



Safeguarding and Child Protection Policy

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This policy was reviewed and amended February 2024

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Child Protection / Safeguarding Policy

Mission Statement

‘To educate young people to meet the challenges of life courageously, to use their talents to the full and to live the values of Christ’s Gospel’

Thornton College is committed to safeguarding and promoting the welfare of all children and young people within the school.

Any concerns or signs of abuse or neglect must be immediately reported to one of the Designated Safeguarding Leads (DSL). Any immediate risk of harm must be reported to the police or First Response directly.

1. Contacts

School contacts

Head Teacher	Dr Louise Shaw lashaw@thorntoncollege.com Internal phone: 100
Designated Safeguarding Lead (DSL) and Deputy Head Teacher	Tracey Wilks, twilks@thorntoncollege.com , Internal phone: 123
Deputy Designated Safeguarding Lead(s)	Juliet Dixon, jdixon@thorntoncollege.com , Internal Phone : 114 Annette Woodruff, awoodruff@thorntoncollege.com Internal phone: 122 Caroline Thomas (DDSL with responsibility in EYFS) , cthomas@thorntoncollege.com Internal phone: 205
Nominated Safeguarding Governor	Mrs Rosemary Kaye, vicechairofgovernors@thorntoncollege.com
Chair of Governors	Sr Helen Mary Haigh, chairofgovernors@thorntoncollege.com
Independent listeners:	Mrs Angie Sinnott: 01908 281564/07779 249853

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Contacts in County

Education Safeguarding Advisory Service ESAS offers support to education providers to assist them to deliver effectively on all aspects of their safeguarding responsibilities.	01296 387981 Secure-esasduty@buckinghamshire.gov.uk
First Response Team (including Early Help, Channel) The First Response Team process all new referrals to social care, including children with disabilities. Referrals are assessed by the team to check the seriousness and urgency of the concerns and whether Section 17 and/or Section 47 of the Children Act 1989 apply. The First Response Team will ensure that the referral reaches the appropriate team for assistance in a quick and efficient manner.	01296 383962 Out of hours 0800 999 7677 Secure-cyp.firstresponse@buckinghamshire.gov
Local Authority Designated Officer (LADO) The Buckinghamshire Local Authority Designated Officer (LADO) is responsible for overseeing the management of all allegations against people in a position of trust who work with children in Buckinghamshire on either a paid or voluntary basis	01296 382070 Secure-lado@buckinghamshire.gov.uk
Bucks Family Information Service Information for families on a range of issues including childcare, finances, parenting and education	01296 383065
Buckinghamshire Safeguarding Children Partnership (BSCP) Procedures, policies, and practice guidelines	
Schools Web School bulletin, Safeguarding links, A-Z guide to information and services	
Buckinghamshire Council Equalities & School Improvement Manager	01296 382461 Yvette.thomas@buckinghamshire.gov.uk
Buckinghamshire Council Prevent Co-ordinator	01296 674784 Alisonwatts1@buckinghamshire.gov.uk
Thames Valley Police	101 (999 in case of emergency)

Other contacts

NSPCC NSPCC	0800 800 5000
Childline	0800 11 11

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Childline	
Kidscape – Parent Advice Line (bullying) (Mon-Weds from 9:30am to 2:30pm) Kidscape	020 7823 5430
Female Genital Mutilation Helpline (NSPCC) NSPCC FGM Helpline	0800 028 3550 fgmhelp@nspcc.org.uk
Samaritans - Helpline Samaritans	116 123
Forced Marriages Unit - Foreign and Commonwealth Office Forced marriage - GOV.UK	020 7008 0151 fmfco@fco.gov.uk
To report FGM – call NSPCC helpline (this can be reported anonymously)	0800 028 3550 fgmhelp@nspcc.org.uk
Crimestoppers Crimestoppers	0800 555 111
R-U Safe? Barnardos - Children/Young People Sexual Exploitation Service	01494 785 552 rusafe@barnardos.org.uk
CEOP (Child Exploitation and Online Protection)	www.ceop.police.uk 0870 000 3344

Contact Details for Social Services			
Social Services County Hall Walton Street Aylesbury Bucks HP20 1UA 01296 383962 (0845 4600 001)	Social Services Civic Offices 1 Saxon Gate East Central Milton Keynes MK9 3EH 01908 691691	Social Services Northamptonshire County Council John Dryden House 8-10 The Lakes Northampton NN4 7YD 01604 236236	Social Services Oxfordshire County Council County Hall New Road Oxford OX1 1ND 01865 792422

This policy should be read in conjunction with the following policies and other policies you feel it would be useful to refer to:

- Anti-bullying
- Attendance
- Behaviour
- Children Looked After
- Complaints
- Equalities
- Lettings
- SEN/Inclusion
- Health & Safety (including managing children with medical needs) and First Aid

This policy was reviewed and amended February 2024

This policy is to be reviewed by 31st August 2024

- Photography
- E-Safety (including use of social media)
- Staff Code of Conduct
- PSHE - to include RE & RSE
- Visitors
- Whistleblowing
- Safer Recruitment
- Staff concerns

Definitions

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 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 the safeguarding process, and it refers to the procedures undertaken to protect individual children who have been identified as suffering or 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. Further information regarding the categories of abuse can be found in the appendix to this document.

Children includes everyone under the age of 18.

2. Introduction

2.1. At Thornton College we believe that a policy on child protection is founded on the right of all children to be safe. We require all members of the school community including staff (including Invigilators), trustees, governors, supply staff and volunteers to share this commitment. Every member of the school community is responsible for contributing to a positive culture of safeguarding.

The aim of this policy is to provide staff, supply staff, trustees, governors, and volunteers with the framework they need to keep children in Thornton College safe and secure and to provide parents and carers with the information about how we will safeguard their children whilst in our care.

This policy has been developed in accordance with following legislation and guidance:

- Children Act 1989 (amended 2004)
- "Working Together to Safeguard Children 2018" - July 2018 [Working Together To Safeguard Children July 2018](#)

This policy was reviewed and amended February 2024

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- “Keeping Children Safe in Education”- statutory guidance for schools and further education colleges - Sept 2023
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1161273/Keeping_children_safe_in_education_2023_-_statutory_guidance_for_schools_and_colleges.pdf
- Information Sharing Guidance for Safeguarding Practitioners [Information Sharing Guidance](#) – DfE July 2018
- Children Missing Education; Statutory Guidance for Local Authorities - Sept 2016 [Children missing education - GOV.UK](#)
- Statutory Guidance issued under section 29 of the Counter Terrorism and Security Act - 2015 [Prevent Duty Guidance](#)
- The Equality Act - 2010 [Equality Act 2010: guidance - GOV.UK](#)
- What to do if you're worried a child is being abused - March 2015 [What to do if you are worried a child is being abused](#)
- Statutory guidance on FGM [Multi-agency Statutory Guidance on Female Genital Mutilation](#)

2.2. We believe clear governance and leadership is central to embedding a safeguarding culture. The Governing Body takes its responsibility seriously under **section 157 of the Education Act 2002** to safeguard and promote the welfare of children; working together with other agencies to ensure effective and robust arrangements are in place within our school to identify and support those children who are suffering harm or whom may be at risk of harm. Governors will ensure all staff at the school have read and understood their responsibilities pertaining to **Part 1, Part 5 and Annexe B of Keeping Children Safe in Education, Sept 2023**.

2.3. All staff are required to read and adhere to the **Staff Code of Conduct**.

2.4. Every member of the school community is responsible for contributing to a positive culture of safeguarding.

2.5. The school recognises that as well as risks to the welfare of children from within their families, children may be vulnerable to abuse or exploitation outside their homes and from other children. Staff must remain vigilant and alert to these potential risks.

2.6. The aims of this policy are:

2.6.1. To provide an environment in which children feel safe, secure, valued, and respected.

2.6.2. To ensure that senior leaders, teaching staff and non-teaching staff, supply staff, governors, and volunteers:

- Are aware of the need to safeguard and promote the wellbeing of children.
- Identify the need for early support.
- Promptly report concerns, in line with guidance from the Buckinghamshire Continuum of Need.
- Are trained to recognise signs and indicators of abuse.

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- 2.6.3. To provide systematic means of monitoring children known to be or thought to be at risk of harm and ensure contribution to assessments of need and support plans for those children.
- 2.6.4. To provide systematic means of monitoring children known to be or thought to be at risk of harm and ensure contribution to assessments of need and support plans for those children.
- 2.6.5. To ensure Thornton College has a clear system for communicating concerns both internally and with external agencies in line with the Working Together guidance.
- 2.6.6. To ensure the school has robust systems in place to accurately record safeguarding and child protection concerns.
- 2.6.7. To ensure that all staff appointed have been through the safer recruitment process and understand the principles of safer working practices as set out in our **Staff Code of Conduct**.
- 2.6.8. To ensure that any community users of our facilities have due regard to expectations of how they should maintain a safe environment, which supports children's wellbeing.
- 2.6.9. This policy is published on our website, <https://www.thorntoncollege.com/about-us/safeguarding/> and hard copies are available from the school office.

3. Responsibilities

- 3.1. All staff (including Invigilators), supply staff, volunteers, visitors, trustees, governors, and contractors understand safeguarding children is everyone's responsibility. Any person who receives a disclosure of abuse, an allegation, or suspects that abuse may have occurred must report it immediately to T Wilks (Designated Safeguarding Lead; DSL) or, in their absence, to Annette Woodruff, Jules Dixon or Caroline Thomas (Deputy DSLs). In the absence of all of the above, concerns will be brought to the attention of the most senior member of staff on site. Staff understand that if there is an immediate risk of harm then the police or First Response will be called directly, and the DSL will be updated at the earliest opportunity.
- 3.2 Staff must maintain a good working knowledge of the Buckinghamshire Continuum of Need [The Continuum of Need - Buckinghamshire Safeguarding Children Partnership \(buckssafeguarding.org.uk\)](https://www.buckssafeguarding.org.uk) and any updates and how it should be used to inform decision making regarding a referral to First Response.
- 3.3 Staff have the skills, knowledge and understanding to keep both looked after children and previously looked after children safe.
- 3.4 Staff understand vulnerability and that barriers exist when recognising abuse and neglect for children. Staff consider the following groups who may have increased vulnerability:
 - Young carers
 - Children with SEND

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- Children living with domestic abuse.
- Children whose parents suffer with poor mental health, including substance misuse.
- Criminal exploitation, including sexual exploitation, radicalisation, County Lines radicalisation and gang involvement .
- Looked after children and previously looked after children.
- Children who have a social worker.
- Privately fostered children.
- Asylum seekers.
- So-called Honour Based Violence, including FGM and forced marriage.
- Children who frequently go missing or whose attendance is a concern.
- Children who are part of the LGBTQ+ group.
- Children who are at risk of discrimination due to faith and belief, race, or ethnicity.

