



RECRUITMENT PACK

POLICIES

- **CHILD PROTECTION AND SAFEGUARDING**
- **STAFF CODE OF CONDUCT**
- **WHISTLE BLOWING**

Child Protection and Safeguarding Policy

Consistent with the current Keeping Children Safe in Education

Policy author	Designated Safeguarding Lead: Rebecca Goddard
Review date	October 2025
Review frequency	Annually
Next review date	October 2026
Approved by	Trust Board

Adopted by All Trust Schools and this Policy is available on each school website.

The policy is reviewed and updated at least annually and/or following any updates to national and local guidance and procedures.

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KEY PERSONNEL AT OUR TRUST: TABLE OF KEY CONTACTS

Key Personnel	Name(s)	Contact details
Chief Executive Officer (CEO)	Wendy Hemmingsley	Email: ceo@millacademy.co.uk
Chair of Board	Claire King	Email: cking@millacademy.co.uk
Nominated Safeguarding Trustee	Claire King	Email: cking@millacademy.co.uk
Local Authority Designated Officers (LADOs)	Jo Lloyd Sandra Barratt Amie Pilcher	Email: Lado.safeguardingchildren@oxfordshire.gov.uk Tel: 01865 810603
Education Safeguarding Advisory Team (ESAT)	Jo Lloyd Becky Langstone Sophie Kendell	Email: ESAT.safeguardingchildren@oxfordshire.gov.uk Tel: 01865 810603
Locality Community Support Service (LCSS) Worker		
Multi Agency Safeguarding Hub (MASH)		0345 050 7666
Emergency Duty Team (EDT)		0800 833408
Police		101 or in emergencies 999

School Specific Contact Details – The Henry Box School Phone: 01993 703955		
Key Personnel	Name(s)	Contact details
Designated Safeguarding Lead (DSL)	Rebecca Goddard	rgoddard@henrybox.oxon.sch.uk
Deputy DSL(s)	Ann Auton Kerrie Bradley Tracey Cole Diana Dognon Sarah Ebanja Curtis Evans Juliette Gilleard Amy Griffiths Catherine Hardie Tracy Higgs Annie Hyde Roisin Maddison Natasha Oliver Carl Tysom Amy Westwood	aauton@henrybox.oxon.sch.uk kbradley@henrybox.oxon.sch.uk tcole@henrybox.oxon.sch.uk ddognon@henrybox.oxon.sch.uk sebanja@henrybox.oxon.sch.uk cevans@henrybox.oxon.sch.uk jgilleard@henrybox.oxon.sch.uk agriffiths@henrybox.oxon.sch.uk chardie@henrybox.oxon.sch.uk thiggs@henrybox.oxon.sch.uk ahyde@henrybox.oxon.sch.uk rmaddison@henrybox.oxon.sch.uk noliver@henrybox.oxon.sch.uk ctysom@henrybox.oxon.sch.uk awestwood@henrybox.oxon.sch.uk
School's named 'Prevent' Lead	Rebecca Goddard	rgoddard@henrybox.oxon.sch.uk
Headteacher	Wendy Hemmingsley	head.4050@henrybox.oxon.sch.uk
Chair of the Local Committee	Joanna Hoskin	jhoskin@henrybox.oxon.sch.uk
Local Committee Nominated Safeguarding Link	Helen Marshall	hmarshall@henrybox.oxon.sch.uk

School Specific Contact Details – Queen Emma’s Primary School Phone: 01993 704770		
Key Personnel	Name(s)	Contact details
Designated Safeguarding Lead (DSL)	Leanne Dixon	leanne.dixon@queen-emmas.oxon.sch.uk
Deputy DSL(s)	Alex James-Bott Karen Wavish Amanda Cox Claire Cooper	ajames-bott@finstock.oxon.sch.uk karen.wavish@queen-emmas.oxon.sch.uk acox9499@queen-emmas.oxon.sch.uk ccooper@queen-emmas.oxon.sch.uk
School’s named ‘Prevent’ Lead	Leanne Dixon	leanne.dixon@queen-emmas.oxon.sch.uk
Headteacher	Leanne Dixon	leanne.dixon@queen-emmas.oxon.sch.uk
Chair of the Local Committee	Kate Sutton	kate.sutton@queen-emmas.oxon.sch.uk
Local Committee Nominated Safeguarding Link	Jenny Prowse	jprowse@queen-emmas.oxon.sch.uk

School Specific Contact Details – Finstock Church of England Primary School Phone: 01993 868314		
Key Personnel	Name(s)	Contact details
Designated Safeguarding Lead (DSL)	Leanne Dixon	leanne.dixon@queen-emmas.oxon.sch.uk
Deputy DSL(s)	Leanne Jones Alex James-Bott	ljones@finstock.oxon.sch.uk ajames-bott@finstock.oxon.sch.uk
School’s named ‘Prevent’ Lead	Leanne Dixon	leanne.dixon@queen-emmas.oxon.sch.uk
Headteacher	Leanne Dixon	leanne.dixon@queen-emmas.oxon.sch.uk
Chair of the Local Committee	Kate Sutton	kate.sutton@queen-emmas.oxon.sch.uk
Local Committee Nominated Safeguarding Link	Jenny Prowse	jprowse@queen-emmas.oxon.sch.uk

The MILL Academy (the Trust) recognises its responsibility for safeguarding and child protection.

