The Athelstan Trust

Child Protection and Safeguarding Policy

INSERT NAME OF SCHOOL HERE

Date of Review	Approved by	Date of Approval	Next Review Date	Website
May 2022, Feb 2023 July 2023, July 2024, July 2025, July 2026	Board	21st July 2026	July 2027	Y

This policy applies to all Athelstan Trust schools. This version of the policy must be implemented from 1st September 2026.

Schools are required to add their school specific information to Section 1. The policy must be published on the school website.

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1 School Information

1.1 Key Internal Contacts

School Designated Safeguarding Lead (DSL)	Name: Email: Contact Number:
School Deputy Designated Safeguarding Lead(s) (DDSLs)	Name: Email: Contact Number: Name: Email: Contact Number: *(Please expand to add all DDSLs)*
Designated Teacher for Looked After Children	Name: Email: Contact Number:
Headteacher	Name: Email: Contact Number:
Local Governing Body	<u>Chair</u> Name: Email: <u>Safeguarding Link Governor</u> Name: Email:

1.2 Key External Contacts

Local Authority Designated Office (LADO)	*Local authority name* Email: Contact number:
Local Authority Children's Social Care	Contact number: Out of hours emergency number:

Link to local authority partnership procedures:	e.g. Safeguarding guidance, procedures and policies South Gloucestershire Wiltshire Safeguarding Vulnerable People Partnership (SVPP) - Home page Gloucestershire Safeguarding Children Partnership | Gloucestershire Safeguarding Children's Partnership
Multi-agency Safeguarding Hub	*Name* Email: Contact number:
Support and advice about extremism	Name of Police force Email: *prevent team email* Contact number: 101 Name of local authority department Email: Contact number Department for Education Non-emergency contact number: 0207 340 7264 Email: counter.extremism@education.gov.uk Contact form: Report Extremism in Education - Start Anti-terrorist hotline: 0800 789 321
NSPCC's "what you can do to report abuse" dedicated helpline	Contact number: 0808 800 5000 Email: help@nspcc.org.uk
Teaching Regulation Agency	Contact number: 0207 593 5393 Email: misconduct.teacher@education.gov.uk
OFSTED (concerns)	Contact number: 0300 123 4666
Trust Whistleblowing Policy	Policies – The Athelstan Trust

2 Policy Statement

The Athelstan Trust is a family of caring, collaborative, and excellent schools. Within this family, Safeguarding is everyone's responsibility: all staff, governors, volunteers, and visitors are expected to play their full part in keeping children safe and promoting their welfare.

We are committed to putting the welfare and safeguarding needs of children first.

Our aim is to create a strong safeguarding culture throughout our Schools, which is deeply embedded in the ethos, values and everyday practices. Staff should maintain an attitude of it could and does happen here.

Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.

3 Scope

This policy **must** be read in conjunction with the statutory guidance documents 'Keeping children safe in education' (KCSIE 2026) and 'Working together to safeguard children, statutory guidance on multi- inter-agency working to help, protect children" and does not supersede those statutory documents. All references are from the latest iterations of those documents which can be found on the GOV.UK website.

In line with the law, this policy defines a child as anyone under the age of 18 years or any child on roll at a school in our Trust. Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

This policy applies to all members of Athelstan Trust Staff, including all permanent, temporary and support staff, supply staff, Trustees, governors, volunteers, contractors and external service or activity providers.

4 Legislation and statutory guidance

This Policy has regard to the following guidance and advice:

- Keeping Children Safe in Education (DfE, 2026)
- Working together to safeguard children (DfE)
- What to do if you're worried a child is being abused (2015)
- Children Missing Education 2025
- Statutory Guidance on FGM
- UKCIS Sharing nudes and semi-nudes (2024)
- Working together to improve school attendance (2024)
- Managing risk of radicalization in your education setting (2023)
- Designated teacher for looked after and previously looked after children guidance
- Searching, screening and confiscation in schools (2023)
- Generative AI: product safety standards
- DfE Guidance on Mobile phones in schools (2026)
- Information sharing: advice for practitioners (DfE, 2024)
- Safer Recruitment Consortium Guidance for safer working practice for those working with children and young people in education settings
- The Prevent Duty - Guidance
- The Prevent duty: safeguarding learners susceptible to radicalisation
- Early years foundation stage (EYFS) statutory framework
- Data Protection Act (DPA) 2018, UK GDPR and Data (Use and Access) Act 2025
- Disqualification under the Childcare Act 2006 (DfE, August 2018)
- Education (Independent School Standards) Regulations 2014
- Equality Act 2010
- Human Rights Act 1998
- Teachers' Standards 2012
- The Rehabilitation of Offenders Act 1974
- The Children Act (1989 and 2004 amendment)
- UN Convention on the rights of the child
- UN Convention on Rights of a Child (UNCRC)
- Use of reasonable force in schools