3.5. The Governing Body understands and fulfils its safeguarding responsibilities.

It must:

- 3.5.1 Ensure that the Head Teacher and the DSL create and maintain a strong, positive culture of safeguarding within the school.
- 3.5.2 Ensure that this policy reflects the unique features of the community we serve and the needs of the students attending our provision. This policy will be reviewed at least annually.
- 3.5.3 Regularly monitor and evaluate the effectiveness of this Child Protection Policy.
- 3.5.4 Appoint a Designated Safeguarding Lead (DSL), who is a member of the Senior Leadership Team (SLT) and has the required level of authority and also appoint at least one Deputy DSL. The Headteacher has overall responsibility for safeguarding within the school. The roles and responsibilities of the DSL are made explicit in that post-holders' job description. Although not the DSL, the Headteacher still maintains overall responsibility for safeguarding and child protection within the school.
- 3.5.5 Recognise the importance of the role of the DSL, ensuring they have sufficient time, training, skills, and resources to be effective. Refresher training must be attended every 2 years, in addition knowledge and skills must be refreshed at regular intervals, at least annually.
- 3.5.6 Ensure that all staff complete safeguarding training to include their roles and responsibilities with regards to the school IT systems online filtering and monitoring.
- 3.5.7 Ensure measures are in place for the governing body to have oversight of how the school's delivery against its safeguarding responsibilities is exercised and evidenced, to include reviewing online filtering and monitoring on a regular basis and at least annually. Ensure robust structures are in place to challenge the Head Teacher where there are any identified gaps in practice or procedures are not followed.
- 3.5.8 Recognise the vital contribution that the school can make in helping children to keep safe, through incorporation of safeguarding within the curriculum. This will also be taught through the PSHE curriculum and relevant issues through the Relationship Education (primary schools)

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- or Relationship Sex Education (secondary schools, mandatory from Sept. 2020). Ensure that through curriculum content and delivery children understand how to keep themselves safe.
- 3.5.9 Ensure that school is following the statutory RSE guidance – [Relationships and sex education \(RSE\) and health education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/relationships-and-sex-education-rse-and-health-education)
 - 3.5.10 Ensure safe and effective recruitment policies and disciplinary procedures are in place.
 - 3.5.11 Ensure resources are allocated to meet the needs of students requiring Child Protection or early intervention.
 - 3.5.12 Ensure the DSL completes an Annual Safeguarding Report for Governors and a copy is shared with the Education Safeguarding Advisory Service at Buckinghamshire Council.
- 3.6 It is the duty of the Chair of Governors (Sr Helen Mary Haigh) or, in her absence the Deputy Chair of Governors, Rosemary Kaye, to liaise with relevant agencies if any allegations are made against the Head Teacher. If there are concerns that issues are not being progressed in an expedient manner, staff/students/parents/carers should escalate concerns to the Local Authority Designated Officer (LADO) via First Response.
- 3.7 The Governing body must ensure that procedures are in place to manage safeguarding concerns of allegations against staff, supply staff, governors, volunteers, visitors or contractors where they could pose a risk of harm to children. The guidance in Part four of Keeping Children Safe in Education 2021 must be followed if there were any such concerns. [Keeping children safe in education 2023.pdf](#)
- 3.8. The Governing Body must ensure that a named teacher (Tracey Wilks) is designated for Children Looked After and that an up-to-date list of children who are subject to a Care Order or are accommodated by the County Council is regularly reviewed and updated. The school must work with the Virtual Schools Team to support the educational attainment for those children who are Looked After.
- 3.9. The governing body has a statutory duty to appoint a Nominated Governor for safeguarding. The Nominated Governor (Rosemary Kaye) must be familiar with [Buckinghamshire Safeguarding Children Partnership](#) procedures, Local Authority procedures and guidance issued by the Department for Education. The Nominated Governor must:
- 3.9.1. Work with the DSL to produce the Child Protection Policy annually.
 - 3.9.2. Undertake appropriate safeguarding training, to include Prevent training.
 - 3.9.3. Ensure child protection is regularly discussed at Governing Body meetings
 - 3.9.4. Meet at least termly with the DSL to review and monitor the school's delivery on its safeguarding responsibilities and to review the Single Central Record and complete an audit of the staff files
 - 3.9.5. Take responsibility to ensure that the school is meeting safeguarding requirements as set out in the ISI inspection guidance:
- <https://www.isi.net/safeguarding/statutory-guidance>
- 3.10. All governors must complete safeguarding training on appointment, to also include Prevent training. This training must be regularly updated in line with national or local guidance.

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3.11. The governing body must ensure that relevant staff have due regard to the relevant data protection principles set out in the Data Protection Act 2018 and the GDPR, which allow them to share or withhold personal information when it is necessary to safeguard any child.

3.12. We have a Designated Safeguarding Lead (DSL), T Wilks, who is responsible for:

3.12.1. Creating a culture of safeguarding within the school, where children are protected from harm. Ensuring all staff receive an effective induction and ongoing training to support them to recognise and report any concerns.

3.12.2. Ensuring children receive the right help at the right time using the Buckinghamshire Continuum of Need document.

3.12.3. Ensuring referrals to partner agencies are followed up in writing including referrals to First Response and Early Help (FSS)

3.12.4. Establishing a safe and secure system for recording and recording safeguarding and child protection records. These records are audited regularly to ensure all actions are completed. Thornton College uses CPOMS to record all safeguarding and child protection records.

3.12.5. Ensuring all child protection files are held separately from students' educational records.

3.12.6. Maintaining the record for staff safeguarding training. We use Parago software to record that all staff sign to confirm they have attended training and that they have read and understood the required parts of KCSIE. Ensuring that the safeguarding team contact details and photos are displayed in prominent areas around the school and also on the website.

3.12.7. Being the designated point of contact for staff to be able to discuss and share their concerns.

3.12.8 Ensuring the online filtering and monitoring system is reviewed regularly, at least annually

3.12.9. Being available to staff and outside agencies during school hour and term time for consultation on safeguarding concerns raised.

Having responsibility to ensure that cover is arranged outside of term-time during working hours with the expectation that all meetings in school holidays are attended including those convened at short notice.

During residential and extended school hours, ensuring arrangements are in place for staff to have a point of contact.

3.12.10. Contributing effectively to multiagency working, for the safeguarding and promotion of the welfare of children, as set out in Working Together.

3.12.11. Providing the Head Teacher (L Shaw), with an annual report for the Governing Body, detailing how school delivers on its safeguarding responsibilities and any child protection issues within the school. The Governing Body will use this report to fulfil its responsibility to provide the Local Authority with information about their safeguarding policies and procedures.

3.12.12 Meeting regularly, at least once a term, with the Nominated Governor, Mrs R Kaye to share oversight of the safeguarding provision within the setting, monitor performance

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and develop plans to rectify any gaps in policy or procedure. A record should be kept of these meetings. Providing Dr L Shaw with up-to-date information of any issues.

3.12.13 Meeting the statutory requirement to keep up to date with knowledge, enabling them to fulfil their role, including attending mandatory and any other additional relevant training.

3.12.14 Referring immediately to the Police, using the guidance, When to call the police, [2491596 C&YP schools guides.indd \(npcc.police.uk\)](#), for any cases where a criminal offence may have been committed or risk of harm is imminent.

4. Procedures

4.1. Our school procedures for all staff, supply staff, governors, volunteers, visitors and contractors in safeguarding and protecting children from harm are in line with Buckinghamshire Council and [Buckinghamshire Safeguarding Children Partnership](#) safeguarding procedures, **“Working Together to Safeguard Children 2018”** [Working Together to Safeguard Children 2018](#), **“Keeping Children Safe in Education 2023”** [Keeping children safe in education 2023.pdf](#) and statutory guidance issued under section 29 of the **Counter-Terrorism and Security Act 2015** [Revised Prevent duty guidance: for England and Wales - GOV.UK \(www.gov.uk\)](#).

We will ensure:

4.2. Visitors must be:

- Clearly identified with visitor/contractor passes.
- Met and directed by school staff/representatives.
- Signed in and out of the school-by-school staff.
- Directed to a poster informing them of how to report a concern
- Given restricted access to only specific areas of the school, as appropriate.
- Escorted by a member of staff/representative as required.
- Given access to students restricted to the purpose of their visit.
- Will have up to date DBS if required, for example, unaccompanied contractors working in school when students are present.

4.3. All members of staff must complete regular safeguarding training, attend regular refresher training, and partake in any training opportunities arranged or delivered by the DSL. Updates must be cascaded to all staff throughout the year, at a minimum of once a year. All new staff will receive safeguarding and child protection training on induction including online safety.

4.4. All parents/carers must be made aware of the school’s responsibilities in regard to child protection procedures through this policy.

All staff, including supply staff, must follow the reporting procedures as follows when reporting any child protection concerns:

- Staff must ensure the child is in a safe place and in receipt of support
- Staff must initially make a verbal report to the DSL to alert them to the safeguarding/child protection concern
- Staff must make a written report using the school record keeping process which in Thornton College is CPOMS.

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- Staff must ensure the time and date of the incident is recorded
 - A factual account of the incident must be recorded, including who was involved, what was said/seen/heard, where the incident took place and any actual words or phrases used by the child
 - Use a body map, where appropriate, to record any injuries seen or reported by the child
 - Staff must sign and date the report giving details of their role within school
 - The DSL must record when the report was passed to them and what action was taken alongside any outcomes achieved on CPOMS
 - The DSL must ensure the child's wishes and feelings are taken into consideration when deciding on next steps.
- 4.5.** Through our **Attendance Policy**, we have a robust system for monitoring attendance and will act to address absenteeism with parents/carers and students promptly and identify any safeguarding issues arising. **Parents are contacted that morning if there are any unexplained absences.**
- 4.6.** All children attending our school are required to have a minimum of two identified emergency contacts.
- 4.7** Any student whose absence is causing concern and where it has not been possible to make contact with a parent/carers, will be reported as a Child Missing in Education (CME) using the **Buckinghamshire CME Protocol**.
- 4.8.** Any absence of a student who is currently subject to a child protection or child in need plan is immediately referred to their social worker.
- 4.9.** Parents/carers must inform school if there are any changes to a student's living arrangement. Thornton College has a mandatory duty to inform the local authority, via the First Response Team, if a child under the age of 16 years old lives with someone other than their parent, stepparent, aunt, uncle, or grandparent for a period of more than 28 days. This is defined as being a private fostering arrangement.
- 4.10.** All staff, parents/carers and children are made aware of the school's escalation process, outlined in our Complaints Policy, which can be activated in the event of concerns not being resolved after the first point of contact.
- 4.11.** Our lettings policy reflects the ongoing responsibility the school has for safeguarding those using the site outside of normal school hours, ensuring the suitability of adults working with children on school sites at any time. School must have sight of the up-to-date **Child Protection Policy** of any organisation hiring the school's facilities.
- 4.12.** The school operates **Safer Recruitment** practices. Governors ensure that staff who are involved in the recruitment process have received safer recruitment training. Robust procedures are in place in order to prevent and deter people who are unsuitable to work with children, from applying or being employed by the school.
- 4.13.** Allegations against members of staff, supply staff, governors, including volunteers and contractors are referred to the Local Authority Designated Officer (LADO).
- 4.14.** Our procedures are reviewed and updated annually as a minimum, or as there are changes to legislation.

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- 4.15. Children are encouraged to share any concerns or worries with staff and are regularly reminded about this as part of the curriculum, assemblies, and tutor time.

5. Record-Keeping and Retention of Records

- 5.1. When a disclosure of abuse or an allegation against a member of staff or volunteer has been made, our school must have a record of this. These records are maintained in a way that is confidential and secure, in accordance with our **Low Level Concerns Policy** and **Data Protection Legislation**.
- 5.2. Records should include:
- a clear and comprehensive summary of the concern;
A clear, detailed, and robust chronology must be maintained.
 - details of how the concern was followed up and resolved;
 - a note of any action taken, decisions reached and the outcome.
- 5.3. There is a statutory requirement for our school to pass any child protection records to the student's next school. This must take place within 5 days of the 1st day of term or within 5 days of an in-year transfer. There must be an auditable system in place to evidence this has taken place. Safeguarding records will be sent separately from the general files using CPOMS or as a printed CPOMS report to be emailed with a separate password or as a hard copy if requested if the receiving school does not use CPOMS.
- 5.4. The last statutory school maintains child protection files until a student reaches the age of 25 years, therefore if the transfer school is unknown, or a student is going to be electively home educated, any child protection files will remain at our school in a secure location. Child protection files will only be destroyed when the student reaches their 25th birthday.
- 5.5. We have a robust system for reviewing our archived information held. Our files are stored and disposed of in line with GDPR protocols, local and national policies.

