so a trained DSL or deputy is always available during school hours. Cover arrangements will be documented and reviewed regularly.

Full details of the DSL's role can be found at Annex C of *KCSIE*.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

TRAINING

Induction and training (including online safety, which amongst other things includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) are in line with advice from local safeguarding partners.

All Staff

All new staff* will be provided with induction training that includes:

- Safeguarding and child protection, including online safety
- the child protection policy, including information about the identity and role of the DSL and DDSL
- the behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- the safeguarding response to children who go missing from education

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- the staff code of conduct including the school's whistleblowing procedure and the acceptable use of technologies policy, staff/student relationships and communications including the use of social media
- a copy of Part 1 of *KCSIE* (Current edition/publication)
- School leaders and staff who work directly with children will also be required to read Annex B of KCSIE.
-

Induction training usually takes place within seven (7) working days of staff commencing work. Copies of the above documents are provided to all 'staff' during induction. On appointment and as part of United Learning Annual Declaration, all staff will receive and sign the up-to-date versions of the Staff Student Relationship Letter and Acceptable Use Declaration. The staff code of conduct can be found on the school intranet.

Temporary staff and volunteers are provided with a handout of all essential information upon arrival at school reception.

As part of the whole school safeguarding approach, all staff are also required to:

- Read Part One of *KCSIE* and confirm that they have done so by signature. Each time Part One of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via briefings led by the DSL.
- Understand key information contained in Part One of *KCSIE*. The school will ensure staff understanding by inset training and completing an online module set on Educare.
- Receive training in safeguarding and child protection regularly, in line with advice from the local safeguarding partners. Training will include online safety and harmful sexual behaviours including sexual violence and sexual harassment between children. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help. All staff will also be made aware of the local early help process and understand their role in it.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The school provides these via fortnightly briefings.

DSL(s) - Designated Safeguarding Lead (s)

The DSL receives updated child protection training at least every two years to provide them with the knowledge skills and authority required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, supporting SEND children particularly when online, overseeing online safety in school, record keeping and promoting a culture of listening to children, training in the Lancashire Safeguarding Board approach to Prevent duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of KCSIE.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

The DDSL is trained to the same level as the DSL.

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*Whilst external catering and maintenance staff are not technically United Learning/school employees (and therefore safeguarding training is not the responsibility of the school), they should receive an appropriate safeguarding induction to ensure they are aware of and understand all the school's relevant safeguarding policies (e.g. safeguarding policy/whistleblowing policy).

Governors and Trustees

All governors and trustees must receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in are effective and support the delivery of a robust whole school approach to safeguarding. This training should be regularly updated.

All governors (and proprietors) should be aware of their obligations under the Human Rights Act 1998 and, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Christie Spurling is the board-level lead designated to take a lead in relation to responsibility for the Trust's safeguarding arrangements. Angela Donovan is the LGB lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the school. They are a member of the School's LGB.

A review of the school's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. This is done in the form of an annual audit completed over a full school day including, speaking to students, site walk and auditing safeguarding files as well as the SCR. The school draws on the expertise of staff, including the DSL(s), in shaping the school's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the school will work with the Local Authority designated officer to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Teaching children how to keep safe

The United Learning Trust ensures that all students are taught about safeguarding, including online, through the curriculum, Relationships and Sex Education and Health Education and PSHE to help children to adjust their behaviours to reduce risks and build resilience, including to radicalisation. This includes teaching students about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. It will also include teaching students, for example, about healthy relationships, consent and that sexual violence and sexual harassment is always wrong.

The school recognises the additional risks that children with SEND face online and works with the Head of IT to ensure that additional support and measures are in place to support these

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children. Online safety is an integral part of the school's ICT curriculum for all pupils and is taught in an age-appropriate way relevant to pupils' lives. It is essential that children are safeguarded from potentially harmful and inappropriate online material. A whole school approach is taken to online safety in the Online/E-Safety Policy that empowers the school to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

It is also embedded in PSHE and Relationships and Sex Education. Pupils will be taught what positive, healthy and respectful online relationships look like; the effects of their online actions on others; how to recognise and display respectful behaviour online; how to use technology safely, responsibly and securely; and where to go for help and support when they have concerns.

The school has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online, which must be regularly reviewed for their effectiveness. The school's systems are 'Smoothwall'. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm.

The leadership team and relevant staff must understand and manage the filtering and monitoring provisions and know how to escalate concerns to the DSL or DDSL. The SLT member responsible for filtering and monitoring, supported by the DSL and IT support, will review effectiveness at least once every academic year, including checks across all internet-connected devices and relevant locations, and will keep a record of those checks.