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

5 Definitions

The Athelstan Trust adopts the definitions used in KCSIE 2026. Key definitions that we use are:

Safeguarding and promoting the welfare of children means:

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

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. The categories of Abuse are physical abuse, emotional abuse, sexual abuse and neglect.

- **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. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual Abuse** - involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **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. Neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Child Criminal Exploitation, Child Financial Exploitation and Child Sexual Exploitation – CCE, CFE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE, CFE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Serious Violence - Serious violence is a safeguarding issue that can include physical assault, weapon-related incidents (including carrying, threatening with, or using a weapon), gang-related activity, and violence linked to criminal exploitation. Children may be at risk of serious violence as victims, witnesses, or perpetrators.

6. The Management of Safeguarding (including roles and responsibilities)

Safeguarding and child protection is **everyone's** responsibility.

6.1 All staff

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 updated guidance.
- Reinforce the importance of online safety when communicating with parents. This includes making parents 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 students who are LGBTQ+ to speak out and share their concerns
- 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 deputies, the behaviour policy, and the safeguarding response to children who go missing from education
    - The Family Help process and 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. More information about Family Help is available in Appendix B
    - 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
    - The Multi agency working aspect of Child Protection, ensuring agencies work together to support the child.
    - What to do if they identify a safeguarding issue or a child tells them they are being abused, exploited 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, risks outside the home, radicalisation and serious violence (including that linked to county lines).
    - 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 their home through intra - familial harm and outside their home - extra familial harm. And the fact that schools work to understand the child's lived experience and provide vital information to outside agencies to support in the contextual safeguarding of the child.
    - The fact that children who belong to (or are perceived to belong to) the LGBTQ+ community can be targeted by other children

- What to look for to identify children who need help or protection, and to exercise professional curiosity to ensure there is early identification of abuse and neglect.

6.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team.

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 children safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. DSL can also be contacted out of school hours if necessary, via email: see section 1.0 of this Policy for contact details. (Contacting the DSL should not delay action being taken; staff should refer to section 7.0 of this Policy).

Headteachers, in consultation with the DSL, will ensure that appropriate arrangements, as per Annex B of KCSIE 2026, are made to provide a DSL contact point when the DSL is unavailable due to illness, leave or other circumstances. These arrangements will:

- meet local authority requirements
- be shared appropriately with the local authority and other partners
- ensure that the DSL (and Deputies) have appropriate illness, absence and holiday cover

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 Prevent "Notice, Check, Share" referral process and Prevent self-assessment tool.
- Have a good understanding of the filtering and monitoring systems and processes in place

The full responsibilities of the DSL and deputies are set out in their job role, in accordance with Annex B of KCSIE 2026.

6.3 The Board of Trustees

The Board will:

- Facilitate a whole trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. This includes ensuring pupils are taught about how to keep themselves and other safe.
- Ensure schools in the Trust play a crucial role in preventative education in order to prepare pupils for life in modern Britain and create a culture of zero tolerance towards sexism, racism, misogyny, homophobia / biphobia, sexual violence and harassment.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the CEO to account for its implementation

- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the Trust's local multi-agency safeguarding arrangements.
- Appoint a Safeguarding Link Trustee and require that Local Governing Boards implement Link Governors, to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL. The roles of the Safeguarding Link Trustee and Safeguarding Link Governors are defined in our Scheme of Governance.
- Ensure all staff undergo contextually appropriate 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

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All governors and Trustees will read Part Two of Keeping Children Safe in Education.

