CHILTERN LEARNING TRUST

LEA MANOR HIGH SCHOOL

Lea Manor High School

Safegarding Policy (including Child Protection) 2026/27

Date Reviewed	Body
October 2026	Local Governing Body
Next review date: October 2027	To be reviewed: Annually

Together we succeed

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
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Deputy DSL(s)	Jamie Campbell Rozina Butt	jcampbell@leamanorhighschool.org rbutt@leamanorhighschool.org
Local authority designated officer (LADO)	Paul James	LADO@luton.gov.uk 01582 548069
Safeguarding Governor	Claire Justin	cjustin@chilternlearningtrust.org
Chair of Governors	Jamie Pardon	chairofgovernors@leamanorhighschool.org
Senior Mental Health Lead	Kalil Rouse	krouse@leamanorhighschool.org
Designated Teacher for Looked after Children	Kalil Rouse	krouse@leamanorhighschool.org
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Channel Helpline		0800 011 3764

1. Introduction

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment;
- Preventing impairment of children's mental and physical health or development;
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best outcomes;

Children includes everyone under the age of 18.

2. Aims

Chiltern Learning Trust and its schools, aim to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues
- It has created a culture where young people can speak out and share their concerns

3. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education 2026 and Working Together to Safeguard Children (2018), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- The Crime and Policing Act 2026, which amends the Safeguarding Vulnerable Groups Act 2006 to remove the 'supervision exemption' from the definition of regulated activity, meaning volunteers who teach, train, instruct or supervise children on more than 3 days in a month, or overnight, are in regulated activity regardless of whether they are supervised
- The Data (Use and Access) Act 2025, effective from January 2026, which schools should refer to alongside UK GDPR when sharing and storing safeguarding information

- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The DfE has updated the statutory relationships and sex education (RSE) and health education guidance.
- Working Together to Improve School Attendance:

  https://www.gov.uk/government/publications/working-together-to-improve-school-attendance

For schools with pupils aged under 8:

- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- For early years:
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

This policy also complies with our funding agreement and articles of association.

See Luton Borough Council's Safeguarding information for locally-agreed procedures:
https://m.luton.gov.uk/Page/Show/Health_and_social_care/safeguarding/Pages/default.aspx

4. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge whether this is within or outside the home including online
- Protecting children from maltreatment
- 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
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is 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. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Misinformation, disinformation, and **conspiracy theories** are safeguarding harms.

Children includes everyone under the age of 18.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

5. Equality Statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 11)

- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 13)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated
- Are LGBTQ+ (beyond the definition in the Equality Act 2010)

6. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
        - The links between sexism and misogyny and violence against women and girls
        - How to identify and learn from positive male role models
        - Ethical behaviour in relationships, beyond respecting boundaries and consent
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

6.1 All staff

Staff who work directly with children are expected to read at least part 1 of Keeping Children Safe in Education (KCSIE).

KCSIE 2026 has withdrawn the condensed Annex A version of Part one. All staff, including those who do not work directly with children, are now expected to read Part one in full.

Staff who work directly with children are also expected to read Annex A of KCSIE (about specific safeguarding issues), but you may expect all of your staff, including those who don't work directly with children, to read it too. Amend the sentence below, as necessary, to reflect your approach.

All staff will:

- read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.
- sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns
- Complete annual compulsory NCSC Cyber Security Training through the schools designated training platform
- Actively challenge everyday sexism, misogyny, homophobia and stereotypes.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and [deputy/deputies] (DDSL), the behaviour policy, online safety information and the safeguarding response to children who go missing from education
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines) and modern slavery
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual, transgender and queer or questioning (LGBTQ+) can be targeted by other children
- What to look for to identify children who need help or protection

Section 17 and appendix 4 of this policy outline in more detail how staff are supported to do this.

6.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Kalil Rouse. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online. The DSL cannot be the Headteacher.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

DSLs can also be contacted out of school hours if necessary via: safeguarding@leamanorhighschool.org

When the DSL is absent, the deputy/deputies – Jamie Campbell and Rozina Butt – will act as cover.

If the DSL and deputy/deputies are not available, Andrew Smith (Deputy Headteacher) will act as cover (for example, during out-of-hours/out-of-term activities).

We have robust arrangements in place for DSL cover when the DSL and deputy/deputies are unavailable, including a confidential shared mailbox, so that safeguarding concerns can always be reported and actioned promptly.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school.

The DSL will also:

- keep the headteacher informed of any issues,
- liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- support the headteacher with the annual safeguarding audit and reporting to governors and the central team.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale behind those decisions. This should include instances where referrals were or were not made to another agency.

- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and deputy/deputies are set out in their job description.

6.3 The governing board

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, and hold the headteacher to account for its implementation
- Ensure that their school's Governors are checked by the Disclosure and Barring Service (DBS) where these Governors participate in regulated activity with children and/or young people
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Receive and engage with annual safeguarding audits, ensuring the follow up actions plans are fully implemented
- Periodically check the website and its Single Central Record to ensure compliance in relation to safeguarding requirements - at least annually
- Appoint a safeguarding governor to:
    - monitor the effectiveness of this policy in conjunction with the full governing board
    - offer strategic support to the DSL, to include half termly meetings and visits as per the school safeguarding schedule and report back to the LGB
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
    - Reviewing the DfE's filtering and monitoring standards, and discussing with the DSL what needs to be actioned to support the school in meeting these standards.
- Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
    - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
    - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place

    - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
    - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
    - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
    - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

Chiltern Learning Trust have identified filtering and monitoring responsibilities. The list of these responsibilities can be found in appendix 7.

The chair of governors may need to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3 and role of the Central Team).

All governors will read Keeping Children Safe in Education in its entirety and be aware of their local arrangements i.e. the local criteria for action and the local protocol for assessment and ensure these are implemented at school level (the local arrangements are published by the 3 partners). Governors will ensure that all staff read Keeping Children Safe in Education in its entirety too.

Section 17 of this policy has information on how governors are supported to fulfil their role.