The school will review the **effectiveness** of its filtering and monitoring systems **at least annually**, ensuring governors receive oversight reports. Records of checks, incidents and system changes will be maintained as part of safeguarding governance.

The school will communicate with parents and carers to reinforce the importance of children being safe online and to help them understand what systems schools and colleges use to filter and monitor online use. It will be especially important for the school to make parents and carers aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

Further detail of the school's approach to online safety can be found in school's Online E-Safety Policy which also includes detail on the use of mobile technology in school (and accessing 3G 4G and 5 technology on school premises) and the School's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the school's systems.

The school is a mobile phone-free environment by default throughout the school day, including lessons, lesson changeovers, breaktimes and lunchtime. Any exception must be authorised, justified by individual need or school operations, and managed under the school's mobile phone and acceptable-use arrangements.

Online safety will address content, contact, conduct and commerce risks, including harmful interaction with generative AI, explicit images generated using AI, deepfakes, misinformation, misogynistic influencers and financial scams. Any use of generative AI by staff or pupils must follow current Department for Education safety guidance and the school's safeguarding, data protection and acceptable-use arrangements.

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Staff must ensure the **safe and appropriate use of generative AI** in education. AI tools must not be used to create or manipulate images of pupils, and staff must be alert to risks such as deepfakes, misinformation, and harmful content. The DSL will oversee incidents involving AI misuse.

Looked after children (and previously looked after children)

Looked after children (and previously looked after children) are a particularly vulnerable group. The school will ensure that prompt action is taken when necessary to safeguard these children and the local governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after (and previously looked after) by a local authority.

Rachael Kissick is the designated member of teaching staff who has responsibility for their welfare and progress and to ensure that the needs identified in personal education plans are met. The school ensures that the designated member of staff receives appropriate training to carry out their role and has the information they need in relation to any child's looked after status, their care arrangements (including contact arrangements with birth parents and those with parental responsibility) and details of the child's social worker and virtual school head.

The designated member of staff will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care and will work closely with virtual school heads to promote their educational achievement. The DSL will ensure they have details of the local authority Personal Advisor appointed to guide and support any care leavers and will liaise with them as necessary regarding any issues of concern affecting them.

Children potentially at greater risk of harm (Children who need a social worker - Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Where the local authority has made the school aware a child has a social worker, the designated safeguarding lead will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

This information will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Use of 'reasonable force'

There are limited circumstances when it is appropriate for staff to use reasonable force to safeguard children. Reasonable force means using no more force than is necessary for the least amount of time. The decision depends on the individual circumstances and professional judgement. A blanket 'no contact' approach will not be adopted where it would prevent staff from appropriately supporting or protecting a child.

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The school recognises the additional vulnerability when using reasonable force in response to risks presented by incidents involving children with SEND, mental health or with medical conditions. The school will consider its duties under the Equality Act 2010 and their Public Sector Equality Duty. Positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children and agreeing them with parents and carers can reduce the occurrence of challenging behaviour and the need to use reasonable force.

The School's procedures for use of reasonable force can be found in the Behaviour Policy.

Arrangements for Visiting Speakers

The school has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The school's responsibility to students is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The school is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the school. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the school may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the school site, will be supervised by a school employee. On attending the School, Visiting Speakers will be required to show original current identification documents, including a photograph, such as a passport or photo card driving licence. The school shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy. All visiting speakers will be placed on a Red Lanyard and will be supervised at all times by a member of staff whilst in the building.

Use of school premises for non-school activities

Where governing bodies or proprietors hire or rent out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the governing body or proprietor, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body or proprietor will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. The governing body or proprietor will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as

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a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

Alternative provision

Where the school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and will ensure it is satisfied that the placement meets the pupil's needs.

The School will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the school of any arrangements that may put the child at risk (i.e. staff changes), so that the school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

The school will know where a child is based during school hours and will have records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. They will regularly review the alternative provision placements they make. Reviews will be at least half termly to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

Single-sex facilities, sport and social transition requests

The school provides toilets, changing rooms and single-sex facilities **based on biological sex**, with no exceptions. This requirement ensures compliance with statutory guidance and supports safeguarding, dignity and privacy for all pupils.
The school will comply with safeguarding, equality and premises requirements for single-sex toilets, changing rooms, showers, sport and any residential accommodation. Pupils will not be permitted to use facilities designated for the opposite biological sex. Where a child requests support connected with social transition, the school will not initiate changes; it will involve parents or carers as a priority unless this would increase risk, involve the DSL, consider the child's and other children's best interests, document decision-making, maintain accurate information and review arrangements regularly. Alternative individual facilities may be considered where appropriate without compromising safety, comfort, privacy or dignity.
Where single-sex sport is required for safety, there will be no exceptions. In other cases, requests will be considered in light of safeguarding duties, fairness, equality law, the impact on all children and the school's documented assessment of best interests.