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

6.4 The Headteacher

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

- Ensuring that staff (including temporary staff), contractors (including self-employed contractors) and volunteers:
  - Are informed of our 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, exploitation 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. This should include liaising with the DSL regarding arrangements when the DSL is unavailable due to illness, leave or other circumstances (as detailed in section 6.2).
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- 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)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- 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

7 How Staff should address a Safeguarding issue.

Staff, volunteers, trustees 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)".

7.1 What staff must do if a child is suffering or likely to suffer harm, or in immediate danger

- Make a referral to the local authority 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. If possible, this referral should be done with the involvement of the DSL. If the DSL is not available, this should not delay action being taken: **anyone can make a referral. Use the contact information in Section 1.0 of this document to do this.**
- You must inform the DSL as soon as possible if you make a referral directly.

7.2 What staff must do 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
- If in paper copy, sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to the local authority children's social care and/or the police directly. You must inform 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.
- 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.

7.3 What staff must do if you have concerns about a child

- The flow chart in Appendix A illustrates the procedure to follow if you have any concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger). This includes a child who you think is involved or is at risk of being involved in CCE, CFE, CSE and / or serious violence.

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

Following a referral:

- The local authority must acknowledge a referral from a school and make a decision on next steps within 1 working day, and will let the person who made the referral know the outcome. If there is no response within 3 days, the school should escalate this to the Local Authority Children's Social Care team 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.

The Guidance "What to do if you're worried a child is being abused" may also be referenced.

7.4 What staff must do if you discover that a child is at risk of so-called Honor Based Abuse, including if FGM has taken place or a student is at risk of FGM)

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

Any **teacher** who:

- 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

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**.** The Police should be contacted by ringing 101.

Unless they have been specifically told not to disclose, you must inform the DSL as soon as possible and make a referral to the local authority children's social care.

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

Any member of staff (including teachers) who suspect a student is *at risk* of FGM or suspects that FGM has been carried out or discovers that a student **aged 18 or over** appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures.

7.5 What staff must do if you have concerns about a child being exposed to radicalisation, extremism or terrorism.

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

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

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.

- Refer to section 7.1 of this Policy if you believe the child is suffering or likely to suffer harm, or in immediate danger.
- In an emergency, or if you think someone is in immediate danger, call 999.
- Call the confidential anti-terrorist hotline on 0800 789 321 if you think someone may be planning to travel to join an extremist group or see or hear something that may be terrorist-related.
- In all other cases, follow the Notice, Check, Share referral process: the first step of this is to speak to the DSL or DDSL who will provide full cover and act with the necessary authority to manage Prevent referrals and decisions.
- The DSL / DDSL will **check** the concern against local frameworks, training, and the Security Threat Check (STC) criteria to ensure referrals are high-quality and based on genuine radicalisation risks. They may also want to seek advice from the 24 hour ACT Early Support Line on 0800 011 3764.
- The DSL / DDSL will **share** the concern by submitting the Prevent National Referral Form (NRF) to the Police. Police specialists will assess the NRF using the prevent National Assessment Framework (PAF) and, if appropriate the case may be passed to Channel – a multi-agency support panel, or signposted to appropriate services.
- If the DSL/DDSL 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 the 24 hour ACT Early Support line on 0800 011 3764. If a Prevent Referral is made, inform the DSL or DDSL as soon as practically possible after the referral.
- 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 student. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

Further information on radicalisation risk factors can be found in the following guidance: The Prevent Duty: safeguarding learners susceptible to radicalisation

7.6 What staff must do if you are concerned about a child's mental health

- All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff should be aware of the potential warning signs listed in Section 48 of KCSIE 2026.
- If you have a concern about a child's mental health that is also a safeguarding concern, take immediate action by following the steps in section 7.3.
- If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

7.7 What staff must do if you are concerned that a staff member, supply teacher, volunteer or contractor may pose a risk of harm to children.

- 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 (see section 1 of this Policy for contact details).
- The Headteacher/Chair of Governors will then follow the procedures set out in Appendix D, 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). See section 1 of this Policy for LADO contact details.
- If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

7.8 What staff must do if allegations of abuse are made against other students

Child on child abuse is when one child or a group of children inflicts physical, sexual, or emotional harm on another child. It can occur in person or online. Sections 37 and 193 of KCSIE 2026 describe the different forms of child on child abuse. All child on child abuse is unacceptable and will be taken seriously. Most cases of students hurting other students 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, as described in KCSIE 2026. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the school at risk
- Is violent
- Involves students 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)

If a student makes an allegation of abuse against another student that raises safeguarding concerns:

- You must record the allegation and tell the DSL, but do not investigate it

- The DSL will consider whether it is necessary to 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(s).
- The DSL will contact appropriate mental health support (this may include the children and adolescent mental health services (CAMHS)).
- 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.