6. Alternative Provision

When a child is accessing an alternative provision, the school will ensure that the provision has secure and robust safeguarding arrangements in place. A member of staff, from school, will regularly visit the provision and meet with the child to hear their voice.

7. Confidentiality

- 7.1.1 We recognise that all matters relating to child protection are confidential.
- 7.1.2 The Headteacher or Designated Safeguarding Lead must only disclose personal information about a student to other members of staff on a need-to-know basis.
- 7.1.3 Staff must not keep duplicate or personal records of child protection concerns. All information must be reported to the Designated Safeguarding Lead and securely stored on CPOMS, separate from the student records.
- 7.1.4 All staff are aware they cannot promise a child to keep secrets which might compromise the child's safety or well-being or that of another as they have a duty to share. Staff must,

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however, reassure the child that information will only be shared with those people who will be able to help them and therefore need to know.

- 7.1.5 We will always undertake to share our intention to refer a child to Social Care (First Response) with their parent/carer's consent, unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with First Response on this point. We recognise that GDPR must not be a barrier for sharing information regarding safeguarding concerns in line with 'Working Together.'

Gov guidance link: <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

8 Recognising abuse

In the event of a child disclosing abuse staff must:

- 8.1 Refer to the following guidance:

"What to do if You're Worried a Child is Being Abused" [Stat guidance template \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

- 8.2 Listen to the child, allowing the child to tell what has happened in their own way, and at their own pace. Staff must not interrupt a child who is freely recalling significant events. Remain calm. Be reassuring and supportive, endeavouring not to respond emotionally.
- 8.3 Not ask leading questions. Staff are reminded to ask questions only when seeking clarification about something the child may have said or to gain sufficient information to know that this is a safeguarding concern. Staff are trained to use TED; Tell, Explain, Describe.
- 8.4 Make an accurate record of what they have seen/heard using CPOMS, recording; times, dates or locations mentioned, using as many words and expressions used by the child, as possible.
Staff must not substitute anatomically correct names for body part names used by the child.
- 8.5 Reassure the child that they did the right thing in telling someone.
- 8.6 Staff must explain to the child what will happen next and the need for the information to be shared with the DSL.
- 8.7 In the unlikely event the DSL and deputy DSLs not being available, staff are aware they must share concerns with the most senior member of staff.
- 8.8 **If there is immediate risk of harm to a child, staff will NOT DELAY and will ring 999.**
- 8.9 The child will be monitored/accompanied at all times following a disclosure, until a plan is agreed as to how best they can be safeguarded.
- 8.10 Following a report of concerns the DSL must:
- 8.10.1 Decide whether there are sufficient grounds for suspecting significant harm, in which case a referral must be made to First Response and the police if it is appropriate,

This policy was reviewed and amended February 2024

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referring to the guidance, When to call the police, [2491596 C&YP schools guides.indd \(npcc.police.uk\)](#) The rationale for this decision should be recorded by the DSL.

- 8.10.2** School should try to discuss any concerns about a child's welfare with parents/carers and, where possible, obtain consent before making a referral to First Response. However, in accordance with DfE guidance, this should only be done when it will not place the child at increased risk or could impact a police investigation. Where there are doubts or reservations about involving the child's family, the DSL should clarify with First Response or the police whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation. The child's views should also be taken into account.
- 8.10.3** If there are grounds to suspect a child is suffering or is likely to suffer significant harm, the DSL (or Deputy) must contact First Response by telephone immediately, in the ~~the~~ instance and then complete the Multi Agency Referral Form (MARF).
- 8.10.4** If the child is in immediate danger and urgent protective action is required, the police must be called via 999. The DSL must then notify First Response of the occurrence and what action has been taken, and to take advice about informing parents/carers.
- 8.10.5** If a child needs urgent medical attention, the DSL (or Deputy) should call an ambulance via 999. DSL to contact First Response; advice to be sought from First Response about informing parents/carers.

9 Multi-agency working

- 9.1** Thornton College know what the role of schools is, as a relevant agency, within the three safeguarding partner arrangements and as required, will contribute to multi-agency working, in line with the statutory guidance 'Working Together to Safeguard Children'.
- 9.2** When named as a relevant agency and involved in safeguarding arrangements, Thornton College will co-operate alongside other agencies with the published arrangements.
- 9.3** Thornton College will contribute to inter-agency plans to offer children support of early help and those children supported through child protection plans. Thornton College will allow access for and work with children's social care to conduct or consider whether to conduct a section 17 or section 47 assessment.

If, following a referral, the situation is not improving for the child, the DSL will follow the escalation process.

10 Supporting Staff

- 10.1** We recognise that staff becoming involved with a child who has suffered harm, or appears to be likely to suffer harm, could find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support if necessary. This could be provided by the Headteacher or another trusted colleague, Occupational Health, and/or a representative of a professional body, Employee Assistance Programme or trade union, as appropriate.

This policy was reviewed and amended February 2024

This policy is to be reviewed by 31st August 2024

11 Safer Recruitment

Thornton College follows the guidance as set out in the KCSIE together with the information provided by the Bucks Safeguarding Children Partnership to ensure that all the appropriate checks have been carried out on new staff and volunteers.

<https://www.buckssafeguarding.org.uk/childrenpartnership/professionals/lado/>

12. Allegations against staff, supply staff, volunteers, and contractors (including Governors)

12.1. Here at Thornton College, we have our own procedures for managing concerns and/or allegations against those working in school to include staff, supply teacher, volunteers, and contractors.

12.2. KCSIE 2023 - Part four contains comprehensive guidance covering the two levels of allegations/concern:

1. Allegations that may meet the harms threshold
2. Allegations/concerns that do not meet the harms threshold- referred to for the purpose of this guidance as 'low level concerns'.

12.3 All school staff, supply staff, volunteers and contractors must take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents/carers to be conducted, where possible, in view of other adults

12.4 We understand that a student may make an allegation against a member of staff, member of supply staff, volunteer, or contractor. If such an allegation is made, the member of staff notified of the allegation will immediately inform the Headteacher or the most senior teacher if the Headteacher is not present. If the allegation is made against the Headteacher, the Chair of Governors must be informed.

12.5 At Thornton College we recognise that an allegation may be made if a member of staff, a member of supply staff, a volunteer or a contractor has:

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

12.6 The Head Teacher (or Chair of Governors where the allegation is in reference to the Head Teacher) on all such occasions must immediately discuss the content of the allegation with the Local Authority Designated Officer (LADO).

12.7 The Head Teacher must:

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- 12.7.1 Follow all advice given by the LADO throughout the investigation process, including how to manage the staff member, supply staff member, volunteer, or contractor against whom the allegation is made, as well as supporting other staff, supply staff members, volunteers, and contractors within the workplace.
- 12.7.2 Follow all advice given by the LADO relating to supporting the child making the allegation, as well as other children connected to the organisation.
- 12.7.3 Ensure feedback is provided to the LADO about the outcome of any internal investigations.
- 12.8 The school will follow the local safeguarding procedures for managing allegations against staff, supply staff, volunteers, and contractors.
- 12.9 If the allegation is made against a member of staff supplied by an external agency, the agency will be kept fully informed and involved in any enquiries from the LADO.
- 12.10 Suspension of the member of staff against whom an allegation has been made needs careful consideration and, if necessary, we will consult with the LADO in making this decision. Guidance will also be sought from HR.
- 12.11 Our lettings agreement for other users requires that the organiser will follow the Buckinghamshire Council procedures for managing allegations against staff and where necessary, the suspension of adults from school premises.
- 12.12 Should an individual staff member, supply staff member, governor, volunteer, or contractor be involved in child protection, other safeguarding procedures, or Police investigations in relation to abuse or neglect, they must immediately inform the Head Teacher. In these circumstances, the school will need to assess whether there is any potential for risk of transfer to the workplace and the individual's own work with children.

13 Whistleblowing

- 13.1 We have a **Whistleblowing Policy** which is found within the document 'Staff Concern Policy and Procedure.' Staff are required to familiarise themselves with this document during their induction period.
- 13.2 All staff must be aware of their duty to raise concerns about the attitude or actions of colleagues and report their concerns to the Headteacher or Chair of Governors
- 13.3 Low Level Concerns

At Thornton College, all staff know they have a responsibility to share any concerns, no matter how small, about any adults working in school. Staff are made aware of what a low-level concern might look like using the examples from the KCSIE page 10. All reports will be dealt with effectively and recorded, enabling the school to identify any concerning behaviour and support any adults becoming the subject of false low-level concerns.

This policy was reviewed and amended February 2024
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14. Physical intervention/Positive handling

Our policy on physical intervention/positive handling by staff is set out separately, as part of our Behaviour Policy.

15. Anti-Bullying

Anti-Bullying is discussed within the Anti-Bullying Policy and our Behaviour Policy and measures are in place to prevent and respond to all forms of bullying, which acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

16. Discriminatory Incidents

In line with the **Equalities Act 2010**, our **Equalities Policy** addresses all forms of discriminatory incidents.

17. Health and Safety

- 17.1** We recognise the importance of safeguarding students throughout the school day and within our Boarding Houses. Our **Health and Safety policy** reflects the consideration we give to the protection of our children, both physically and emotionally, within the school environment.
- 17.2** Part of the safeguarding measures we have in place include the safe dropping off and collection of students at the start and end of the school day.
- 17.3** Students who leave the site during the school day may do so only with the written permission of a parent/carer and are collected by an authorised adult where appropriate. School should be notified by the parents/carers regarding whom they have authorised for this task. Boarders who leave the site outside of school hours must have the permission of the House Mistress and sign in and out when leaving and returning.
- 17.4** Students who attend Late Stay are collected by a parent or nominated adult who must go to reception and give the student's name. Reception staff then notify the member of staff on duty in Late Stay who sends the child to reception to meet with their parents or nominated adult.
- 17.5** In the event of a student going missing during the course of the school day we will carry out immediate checks to ensure the student is not on site, we will then make contact with the student's parents/carers and inform the police.
- 17.6** When the school is hired out to a 3rd party provider, we ensure that they have appropriate arrangements in place to keep children safe through the sight of their child protection and safer recruitment procedures.
- 17.7** At Thornton College, we ensure that we are aware of the content of materials used by any visiting speakers prior to their visit.

This policy was reviewed and amended February 2024

This policy is to be reviewed by 31st August 2024

18 Prevent Duty

- 18.1 We are aware of the Prevent Duty under **Section 26 of the Counter Terrorism and Security Act 2015** to protect young people from being drawn into terrorism.
- 18.2 All school staff and governors have completed Prevent training and we have training logs to evidence this.
- 18.3 We have in place and monitor appropriate web filtering systems.
- 18.4 The DSLs and senior leaders are familiar with their duties under The Prevent Duty Guidance: [Prevent-duty-guidance-for-england-and-wales-accessible](#)

19. Online Safety

- 19.1 All staff are aware of the school policy for **Online-Safety** (Appendix 4 of this policy also outlines our online safety policy in the event of a government directed lockdown and our framework for an online safety culture) which sets out our expectations relating to:
- Creating a safer online learning environment,
 - Giving everyone the skills, knowledge and understanding to help children stay safe on-line, question the information they are accessing and support the development of critical thinking,
 - Inspiring safe and responsible use of mobile technologies, to combat behaviours on-line which may make students vulnerable, including the sending of nude or semi-nude images.
 - Use of camera equipment, including smart phones.
 - What steps to take if there are concerns and where to go for help.
 - Staff use of social media as set out in the **Staff Code of Conduct**.
- 19.2 Cyber-bullying by children, via texts, social media, and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.
- 19.3 School is aware of the risks posed by children in the online world; in particular non-age-appropriate content linked to self-harm, suicide, grooming and radicalisation.
- 19.4 Students, staff and parents/carers are supported to understand the risks posed by:
- the CONTENT accessed by students.
 - their CONDUCT on-line
 - who they have CONTACT within the digital world.
 - COMMERCE - risks such as online gambling, inappropriate advertising, phishing and or financial scams.
 - Further information can be found in our IT Acceptable Use and E-Safety policy.
- 19.5 Thornton College has online filtering and monitoring systems in place to ensure children are safeguarded from potentially harmful online material. These systems are regularly monitored, at least annually, by the DSL, IT provider and nominated governor. A record will be kept of these reviews.
- 19.6 Thornton College will follow the advice as given by the government, to advise and support children with any online learning taking place at home to ensure this is done so safely.