Use of mobile phones and cameras (and other relevant devices)

The school's policy on the use of mobile phones and cameras (and other relevant devices) can be found in the School's Acceptable Use Policy. Staff who wish to use or take photographs or video of students (whether on a personal or school device) must first speak with the Principal to obtain their approval before using or taking any image of a student. Staff who wish to use their personal mobile devices or cameras in school for any other reason must first speak with the Principal. Staff who act in breach of this may be subject to disciplinary action.

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APPENDIX 1 –FURTHER INFORMATION

All staff should be aware of indicators of abuse and neglect, as well as specific safeguarding issues such as child criminal exploitation and child sexual exploitation. Staff should always be vigilant, and if unsure, should **always** speak to the DSL or DDSL.

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. They can occur from within or outside families, in or out of school, from other children within peer groups or the wider community and/or online. In most cases, multiple issues will overlap with one another and children can therefore be vulnerable to multiple threats.

All staff should be aware that behaviours linked to drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

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 or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include 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 that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child 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. Staff are referred to DfE guidance Sexual Violence and Sexual Harassment for further information.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of 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 oral sex) 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. The sexual abuse of children by other children (also known as child-on-child abuse) is a specific safeguarding issue in education and **all** staff should be aware of it and of their school's policy and procedures for dealing with it.

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

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during pregnancy 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic abuse; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

Child Criminal Exploitation (CCE) and Child Sexual Exploitations are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. CSE and CCE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

More information can be found at:

Multi-agency practice principles for responding to child exploitation and extra-familial harm

Non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice

Child Criminal Exploitation (CCE) Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may

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still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE): CSE is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 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. CSE does not always involve physical contact: it can also occur through the use of technology.

CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex; can still be abuse even if the sexual activity appears consensual; can include both contact (penetrative e.g. rape and oral sex and non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing) and non-contact sexual activity (such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. It can take place in person or via technology, or a combination of both; can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence; may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media); can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse; and is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- 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; and
- Children who regularly miss school or education or do not take part in education.

CSE is a geographically widespread form of harm that is a typical **feature of county lines** criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of drugs trafficking. The DSL or DDSL will consider a referral to

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the National Referral Mechanism as soon as possible if there are county line concerns, such as a child being a potential victim of modern slavery or human trafficking.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with **serious violent crime**. These 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. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the 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.

If staff have a concern about a child or a child makes a report to a member of staff, staff should follow the referral process in this policy. If staff are in any doubt about what to do, they should speak to the DSL or DDSL.

County lines

County lines is 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 [within the UK], using dedicated mobile phone lines or other form 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 be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

The Home Office has provided further information in the document below:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863323/HOCountyLinesGuidance_-_Sept2018.pdf

So called 'Honour Based' Abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation

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(FGM)], forced marriage, and practices such as breast ironing. It can include multiple perpetrators.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the multi-agency statutory guidance on FGM.

If staff have a concern that a student may be at risk of HBA or has suffered HBA, they should speak to the DSL (or DDSL). As appropriate they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care.

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a student is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) [or it involves a student over 18], teachers should follow the school's local safeguarding procedures.

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. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at: **https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage .** School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

In addition, 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.

Preventing Radicalisation: Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' safeguarding approach.

• **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

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1. negate or destroy the fundamental rights and freedoms of others; or

2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or

3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

• **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

• **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

Special Educational Needs and/or Disabilities or physical health issues: Students with SEND or certain health conditions can face additional safeguarding challenges. They may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect. Students with SEND are more likely to be abused by other children. The barriers to recognising abuse and neglect of this group of children can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability or health condition without further exploration;
- being more prone to peer group isolation than other children
- the potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, including prejudice-based bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

To address these additional challenges, the school has put in place the following pastoral support measures – Students will be supported by Learning Support Assistants of the most appropriate strand of SEND support

Further guidance can be found in the DfE guidance Supporting pupils at school with medical conditions, and where applicable in the SEND Code of Practice.