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.
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.

7.9 What staff must do if you become aware of an incident of sharing of nudes and semi-nudes ('sexting'), including images generated by AI

- 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. This includes images generated by AI.
- You must **not**:
    - View, copy, print, share, store or save the imagery yourself, or ask a student 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 student to delete it
    - Ask the student(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 student(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 student(s) that they will receive support and help from the DSL.
- Following a report of an incident, the DSL will follow the guidance set out in: **Sharing Nudes and Semi-Nudes: how to respond to an incident (overview) (updated March 2024)**

7.10 What staff must do if a child is missing education.

Children who go missing from education are at significant risk. Staff must follow the protocols set out in their Attendance Policy. The School will follow the guidance set out in Working Together to Improve School

Attendance (2024), the guidance in Children Missing Education 2025 and the local authority procedures for notifying the CME team.

7.11 What staff must do to ensure if a child is safe at the end of the school day

Some children will be collected at the end of the school day (particularly in our primary schools). Staff should follow their school's own procedures to ensure children are collected by an appropriate person at the end of the day. Staff must ensure these procedures are also shared with temporary staff.

7.12 What staff must do if a child goes missing during the school day

Schools in the Trust will hold their own procedures designed to ensure that a missing child is found and returned to effective supervision as soon as possible. Staff should familiarise themselves with this information and follow their school procedure if a child goes missing. Such incidents must be recorded on our electronic safeguarding platform.

8. Students with special educational needs, disabilities or health issues

The Trust recognises that students with special educational needs (SEND) or certain health conditions can face additional safeguarding challenges and are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group and staff will therefore recognise the vulnerabilities of pupils with SEND. Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the school SENDCo.

9. Students with a social worker

Students 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 student has ever had or currently has a social worker, or ever been known to social services, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes.

10.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
- Each school appoints a designated teacher 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. The designated teacher must be a qualified teacher who has completed the appropriate

induction period and is working as a teacher at the school or is a head teacher or acting head teacher of the school.

As part of their role, the designated teacher will:

- Work closely with staff 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 student premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

11.Children who are lesbian, gay, bisexual or gender questioning children

Staff recognise that a child being lesbian, gay or bisexual is not in itself a risk factor for harm. However, they can sometimes be vulnerable to bullying and we take steps to prevent this. Staff will work to create a culture where pupils can speak out or share any concerns with staff.

When supporting a gender questioning child, staff will seek appropriate guidance from the DSL and / or headteacher when deciding how to proceed. Our schools will recognise a careful approach should be taken and follow the guidance in paragraphs 252 to 282 of KCSIE 2026, particularly noting the following requirements:

- The need to take a strong, proactive stand against all forms of bullying, and tackle bullying at the earliest opportunity. (para 257)
- The need to meet obligations under both safeguarding legislation and equality and human rights law. (para 260 & 273)
- The statutory duty to safeguard and promote the welfare of all children, ensuring that any agreed course of action for a child who is questioning their gender take account the impact on all those affected. (para 262)
- Schools must not allow pupils into toilets, changing rooms or residential accommodation designated for the opposite sex. Where single sex sports are implemented as being necessary for safety reasons, there should be no exceptions and pupils must not be allowed to participate in sports designated for the opposite sex. (Para 274)
- Ensuring that school policies do not disadvantage a gender-questioning child (para 275)
- Meet the legal requirement that a child's biological sex is accurately recorded (para 280)

This is not an exhaustive list of requirements and Staff should refer to the DSL and KCSIE for further information and guidance.

12.Online safety and the use of mobile technology

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, our Trust aims to:

- Have robust processes in every school to ensure the online safety of students, staff, volunteers and governors, which also recognise risks specific to Artificial Intelligence.
- Protect and educate the whole school community in the safe and responsible use of technology, including Artificial Intelligence (AI), mobile, online and other smart technology (which we refer to as 'mobile phones'). Staff are available to help students with any concerns.
- Observe the DfE requirement that schools should be mobile-phone free environments by default; anything other than this should be by exception only. We will set clear guidelines for the use of mobile phones for the whole school community through the Mobile Phone Policies in our individual schools.
- 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, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.