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Appendix 3 outlines our online safety policy in the event of a government directed lockdown and our framework for an online safety culture.

- 19.7 Mobile Phone usage is addressed within our Behaviour Policy** which sets out the acceptable use of mobile technologies by students whilst onsite. This includes sanctions which will be applied when these boundaries are not adhered to.
- 19.8 The use of mobile phones within the EYFS setting is prohibited. EYFS students are not allowed to bring mobile phones into school and there are notices in the setting to advise parents and visitors that phones and cameras must not be used.**
- 19.9 The use of mobile technology by visitors to our site is covered in the IT Acceptable Use and E-Safety Policy**
- 19.10 Staff use of mobile technology whilst on site is set out in the Staff Code of Conduct and in the IT Acceptable Use and E-Safety Policy**
- 19.11 All staff receive awareness training in order to understand the risks children are exposed to, on induction and at least once per academic year.**

20. Sending nude or semi-nude images

Sending nude images or semi-nude images, is one of a number of 'risk-taking' behaviours associated with the use of digital technologies, social media, or the internet. It is accepted that children experiment and challenge boundaries and therefore the risks associated with 'online' activity can never be completely eliminated.

Further advice and guidance can be found using the link below:

[Sharing nudes and semi-nudes](#)

- 20.1 Staff, students, and parents/carers are supported, via training, to understand the creation and sharing of sexual imagery, such as photos or videos, of under 18s is illegal. This includes images of students themselves if they are under the age of 18.
- 20.2 Any youth produced sexual imagery disclosures will follow the normal safeguarding practices and protocols for our school. We will also use the guidelines for responding to incidents, as set out in:

[Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](#) produced by the UK Council for Internet Safety.

21. Child-on-Child Abuse including sexual violence and sexual harassment

- 21.1 Thornton College believes that all children have a right to attend school and learn in a safe environment free from harm by both adults and other students. We recognise that some safeguarding concerns can occur via child-on-child abuse.
- 21.2 All staff operate a zero-tolerance policy to child-on-child abuse and will not pass off incidents as 'banter' or 'just growing up.'
- 21.3 All staff recognise that child on child issues may include, but may not be limited to:

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- Bullying (including cyber bullying)
- Racial abuse
- Physical abuse, such as hitting, hair-pulling, shaking, biting or other forms of physical harm.
- Sexual violence and sexual harassment
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Abuse related to sexual orientation or identity.
- Sending nude or semi-nude images (consensual & non-consensual)
- Up skirting and initiation/hazing type violence and rituals
- Emotional abuse
- Abuse within intimate partner relationships

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. Incidents of child-on-child abuse must be reported to the DSL, who will refer to the appropriate agencies as required.

21.4 The following will be considered when dealing with incidents:

- Whether there is a large difference in power between the victim and perpetrator i.e., size, age, ability, perceived social status or vulnerabilities, including SEND, CP/CIN or CLA
- Whether the perpetrator has previously tried to harm or intimidate students
- Any concerns about the intentions of the alleged perpetrator
- How to best support and protect the victim and alleged perpetrator as well as any other children who may have been involved or impacted.
- Risk assessments and safety planning will be created in conjunction with external professionals.

21.5 In order to minimise the risk of child-on-child abuse taking place, school must:

- Deliver RE/RSE/PSHE to include teaching students about how to keep safe and understanding what acceptable behaviour looks like
- Ensure that students know that all members of staff will listen to them if they have concerns and will act upon them.
- Have systems in place for any student to be able to voice concerns.
- Develop robust risk assessments if appropriate.
- Refer to any other relevant policies when dealing with incidents, such as the **Behaviour Policy** and/or the **Anti-Bullying Policy**.

21.6 We recognise that 'Upskirting' involves taking a photograph under an individual's clothing without their knowledge. We understand that it causes the victim distress and humiliation and that any gender can be a victim. Staff recognise that 'Upskirting' is a criminal offence and must promptly report any such incidents to the Headteacher, DSL or most senior member of staff.

21.7 Reference will be made to the following government guidance and part 5 of the **Keeping Children Safe in Education, Sept 2023** to ensure that all staff have an understanding of the serious nature of sexual violence and sexual harassment between children in schools. The school ensure that they keep up with current

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legislation and practice referring to trusted advisors such as BSCP, , NSPCC, ISI and Ofsted guidance.

- 21.8 . Sexual violence and sexual harassment can occur between two children of **any age and sex**. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. This can occur online, face to face (both physically and verbally) and can take place inside or outside of school. As set out in Part five of the KCSIE 2023, all staff maintain an attitude of **‘it could happen here’** and it is never acceptable.
- 21.9 All staff have a responsibility to address inappropriate behaviour in a timely manner, however, seemingly insignificant it may appear.
- 21.10 . All victims will be reassured that they are being taken seriously and that they will be supported and kept safe. No child will ever be made to feel ashamed for making a report or that they are creating a problem for our school.
- 21.11 Support will be given to both victims and perpetrators.

22 Cultural Issues

- 22.1 As a school we are aware of the cultural diversity of the community around us and work sensitively to address the unique culture of our students and their families as they relate to safeguarding and child protection. This includes children at risk of harm from abuse arising from culture, ethnicity, faith, and belief on the part of their parent, carer, or wider community.
- 22.2 Staff must report concerns about abuse linked to culture, faith, and beliefs in the same way as other child protection concerns.

23 So-Called ‘Honour’ Based Abuse

- 23.1 Staff at our school understand there is a legal duty to report known cases of Female Genital Mutilation (FGM) and So Called ‘Honour’ Based Abuse to the police and they will do this with the support of the DSL. [Mandatory reporting of female genital mutilation: procedural information - GOV.UK](#)
- 23.2 Our school is aware of the need to respond to concerns relating to forced marriage and understand that it is illegal, a form of child abuse and a breach of children’s rights. We recognise some students, due to capacity or additional learning needs, may not be able to give an informed consent and this will be dealt with under our child protection processes. Thornton College staff can contact the Forced Marriage Unit if they need advice or information. Contact 020 7008 0151 fm@fco.gov.uk
- 23.3 We are aware of the signs of FGM [Female genital mutilation \(FGM\) | NSPCC](#)
- 23.4 We promote awareness through training and access to resources, ensuring that the signs and indicators are known and recognised by staff.

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- 23.5 Any suspicions or concerns for forced marriage are reported to the DSL who will refer to First Response or the police if emergency action is required.

24 Contextual Safeguarding and extra-familial harms

- 24.1 Contextual Safeguarding is an approach to understanding, and responding to, children's experiences of significant harm beyond their families. It recognises that the different relationships that children form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers may have little influence over these contexts, and children's experiences of extra-familial abuse can undermine parent/carer-children's relationships.
- 24.2 At Thornton College, all staff recognise that students may encounter safeguarding incidents that happen outside of school and can occur between children outside of this environment. We will respond to such concerns, reporting to the appropriate agencies in order to support and protect the student.
- 24.3 All staff and especially the DSLs, will consider the context of incidents that occur outside of school to establish if situations outside of their families may be putting the student's welfare and safety at risk of abuse or exploitation, including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
- 24.4 Children who may be alleged perpetrators will also be supported to understand the impact of contextual issues on their safety and welfare.
- 24.5 In such cases the individual needs and vulnerabilities of each child will be considered.

Further guidance can be found at: <https://contextualsafeguarding.org.uk/>

25 Serious Violence

- 25.1 All staff are aware of signs and indicators which may signal that children are at risk from, or are involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in well-being or signs of assault or unexplained injuries. Staff are aware that unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.
- 25.2 At Thornton College we are aware of the range risk factors which increase the likelihood of involvement in serious violence such as having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending behaviour such as theft or robbery. School will take appropriate measures to manage any situations arising. [Preventing youth violence and gang involvement - Practical advice for schools and colleges \(publishing.service.gov.uk\)](#).

This policy was reviewed and amended February 2024
This policy is to be reviewed by 31st August 2024

26 Domestic Abuse

All staff recognise that children can witness and be affected by domestic abuse that occurs within their home between family members. They may also experience abuse within their own intimate relationships, referred to as 'teenage relationship abuse' and can suffer long lasting emotional and psychological effects. Staff must report any concerns using the school's safeguarding procedures.

27 Children who need a social worker (Child Protection and Child in Need Plans)

- 27.1.** Staff recognise that children may have a social worker due to safeguarding or welfare needs and this can cause them to have barriers with attendance, behaviour, learning and mental health.
- 27.2.** Thornton College will share information with a social worker for any child whom they are supporting to ensure decisions are made in the best interests of the child.
- 27.3.** Informed decisions will be made by staff with regards to safeguarding for those children who are being supported by a social worker.
- 27.4** The Virtual School lead the support for this cohort of children and Thornton College will work in partnership with them and the Local Authority to improve outcomes for these children.

28. Mental Health

- 28.1** At Thornton College, we are aware that mental health problems can be an indicator that a child has suffered or may be at risk of suffering abuse, neglect, or exploitation.
- 28.2** Staff recognise that traumatic adverse childhood experiences can have lasting impact throughout a child's life, and this can impact on mental health, behaviour, and education.
- 28.3** Staff will report any mental health concern that is linked to a safeguarding concern to the DSL. Tracey Wilks has undertaken the training for Designated Safeguarding Lead – Mental Health (DSL-MH) and 16 members of staff in key areas of the school have undertaken the Mental Health First Aid training.
- 28.4** Where there are concerns for a child's mental health Thornton College will support parents to seek advice from a trained professional, who would be able to make a diagnosis of a mental health problem. T Wilks is the Mental Health Lead and there are a number of staff who are trained as MHFA.

[Mental health and behaviour in schools \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

29 Looked After Children

- 29.1 .** Thornton College has a named Designated Teacher (DT), T Wilks, who is responsible for promoting the education achievement and well-being for LAC and previously LAC children.

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- 29.2** The Virtual School, who is responsible for overseeing the progress of this group of children, work in partnership with the DT and other agencies, supporting them to promote better outcomes for these children.

30 Children with family members in prison

Children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. School will access support for any affected children through The National Information Centre on Children of Offenders (NICCO), who can provide information designed to support professionals working with offenders and their children.

[NICCO](#)

31. Homelessness

Thornton College recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare and that some 16- and 17-year-olds could be living independently from their parents or guardians. If there are indicators that a family or individual are at risk, school will seek timely support from the local authority.

32. Modern Slavery and the National referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. If school are concerned that a child is being affected by modern slavery they will refer to the home office guidance for further information on the indicators that someone may be a victim, what support is available to victims and how to refer them to the NRM, whilst also seeking support from the local authority.

[Modern slavery: how to identify and support victims - GOV.UK \(www.gov.uk\)](#)

33. Allegations against students

If an allegation is made against a student, the school will follow the procedures in the Behaviour Policy with regards to sanctions that may need to be applied.

Where there is a risk of significant harm, a child-on-child referral will be made to Children's Services for either victim, perpetrator or both.

If it is necessary for a child to be interviewed by the police, or other authorities, school will ensure that parents/carers are informed as soon as possible, following advice from external agencies and that the child is supported by an appropriate adult during the interview. The safety and welfare of the child will always be carefully considered by school.

Appendix 1

Everyone who works with children has a duty to safeguard and promote their welfare. They should be aware of the signs and indicators of abuse and know what to do and to whom to speak if they become concerned about a child or if a child discloses to them.