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Staff will support such students in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate. Any reports of abuse involving children with SEND will entail close liaison with the DSL or DDSL and named person with oversight for SEN.

The school will make **reasonable adjustments** in reporting, communication and safety planning for pupils with SEND, neurodivergence or communication differences. Staff must recognise additional barriers these pupils face when disclosing concerns and adapt practice accordingly.

Young Carers: Young carers may face increased safeguarding risks due to caring responsibilities, fatigue, isolation or role-reversal. Staff must identify concerns early and refer to the DSL for support planning.

Children with Medical Conditions: Children with medical conditions may require additional safeguarding consideration, including medication management, emergency planning and multi-agency coordination.

Lesbian, Gay, Bisexual or gender questioning: This is not in itself an inherent risk factor for harm. However, children can be targeted by other children. In some cases, a child who is perceived by other children to be Lesbian, Gay, Bisexual or gender questioning (whether they are or not) can be just as vulnerable as children who identify as Lesbian, Gay, Bisexual or gender questioning .

Risks can be compounded where children who are Lesbian, Gay, Bisexual or gender questioning lack a trusted adult with whom they can be open. School provides all students access to our online concerns report system (SHARP) and school provides students with a safe space for students to speak out or share their concerns through the pastoral support and safeguarding teams. School also delivers RSE and Health curriculum.

The school will adopt a **"very careful" and cautious safeguarding approach** when supporting gender-questioning children. Schools must not initiate social transition. Parents will be involved in the vast majority of cases, and decisions will be informed by multi-agency consultation, risk assessment, and the child's welfare. Staff must record concerns promptly and seek DSL guidance.

Children and the court system: Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed, and this will be stressful for them. Making child arrangements following separation can also be stressful and entrench conflict in families. Staff should be alert to the needs of such students and report any concerns to the DSL or DDSL in accordance with this policy. There are two age-appropriate guides to support children: 5–11-year-olds and 12–17-year-olds; links can be found in Annex B of KCSIE.

Children Missing from Education / Children Absent from Education: Children missing from education, particularly persistently or repeatedly, can be a vital warning sign of a range of safeguarding issues, including abuse, neglect, child sexual exploitation, child criminal exploitation, county lines, harm outside the home, or radicalisation. Accrington Academy therefore regards poor attendance, unexplained absence, persistent absence and children absent from education as potential safeguarding concerns, not solely attendance matters.

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Staff must follow Accrington Academy's Attendance Policy and children missing from education procedures when a child is absent from school, missing from education, or absent on repeat occasions. The school holds more than one emergency contact number for each student so that additional options are available to contact a responsible adult where absence gives rise to a welfare or safety concern. All unexplained or unauthorised absences will be rigorously followed up, recorded and addressed in accordance with the Attendance Policy.

The school's attendance registers are carefully monitored to identify trends, concerning patterns and individual cases requiring further support or escalation. Action must be taken in accordance with this policy where any student's absence gives rise to concern about their welfare. In partnership with appropriate agencies, the school will pursue and address unauthorised absence to safeguard the welfare of children in its care.

The school will inform the local authority of any student who is added to or deleted from the school's admission register at non-standard transition points, in accordance with statutory registration requirements. This supports the local authority to identify children of compulsory school age who may be missing from education and to follow up with any child who may be in danger of not receiving a suitable education or who may be at risk of abuse, neglect, exploitation or radicalisation.

The school will notify the local authority, and the local authority where the child is normally resident, of any student who fails to attend school regularly or who has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

Persistent absence is a major safeguarding risk factor. The Designated Safeguarding Lead (DSL) and attendance lead will jointly analyse attendance patterns, identify early help needs and escalate concerns through multi-agency pathways where appropriate. Attendance data will be used to inform risk assessments, case management and decisions about further safeguarding action.

Students who are already known to local authority children's services and require a social worker, including those subject to child protection, child in need or looked-after child arrangements, as well as students on a safety plan due to high-risk emotional health and wellbeing concerns, will have their attendance monitored rigorously. Absence for these students may increase known safeguarding risks within the family or community and must be treated with appropriate urgency.

Where a safeguarding concern is logged because a student is missing from education or contact cannot be established, the Safeguarding Team will liaise with external professionals involved with the student to advise that the student is currently missing from education and that the school has been unable to establish contact.

Overseas Travel During Term Time

If staff become aware that a student has travelled, or intends to travel, overseas during term time, this must be logged on CPOMS as a potential safeguarding concern for the Designated Safeguarding Leads to assess. Where possible, parents and carers should inform the school before a student travel overseas during term time and must provide return flight details to the student's Head of Year. This applies to all students travelling overseas to any destination during term time.