Contact – being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,

Conduct – online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

- Educate students 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 students 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 other predatory behaviour. 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 (or other smart devices) for example that:
  - Staff are allowed to bring their personal phones (or other smart devices such as iwatches) to school and may be required to use a phone for work purposes but will only use phones for personal use during non-contact time when students are not present.
  - Staff will not take pictures or recordings of students on their personal phones, cameras or smart devices

- Make all students, parents/carers, staff, volunteers and governors aware that they are expected to observe the Trust's IT Acceptable Use agreement.
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the DfE's guidance on searching, screening and confiscation.
- Prohibit the use of "Smart Glasses" in our schools by staff, visitors, parents and pupils. The only exception to this is use by a pupil where they are named as a reasonable adjustment in a child's EHCP.
- 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 which are annually audited and regularly tested as per the requirements of Section 173 of KCSIE 2026.
- Systems are constantly monitored and reviewed externally (live) to reflect risks faced by our Trust community.
- Provide regular safeguarding and child protection updates including online safety to all staff, at least annually to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.
- Refer to the following guidance in relation to the application of generative AI in education. Generative AI: product safety expectations - GOV.UK
- Refer to DfE support materials on using AI in education settings Using AI in education settings: support materials - GOV.UK

For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policies and mobile phone policies, which you can find on the schools' websites.

13.Alternative Provision

Alternative Provision (AP) placements can be invaluable in providing bespoke education and support for students with complex needs. However, The Athelstan Trust recognises that it is often used for the most vulnerable young people in our communities and that it is imperative that schools ensure safeguarding and Quality Assurance is robust and checked regularly.

Where we place a student with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil.

Our schools will maintain information about the AP including records of the address of the AP and any sub-contracted provision or satellite sites the child might attend.

13.1 Commissioning

Schools will undertake an initial assessment of the suitability of an AP provider, to include viewing key records and documentation to include:

- Single Central Record
- Records of staff Safeguarding Training
- Relevant Policy Documents (as per The Athelstan Trust Alternative Provision Commissioning, Safeguarding and Auditing Documents)

- Relevant Insurance documentation

The school will obtain written **confirmation that for all individuals the provider has conducted all appropriate recruitment checks, including enhanced DBS checks**. This will be recorded on the school SCR.
The initial assessment will include a site visit, during which checks will be made as to the safeguarding culture and suitability of the accommodation.
A Service Level Agreement will be made between the school and AP provider and will include expectations and routines regarding:

- Monitoring and reporting attendance
- Recording and sharing safeguarding concerns
- Health & Safety arrangements, dependent on activities offered
- Transport arrangements

When commissioning Alternative Provision, schools will assure themselves that the AP meets the needs of the pupil and enables them to achieve good educational outcomes.

13.2 Initial Referral and Admission

Schools will share all appropriate information regarding a pupil with the AP provider to ensure they can safeguard the pupil whilst in their care. This will include details of individual needs, risk assessments and information regarding other external agencies involved. Schools will involve parents/carers and ensure that these stakeholders can give informed consent to their child attending Alternative Provision.

13.3 On-going Monitoring

AP placements will be reviewed on a regular basis (at least half termly) to check that it continues to be safe and meets the child's needs.
Where safeguarding concerns arise, the placement should be immediately reviewed and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

14.Use of school premises for non-school activities (including Lettings).

Where the School premises are hired or rented out the Headteacher will ensure that appropriate arrangements are in place to keep children safe:

- School and Trust policies will apply where the services or activities are provided by the school and are under the direct supervision or management of school staff.
- Where services or activities are provided separately by another body, the governors and the Headteacher will seek written assurance that the body concerned has appropriate child protection and safeguarding policies in place (including inspecting these as needed) and ensure that there are arrangements in place to liaise with the school on these matters where appropriate.

This applies whether or not the children who attend any of these services or activities are children on the school roll.

- The Headteacher and governors should also ensure safeguarding arrangements are included in any transfer of control agreement (i.e. lease or hire agreement) as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

- The guidance found in 'Keeping children safe in out-of-school settings' and Working together to safeguard children 2026 detail the safeguarding arrangements that the school should expect these providers to have in place.