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The following is intended as a reference for school staff and parents/carers if they become concerned that a child is suffering or likely to suffer significant harm.

The Children Act 1989 defines abuse as when a child is suffering or is likely to suffer 'significant harm'. Harm means ill treatment or the impairment of health or development. Four categories of abuse are identified:

Categories of Abuse

Child abuse is a form of maltreatment. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

Physical Abuse

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

Emotional Abuse

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

Sexual Abuse

Involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

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

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- a) provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- b) protect a child from physical and emotional harm or danger
- c) ensure adequate supervision (including the use of inadequate caregivers)
- d) ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Exploitation

Exploitation is a form of child abuse and may take a number of forms:

Child Sexual Exploitation (CSE) and child Criminal Exploitation (CCE)

Both CSE and CCE 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 sexual or criminal activity, in 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. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Taken from – **"Keeping Children Safe in Education 2022"**.

[Home Office – Serious Violence Strategy, April 2018 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/682222/serious_violence_strategy.pdf)

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line." This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store, and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Taken from **"Keeping Children Safe in Education 2022"**

Extremism

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Harmful sexual behaviour (HSB)

Children's sexual behaviour ranges, from normal and developmental expected to inappropriate, problematic, abusive, and violent. The inappropriate, problematic, abusive, and violent behaviour can cause developmental damage and is referred to as "Harmful Sexual Behaviour" (HSB).

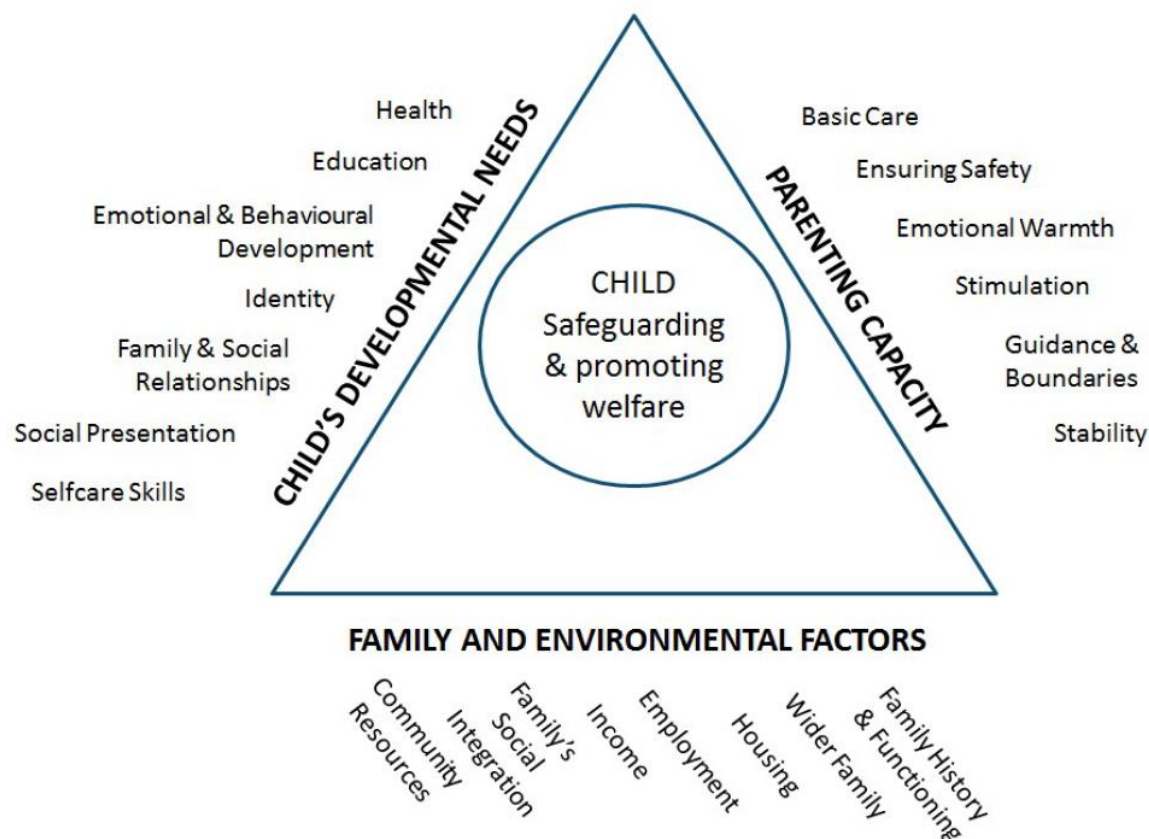
This policy was reviewed and amended February 2024

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Appendix 2:

Assessment Framework

(From Working Together to Safeguard Children, July 2018)



Every assessment should draw together relevant information gathered from the child and their family and from relevant practitioners including teachers and school staff, early years workers, health practitioners, the police and adult social care.

Every assessment of a child should reflect the unique characteristics of the child within their family and community context.

Each child whose referral has been accepted by children's social care should have their individual needs assessed, including an analysis of the parental capacity to meet those needs, whether they arise from issues within the family or the wider community.

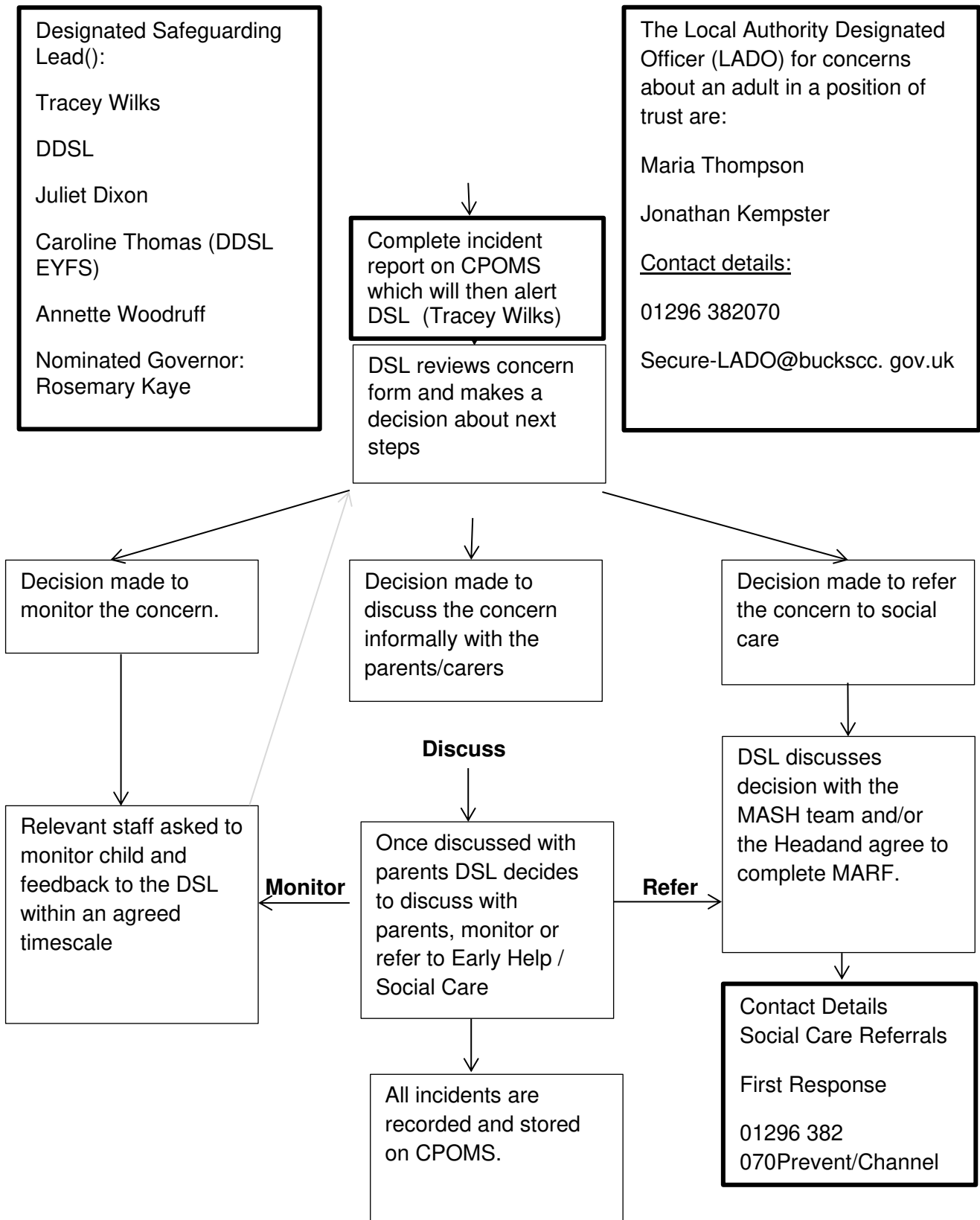
Frequently, more than one child from the same family is referred and siblings within the family should always be considered.

This policy was reviewed and amended February 2024

This policy is to be reviewed by 31st August 2024

Appendix 3:

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD



This policy was reviewed and amended February 2024
This policy is to be reviewed by 31st August 2024

Appendix 4: Online safety including online learning in the event of a lockdown.

Policy Overview:

The purpose of this policy is to safeguard and protect all members of Thornton College online community by providing a framework to promote and maintain a safe, effective, and responsive online safety culture. The policy is applicable to all members of Thornton College. This includes staff, students, volunteers, parents/carers, visitors, and community users who have access to and are users of Thornton College digital technology systems, both internally and externally.

References:

Department for Education (DfE) (2020) Keeping Children Safe in Education: statutory guidance for schools and colleges. London: DfE.

Department for Education (DfE) (2020) Safeguarding and remote education during coronavirus (COVID-19): London: DfE

Department for Education (DfE) (2019) Teaching online safety in school: guidance supporting schools to teach their students how to stay safe online, within new and existing school subjects. London: DfE.

Department for Education (DfE) (2018) Working together to safeguard children. London: DfE

Department for Education (2014) Cyberbullying: Advice for headteachers and school staff. London: DfE.

Children Act 1989

Children Act 2004

This policy was reviewed and amended February 2024

This policy is to be reviewed by 31st August 2024

Communications Act 2003

Computer Misuse Act 1990

Criminal Justice and Courts Act 2015

Data Protection Act 1998

Data Protection Act 2018

Education Act 2011

Education and Inspections Act 2006

Freedom of Information Act 2000

Malicious Communications Act 1988

Serious Crime Act 2015

Voyeurism (Offences) Act 2019

This policy links with other policies and practices

- Safeguarding, Child Protection Policy
- Anti-bullying Policy
- Staff Concern Policy and Procedure
- Behaviour Policy
- I.T and e-safety Policy
- Camera Use Policy
- GDPR Policy

This policy was reviewed and amended February 2024

This policy is to be reviewed by 31st August 2024

- Code of Conduct Policy
- Conduct and Communication with Students Policy
- Complaints Policy
- Confidentiality and Data Protection Policy
- Curriculum Policies

Disclaimer

Every effort has been made to ensure that the information contained within this policy is up to date and accurate and reflective of the latest legislative and statutory guidance. If errors are brought to our attention, we will correct them as soon as is practicable.

CONTENT:

- 1. Introduction**
- 2. Online Safety School Statement**
- 3. Policy Scope**
- 4. Roles and Responsibilities**
- 5. Education and Training**
- 6. Cultivating a Safe Environment**
- 7. Responding to Online Safety Concerns**
- 8. Responding to Complaints**
- 9. Monitoring and Compliance**
- 10. Dissemination and Communication Process**
- 11. Development of the Policy**

This policy was reviewed and amended February 2024
This policy is to be reviewed by 31st August 2024

1. Introduction

Online safety in Thornton College is of paramount importance. As the online world evolves, so do both the online harms and risks facing our students and the relevant legislation, both statutory and non-statutory, which directs and guides how schools should meet their online safety requirements.