6.4 The Headteacher

The Headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of all systems which support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Appoint a DSL from their Senior Leadership Team and be responsible for the appraisal of the DSL
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Ensuring there is an annual safeguarding schedule for the safeguarding governor, and half termly reports to the LGB
- Ensuring actions from the annual audit are fully implemented
- Ensuring there is an annual statement of assurance regarding safeguarding for Senior Trust Directors

- Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Ensuring the appointment of a suitably trained Designated Teacher for Looked After Children and a Senior Mental Health Lead. Both of these posts should be a member of the Senior Leadership Team or supported by a member of the Senior Leadership Team.
- Ensuring all listed policies in Appendix 4 are updated to reflect current legislation and guidance
- Ensuring they themselves audit the SCR termly to ensure compliance in relation to safeguarding requirements
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Will share all information related to safeguarding including any low-level concerns if a member of staff moves to another Trust school
- Inform a member of the central safeguarding team of any LADO referrals/involvement and ensure that the central team are invited to any subsequent Joint Evaluation Meetings (JEMs)
- Ensuring the website in relation to safeguarding is compliant
- In addition, in our schools with early years:
    - Ensuring the relevant staffing ratios are met, where applicable
    - Making sure each child in the Early Years Foundation Stage is assigned a key person
    - Overseeing the safe use of technology, mobile phones and cameras in the setting

6.5 The Central Team

The Central Team will:

- Ensure there is challenge and support provided to school regarding safeguarding, including checks, visits, peer and expert support, and network meetings
- Periodically check each school’s website and its Single Central Record to ensure compliance in relation to safeguarding requirements
- Commission and review the independent annual safeguarding audits including the follow up action plans, and share the audit reports with the relevant LA
- Produce an annual safeguarding report for the Board of Trustees
- Appoint a ‘case manager’ in the event that an allegation of abuse is made against the headteacher, where appropriate

See Appendix 6, which provides an overview of CLTs approach to Safeguarding.

In relation to the Teaching School Hubs, a SCR will be held for all trainees and commissioned workers (consultants or members of CLT staff) who will carry a letter of assurance that all relevant checks have been satisfactorily completed. This includes Specialist Leaders of Education (SLEs).

6.6 Trustees

Trustees have overall responsibility for the leadership of safeguarding arrangements across the Trust schools. All Trustees need to understand their safeguarding duties and should be kept up-to-date with legislation and regulation. The Trust Board has a legal responsibility to make sure that all our schools have effective safeguarding policies and procedures in place and monitor the implementation of these policies regularly.

The Trust Board will:

- Ensure that all schools within Chiltern Learning Trust comply with child protection related legislation, including statutory training
- Ensure that overarching policies relating to child protection and safeguarding are provided to all Trust schools but that all schools tailor these policies to reflect local circumstances;
- Ensure that the required safeguarding practices referenced throughout this policy are consistent across the Trust,
- Have regard for the Department for Education's latest guidance (statutory and non-statutory) for schools and colleges, ensuring that Trust wide policies, procedures and training are effective and compliant in light of these
- Ensure that Disclosure and Barring Service checks are carried out on all Members and Trustees of the Chiltern Learning Trust
- Ensure that the Central Team undertaken safeguarding audits of each school once per year and commission an independent safeguarding audit once every three years
- Receive regular reports from the Senior Directors on safeguarding to the Board of Trustees
- Delegate responsibilities to LGBs as defined above
- Appoint a safeguarding trustee to meet termly with Senior Directors to monitor all points listed above (KCSIE 2026 and all other legislation listed in section 3) and provide challenge and support to the Directors
- Undergo regular safeguarding training so they have an awareness of contextual safeguarding including their strategic responsibility

The Safeguarding Trustee is **Shahed Koyes.**

6.7 Virtual School Heads

The Virtual School Head (VSH) promotes and supports the education of children who are, or have been, in care, including looked-after children (LAC), children with a social worker (CWSW), and children in kinship care. The VSH monitors their educational progress, ensures they receive appropriate support, manages pupil premium funding, and works with schools, social workers, and other professionals to improve educational outcomes and raise aspirations for these vulnerable children.

7. Confidentiality

Our schools will have procedures to ensure confidentiality and data protection with respect to safeguarding. These can be found in CLT Data Protection Policy, Privacy notice for parents and carers – use of your child's personal data. They will have processes and principles for sharing information within the school and Trust, and with the 3 safeguarding partners and other agencies as required.

You should note that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
    - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:
    - Parents or carers should normally be informed (unless this would put the victim at greater risk)
    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
    - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).

Confidentiality is also addressed in this policy with respect to record-keeping in section 16, and allegations of abuse against staff in appendix 3.

8. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

8.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 6.2) as soon as possible if you make a referral directly.

Our schools will set out their local procedures for making a referral, as per the arrangements put in place by the 3 safeguarding partners.

Please visit the following web page in order to make a children's MASH safeguarding referral or use the contact details below to speak with someone from the MASH team.

MASH
Telephone: 01582 547653
Out of hours: 0300 3008123
Police report: 101 or online
Emergency: 999
Email: mash@luton.gov.uk
Website: https://directory.luton.gov.uk/kb5/luton/directory/service.page?id=aJZE_OSgZfQ

This is a link to the GOV.UK webpage for reporting child abuse to your local council:

https://www.gov.uk/report-child-abuse-to-local-council

8.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 8.1) and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

8.3 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out [for our schools with post 16 pupils this also includes discovery that a pupil **aged 18 or over]** appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures.

Our schools will follow local procedures detailed here:

If you think someone is in immediate danger you should contact the police.

If the young person has already been taken abroad you should contact the Foreign and

Commonwealth Office on 020 7008 1500 or from overseas call +44 (0)20 7008 1500.

You should also contact our Safeguarding Adults and Children's MASH teams who will be able to offer support and guidance:

Luton Safeguarding Adults team – Telephone: 01582 547730
Luton Children's Multi-Agency Safeguarding Hub (MASH) Telephone: 01582 547653
Out of hours: 0300 3008123
Emergency: 999
Email: mash@luton.gov.uk

You can also call the NSPCC anonymously on 0800 028 3550 if you're a worried someone might be a victim of FGM. You can also email them at fgmhelp@nspcc.org.uk

8.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 8.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help/family partnership

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an 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 practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

All Early Help referrals now go through the Luton Children's MASH team. All online referrals are made via the following webpage Safeguarding children or by using the below contact details.

MASH
Telephone: 01582 547653
Out of hours: 0300 3008123
Police report: 101 or online
Emergency: 999
Email: mash@luton.gov.uk
Website: https://directory.luton.gov.uk/kb5/luton/directory/service.page?id=aJZE_OSgZfQ

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 8.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Lea Manor High School follows the Pan Bedfordshire Multi Agency Disagreement and Escalation Procedure. Their procedure highlights when practitioners are working alongside those from other agencies, there will at times be differences of opinion or concerns in relation to a child, young person or their family. Throughout our work the safety and wellbeing of the young person is the primary concern, and any disagreements must not obstruct this.

If staff feel that a practitioner or an agency is not acting in the best interests of a young person or their family; professionals have a responsibility to respectfully challenge the practitioner or agency and escalate that concern if resolution is not achieved.