15. Checking the identity and suitability of visitors

All schools hold appropriate procedures and where appropriate will assess risk and appropriate level of vetting of all visitors, including those who are visiting for professional purposes (e.g. Educational Psychologists) in line with KCSIE 2026 Para 380 and other guidance. Individuals will be asked to show their DBS certificate where required. Staff should also refer to Appendix C for further guidance.

16. Reporting, records and confidentiality

16.1 Reporting systems for our students

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 students feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, our Schools will:

- Have clear age-appropriate systems for students to confidently report abuse or other safeguarding issues.
- Ensure our reporting systems are promoted, easily understood and accessible for all
- Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback

Students are informed about reporting systems through the curriculum, assemblies, tutor time, and school notices.

Staff reassure students following disclosures, helping them feel safe to raise concerns.

16.2 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 concern or disclosure and / or professional curiosity.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL. The DSL will then oversee correct procedures for that pupil.

16.3 Confidentiality

Our approach to confidentiality and data protection with respect to safeguarding can be found in our Data Protection and Records Management Policies.

When sharing information within our Trust and with the 3 safeguarding partners and other agencies, we uphold the following principles:

- 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, UK GDPR and Data (Use and Access) Act 2025 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

Staff will however respect that information about a child is shared on a need to know basis.
The government's information sharing advice for safeguarding practitioners includes seven '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.

16.4 Record-keeping

Safeguarding and Child Protection Records will be held in line with our Records Management Policy and Data Retention Policy.
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 only be available to those who have a right or professional need to see them. This applies to paper records which will be held in a single secure location in each school, and electronic records which will be held via MyConcern or CPOMS.
The DSL / DDSL must keep written records of all concerns, discussions, and decisions, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as the local authority children's social care or the Prevent Team.
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, and separately from the main student file.
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

However, files should only be sent once the school has received written confirmation from the new school that the child has joined the new school roll, and a receipt should be requested.
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.

17.Training

17.1 All staff

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

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 three safeguarding providers and local authority
- 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 students

All staff will have training on the government's anti-radicalisation strategy, Prevent, to provide them with knowledge and confidence to enable them to identify children at risk of radicalisation and to challenge extremist ideas. Refresher training should be determined by local risk assessments.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training. Schools are responsible for ensuring they have had the relevant training.

Volunteers will receive appropriate training, as per the school induction process.

17.2 The DSL and DDSLs

The DSL and DDSLs will undertake high level multi agency child protection and safeguarding training in line with the requirements set in the current version of KCSIE and the local safeguarding partnership requirements. Refresher training will be completed 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). The DSL and DDSLs will also undertake advanced Prevent awareness training, which is refreshed every 2 years.

17.3 Trustees and Local Governors

All Trustees and local governors receive training about safeguarding, and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As 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.Complaints and allegations

Complaints and allegations 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 D).

Other complaints

Safeguarding related complaints of other types for example, those related to students or premises are dealt with via The Athelstan Trust Complaints Policy, available on the Trust website.