School staff and governors play a vital role in setting an example for the whole school and are central to implementing policy and process. It is imperative that a whole school community approach to online safety is adopted and that all stakeholders are aware of their responsibilities and duties in relation to keeping children safe online. This will support a robust online safety ethos and ensure that we are providing the best online safety provision we possibly can.

This policy is applicable to all members of Thornton College. This includes, staff, students and students, volunteers, parents/carers, visitors, and community users who have access to and are users of the Thornton College digital technology systems, both internally and externally within the home and community setting.

2. Online Safety School Statement

Thornton College asserts that online safety is an essential element of safeguarding and duly acknowledges its statutory obligation to ensure that all students and staff are protected from potential online harm.

Thornton College believes that the internet and associated devices are an integral part of everyday life.

Thornton College affirms that all students should be empowered to build resilience and to develop strategies to recognise and respond to online risks.

3. Policy Scope

Online safety is an omnipresent topic, which requires recurrent regulatory review and places a stringent duty of care on us all. This policy supports us in meeting statutory requirements as per the DfE guidance under KCSiE (2020), Working together to safeguard children (2018) and non-statutory guidance, Teaching online safety in schools (2019). Effective, timely and robust online safety is fundamental to protecting our students and it is a significant part of the safeguarding agenda.

High quality online safety provision requires constant vigilance and a readiness to act where abuse, exploitation or neglect is suspected. The landscape of safeguarding is constantly evolving, and we must endeavour to embrace and shape their key priorities in support of this. Education has a vital role to fulfil in protecting children and young people from forms of online abuse whilst demonstrating a concerted obligation to respond with haste and flexibility to concerns as they arise. Above all, all staff must foster dedication to ensuring that they listen to the voices of the vulnerable and act upon what is heard. Safeguarding is everyone's responsibility.

Defining online abuse: "Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones" (NSPCC, 2019).

This policy was reviewed and amended February 2024

This policy is to be reviewed by 31st August 2024

Hidden harms – types of online abuse may include:

- Cyberbullying
- Emotional abuse
- Grooming
- Sexting
- Sexual abuse
- Sexual exploitation

The types, patterns and different circumstances of significant harm and abuse should be considered within the categories identified for children in the Children Act 1989 / 2004. These are:

- Neglect
- Sexual
- Physical
- Emotional

Technology can facilitate a world of learning and development in addition to help yield a range of opportunities. However, the stark reality is that it can also present a window to potential and actual harm and abuse. It can elicit and support an array of illegal abusive behaviours including, but not limited to:

- harassment
- stalking
- threatening behaviour
- creating or sharing child sexual abuse material
- inciting a child to sexual activity
- sexual exploitation
- grooming
- sexual communication with a child
- causing a child to view images or watch videos of a sexual act.

This policy should be read alongside our Safeguarding Policy and in addition to the associated statutory legislation and guidance as stipulated on page 1-2 of this policy.

4. Roles and Responsibilities

The following section outlines the online safety roles and responsibilities of all stakeholders across the online community within Thornton College.

This policy was reviewed and amended February 2024
This policy is to be reviewed by 31st August 2024

4.1 Teachers and Staff

All members of school staff (teaching and non-teaching) have a responsibility to protect children online. This includes every member of staff who works at the school. All teachers and staff must always act in accordance with their own professional boundaries, upholding professional behaviour and conduct at all times.

All school staff need to:

- Be aware of and adhere to all policies in school that support online safety and safeguarding.
- Contribute to policy development and review.
- Model good practice when using technology.
- Know the process for making referrals and reporting concerns.
- Know how to recognise, respond, and report signs of online abuse and harm.
- Receive and engage in appropriate child protection training.
- Always act in the best interests of the child.
- Be responsible for their own continuing professional development in online safety.

4.2 Governors and Senior Management Team

A Governor's role for online safety in a school should include, but is not limited to:

- Upholding online safety as a safeguarding issue that is embedded across the whole school culture.
- Ensuring that children are provided with a safe environment in which to learn and develop.
- Ensuring that the school has appropriate filters and monitoring systems in place.
- Ensuring the school has effective policies and training in place.
- Carrying out risk assessments on effectiveness of filtering systems.
- Auditing and evaluating online safety practice.
- Ensuring there are robust reporting channels.

4.3 Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (Deputy DSL)

With respect to online safety, it is the responsibility of the DSL to:

- Ensure children and young people are being appropriately taught about and know how to use the internet responsibly.
- Ensure teachers and parents are aware of measures to keep children safe online through relevant training provision.
- Take responsibility for all safeguarding matters, including online safety.
- Collaborate with the Senior Management Team, the I.T manager and Head of I.T
- Facilitate effective record keeping on CPOMS and the reporting and monitoring of all online safety concerns.
- Promote online safety and the adoption of a whole school approach.
- Maintain own training and learning needs, ensuring they are up to date with all matters relating to online safety.

This policy was reviewed and amended February 2024

This policy is to be reviewed by 31st August 2024

4.4 Children and Young People

With respect to online safety, students need to:

- Know who the DSL is.
- Engage in age-appropriate online safety education opportunities.
- Contribute to policy development and review.
- Read and adhere to online safety policies.
- Respect the feelings of others, both off and online.
- Take responsibility for keeping themselves and others safe online.
- Where and how to find help with any online incidents or concerns.
- How, when, and where to report concerns and when to seek help from a trusted adult.

The UKCCIS 'Education for a Connected World' framework aims to equip children and young people for digital life. It covers:

- Self-image and identity
- Online relationships
- Online reputation
- Online bullying
- Managing online information
- Health, wellbeing, and lifestyle
- Privacy and security
- Copyright and ownership

4.5 Parents and Carers

Parents and carers need to understand the risks that students face online to protect them from online dangers. Parents need to:

- Read and adhere to all relevant policies.
- Be responsible when taking photos/using technology at school events.
- Know who the DSL is.
- Know how to report online issues.
- Support online safety approaches and education provision.
- Be a role model for safe and appropriate behaviour.
- Identify changes in children's behaviour that could indicate they are at risk of online harm or abuse.

5. Education and Training

A commitment to ensuring the provision of an integrated and highly robust safeguarding service for all ages is essential. Effective online safety provision and promotion of the welfare of children and young people rely upon constructive relationships that are conducive to robust multi-agency partnership working. This can only be effective when all staff are knowledgeable, confident, and equipped with the skills to deal with processes and procedures when concerns arise relating to online abuse or harm.

This policy was reviewed and amended February 2024

This policy is to be reviewed by 31st August 2024

Online safety has a high emphasis on a competent well-established workforce, up to date policies and procedures, robust governance arrangements and collaborative practices. Types of online risk usually fall under one of three categories:

Contact: Contact from someone online who may wish to bully or abuse the child. This could also include online grooming, online harassment, or activities of a commercial nature, including tracking and harvesting person information.

Content: Inappropriate material available to children online including adverts, spam, sponsorship, personal info, violent or hateful content, pornographic or sexual content, biased materials, racist materials, and misleading information or advice.

Conduct: The child may be the perpetrator of activities including illegal downloading, hacking, gambling, financial scams, bullying or harassing another child. They might create and upload inappropriate material or provide misleading information or advice.

5.1 Students

Thornton College will promote safe and responsible internet use:

- Education regarding safe and responsible use and access of the internet.
- Include online safety in Personal, Social, Health and Economic (PSHE) education, Relationships and Sex Education (RSE) and Information Computer Technology studies.
- Reinforce online safety messages as a continuum in all subjects.

Thornton College will support understanding based on age and ability:

- Acceptable use posters in all rooms with internet access.
- Informing all learners of monitoring and filtering in place.
- Provide continuous training and education as part of their transition across key stages.
- Use alternative, complementary support where needed.
- Seeking learner voices.

5.2 Vulnerable Learners

Vulnerable children who need our help the most are not only missing out on opportunities to flourish online but are often experiencing the very worst that the online world can be. Over 2 million children in England are living in families with complex needs. Many children are living in families with domestic abuse, parental substance abuse and mental health problems.

Thornton College recognises that some learners are more vulnerable due to a range of factors. Those children may be:

- Receiving statutory care or support.
- Known to have experienced specific personal harm.
- With a disability, ill-health, or developmental difficulties.
- In households or families with characteristics or locations that indicate higher potential likelihood of current and future harm.

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- Vulnerable or of concern by virtue of their identity or nationality.
- At risk in relation to activity or institutions outside the home.
- Caring for others.

Thornton College will ensure the effective and safe provision of tailored online safety education. Thornton College will obtain input and advice from specialist staff as deemed necessary.

5.3 Staff

Thornton College will:

- Ensure provision of robust policies and practices as part of induction and ongoing training provision.
- Provide up to date online safety training at least annually or more in line with legislative and statutory changes and/or online safety incidents arising.
- Ensure training will include recognition of risks and responding to concerns.
- Inform of monitoring and filtering processes.
- Make staff aware that their online conduct outside of work can impact upon their professional role and responsibilities.
- Advise of appropriate resources.
- Ensure that all staff are aware of procedures to follow in recognising, responding, and reporting online safety concerns.

5.4 Parents and carers

Thornton College will:

- Recognise and cultivate the essential role parents and carers have in fostering safer online safety practices in children and young people.
- Ensure provision of resources, support, and advice.
- Ensure provision and adherence to online safety policies and other policies of relevance.
- Advise of how and when to raise concerns including training in how to use CPOMS.
- Provide details of all relevant contacts (for example, the DSL).

6. Cultivating a safe environment

“All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs” (DfE, 2019).

Children should be educated in an age-appropriate way around:

- ✓ How to evaluate what they see online
- ✓ How to recognise techniques for persuasion
- ✓ Their online behaviour
- ✓ How to identify online risks

This policy was reviewed and amended February 2024

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- ✓ How and when to seek support

6.1 Evaluate: How to evaluate what they see online

This will enable students to make judgements about what they see online and not automatically assume that what they see is true, valid, or acceptable.

Thornton College will help students to consider questions including:

- Is this website/URL/email fake? How can I tell?
- What does this cookie do and what information am I sharing?
- Is this person who they say they are?
- Why does someone want me to see this?
- Why does someone want me to send this?
- Why would someone want me to believe this?

6.2 Recognise: How to recognise techniques used for persuasion

This will enable students to recognise the techniques that are often used to persuade or manipulate others. A strong grasp of knowledge across many areas makes people less vulnerable to these techniques and better equipped to recognise and respond appropriately to strongly biased intent or malicious activity.

Thornton College will help students to recognise:

- Online content which tries to make people believe something false is true and/or mislead (misinformation and disinformation).
- Techniques that company use to persuade people to buy something.
- Ways in which games and social media companies try to keep users online longer (persuasive/sticky design)
- Criminal activities such as grooming.

6.3 Online Behaviour

This will enable students to understand what acceptable and unacceptable online behaviour looks like. Thornton College will teach students that the same standard of behaviour and honesty applies online and offline, including the importance of respect for others. Thornton College will also teach students to recognise unacceptable behaviour in others.

Thornton College will help students to recognise acceptable and unacceptable behaviour by:

- Looking at why people behave differently online. For example, how anonymity (you do not know me) and invisibility (you cannot see me) affect what people do.
- Looking at how online emotions can be intensified resulting in mob mentality.
- Teaching techniques (relevant on and offline) to defuse or calm arguments (for example, a disagreement with friends) and disengage from unwanted contact or content online; and
- Considering unacceptable online behaviours often passed off as so-called social norms or just banter. For example, negative language that can be used, and in some cases is often expected,

This policy was reviewed and amended February 2024

This policy is to be reviewed by 31st August 2024

as part of online gaming and the acceptance of misogynistic, homophobic, and racist language that would never be tolerated offline.