This is a four-stage process which is to be followed. This should be completed by a member of the safeguarding team. A short summary that an escalation has been submitted should be captured on the child's CPOMS' record. The Pan Bedfordshire Multi Agency Disagreement and Escalation Procedure can be found here: https://bedfordscb.proceduresonline.com/p_resolution_disagree.html

8.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

8.6 If you have a mental health concern

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 8.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the Senior Mental Health Lead to agree on a course of action.
The Senior Mental Health Lead at Lea Manor High School is Kalil Rouse.
Contact: 01582 652600
Email: krouse@leamanorhighschool.org

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)
(Note – if the DSL is unavailable, this should not delay action. See section 8.4 for what to do.)

Safeguarding Flowchart

A member of staff has a concern about a child

If the pupil is at immediate risk, speak to a member of the Safeguarding Team (DSL/DDSL) Do not let the child leave you-they must remain with you until you have passed to a member of the safeguarding directly

The DSL will consider further actions required, including consultation with Children's Social Care. Concerns and discussion, decisions and reasons will be recorded in writing. Parents will be informed, however, if it is deemed that parents pose risk/harm then they will not be contacted by school.

If a concern is raised out of school hours, any member of staff may complete the escalation.

Log concern on CPOMS or recording forms.

If escalation to the Local Authority is not required, the pupil will be monitored and any necessary support put in place in consultation with family

No concerns -

No further action required

Still concerns -

If concerns escalate/accumulate, the DSL/DDSL will make a referral to the relevant Local Authority.

If a concern is raised out of school hours, any member of staff may complete the escalation

If escalation to the Local Authority is required, a referral will be made to either the Integrated Front Door (BBC 01234 718700) Access and Referral Hub (CBC 0300 300 8585) or MASH (LBC 01582 547653)

Social Care will –

- Acknowledge receipt
- Decide on next courses of action
- Feedback decisions to referrer

Formal assessment

CP protocols are implemented

No formal assessment

School considers Early Help/ Family Partnership or other agency support with parents

DSL/DDSL will check the Threshold Document and challenge if appropriate, using escalation

Staff keep the pupil's circumstances under review and re-refer if appropriate to ensure the circumstances improve. The pupil's best interests must always come first. The DSL will refer to the Local Authority's Escalation Policy.

8.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors. If you are a member of the central team, you should speak to the Director of Safeguarding and SEND as soon as possible.

The headteacher/chair of governors/Chief Executive will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

8.8 Allegations of abuse made against other pupils (child-on-child abuse, including harassment and violence)

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

Where pupils involved in an allegation of child-on-child abuse need to be kept apart while the matter is investigated, staff should refer to section 7.3 of the Behaviour Policy (Separation of pupils for safeguarding purposes). This is a safeguarding measure rather than a disciplinary sanction, and the decision must be taken by the DSL or Headteacher, in liaison with the CLT Central Team, with the governing board notified without delay.

See appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator.
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

At the point of conclusion of any police investigation; a review and assessment as to next steps will be completed.

Should the allegation not be fitting of the police threshold for criminal investigation; an internal enquiry will be completed as swiftly as possible.

All child-on-child abuse incidents will be recorded accurately on our internal safeguarding platform (CPOMS) to include information about what happened, along with all actions taken and the support put in place for both the victim(s) and perpetrator(s).

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 8.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report
        - A member of staff may overhear a conversation
        - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

8.9 Sharing of nudes and semi-nudes ('sexting')

This following approach is suggested by CLT as it is based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13

- The DSL has reason to believe a young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialling 101 to Bedfordshire Police or using the online chat function. All necessary information will be shared, a reference number will be obtained along with the relevant details of the police officer spoken to. All of this will be captured on the CPOMS entry.

Should there be any difficulty in connecting via the telephone or online chat, completing the Bedfordshire Police online form should be attempted next. This can be done:
https://www.beds.police.uk/ro/report/ocr/af/how-to-report-a-crime/

A confirmation email will be received; this too should be noted on a CPOMS entry.

Any further Police liaison, staff will contact PC Doll - Safer Schools Police Officer –
Bedfordshire Police
Email: Mohammed.Doll@beds.police.uk

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 16 of this policy also apply to recording these incidents.

Curriculum coverage

The following approach is suggested by CLT as an example of how the curriculum might cover the sharing of nudes and semi-nudes and schools will amend as relevant.
Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships education/relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

8.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Our schools will have systems for:
- Reporting systems for pupils, e.g. what it looks like for pupils in terms of who they should report concerns to
- Making pupils aware of the reporting systems and processes, e.g. through discussion in your relationship/sex education curriculum
- Ensuring pupils feel safe in submitting any concerns, e.g. reassurances provided following disclosures

All students are regularly encouraged to report all concerns or allegations to either the Safeguarding Leads, their Pastoral Teams or any member of staff in school. Naturally, some students will feel more comfortable with certain members of staff in disclosing their concerns, which is also encouraged.

8.11 Reasonable force and restrictive interventions

There are limited circumstances when it is appropriate for staff to use 'reasonable force' to safeguard children. 'Reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children, and 'reasonable' means using no more force than is necessary for the least amount of time. The decision on whether to use reasonable force is down to the professional judgement of the staff member concerned and should always depend on the individual circumstances.
When using reasonable force in response to risks presented by incidents involving pupils with SEND, mental health problems or medical conditions, staff will carefully consider the additional vulnerability of these groups and our duties under the Equality Act 2010, including the Public Sector Equality Duty. Positive and proactive behaviour support, such as individual behaviour plans agreed with parents, will be used to reduce the occurrence of challenging behaviour and the need to use reasonable force.
Full detail on classifying interventions, prohibited techniques, mandatory preventative strategies, recording and reporting duties, post-incident support, and staff training and competency requirements is set out in Appendix 8: Restrictive Interventions and the Use of Reasonable Force.

9. Online safety and the use of mobile technology

Keeping Children Safe in Education outlines that your policies on online safety and the use of mobile and smart technology should be reflected in your child protection and safeguarding policy. Among other things, this should include filtering and monitoring on school devices and the school network. **(Appendix 7 with CLT filtering and monitoring spreadsheet).**

More information can be found in our school's Mobile Phone and Mobile Device Policy

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, we will:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

Please visit the Lea Manor High School website, following link for 'e-safety' for further information.
https://www.leamanorhighschool.org/Policies/

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems (e-safety information).
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Ensure that a review of the effectiveness of our filtering and monitoring systems is carried out at least once every academic year. This review will be carried out by the senior leadership team member responsible for filtering and monitoring, with the support of the DSL and IT support, and will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept
- Maintain a clear mobile phone policy setting out expectations for pupils' and staff's use of mobile phones and other personal devices during the school day, to reduce distraction, bullying and safeguarding risks

- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Chiltern Learning Trust will review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly
- The following links have been added to reflect changes in technology, supporting schools to navigate the challenges of ever an evolving landscape:
    - Page 40, Para 142 KCSIE 2026, Part two: Link added to the 'Plan Technology for Your School' self-assessment tool. https://www.gov.uk/guidance/plan-technology-for-your-school-or-college
    - Page 41, Para 143: Link added to DfE guidance on the use of generative AI in education (2025). KCSIE 2026, paragraphs 165-166: Expanded guidance and resources on the safe and effective use of Generative AI in education. https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education
    - Page 41, Para 144 KCSIE 2026, Annex A: Clarified wording: cybersecurity standards help schools improve cyber resilience. https://www.gov.uk/government/publications/cyber-security-standards-for-schools-and-colleges.

10. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

11. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

Fear or anxiety about the potential loss of care or support if they were to disclose abuse or neglect, and reluctance to make a disclosure that might jeopardise arrangements they rely on. We also recognise that pupils with certain medical conditions may need additional support, and that the management of a medical condition should never mask or delay the recognition of a wider safeguarding concern.

Our schools will offer extra pastoral support for these pupils. This includes:

- Intervention sessions arranged for students identified as requiring further support.
- Key workers assigned to vulnerable SEND students in order to support them through school and liaise with parents where needed.
- Emotional, behavioural and social support from the Pastoral Team.
- Mental health referrals into the CAMHS Community Access Service.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

12. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes.

For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

13. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Kalil Rouse (DSL), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the rest of the Safeguarding Team to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans
- They should also identify and engage with key professionals, e.g. DDSLs, SENCOs, social workers, mental health leads and others.

14. Pupils with mental health needs

We will ensure that staff have the skills, knowledge and understanding to keep children with mental health needs safe. In particular, we will ensure that:

- Appropriate staff have relevant information and training about children's mental health
- There are clear expectations of behaviour, well communicated social norms and routines reinforced by a highly consistent consequence systems, which take into account educational, mental health and other needs or vulnerabilities
- There are clear systems and processes in place for identifying possible mental health problems including routes to escalate and refer
- We signpost local services available to support pupils including school nurses, GPs, trained professionals and voluntary organisations

We have appointed a Senior Mental Health Lead, Kalil Rouse (DSL), who is responsible for promoting the educational achievement of children with mental health needs

The Senior Mental Health Lead is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the Senior Mental Health Lead will:

- implement the 4 stage process, namely: Prevention, identification, early support and access to specialist support (see the guidance referenced in section 8.6)

- Work closely with the DDSLs, SENCO and Heads of Year to ensure children are supported and safeguarded

15. Pupils placed in Alternative Provisions

Schools should be undertaking checks for alternative provision (KCSiE 2025 paras 169-170 and 331), all of which are in the Alternative Provision guidance updated in February 2025. There needs to be written confirmation that full safer recruitment steps have been taken on all staff and of arrangements "that might put a child at risk" such as new staff joining the alternative provision so that checks can be made there too.

Schools need to know where their students are throughout school hours (i.e. the address where they are being educated). Placements should be reviewed at least half termly to ensure children are attending, their holistic needs are met and the setting is safe, with the potential that the placement is ended if any concerns are not addressed.

Schools should use the CLT Due Diligence paperwork to keep a comprehensive record of pupils who are not in school full time.

16. Complaints and concerns about school safeguarding policies

16.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

16.2 Other complaints

Where the school is presented with other complaints of a safeguarding nature, the DSL will record details of the concerns and conduct fact finding procedures in order to address concerns promptly. Appropriate action will be taken depending on the nature of the concern, involving agencies and the local authorities if required. For all complaints of a premises related nature, the DSL will report to the site team immediately for rectification.

16.3 Whistle-blowing

Chiltern Learning Trusts whistle-blowing policy covers concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures found on our website.

Our Trust policy can be found here

17. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will 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

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. The Independent Inquiry into Child Sexual Abuse (IICSA) found that proper creation, maintenance and long-term retention of records is an important part of supporting victims of Child Sexual Abuse (CSA) and bringing perpetrators to justice. This is because victims and survivors may take decades to come to terms with what has happened to them and potentially to decide to take action to report a crime.

The IICSA Inquiry recommends that records relating to CSA should be retained for 75 years.

Given these very long retention periods, we will ensure that safeguarding, child protection and CSA records are written in such a way as to be intelligible in the future and without any additional knowledge of the school, its staff, pupils or systems. Staff will be trained in good practice.

Our records will:

- Be quality assured by the school's Designated Safeguarding Lead (DSL), Deputy (DDSL) or other suitably trained staff [delete / amend as required]
- Identify the author by name and role
- Make it clear where the person who is recording the information is not the person who has seen or heard the issue, and identify all relevant parties by name and role
- Use full names of staff, other adults and parents/family members (full name in this context means first and surname)
- Ensure family relationships are clear
- Use full name of child whose record this is
- If appropriate, use full name of any other child involved and ensure a mirror record is on their file
- Not use initials when recording names

- Where individuals have the same or similar names, ensure there is a distinguishing factor, eg middle name, job title, DoB etc
- Ensure all spelling, punctuation and grammar is correct.
- Use appropriate language to describe events, not slang, shorthand, local terminology or asterixis.
- Ensure quotes are properly identified as such and attributed to their owner
- Be objective and avoid opinion. If opinion is necessary, ensure it is identified as such and attributed to its owner.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely (within the 5 day window), and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

- All safeguarding records in Lea Manor High School are stored electronically on CPOMS.
- Any paper copies from primary school or from in year transitions are uploaded onto CPOMS.
- All records are archived on CPOMS until the age of 25.
- All staff have a log-in to CPOMS so they can record any safeguarding concerns.
- Designated safeguard leads have access to all records.
- Pastoral teams are able to access those students within their year group.
- Transfers of files are predominantly done electronically via either CPOMS or through secure/encrypted communication. Where required and in exceptional circumstances, DSLs can transfer files in person through use of a safe-bag.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

18. Training

18.1 All staff

All staff members will undertake compulsory safeguarding and child protection training at induction, including on whistle-blowing procedures, online safety and NCSC Cyber Security Training, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

18.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

In addition to this the Director of SEND and Safeguarding, HR Manager and a Deputy CEO for Chiltern Learning Trust will also undertake DSL training at least every 2 years.

18.3 Governors

All governors receive training about safeguarding (including online safety) and cyber security training, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

- Such as providing strategic challenge
- Assurances that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

The chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

18.4 Recruitment – interview panels

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

18.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

19. Monitoring arrangements

This policy will be reviewed **annually** by the Board of Trustees and at a school level by Kalil Rouse (DSL). At every review, it will be approved by the full governing board.

20. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff behaviour/code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Mobile phone use
- Equality
- Relationships and sex education
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Whistle-blowing
- Internet and email acceptable use (includes social media)
- Lettings
- Educational visits
- Guidance on Contractors Working in Schools
- Cyber Security Protocol
- AI Policy 26-27

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical abuse 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 is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Emotional abuse may include verbal abuse, such as criticism, belittling and name-calling.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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
- Physical contact, including assault by penetration (for example rape, or penetration of the mouth, vagina or anus with any part of the body or an object, which does not require erection or ejaculation) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. Sexual assault occurs when a person intentionally touches another person sexually, without their consent
- 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 (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: Safer Recruitment and DBS checks – policy and procedures
Recruitment and selection process

The recruitment steps adopted by Chiltern Learning Trust are those outlined below are based on part 3 of Keeping Children Safe in Education 2024.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our Trust's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
    - If they have a criminal history
    - Whether they are included on the barred list
    - Whether they are prohibited from teaching
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
    - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
    - For all staff, including teaching positions: criminal records checks for overseas applicants
    - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Carrying out paid or unpaid work regularly in a school or college where that work provides an opportunity for contact with children; this includes any person, paid or volunteer, who teaches, trains, instructs or supervises children on more than 3 days in a 30-day period, or overnight, regardless of whether they are supervised (the Crime and Policing Act 2026 has removed the 'supervision exemption' that previously excluded supervised volunteers from regulated activity); or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- For those who have not had a new enhanced DBS check within the last 5 years of continuous service (this is not dependent on change of role)

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding

Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or

- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors. We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Never leave an unchecked volunteer unsupervised. Following the Crime and Policing Act 2026, any volunteer who teaches, trains, instructs or supervises children on more than 3 days in a 30-day period, or overnight, is in regulated activity regardless of whether they are supervised, and must have an enhanced DBS check with barred list information before starting
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Trustees, Local Governors and Members

All trustees, local governors and Members will have as a minimum an enhanced DBS check without a barred list check.

If they will be working in regulated activity, they will be required to have an enhanced DBS check with a barred list check.

The chair of the Board of Trustees will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to cyberprotect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 3: Allegations of abuse made against staff, including low level concerns

Section 1: Allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.
This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:
This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, trainee teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity. If this is a member of the central team, a Manager or Director will be tasked as the 'case manager'.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children

- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for Chiltern Learning Trust.
- If in doubt, the case manager will seek views from the school's HR team and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk

assessment of the situation. If necessary, the DSL may make a referral to children's social care

- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. If staff are subscribed to a Trade Union, they can contact their union representative for additional support.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part

of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

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

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation

is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations
If an allegation is:
- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

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

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:
- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping
The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:
- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all

other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education. All 'low level concerns' are to be reported to the Headteacher or to the Chair of Governors if the concern involves the Headteacher.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold, set out in section 1 above.

Concerns may arise through, for example:

- Suspicion

- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – 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**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Humiliating pupils
- 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
- Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 8.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff behaviour policy/code of conduct. The headteacher

will be the ultimate decision maker in respect of all low level concerns though they may wish to collaborate with the DSL.

Keeping Children Safe in Education also links to this report for more information Developing and implementing a low-level concerns policy: A guide for organisations, which work with children.

Record keeping

All low-level concerns will be recorded in writing. A model form can be found in appendix 7. This record form will be held securely, either digitally or in paper form, in one central file in accordance with the School's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with School's Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

Appendix 4: Specific Safeguarding issues

This appendix is mostly based on the advice in Keeping Children Safe in Education, in particular Annex A.

Annex A also includes information on further issues to be aware of, including child abduction and community safety incidents, children's involvement in the court system, children with family members in prison, county lines, modern slavery and cybercrime.

In these instances, the DSL and/or DDSLs will work very closely with external safeguarding partners such as the police and children's services through referrals, crime or intel reports and information sharing.

Children missing or absent from education

A child going missing or absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent or missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

These procedures are set out in the Attendance Policy, in particular section 8 (Safeguarding and Attendance) and section 23 (Children Missing Education and removing pupils from roll). The DSL will work with the Family Support Worker and attendance colleagues, including through home visits where appropriate, and Children Missing Education referrals will be made to the local authority in line with that policy.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Contact will be made to Luton Children's MASH and/or the Police.

MASH
Telephone: 01582 547653
Out of hours: 0300 3008123
Police report: 101 or online
Emergency: 999
Email: mash@luton.gov.uk
Website: https://directory.luton.gov.uk/kb5/luton/directory/service.page?id=aJZE_OSgZfQ

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.
CCE can be committed or facilitated by an organised network or gang, and victims may identify as part of this group. Where the exploitation involves this level of organisation, it may also constitute modern slavery, and staff should be aware that victims may be criminalised for actions taken as a result of coercion. Where modern slavery is suspected, staff will discuss this with the DSL, who will consider a referral in line with the Modern Slavery statutory guidance.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Contact will be made to Luton Children's MASH and/or the Police.

MASH
Telephone: 01582 547653
Out of hours: 0300 3008123
Police report: 101 or online
Emergency: 999
Email: mash@luton.gov.uk
Website: https://directory.luton.gov.uk/kb5/luton/directory/service.page?id=aJZE_OSgZfQ

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.
CSE can be committed by an individual or an organised network, and most sexual abuse is committed by individuals known to the victim. Staff should be aware that victims may be criminalised for actions taken as a result of coercion.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

MASH
Telephone: 01582 547653
Out of hours: 0300 3008123

Police report: 101 or online
Emergency: 999
Email: mash@luton.gov.uk
Website: https://directory.luton.gov.uk/kb5/luton/directory/service.page?id=aJZE_OSgZfQ

Child-on-child abuse (including harassment and violence)

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- 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)
- 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
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- 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)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 8 of this policy, as appropriate. In particular, section 8.8 and 8.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Young carers

A young carer is a child or young person who provides regular and ongoing care and emotional support to a family member who is disabled, physically or mentally ill, or misuses substances. Young

carers may face additional barriers to disclosing abuse or neglect, including fear of the family being separated, worry about the person they care for, or a reluctance to burden others. Staff will be alert to the specific needs of young carers and will ensure that any concerns are shared with the DSL.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children. It can also include stalking. Child to parent or care-giver abuse is a specific and recognised form of domestic abuse, and staff should be alert to this dynamic as well as to abuse directed towards children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day via Operation Encompass.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputy/deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

Gender Questioning and Children who are LGB

Keeping Children Safe in Education 2026 has substantially updated its content on children who are LGB or gender-questioning. Schools should review Part one of the full guidance and update this section to reflect the latest advice.

Schools must teach about biological sex and the law around gender reassignment, while avoiding the endorsement of gender identity as fact. Schools should also avoid using oversimplified materials that might push stereotypes and should inform parents if a child wishes to change their name, pronouns, or uniform at school.