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In the first instance, and where the student has not already travelled overseas, the Head of Year, who has initial responsibility for student attendance, should complete a wellbeing check with the student to ascertain the reason for the trip and assess whether there is an emerging safeguarding concern. If a safeguarding concern is identified, the Head of Year should record this on CPOMS and assign it to the Senior Pastoral Lead for review by the wider Safeguarding Team.

Heads of Year should contact parents and carers by telephone, text or email to request confirmation of return flight details by email to the Safeguarding Team at safeguarding@accrington-academy.org. This information should be provided with immediate effect and no later than two working days following the request. A reason for the absence should also be requested and recorded, and parents and carers should be informed that the absence will be unauthorised.

If parents or carers do not respond within two working days with return flight details and a reason for the unauthorised absence, the Head of Year should email parents and carers to explain that the school has an inherent duty to safeguard all students. The Designated Safeguarding Lead, Jude Ward, will then consider contacting Lancashire Police to request a welfare check at the student's home address, as the student may be classed as missing from home and education. The DSL will also decide whether the safeguarding concern meets the threshold for a MASH referral to Lancashire Children's Services.

Children with family members in prison: Children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Staff should be alert to the needs of such students and report any concerns to the DSL or DDSL in accordance with this policy.

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.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org
and www.clevernevergoes.org.

Mental Health as a Safeguarding Concern

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children

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have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

Mental health concerns—including self-harm, eating disorders, suicidal ideation, and significant emotional distress—are recognised as key safeguarding indicators. Staff must respond to mental health concerns as potential safeguarding issues, not solely wellbeing matters, and must follow reporting procedures to the Designated Safeguarding Lead (DSL).

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken in line with the child protection policy, including speaking to the Designated Safeguarding Lead or a deputy and recording the concern through the appropriate safeguarding reporting procedures.

Relevant Guidance

Reference should be made to:

- Mental Health and Behaviour in schools DfE guidance (November 2018);
- DfE guidance 'promoting and supporting mental health and wellbeing in schools, which details numerous resources available to schools; and
- Public Health England: Promoting children and young people's emotional health and wellbeing a whole school and college approach
- Paragraphs 183-189 of 'Keeping Children Safe in Education'

Warning Signs and Urgent Action

Staff should recognise potential warning signs that a child may be struggling with their mental health or contemplating suicide. These may include significant behavioural change, persistent sleep difficulties, social withdrawal, disengagement from usual activities, physical signs of self-harm or self-neglect, or any presentation that gives rise to concern about a child's immediate safety or wellbeing.

Where a child is in immediate danger, staff must call 999 or arrange urgent attendance at A&E with a parent, carer or other suitable person. Where urgent mental health help is required but it is not an emergency, staff should use NHS 111 online or call 111 and select the mental health option.

Internal Reporting, Pastoral Response and Referral Pathways

Liaison with a student's Head of Year should be undertaken immediately by the member of staff who has concerns about a student's mental health. Members of the pastoral team are mental health first aid trained and have the skills and knowledge to refer a student for more dedicated assessment and support. Relevant referrals are then made to appropriate external agencies, where they will be triaged by qualified mental health practitioners.

There are many processes in place at the Academy to support the students who are experiencing difficulties with their mental health or who need extra support. All safeguarding concerns are

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initially reported via the CPOMs system which is monitored and actioned by the DSL/DDSL/Safeguarding Team so early intervention can take place.

Staff are also able to put a referral in for extra support. Once the referral has been completed, the referral will be triaged appropriately through the TAP Continuum and an action plan agreed. The various levels of support depend on the needs of the child and may include:

- YNOT
- Accrington Stanley Hub
- School nurse
- MHST
- We are with you
- Pru Outreach
- Barnados
- School counselling
- ELCAS

All students who are attending sessions are logged and tracked to assess their progress. Our CPOMS system is used to provide basic information which can be shared with the Safeguarding Team. Anything confidential is kept at the Academy Counsellor's level and cannot be shared without consent. Parents and Carers are informed throughout (where appropriate) to ensure they are aware of the support we are providing to their child to help improve their wellbeing.

Mental Health Lead

Ebony Scammell is the member of staff who leads on students' mental health and liaises with all Heads of Year on these matters.