6.4 Identify: How to identify online risks

This will enable students to identify possible online risks and make informed decisions about how to act. This should not be about providing a list of what not to do online. The focus should be to help students assess a situation, think through the consequences of acting in different ways and decide on the best course of action.

Thornton College will help students to identify and manage risk by:

- Discussing the ways in which someone may put themselves at risk online.
- Discussing risks posed by another person's online behaviour.
- Discussing when risk taking can be positive and negative.
- Discussing "online reputation" and the positive and negative aspects of an online digital footprint. This could include longer-term considerations; i.e. how past online behaviours could impact on their future when applying for a place at university or a job for example.
- Discussing the risks vs, the benefits of sharing information online and how to make a judgement about when and how to share and who to share with.
- Asking questions such as what might happen if I post something online? Who will see it? Who might they send it to?

6.5 How and when to seek support

This will enable students to understand safe ways in which to seek support if they are concerned or upset by something they have seen online.

Thornton College will help students by:

- Helping them to identify who trusted adults are.
- Looking at the different ways to access support from the school, police, the National Crime Agency's Click CEOP reporting service for children and 3rd sector organisations, such as Childline and the Internet Watch Foundation. This links to our wider school policies and processes around reporting of safeguarding and child protection incidents and concerns to school staff (see Keeping Children Safe in Education).
- Helping them to understand that various platforms and apps will have ways in which inappropriate contact or content can be reported.

7. Responding to Online Safety Concerns

The safety of our students is of paramount importance. Immediate action may be required to safeguard investigations and any other children and young people. Any concern that children and young people may be at risk of harm or abuse must immediately be reported. Reputational issues must be managed appropriately by discussion with the relevant communications team.

Online safety is recognised as part of the education settings safeguarding responsibilities – the DSL will take lead responsibility for online safety concerns which should be recorded and actioned.

Children and young people will be enabled (at a level appropriate to their age and ability) to share

This policy was reviewed and amended February 2024

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online concerns. The safeguarding and child protection policy for Thornton College includes procedures to follow regarding online safety concerns.

Remember:

- Child welfare is of principal concern – the best interests of children take precedence.
- If there is any immediate danger, contact the police on 999.
- Refer to all appropriate agencies as per safeguarding and child protection policy.
- Always adhere to local safeguarding procedures and report to the DSL and Head Teacher within Thornton College.

8. Responding to Complaints

There are a number of sources from which a complaint or allegation might arise, including those from:

- A child or young person
- An adult
- A parent/carer
- A member of the public (including a friend or relative)
- A colleague

There may be up to three components in the consideration of an allegation:

- A police investigation of a possible criminal offence.
- Enquiries and assessment by children's social care or adult social care relating to whether a child, young person or adult at risk is in need of protection or services.
- Consideration by an employer of disciplinary action in respect of the individual (including suspension).

It is also the responsibility of the member of staff to inform their line manager if they are being investigated in relation to children, young people, or adults at risk with respect to protection concerns outside of work. They should also report if their own children/stepchildren/children they are living with become subject to child protection matters or an adult related to them or living with them become subject to adult protection matters. The line manager must report this to the DSL and Head Teacher).

This policy was reviewed and amended February 2024
This policy is to be reviewed by 31st August 2024

9. Monitoring and Compliance

Monitoring Requirements	For example: Analysing incident logs Checking planning for online safety lessons Student, students, parents and carers questionnaires Evaluations
Monitoring Method	CPOMS reports of incidents SMT and HOD monitoring of online safety lessons Student, students, and parents' questionnaires annually. Staff and governors' evaluation of training
Monitoring Prepared by	DSL
Monitoring Presented to	SMT and Governors
Frequency of Reporting	weekly feedback to SMT, termly reporting to Governors

10. Dissemination and Communication Process

This policy will be available on the school website for parents and students and on the shared drive for staff. The policy will be used in staff training on INSET days and within induction for new staff and for governors. All staff and governors will be required to sign a declaration stating they have read and understood this policy along with the safeguarding policy and KCSiE 2023 part 1 and annex.

11. Development of the Policy

This policy will be reviewed annually, or earlier in the light of any incidents or investigations, legislative changes, or developments in best employment practice, to ensure its continuing relevance and effectiveness.

This policy was reviewed and amended February 2024
This policy is to be reviewed by 31st August 2024

Addendum to be used during any local closure due to COVID -19 as directed by the government or PHE.

Response to COVID-19

There have been significant changes within our setting in response to the outbreak. Despite the changes, the school's Safeguarding Policy is fundamentally the same: **children and young people always come first, staff should respond robustly to safeguarding concerns and contact the DSL in line with our established safeguarding procedure.**

This addendum sets out some of the adjustments we are making in line with the changed arrangements in the school and following [advice from government](#) and local agencies

Principle

This addendum should be read in conjunction with the full safeguarding policy for Thornton College and with the Keeping Children Safe in Education (2022) document. The aim is to ensure that the school always acts in the best interests of the student.

Updated advice from the Local Authority

- Children who are deemed to be suffering or likely to suffer significant harm will continue to receive the intervention of specialist and statutory services as currently provided. Children referred into MASH who are children in need of support will be screened and a professional judgement applied regarding the level and type of intervention required.

DSL Arrangements

- The DSL team is available as usual via email or telephone. Concerns should be raised and recorded on CPOMS in the usual way. CPOMS will be monitored daily, and concerns will be acted upon throughout the time our school remains closed. If concerns are urgent, then contact should be made immediately (i.e., within 30 minutes) with Tracey Wilks twilks@thorntoncollege.com, 07740000093 or any member of the DSL team if she is unavailable.
- Remember we all continue to be responsible for safeguarding and therefore if no member of the DSL team is available you will need to raise any immediate concerns directly by phoning the MASH team on **01908 253169** for Milton Keynes or the MASH team which is local to your student's home address.
- If you believe that a student is in immediate danger, then contact the police on 999.

This policy was reviewed and amended February 2024
This policy is to be reviewed by 31st August 2024

Attendance

The school will follow the [attendance guidance issued by government](#).

Vulnerable Students

- The DSL and DDSLs have identified vulnerable students and categorized them as below:

Red	Students most at risk of harm. These students may have a care plan or involvement of outside agencies. The DSL team are monitoring and contacting these students and/or their parents regularly but at least weekly. If required, TWS will be home visiting. Students will be monitored daily in their registration period by their form/class teacher and/or their Head of Year
Amber	Students with a moderate risk of harm but have some protective factors e.g., mental health needs. The DSL team are monitoring and continuing to offer wellbeing support and contact at least weekly. Students will be monitored daily by their form/class teacher and/or their Head of Year.
Green	Students where there are some concerns escalating or have unmet needs and required monitoring. Parents will be contacted by the DSL team where appropriate and form tutors or class teachers will be monitoring the students daily in their registration period.
Blue	Students with additional learning needs, this includes students with an EHCP. Parents will be contacted weekly by a member of the Learning Support Team. This will be monitored by the SENCO, Annette Woodruff.

- Staff have been advised to keep their personal phone number private when making calls dialling 141 prior to the call. Where contact with a student cannot be made by the DSL Team the MASH will be contacted for further advice. All contact with MASH and outcome will be recorded on CPOMS.
- Tracey Wilks, DSL, will be the main contact for MASH and will respond to all safeguarding queries. She will maintain contact with social workers through online and telephone forums where there are any child protection concerns.

This policy was reviewed and amended February 2024

This policy is to be reviewed by 31st August 2024

Appendix 5

1) Policy Statement

- 1.1 Thornton College ("the School") understands the importance of a positive culture where concerns can be identified and spoken about openly and acknowledges that this is a key element of a strong safeguarding system. This Low-Level Concerns Policy seeks to ensure that all staff who work with children behave appropriately and to enable the early identification and prompt and appropriate management of concerns.
- 1.2 As part of its whole school approach to safeguarding, the School will ensure that it promotes an open and transparent culture in which all safeguarding concerns and allegations about all adults working with children are dealt with promptly and appropriately.
- 1.3 Creating a culture in which **all** safeguarding concerns and allegations about adults (including those that do not meet the harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is crucial. If implemented correctly, this should encourage an open and transparent culture; enable the School to identify inappropriate, problematic or concerning behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the School.
- 1.4 This Low-Level Concerns Policy operates in conjunction (as appropriate) with the following:
 - 1.4.1 Child Protection and Safeguarding Policy
 - 1.4.2 Staff Behaviour Policy
 - 1.4.3 Disciplinary Policy
 - 1.4.4 Grievance Policy
 - 1.4.5 GDPR Policy

2) Introduction to the concept and importance of sharing low-level concerns

- 2.1 Behaviour which is not consistent with the standards and values of the School and which does not meet the organisational expectations encapsulated in the School's Behaviour Policy, needs to be addressed. Such behaviour can exist on a wide spectrum – from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.
- 2.2 All staff need to be informed about and be able to identify inappropriate, problematic, or concerning behaviour and understand the importance of sharing concerns when they observe behaviour which violates the School's Staff Behaviour Policy.

This policy was reviewed and amended February 2024
This policy is to be reviewed by 31st August 2024

3) What is the Low-Level Concerns Policy?

- 3.1 The Low-Level Concerns Policy enables all staff to share any concerns – **no matter how small** – about their own or another member of staff's behaviour with the Deputy Head/DSL. Safeguarding and promoting the welfare of children is everyone's responsibility.

4) What is the purpose of the Low-Level Concerns Policy?

- 4.1 The purpose of the Low-Level Concerns Policy is to create and embed a culture of openness, trust, and transparency in which the clear values and expected behaviour which are set out in the School's Staff Behaviour Policy are constantly lived, monitored, and reinforced by all staff.

5) What are the aims of the Low-Level Concerns Policy?

- 5.1 The aims of the Low-Level Concerns Policy are to:
- 5.1.1 ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic, or concerning behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines;
 - 5.1.2 empower staff to share any low-level concerns with the Deputy Head/DSL, and to help all staff to interpret the sharing of such concerns as a neutral act;
 - 5.1.3 address unprofessional behaviour and support the individual to correct it at an early stage;
 - 5.1.4 identify inappropriate, problematic, or concerning behaviour – including any patterns – that may need to be consulted upon with (on a no-names basis if appropriate) or referred to the Local Authority Designated Officer ("LADO") by the Head Teacher.
 - 5.1.5 provide for responsive, sensitive, and proportionate handling of such concerns when they are raised; and
 - 5.1.6 help identify any weaknesses in the School's safeguarding system.

6) Definitions

- 6.1 Who does the policy apply to?
- 6.1.1 The policy applies to all, whether working in or on behalf of the School as an employee or engaged as a contractor or volunteer. It also includes anyone who is part of the Governing Body or Trustees.
 - 6.1.2 Designated Safeguarding Lead (DSL) means the DSL at the School.
 - 6.1.3 Governing Body means those individuals who are responsible for the School's governance i.e., Governors and Trustees.

Head Teacher means the Head Teacher of the School.

This policy was reviewed and amended February 2024

This policy is to be reviewed by 31st August 2024

Details of the individuals currently in these roles can be found at Annex 1.

- 6.2 Concern or allegation that may meet the harm threshold. This means the behaviour in question might indicate that a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children (i.e., in connection with their employment or voluntary activity) – i.e., a concern is raised/it is alleged that they have:
- i. behaved in a way that has harmed a child, or may have harmed a child; and/or
 - ii. possibly committed a criminal offence against or related to a child; and/or
 - iii. behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
 - iv. behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 6.3 Concern or allegation that does not meet the harm threshold: Low-level concern. The term ‘low-level concern’ does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult working with children may have acted in a way that:
- 6.3.1 is inconsistent with the School’s Staff Behaviour Policy, including inappropriate conduct outside of work; and
 - 6.3.2 does not meet the harm threshold; or is otherwise not serious enough to merit a referral to the LADO.