Key Changes in the Guidance:

Focus on Law and Facts:

Schools are instructed to teach pupils the facts and law regarding biological sex and gender reassignment.

Avoidance of Endorsement:

The guidance stresses that teachers must not endorse any particular view on gender identity or present it as fact.

Caution on Social Transition:

Schools should avoid suggesting that social transition is a simple solution to distress or discomfort.

Parental Involvement:

Parents should be consulted about the content of sex education, and schools should inform them if a child wishes to change their name or pronouns at school.

Age-Appropriate Content:

The guidance allows for the development of age and stage-appropriate RSHE curricula and drops strict age limits that were previously proposed.

Balanced Approach:

The guidance acknowledges the importance of treating everyone with respect and dignity while being mindful of differing views.

So-called ‘honour-based’ abuse (including FGM and forced marriage)

So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 8.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise or missing PE
    - Being repeatedly absent from school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
    - Being reluctant to undergo any medical examinations
    - Asking for help, but not being explicit about the problem
    - Talking about pain or discomfort between her legs

- Potential signs that a pupil may be at risk of FGM include:
    - The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
    - FGM being known to be practised in the girl's community or country of origin
    - A parent or family member expressing concern that FGM may be carried out
    - A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly absent from school

- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage
Forcing a person into marriage is a crime. 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.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

MASH
Telephone: 01582 547653
Out of hours: 0300 3008123
Police report: 101 or online
Emergency: 999
Email: mash@luton.gov.uk
Website: https://directory.luton.gov.uk/kb5/luton/directory/service.page?id=aJZE_OSgZfQ

Preventing radicalisation

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

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to negate or destroy the fundamental freedoms and rights of others, undermine, overturn or replace the UK's system of liberal parliamentary democracy or intentionally create a permissive environment for others.

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 of terrorism 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.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 8.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including our curriculum policy, behaviour policy, online/e-safety policy.

Any concerns around radicalisation will be discussed with our local Prevent officers via the below contacts:

Stephanie Golby - Prevent in Education Officer
Telephone: 01582 547766 Mobile: 07702 948298 Email: prevent@luton.gov.uk

Adele Norman - Channel Supervisor
Mobile: 07885 233 305 Email: adele.norman@luton.gov.uk

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

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 and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they 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.

When supporting victims, staff will:

- re-assure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (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
- 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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 8 of this policy, as appropriate. In particular, section 8.8 and 8.9 set out more detail about our school's approach to this type of abuse.

Serious violence

The serious violence section of Keeping Children Safe in Education has been substantially updated for 2026. Schools should review Part one and Annex A of the full guidance and amend the indicators and risk factors below to reflect the latest advice.

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

If there are risks present that could affect the individual or other individuals within the school building, then a formal risk assessment will be carried by the DSL/DDSL in collaboration with parents/carers. The risk assessment will then be uploaded to CPOMS and also stored in a central tracker for periodic review.

Checking the identity and suitability of visitors

If a Lea Manor staff member has arranged for a visitor to come on site and interact with our pupils, then they must complete the online visitor form which is then shared with HR, Admin and the DSL.

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Visitors are expected to sign in on Inventry and will wear a visitor's badge throughout their time in the building. If we have received the necessary letter of assurance and/or received confirmation of their DBS certificate, the visitor will wear a purple lanyard. If not, then the visitor will wear a red lanyard.

Non-collection of children

If a child is not collected at the end of the session/day, we will:

6. Contact parents/carers to ascertain their whereabouts.
7. If the above is unsuccessful, we will try to make contact with extended family members where possible and if appropriate.
8. Invite the student into the school to be supervised by a member of staff.
9. Call 101 or children's services for further advice and guidance, if no further attempts of contacting the parents are successful.
10. Log the incident on CPOMS as a safeguarding concern.

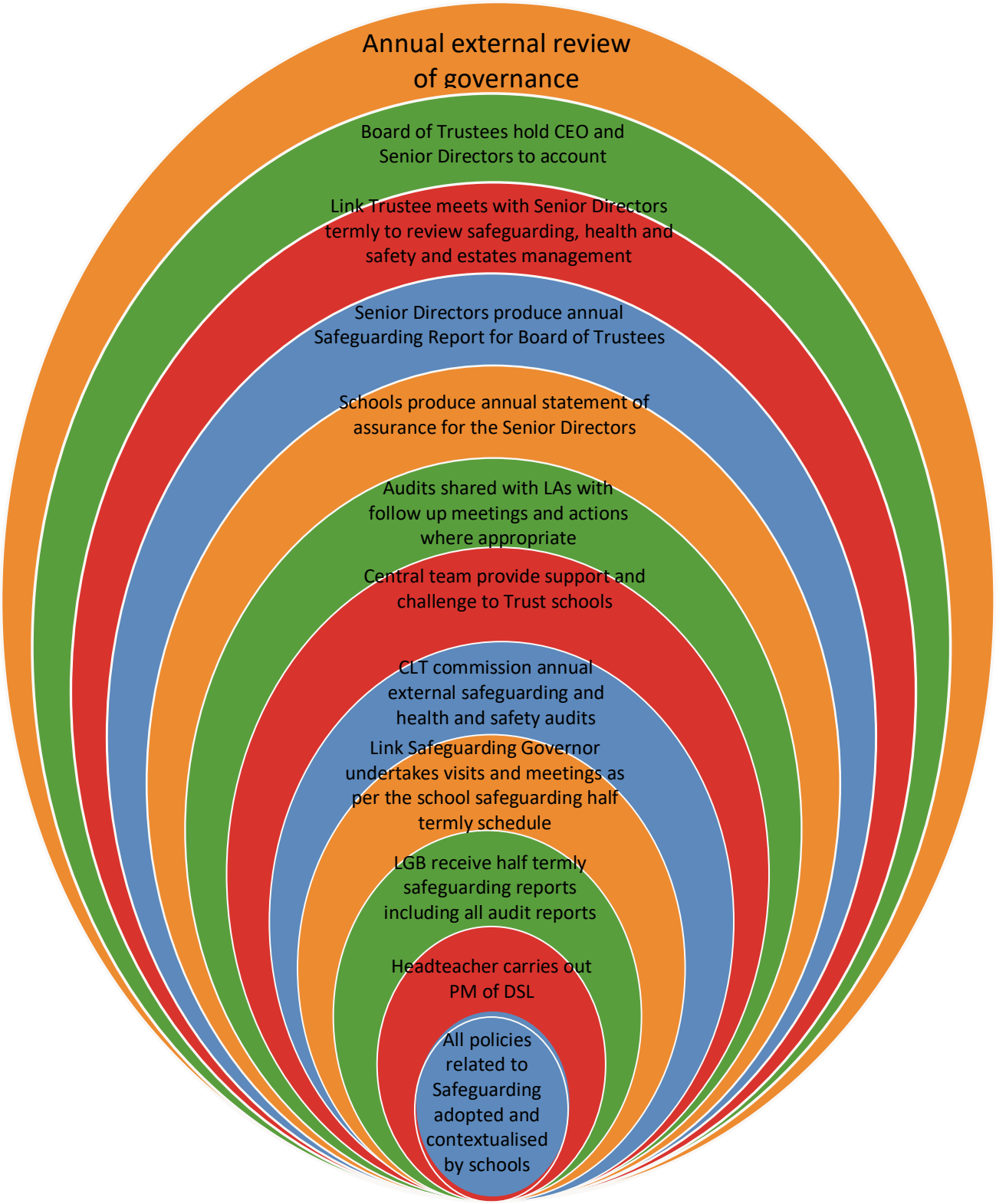
Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