School Counselling Service

The School Counsellor works in accordance with the BACP Ethical Framework for the Counselling Professions, alongside the academy's safeguarding procedures, statutory guidance and professional insurance requirements. The counselling service aims to provide a safe, confidential, and supportive environment for students, while recognising that the welfare of the child is paramount.

Confidentiality will be respected wherever possible; however, confidentiality is not absolute. Information may be shared with the Designated Safeguarding Lead (DSL) or relevant agencies where there are concerns about a student's safety, risk of significant harm, or where there is a legal or safeguarding duty to do so. Wherever appropriate, the student will be informed of this process.

The School Counsellor receives regular clinical supervision, maintains professional indemnity insurance, undertakes continuing professional development and works within the limits of their competence in line with BACP requirements.

In most circumstances, parents/carers will be informed and involved in decisions regarding counselling support. However, where safeguarding concerns indicate that counselling is in the best interests of the child, and the young person is assessed as being Gillick competent and able to provide informed consent, the school may, in exceptional circumstances, offer counselling without obtaining parental consent. Such decisions will be made on a case-by-case basis, in

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consultation with the Designated Safeguarding Lead and in accordance with safeguarding legislation, professional guidance and the welfare needs of the young person.

This approach balances the student's right to access appropriate support with the school's duty to safeguard and promote the welfare of children.

High-risk mental health concerns, suicidal ideation and serious self-harm

Where a student presents with significant mental health concerns, including suicidal ideation, a plan for suicide or serious self-harm, Accrington Academy will respond through immediate safeguarding action. A risk assessment will be completed by the DSL on the day the school becomes aware of the information and shared the same day with relevant teaching staff, Heads of Year, DSLs and DDSLs. The risk assessment will also be shared with the student, parents/carers and relevant external professionals by the DSL, DDSL or Head of Year, where appropriate.

Parents/carers will be asked to collect the student from school and advised to seek urgent professional medical oversight, for example through A&E or the GP. Heads of Year will update CPOMS with the relevant information. Parents/carers are responsible for reporting absence first thing in the morning if the student will not be attending school and for advising when the student will next attend.

If a high-risk student does not attend a timetabled lesson, or leaves a lesson for more than five minutes and does not return, the teacher will press the emergency alert button on Arbor and staff on call will ascertain the student's whereabouts. A wellbeing check will be completed by staff on call or the Head of Year if available. The expectation is that the student returns to lesson following the wellbeing check unless high-risk safeguarding concerns remain evident, in which case parents/carers will collect the student and seek appropriate professional medical oversight.

If staff or parents/carers are unable to locate the student within 45 minutes, the DSL, DDSL or responsible Head of Year will contact 999 and report the student as a high-risk missing person. Parents/carers will also be informed of this course of action.

High-risk students on a risk assessment will be offered and encouraged to access support from the school Mental Health Lead through counselling, or to access emotional health and wellbeing support from external organisations. Significant mental health concerns will be shared with parents/carers in all circumstances unless sharing the information would create a disclosed risk of harm or abuse. In that situation, the DSL will consult Lancashire Children's Services and complete a referral where appropriate.

Children in need: defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services; or a child with a disability. Local authorities are required to provide services to safeguard or promote the welfare of children in need, and they may be assessed under s17 Children Act 1989.

Domestic abuse: Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. 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.

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Homelessness: 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. The DSL or DDSL will raise/progress any concerns about homelessness with the Local Housing Authority although this does not replace a referral into children's social care where a child has been harmed or is at risk of harm.

Cyber security breaches involving sensitive student data are now recognised as **safeguarding incidents**. The DSL will oversee responses to breaches, ensuring risk assessment, parental communication, and multi-agency reporting where required.
Temporary accommodation notifications: Where the school receives notification that a child has been placed in temporary accommodation, staff will use the information to safeguard and promote the child's welfare at the earliest opportunity. This notification does not replace existing safeguarding and welfare duties or a referral to children's social care where a child has been harmed or is at risk of harm.

Operation Encompass: The police have a statutory duty to notify the school where they have reasonable grounds to believe that a child may be a victim of domestic abuse. The notification may relate to a child connected to the household even where the child was not physically present. The DSL or nominated Key Adult will ensure timely, informed support, maintain confidentiality and secure records, liaise with families where appropriate, and make referrals where thresholds are met. Operation Encompass does not replace existing safeguarding procedures.