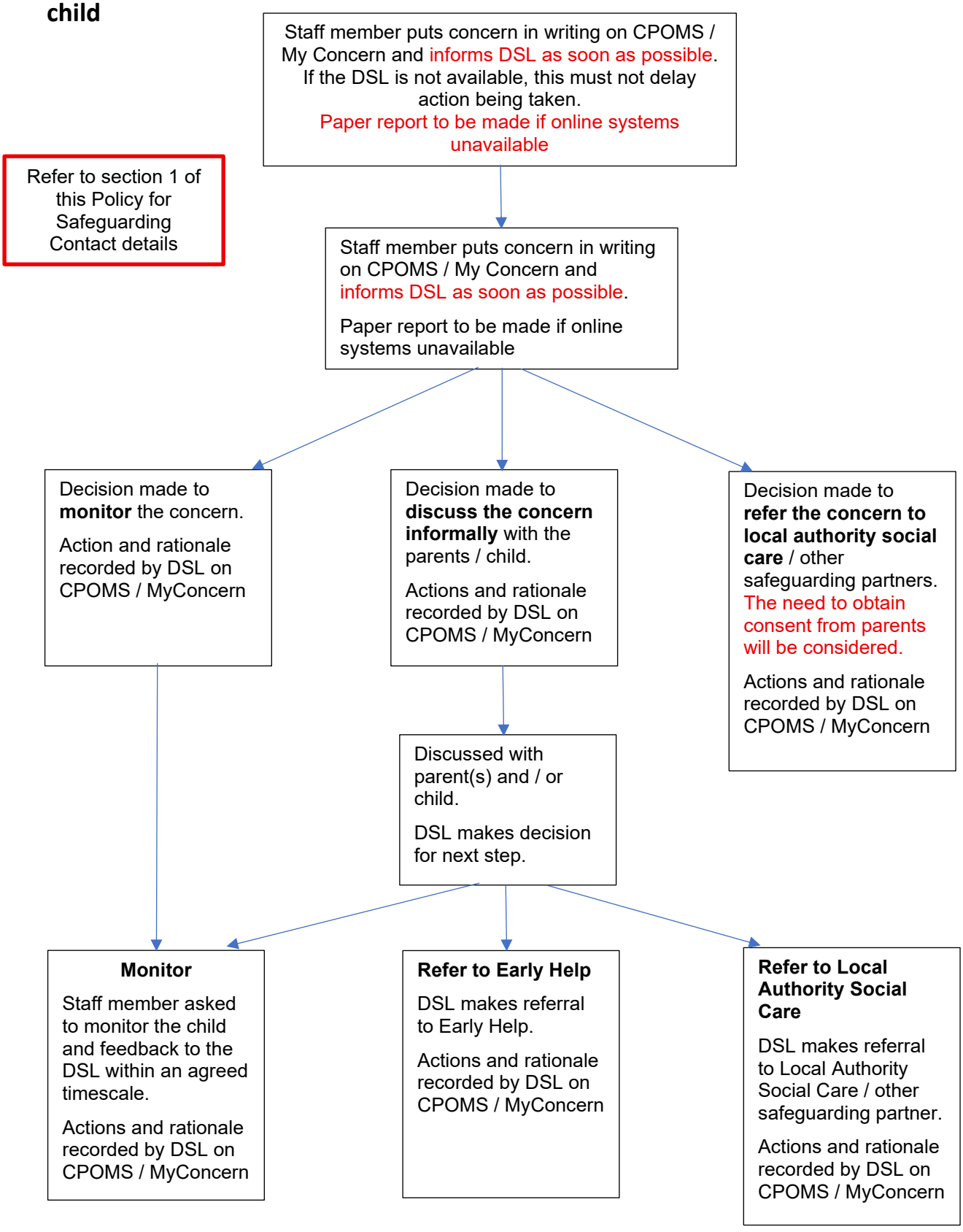
Whistleblowing

The Athelstan Trust Whistleblowing policy that covers concerns regarding the way the school safeguards students – including poor or unsafe practice, or potential failures can be found on the Trust website.

19.Links with other Athelstan Trust policies

This policy links to the following Athelstan Trust policies:
Attendance
Behaviour
Complaints
Curriculum
Designated teacher for looked-after and previously looked-after children
Disciplinary
Equality
Health and safety
IT Acceptable Use
Mobile phone use
Online safety
Privacy notices and data protection policies
Relationships and sex education
Staff Code of conduct
Whistleblowing

Appendix A – Flow Chart – Process to be followed when a concern is raised about a child



Appendix B – Family Help and Early Help.

Schools in the Athelstan trust will provide targeted support for children through Family Help which involves using targeted services coordinated by the Local Authority to deal with concerns within a family. This may include community-based services, youth services youth offending teams and targeted early help services provided through Section 17 of the Children Act 1989 (Child in Need).

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Any child may benefit from early help, but staff should be particularly alert to the potential need for early help for a child meeting the criteria listed in Keeping Children Safe in Education. The Statutory Guidance Working Together to Safeguard Children provides guidance on early help. If appropriate, the DSL will make an early help assessment and liaise with outside agencies to offer further early help and support for children and families.