11. Contact parents/carers to inform them that their child has gone missing
12. If the parent/carer is unable to contact their child to ascertain their whereabouts, the school will phone the police to report the student as missing.
13. Police reference number and details of the incident to be recorded on CPOMS.
14. School will offer support to the family and where appropriate, inform children's services.
15. The student will have a risk assessment put in place to ensure all staff are aware of the risks of the child going missing.

Where a pupil cannot be accounted for during the school day, staff will follow the process set out in section 8.1 and 8.2 of the Attendance Policy, including informing the local authority and/or police where the pupil's whereabouts cannot be established and there is concern for their welfare, and making home visits where appropriate.

Appendix 5 - Safeguarding at Chiltern Learning Trust



Appendix 6

Low Level Concern Form

This form can be used to share any concern with the Head teacher, no matter how small or seemingly insignificant, even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the Schools' Code of Conduct (including inappropriate conduct outside of work) and/or in a way that on first glance does not appear to meet the allegation, 'harm' threshold.

A concise record is required, including brief context in which the low level concern arose, plus details which are chronological, precise and as accurate as possible, of any such concern and /or relevant incident[s]. [Continue on separate sheets as necessary]. The form should be signed, times and dated.

Details of CONCERN:

Name of Staff member: **Signed :**	**Department and Role:** **Time and Date:**

Received by:

At [time]: **Date:**

WAS THE STAFF MEMBER SPOKEN TO? [Good practice will require a response].
NO ☐ - Give a brief but valid reason/explanation for not;

YES ☐ - Please complete detail below - STAFF MEMBER'S RESPONSE TO CONCERN:

ACTION TAKEN :

Was advice/guidance sought from the LADO and or Human Resources? Yes : ☐ No : ☐

Signed :	**Dated :**

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the School's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with School's Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.

Appendix 7 - Filtering and Monitoring Responsibility Chart

	CLT (IT)	School
You should identify and assign roles and responsibilities to manage your filtering and monitoring systems		
Have governors or proprietors identified and assigned a member of the senior leadership team and a governor, to be responsible for ensuring these standards are met?		X
Have governors or proprietors identified and assigned the roles and responsibilities of staff and third parties, for example, external service providers?		X
Does the Senior Leadership Team understand that they are responsible for: • procuring filtering and monitoring systems • documenting decisions on what is blocked or allowed and why • reviewing the effectiveness of your provision • overseeing reports?		X
Has the SLT ensured that all staff: • understand their role • are appropriately trained • follow policies, processes and procedures • act on reports and concerns?		X
Are arrangements in place for governors or proprietors, SLT, DSL and IT service providers to work closely together?		X
Does the DSL take lead responsibility for safeguarding and online safety, which could include overseeing and acting on: • filtering and monitoring reports • safeguarding concerns • checks to filtering and monitoring systems?		X
Does the IT service provider have technical responsibility for: • maintaining filtering and monitoring systems • providing filtering and monitoring reports • completing actions following concerns or checks to systems?	X	
Has the IT service provider worked with the senior leadership team and DSL to: • procure systems • identify risk • carry out reviews • carry out checks?		X
You should review your filtering and monitoring provision at least annually		
Have governing bodies and proprietors ensured that filtering and monitoring provision is reviewed at least annually, to identify the current provision, any gaps, and the specific needs of your pupils and staff?		X
Are reviews conducted by SLT, DSL, the IT service provider and involve the responsible governor?		X
Are the results of the online safety review recorded for reference and made available to those entitled to inspect that information?		X
Does the review cover all required elements (as a minimum)?		X
Have reviews informed: • related safeguarding or technology policies and procedures • roles and responsibilities • training of staff • curriculum and learning opportunities • procurement decisions • how often and what is checked Meeting digital and technology standards in schools and colleges (DfE) (NB Although the DfE standards are not numbered, I have done so here to help with clarity.)		X
Does the review ensure that checks of the system have been carried out?		X

Your filtering system should block harmful and inappropriate content, without unreasonably impacting teaching and learning Technical requirements to meet the standard		
Is your filtering provider • a member of Internet Watch Foundation (IWF) • signed up to Counter-Terrorism Internet Referral Unit list (CTIRU) • blocking access to illegal content including child sexual abuse material (CSAM)	X	X
Is the school's filtering operational and applied to all: • users, including guest accounts • school owned devices • devices using the school broadband connection	X	X
Does the filtering system: • filter all internet feeds, including any backup connections • be age and ability appropriate for the users, and be suitable for educational settings • handle multilingual web content, images, common misspellings and abbreviations • identify technologies and techniques that allow users to get around the filtering such as VPNs and proxy services and block them • provide alerts when any web content has been blocked?	X	
Has the provider confirmed that filtering is being applied to mobile and app content?		X
Has a technical monitoring system been applied to devices using mobile or app content?	X	X
Does the filtering system identify: • device name or ID, IP address, and where possible, the individual • the time and date of attempted access • the search term or content being blocked?	X	X
Are staff aware that they should make a report when: • they witness or suspect unsuitable material has been accessed • they can access unsuitable material • they are teaching topics which could create unusual activity on the filtering logs • there is failure in the software or abuse of the system • there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks • they notice abbreviations or misspellings that allow access to restricted material?		X
Does the school meet the Broadband Internet Standards?	X	
Does the school meet the Cyber Security standards?		X
Have all staff who use the school's IT Network had annual Basic Cyber Security Training?		X
Have governors completed Basic Cyber Security training session?		X
You should have effective monitoring strategies that meet the safeguarding needs of your school or college		
Does the monitoring system review user activity on school and college devices effectively? (For example, does it pick up incidents urgently, through alerts or observations, allowing prompt action to be taken; and is the response recorded?		X
Has the governing body or proprietor supported the SLT to make sure effective device monitoring is in place which meets this standard and the risk profile of the school or college?		X
Does the monitoring system ensure that incidents, whether of a malicious, technical, or safeguarding nature are picked up urgently?		X
Is it clear to all staff how to deal with these incidents and who should lead on any actions?		X
Does the DSL take lead responsibility for any safeguarding and child protection matters that are picked up through monitoring?		X
Has the DSL had training to ensure that their knowledge is current?		X