Child-on-child abuse

Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. This can include (but is not limited to):

- abuse within intimate partner relationships between children/peers;
- bullying (including cyberbullying) prejudice-based and discriminatory bullying;
- sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- 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;
- physical abuse such as 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);
- consensual and non-consensual sharing nudes and semi-nudes images and videos (also known as sexting or youth produced sexual imagery);
- upskirting (see below);
- initiation/hazing type violence and rituals (this could include abuse or humiliation used as a way of initiating a person into a group or event including online).

It can happen both inside and outside school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse, how to identify it and respond to reports. **Even if there are no reports in the school, this does not mean that it is not happening. Any concerns regarding child-on-child abuse must be referred to the DSL or DDSL.**
Sexual violence and sexual harassment between children in schools and colleges

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Context

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;

• not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

• challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is sexual violence and sexual harassment?

Sexual violence
It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B

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consents. This could be forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

a child under the age of 13 can never consent to any sexual activity;

• the age of consent is 16;

• sexual intercourse without consent is rape.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:
• sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;

• sexual "jokes" or taunting;

• physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and

• online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- o non-consensual sharing of nudes and semi-nudes images and videos;
- o sexualised online bullying;
- o unwanted sexual comments and messages, including, on social media;
- o sexual exploitation; coercion and threats; and
- o upskirting.

Upskirting

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

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The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process. As is always the case, if staff are in any doubt as to what to do, they should speak to the designated safeguarding lead (or a deputy).

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.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) 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; and,
- 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.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

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Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

A Whole School Culture of Safeguarding

Some pupils or students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important schools and colleges are conscious of disproportionate vulnerabilities and integrate this into their safeguarding policies and procedures.

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APPENDIX 2 – Meet the Safeguarding Team

The Designated Safeguarding Lead is:

JUDE WARD



JUDE WARD is located at:
ACCRINGTON ACADEMY

The Deputy Designated Safeguarding Leads are:

JORDAN TAYLOR



JORDAN TAYLOR is located at:
ACCRINGTON ACADEMY

NIC KEENAN



NIC KEENAN is located at:
ACCRINGTON ACADEMY

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Other people in the Safeguarding Team are:

JOHANNA ROYLE



JOHANNA ROYLE is located at:
ACCRINGTON ACADEMY
and responsible for: HEAD OF YEAR 7

MARCUS GEE



MARCUS GEE is located at:
ACCRINGTON ACADEMY
and responsible for: HEAD OF YEAR 8

ABBIE WARD



ABBIE WARD is located at:
ACCRINGTON ACADEMY
and responsible for: HEAD OF YEAR 9

RHONDA MOONEY



RHONDA MOONEY is located at:
ACCRINGTON ACADEMY
and responsible for: HEAD OF YEAR 10

EBONY SCAMMELL



EBONY SCAMMELL is located at:
ACCRINGTON ACADEMY
and responsible for: SCHOOL COUNSELLOR

REBECCA WEBB



REBECCA WEBB is located at:
ACCRINGTON ACADEMY
and responsible for: ATTENDANCE MANAGER

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APPENDIX 3 – Safeguarding Training Log

Safeguarding Training Log – Academic Year		
Attendees	**Type of training provided**	**Date undertaken**
Principal/Head	Annual Safeguarding Training KCSIE 2026- Jude Ward (DSL). DSL Initial Training- Lancashire County Council CPOMS and Safeguarding Training- Jude Ward (DSL).	1st September 2026 15th September 2026 17th September 2026
DSL	Annual Safeguarding Training KCSIE 2026- Jude Ward (DSL). DSL Initial Training- Lancashire County Council CPOMS and Safeguarding Training- Jude Ward (DSL).	1st September 2026 17th September 2026
DDSL	Annual Safeguarding Training KCSIE 2026- Jude Ward (DSL). CPOMS and Safeguarding Training- Jude Ward (DSL).	1st September 2026 17th September 2026
Senior Leadership Team	Annual Safeguarding Training KCSIE 2026- Jude Ward (DSL). CPOMS and Safeguarding Training- Jude Ward (DSL).	1st September 2026 17th September 2026
Pastoral Leads	Annual Safeguarding Training KCSIE 2026- Jude Ward (DSL). CPOMS and Safeguarding Training- Jude Ward (DSL).	1st September 2026 17th September 2026
Whole School	Annual Safeguarding Training KCSIE 2026- Jude Ward (DSL). CPOMS and Safeguarding Training- Jude Ward (DSL).	1st September 2026 17th September 2026
e-safety Lead	Annual Safeguarding Training KCSIE 2026- Jude Ward (DSL). CPOMS and Safeguarding Training- Jude Ward (DSL).	1st September 2026 17th September 2026
P.E. staff	Annual Safeguarding Training KCSIE 2026- Jude Ward (DSL). CPOMS and Safeguarding Training- Jude Ward (DSL).	1st September 2026 17th September 2026
Medical Needs Officer	Annual Safeguarding Training KCSIE 2026- Jude Ward (DSL). CPOMS and Safeguarding Training- Jude Ward (DSL).	1st September 2026 17th September 2026
Paediatric First Aiders	Annual Safeguarding Training KCSIE 2026- Jude Ward (DSL). CPOMS and Safeguarding Training- Jude Ward (DSL).	1st September 2026 17th September 2026