STAFF DO NOT NEED TO BE ABLE TO DETERMINE IN EACH CASE WHETHER THE BEHAVIOUR IN QUESTION CONSTITUTES A LOW-LEVEL CONCERN, OR IF IT MAY MEET THE HARM THRESHOLD. ONCE STAFF SHARE WHAT THEY BELIEVE TO BE A LOW-LEVEL CONCERN, THAT DETERMINATION SHOULD BE MADE BY THE HEAD TEACHER IN CONSULTATION, WHERE APPROPRIATE, WITH THE DEPUTY HEAD/DSL AND/OR THE BURSAR.

The diagram at Annex 2 further illustrates the distinction between a concern or allegation that may meet the harm threshold, and a concern or allegation that does not meet the harm threshold – i.e., a low-level concern.

7) School Culture

- 7.1 The School promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the School are dealt with promptly and appropriately.

This policy was reviewed and amended February 2024
This policy is to be reviewed by 31st August 2024

8) Data Protection and Confidentiality / Respecting the rights of all

- 8.1 The School will always respect the personal data of staff (and others, where they may be identifiable) in implementing the Low-Level Concerns Policy and in keeping records of low-level concerns secure.
- 8.2 The Data Protection Act 2018 includes a specific provision which permits organisations to process even the most sensitive personal data where necessary for the purposes of protecting children from harm. Although sharing of low-level concerns will not always involve legally sensitive categories of data, the safeguarding purpose is the same as that under the School's Safeguarding Policy.
- 8.3 A proportionate approach must be taken by all to considering what personal data is in fact necessary to share and record by way of low-level concern(s) in each case to support the safeguarding purpose and to ensure the information is accurate, fair, and as far as possible recorded in neutral terms.
- 8.4 If a member of staff who raises a low-level concern does not wish to be named, then the School will respect their wishes as far as possible. However, staff should be aware that in certain circumstances this anonymity may need to be waived (as explained further in paragraph 10 below).
- 8.5 All staff may, under data protection law, ask to see the content of any low-level concern(s) retained by the School under the Low-Level Concerns Policy as it relates to them personally, and may make any reasonable objection as to the fairness or accuracy of that content. The School will process such requests within the period prescribed by law, subject always to any necessary protection of the rights of third parties and unless any other relevant exemptions apply (including if complying with the request would be likely to prejudice the safeguarding purpose of the Low-Level Concerns Policy). If the content of a low-level concern is disputed, it may not be appropriate for the School to delete or alter the original record, but a note may be recorded alongside reflecting the staff member's alternative account or objection(s).

The School has undertaken a Data Protection Impact Assessment ("DPIA") in relation to the processing of low-level concerns, subject to ongoing review and any necessary updates from time to time. A copy of this DPIA may be requested from the Bursar.

All personal data processed in connection with the Low-Level Concerns Policy will be processed in accordance with the School's Privacy Notices and its GDPR Policy.

9) Who should staff share low-level concerns with?

- 9.1 It is important that low-level concerns are shared initially with the Deputy Head/DSL as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident) – although it is never too late to share a low-level concern.
- 9.2 If the Deputy Head is absent for any reason, low-level concerns should be shared directly with the Head Teacher.

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- 9.3 If any low-level concern relates to the behaviour of the Head Teacher, it should be referred to the Chair of Trustees. If there is a conflict of interest in sharing a low-level concern with the Head Teacher, the low-level concern should be shared with the Chair of Trustees, unless there is conflict of interest in doing so, in which case it should be reported directly to the LADO.

10) Should staff who share low-level concerns be able to remain anonymous?

- 10.1 Staff are encouraged to consent to be named when sharing low-level concerns, as this will help to create a culture of openness and transparency. If the staff member who raises a low-level concern does not wish to be named, the School will respect that person's wishes as far as possible. However, there may be circumstances where the staff member who raises the concern will need to be named (for example, where disclosure is required by a court or local authority, or under a fair disciplinary process) and, for this reason, the School will not promise anonymity to members of staff who share low-level concerns.

11) Should staff share concerns about themselves (i.e., self-report)?

- 11.1 Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Staff should, wherever possible, proactively self-report – for example, if they know they are going to be in a situation which would be deemed a breach of the School's Staff Behaviour Policy, including, for example, where a member of staff (i) has a child who is a student in the school - they may have the mobile phone number of their child's friend; (ii) plays in an external sports team with a current student and they may be on a WhatsApp group with them; and (iii) is having to drive a student somewhere - for example for an urgent medical appointment.
- 11.2 Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the School's Staff Behaviour Policy. Self-reporting in these circumstances can be positive for several reasons, and staff are encouraged to self-report on the basis that:
- 11.2.1 it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity;
- 11.2.2 it demonstrates awareness of the expected behavioural standards and self-awareness as to the member of staff's own actions or how they could be perceived; and
- 11.2.3 crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.
- 11.3 The School's aim is to create an environment where staff are encouraged and feel confident to self-refer.

12) How should low-level concerns be shared and recorded?

- 12.1 The concern can be shared verbally with the Deputy Head/DSL in the first instance, or a written summary of it can be provided to them.

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- 12.2 Where the low-level concern is provided verbally, the Deputy Head will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion and will exercise sound professional judgment in determining what information is necessary to record for safeguarding purposes.
- 12.3 Where a low-level concern relates to a person employed by a supply agency or a contractor, the School will notify that person's employer so that any potential patterns of inappropriate behaviour can be identified.

13) How should a low-level concern be responded to?

- 13.1 Once the Deputy Head has received what is believed to be a low-level concern, they will (not necessarily in the below order but in an appropriate sequence according to the nature and detail of the particular concern shared with them):
- 13.1.1 Inform the Head Teacher.
- 13.1.2 Speak to the person who raised the low-level concern (unless it has been raised anonymously).
- 13.1.3 Speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).
- 13.1.4 Speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).
- 13.1.5 Review the information and determine whether:
- a) the behaviour is in fact appropriate – i.e., is entirely consistent with the School's Staff Behaviour Policy and the law;
 - b) the behaviour constitutes a low-level concern;
 - c) there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact may meet the harm threshold, in which case they will ask the Head Teacher to consult with the LADO;
 - d) in and of itself the behaviour may meet the harm threshold, and should be referred to the LADO/other relevant external agencies; or
 - e) when considered with any other low-level concerns that have previously been shared about the same individual, the behaviour may meet the harm threshold, and should be referred to the LADO/ other relevant external agencies.
- 13.1.5 Ensure that appropriate and detailed records are kept of all internal and external conversations regarding the concern or allegation, their determination, the rationale for their decision and any actions taken, and retain records in accordance with the Low-Level Concerns Policy.

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- 13.1.6 Refer the allegation to the Head Teacher to consider whether the concern or allegation also potentially raises misconduct or capability issues in discussions with the Deputy Head and/or the Bursar on a named or no-names basis where necessary.

14) What action will be taken if it is determined that the behaviour is entirely consistent with the School's Staff Behaviour Policy and the law?

- 14.1 The Head Teacher and/or Deputy Head will update the individual in question and inform them of any action taken (as above).
- 14.2 The Head Teacher and/or Deputy Head will speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with the School's Staff Behaviour Policy and the law.

15) What action will be taken if it is determined that the behaviour constitutes a low-level concern?

- 15.1 Any investigation of low-level concerns will be done discreetly and, on a need-to-know basis.
- 15.2 Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.
- 15.3 Any such conversation with individuals in these circumstances will include being clear with them as to why their behaviour is inappropriate, problematic or concerning, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.
- 15.4 Some low-level concerns may also raise issues of misconduct or poor performance which are unrelated to safeguarding. The Head Teacher will also consider whether this is the case – by referring to the School's disciplinary and/or capability procedure and in discussions with the Deputy Head and/or Bursar on a named or no-names basis where necessary.
- 15.5 If the Head Teacher considers that the School's disciplinary or capability procedure may be triggered, the individual will have a full opportunity to respond to any factual allegations which form the basis of capability concerns or a disciplinary case against them.
- 15.6 Staff should be aware that when they share what they believe to be a low-level concern, the Deputy Head/DSL will speak to the adult who is the subject of that concern (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted) – no matter how 'low' level the concern may be perceived to be, to gain the subject's account – and to make appropriate records (as above), which may need to be referenced in any subsequent disciplinary proceedings.

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- 15.7 How the School responds to a low-level concern may be different depending on the employment status of the individual who is the subject of the concern - i.e., whether they are an employee or worker to whom the School's disciplinary and/or capability procedure would apply; or a contractor, Governor, Trustee, or volunteer. The School's response will be tailored accordingly.

16) What action will be taken if it is determined that the behaviour:

16.1 In and of itself may meet the harm threshold, or when considered with any other low-level concerns that have previously been shared about the same individual, may meet the harm threshold? Then it will be referred to the LADO/other relevant external agencies, and in accordance with the School's Safeguarding Policy in line with Part 4 of KCSIE (Keeping Children Safe in Education) 2023 and the relevant procedures and practice guidance stipulated by the School's Local Safeguarding Partnership.

17) How should low-level concerns be held?

- 17.1 The School will retain all records of low-level concerns (including those which are subsequently deemed by the Head Teacher to relate to behaviour which is entirely consistent with the School's Staff Behaviour Policy) in Staff Safe on CPOMS. A secure log will also be kept by the Deputy Head/DSL.
- 17.2 Where multiple low-level concerns have been shared regarding the same individual these will be kept in chronological order as a running record, and with a timeline alongside. These records will be kept confidential and held securely with access afforded only to a limited number of individuals such as the Head Teacher, Deputy Head, Bursar and Chair of Trustees.

18) How often should the central low-level concerns file be reviewed?

- 18.1 The Deputy Head/DSL will review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of inappropriate, problematic, or concerning behaviour are identified. A record of these reviews will be made.
- 18.2 Where a pattern of behaviour is identified in respect of a specific individual, the Deputy Head will also consider whether any wider cultural issues are at play that may have enabled the behaviour and/or whether the School should arrange for additional training or a review of any of its policies to reduce the risk of it happening again.

19) How long should records of a low-level concern be kept?

- 19.1 Low-level concerns will be retained securely by the School for as long as deemed relevant and necessary for a safeguarding purpose unless the School is required to disclose by law (for example, where the harm threshold is met in respect of the individual in question). In most cases, once a staff member leaves the School, any low-level concerns which are held relating to them:

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19.1.1 will be retained at least until the individual leaves the School / for the same duration as that individual's personnel file and

19.1.2 will not be included in any onward reference, except as set out at paragraph 20.

20) References

Low-level concerns will not be included in references unless they relate to issues which would normally be included in references, for example, misconduct or poor performance. A low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.

21) What is the role of the Governance Body?

21.1 The Deputy Head/DSL will regularly inform the Governing Body about the implementation of the Low-Level Concerns Policy and any evidence of its effectiveness, e.g., by including reference to it in any safeguarding reports and providing any relevant data.

21.2 The Governing Body will also review an anonymised sample of low-level concerns at regular intervals, to ensure that these concerns have been responded to promptly and appropriately. This may be delegated to the Safeguarding Governor on behalf of the Governing Body.

22) Monitoring and Review

22.1 The Low-Level Concerns Policy will be monitored to ensure that it is being effectively implemented in practice and will be reviewed annually by the Deputy Head and in response to any relevant legislative, statutory, or regulatory changes and/or changes in relevant guidance and/or safeguarding best practice. The next scheduled review for the Low-Level Concerns Policy is June 2024.

Annex 1: Details of individuals currently in the roles defined within the Low-Level Concerns Policy

Chair of Trustees: Sr Helen Haigh

Head Teacher: Dr Louise Shaw

Deputy Head/DSL: Ms Tracey Wilks

Bursar: Mrs Jane Sanders

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