Have IT staff had training to ensure that their knowledge is current?	X	
Does the school's monitoring technology apply to mobile devices or content used in apps?	X	X
Are monitoring procedures reflected in the school's Acceptable Use Policy and integrated into relevant online safety, safeguarding and organisational policies, such as privacy notices?		X
If the school has a technical monitoring system, has a data protection impact assessment (DPIA) been completed?		X

Appendix 8: Restrictive Interventions and the Use of Reasonable Force

This appendix incorporates the requirements of Keeping Children Safe in Education 2026 (paragraphs 203-205) on the use of reasonable force, and applies to all staff, volunteers, and those with temporary responsibility for pupils. The primary objective is to safeguard the welfare of pupils and staff by minimising the use of restrictive practices and ensuring that, where used, they are lawful, safe, and transparent.

"Reasonable Force"

Under Section 93 of the Education and Inspections Act 2006, staff may use "such force as is reasonable in the circumstances."

- **Reasonable:** Using no more force than is needed.
- **Proportionate:** The degree of force must be in proportion to the seriousness of the behaviour or the consequences it is intended to prevent.
- **Necessary:** It must be the only remaining option to ensure safety.

Force may be used to prevent a pupil from:

- Committing an offence (or, for pupils under the age of criminal responsibility, what would be an offence for an older pupil).
- Causing personal injury to, or damage to the property of, any person (including the pupil themselves).
- Prejudicing the maintenance of good order and discipline (only where this poses a direct threat to safety or significant disruption to the rights of others).

Classifying Interventions

This guidance distinguishes between different levels of physical contact.

Physical Contact (Non-Restrictive)

Non-restrictive contact is used to support, comfort, or demonstrate a skill. Examples include:

- A hand on a shoulder to provide reassurance.
- Demonstrating how to hold a musical instrument or sports equipment.
- Guiding a pupil (without resistance) toward a goal or away from a minor hazard.

Physical Intervention (Restrictive)

This involves the use of force to overcome resistance.

- **Physical Restraint:** A hold which restricts movement (e.g., a two-person lead or a seated hold).
- **Physical Escorting:** Forcibly moving a pupil from one location to another.

Seclusion and Environmental Restraint

- **Seclusion:** Forced solitary confinement in a room the pupil cannot leave. Seclusion is only lawful in emergency safety situations and must never be used as a “time-out” or punishment. It must be supervised and the pupil must be able to communicate with staff at all times.
- **Environmental Restraint:** Changing the environment to restrict movement (e.g., locking a door or using high-handled latches). This must be noted in a pupil's Individual Risk Assessment.

Mandatory Preventative Measures

Staff are expected to use “Primary” and “Secondary” strategies to avoid the need for force:

- **Primary Strategies (Proactive):** Understanding triggers through a “Positive Handling Plan” (PHP), sensory adjustments, and clear routines.
- **Secondary Strategies (Reactive):** Non-verbal cues, “Time-In” strategies, verbal redirection, and the “Help Protocol” (switching staff members to de-escalate a situation).

Prohibited Techniques and Safety Risks

Any technique that carries a high risk of Positional Asphyxia or significant pain is prohibited.

Staff must never:

- Apply pressure to the neck, throat, or chest.
- Hold a pupil face-down (Prone) or face-up (Supine) on the floor.
- Use “Basket Holds” or any technique that involves “wrapping” the pupil's arms around their own torso.
- Apply pressure to joints or use “pain-compliance” (e.g. wrist locks).
- Obstruct a pupil's mouth or nose.

Medical Warning Signs: Staff must immediately release a hold if the pupil shows signs of respiratory distress, including:

- Sudden change in skin colour (blue/pale).
- Vomiting or “gurgling” sounds.
- Sudden calmness or “going limp.”
- Complaints of “I can't breathe.”

Recording and Reporting (Statutory Duty)

All uses of force or seclusion must be recorded in the school's Central Restrictive Interventions Log (CLT Google form template).

The Reporting Process:

- **Immediate Action:** Staff must notify the Headteacher or Designated Safeguarding Lead (DSL) immediately.
- **The Record:** A formal report must be completed by the end of the working day on the Central Restrictive Interventions Log and individual pupil reports recorded on CPOMS, including the names of the pupils and staff involved, the duration and type of hold/intervention used, the de-escalation techniques attempted prior to the intervention, and a description of any injuries sustained by pupils or staff.
- **Parental Notification:** Parents/carers must be informed of any restrictive intervention on the same day. This must be recorded as having been completed.

Post-Incident Support (The “Repair” Phase)

- **For the Pupil:** A debriefing session (once the pupil is calm) to understand their perspective. For pupils with SEND, this may require visual aids or the support of an advocate.

- **For the Staff:** A formal “check-in” to ensure wellbeing and a review of whether the Positive Handling Plan needs updating.
- **Incident Review:** All staff involved share a debriefing session with the Headteacher so that self-evaluation and learning can be informed. The outcome will be recorded on the Central Restrictive Interventions Log. Individual risk assessments may need to be put in place or amended in conjunction with parents.
- **Policy Review:** If a pupil requires restrictive intervention more than three times in a single term, a full review of their placement and support (e.g., EHCP review) is mandatory.
- **Reintegration:** Following any restrictive intervention or seclusion, the pupil's return to class will be supported in line with section 10 of the Behaviour Policy, which requires a reintegration strategy offering a fresh start, a reintegration meeting, and confirmation that any part-time timetable is used only for the shortest time necessary.

Training and Competency

Only staff who have undergone accredited training (e.g., Team-Teach, MAPA, or equivalent DfE-approved providers) should lead on planned physical interventions. However, the common law duty of care means any staff member may intervene in an emergency to prevent immediate harm. A clear record will be kept of staff who have undertaken accredited training.

Personnel Group	Training Requirement	Frequency
All Staff	De-escalation and Legal Framework	Annual
High-Risk Support Staff	Physical Intervention & Safe Holds	Bi-annual
SLT / DSL	Recording, Reporting, and Data Oversight	Termly

Monitoring and Oversight

The Governing Body will receive a termly anonymised report on the use of restrictive interventions and seclusion. This data must be analysed for trends regarding:

- Frequency per pupil.
- Disproportionality (e.g., higher use among pupils with autism or certain ethnic backgrounds).
- Effectiveness of specific staff teams.

This will be completed through LGB templates using the Central Restrictive Interventions Log.