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Health & Safety /COSH	Annual Safeguarding Training KCSIE 2026- Jude Ward (DSL). CPOMS and Safeguarding Training- Jude Ward (DSL).	1st September 2026 17th September 2026
EVC		
Chair of Governors of LGB		
Nominated Safeguarding Governor of LGB		
Local Governing Body (whole board)		
Agency Staff /Peripatetic		
Volunteers		
Contractors		
Other		

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APPENDIX 4 – STAFF/STUDENT RELATIONSHIP LETTER AND GUIDANCE NOTES

Dear Colleague,

Welcome back. I hope you had a relaxing and enjoyable summer break.

At the start of each school year, we take the opportunity to re-emphasise some important principles about working in United Learning. We work in education to benefit children and young people, and our overarching goal is to do the right things for them, to enable them to lead purposeful lives as good citizens, prosper, succeed and be happy.

Before anything else, therefore, our first priority is that children in our care are appropriately protected and kept safe. That is the main subject of this letter. Additionally, in order to maximise benefit to children and young people from our work and from the education they receive, there are also some other basic things we have to get right – rules that we must comply with for the good reason that ultimately, following them will benefit children and our ability to serve them.

We must look after public and charitable resources properly – the money we have is there for the benefit of the pupils we serve now and in the future and we must therefore prevent fraud, loss or the money being used inappropriately. We must make sure that other people – including our colleagues, families and the wider community – are treated properly, so that United Learning is a great place to work and serves the public properly. We must protect personal data and our systems – if they are compromised, that could cause direct harm to people or serious financial loss.

Your Headteacher will be sharing some key messages and general principles about these things at the start of term, and we will be asking you to sign to say that you have read, seen and understood these. Failure to act in accordance with these principles could have serious consequences for your school and may be a disciplinary offence.

However, I want to stress that the right thing to do if you think something may have gone wrong is to come forward at the earliest opportunity – an honest mistake made in diligently trying to do your job well will always be treated reasonably. Most problems can be solved if we work together – but if, for example, you click on a link that might be suspicious but then don't tell anyone, that's when problems escalate.

Turning now to safeguarding of children, we are all acutely aware that the protection of children is of the highest importance, whatever our individual roles. We also have a responsibility to protect ourselves and others against the possibility of false accusation: openness and transparency are fundamentally important here. Attached to this letter are some important principles about how we conduct our relationships with students which you should read and reflect on. It is also important that you read and familiarise yourself with the DfE's statutory guidance on Keeping Children Safe in Education, which has been significantly updated this year, and ensure that you understand your responsibilities to safeguard and promote the wellbeing of children.

You must notify your Headteacher immediately about any circumstances which could result in a change to your DBS status or may call into question your suitability to work with children, including, but not limited to, arrests, charges, convictions, cautions, court orders, reprimands and warnings.

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FOR STAFF WORKING IN OR MANAGING RELEVANT EARLY OR LATER YEARS PROVISIONS

As part of your role you must confirm that you have not been involved in any activity/incident in the last 12 months which would render you disqualified from working with children under the Childcare (Disqualification) Regulations 2018. If anything has changed, please inform your Headteacher.

FOR EARLY YEARS SETTINGS ONLY, to comply with the requirements of the DfE Statutory Framework on the Early Years Foundation Stage 2021

As part of your role you must confirm that you are not currently taking any medication that is likely to impair your ability to look after children. If anything has changed, please inform your Headteacher.

In sending these reminders to everyone, I am of course conscious that it is your care and concern for children and young people, and your daily efforts to support them, that makes our schools great places for young people to be. I hugely appreciate your devotion and commitment to your work.

The trust placed in us as we guide young people through their formative years is great and we need to help each other to shoulder this responsibility to the very best of our ability. Thank you again for all you have done and continue to do for children and young people in our schools.

Yours sincerely,



Sir Jon Coles

Chief Executive United Learning

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