Staff should be aware that Early Help may be appropriate for a child to whom one or more of the following criteria apply:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- has a mental health need
- is showing signs that they self-harm or may self harm.
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse, or through the Operation Encompass Partnership
- is misusing drugs or alcohol themselves
- has become homeless
- is exposed to domestic abuse
- has returned home to their family from care
- is at risk of so-called 'honour' based abuse such as Female Genital Mutilation or Forced Marriage
- is persistently absent from education, including persistent absences for part of the school day

Appendix C - Safer recruitment and DBS checks – policy and procedures

C.1 Safer Recruitment and Pre-employment checks for new staff

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. At least one member of each interview panel will be Safer recruitment trained. We will refer to the Safer Recruitment Consortium guidance and KCSIE 2026 as appropriate.

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:

- Advertisements will reflect key safeguarding requirements as set out in our Recruitment and Selection Policy.
- Application forms (via MyNewTerm) include a declaration that it is a criminal offence to apply for the role if the applicant is barred for engaging in regulated activity relevant to children.
- The application process includes a link to our Child Protection and Safeguarding Policy.
- The Athelstan Trust Recruitment and Selection Policy sets Safeguarding requirements for advertisements, references, online searches, interviews and pre-employment checks (including DBS checks for new employees).

C2. DBS Checks

The SCR is a formal record of all safer recruitment safeguarding checks, including DBS checks. Each school manages their own SCR and is responsible for keeping it up to date. Schools also have read only access to the Central Team SCR, to allow information on Central Team staff to be viewed.

New Staff

Pre-employment checks for new members of staff are detailed in section C.1 above.

Existing staff

All staff are required to undergo a DBS renewal every 5 years. In addition, Staff are required to complete a Criminal Record Annual Declaration.

Additional DBS checks will be carried out 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

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child as per the guidance here: Making barring referrals to DBS.

Agency and third-party staff

We will obtain written confirmation or notification via The Athelstan Trust Letter of Assurance 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. Further details are available in the school site security policy.

Contractors

Contractors are required to complete The Athelstan Trust Letter of Assurance: 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.

Where required by the relevant legislation: For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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.

Where required by the relevant legislation: In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- 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 with barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

Where required by the relevant legislation: Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out

such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Trustees, Members and Local Governors

All trustees, members and local governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board of trustees will have their DBS check countersigned by the secretary of state.

All, 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). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- 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 student with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil. 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, as per The Athelstan Trust Alternative Provision Commissioning and Auditing Documents. See also section 13 of this Policy.

Adults who supervise students on work experience

When organising work experience, we will ensure that policies, risk assessments and procedures are in place to protect 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 student 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.

Students staying with host families

Individual schools will be responsible for assuring themselves that all steps have been taken to keep children safe when staying with host families abroad. This will include working with partner schools abroad to ensure that appropriate assurances are undertaken prior to a visit. Prospective UK host families should be discussed with relevant staff in the school including the DSL and Head of Year.

Schools will make reference to the guidance in KCSIE 2026 and the International School Exchanges and Visits Guide.

Appendix D - Allegations of abuse made against staff

This Appendix details two processes:

- Process for allegations against staff that may meet the harms threshold (See section D.1).
- Process for concerns that do not meet the harm threshold (See Section D.2)

Section D.1 - Allegations that may meet the harms threshold

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:

- 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.

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

D.1.1 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 the trust

If in doubt, the case manager will seek views from the trust's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

D.1.2 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

D.1.3 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 local authority 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 the local authority 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. Individuals can seek advice and support from trade union representatives and staff governors. The Trust Employee Assistance Programme is also available to all staff for welfare counselling.
- 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

For early years provision: we will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the Trust is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the Trust 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.

D.1.4 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 Trust, 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/ trust, 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.

D.1.5 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.

D.1.6 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 trust 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 trust 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

D.1.7 Confidentiality and information sharing
The trust 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

D.1.8 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.

D.1.9 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.

D.1.10 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 trust'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.

D.1.11 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 D.2: concerns that do not meet the harm threshold

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 D.1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- 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.

D.2.1 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

D.2.2 Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to 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 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

D.2.3 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 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.

The following further guidance is available: Developing and implementing a low-level concerns policy: A guide for organisations which work with children

D.2.4 Record keeping

All low-level concerns will be recorded in writing via the school based recording system. 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 Data Protection Act (DPA) 2018, UK GDPR and Data (Use and Access) Act 2025. The school will determine who has access to records: this must be more than 1 person and will usually be the Headteacher and DSL.
- 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.

D.2.5 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.