The MILL Academy (the Trust) is a school trust currently comprising of: The Henry Box School, Queen Emma’s Primary School and Finstock Church of England Primary School. The MILL Academy Trust is run by a Board of Trustees. The MILL Academy Trust endeavours to provide the best education possible for all of its pupils in an open and transparent environment.

1. INTRODUCTION

1.1. It is essential that everybody working in a school or college understands their safeguarding responsibilities. Everyone who comes into contact with children and families has a role to play in ensuring children and young people are safe from abuse, neglect exploitation and harm. Our Trust is committed to safeguarding children and aims to create a culture of vigilance. All staff should make sure that any decisions made are in the best interests of the child.

- 1.2. Our pupils' welfare is our paramount concern. The Trust Board will ensure that our schools will safeguard and promote the welfare of pupils and work together with agencies to ensure that our schools have adequate arrangements to identify, assess and support those children who are suffering or where significant harm is suggested. [What to do if you think a child is at risk of abuse or neglect - Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](https://www.oscb.org.uk)
- 1.3. This policy provides the basis for good practice within the Trust for Safeguarding work. It should be read in conjunction with the Oxfordshire Safeguarding Children's Board Safeguarding Procedures, plus the safeguarding appendix document. These are in keeping with relevant national procedures and reflect what the partnership considers to be safe and professional practice in this context.
- 1.4. This policy applies to all members of staff in our schools, including all permanent, temporary and support staff, Local Committee members, volunteers, contractors and external service or activity providers.

2. THE LEGAL FRAMEWORK

- 2.1. This policy and the accompanying procedure have been developed in accordance with the following statutory guidance and local safeguarding procedures:

Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children, December 2023:

https://assets.publishing.service.gov.uk/media/65cb4349a7ded0000c79e4e1/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf

Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2025:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

3. ROLES AND RESPONSIBILITIES

- 3.1. Each school has a Designated Safeguarding Lead (DSL) with overall designated responsibility for safeguarding and each school has deputy designated safeguarding leads as listed on the key personnel table at the front of this document for each school to ensure there is always appropriate cover for this role. The responsibilities of a Designated Safeguarding Lead are described in detail in Appendix A.
- 3.2. The **Trust Board** is collectively responsible for ensuring that safeguarding arrangements are fully embedded within the school's ethos and reflected in the school's day-to-day practice.
- 3.3. **All staff members, local committee members, volunteers, and external providers** know how to recognise signs and symptoms of abuse, how to respond to pupils who disclose abuse and what to do if they are concerned about a child.

- 3.4. Our schools acknowledge the need to treat everyone equally, with fairness, dignity, and respect. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents.
- 3.5. Our schools and Trust Board takes all reasonable action to limit children's exposure to the risks from the school's IT system and ensures the school has appropriate filters and monitoring systems in place and regularly review their effectiveness in line with national expectations.

4. SUPPORTING CHILDREN

4.1. Our schools will support all pupils by:

- ensuring the content of the curriculum includes social and emotional aspects of learning through PSHE, RHSE and other curriculum contexts and ensuring that pupils are taught about safeguarding so that they 'recognise when they are at risk and how to get help when they need it'.
- ensuring a comprehensive curriculum response to online safety, enabling children and families to learn about the risks of new technologies and social media and to use these responsibly.
- encouraging pupils to talk about feelings and ensure they are listened to by a range of appropriate adults.
- supporting children to feel safe, develop confidence and independence and increase the development of self-esteem and self-assertiveness and responding to concerns of aggression or bullying. The anti-bullying policies for each school can be found on their school website.
- liaising and working together with other support services and those agencies involved in safeguarding children, including domestic abuse including Early Help and preventative services
- liaising and working together with other support services and those agencies involved in safeguarding children, including Early Help and preventative services as required in Working Together to Safeguarding Children 2023: <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- considering intra familial harms and any necessary support for siblings.
- having a behaviour policy that is aimed at supporting vulnerable pupils in each school. The behaviour policy outlines measures to prevent bullying, including cyber-bullying, prejudice-based and discriminatory bullying.
- having clear procedures in place for addressing and minimising the risk of child-on-child abuse, including harmful sexual behaviours, sexual violence, and sexual harassment (which could take place on or off-line).

- acknowledging the importance of ‘contextual safeguarding’, <https://contextualsafeguarding.org.uk/> which considers wider environmental factors in a pupil’s life that may be a threat to their safety and/or welfare.
- alerting the local authority if it is aware of any child being looked after under a Private Fostering arrangement. On admission to school, and at other times, the school will be vigilant in identifying any private fostering arrangement.
- acknowledging that a child that is looked after (Children We Care For CWCF), in kinship care or has been previously looked after by the Local Authority potentially remains vulnerable and ensures that all staff have the skills, knowledge and understanding to support these children.
- taking positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting pupils or students with certain protected characteristics in order to meet their specific need. For example, taking positive action to support girls if there was evidence that they were being subjected to sexual violence or sexual harassment. This includes making reasonable adjustments for disabled children and young people and those identified as having special educational needs.
- acknowledging that a child or young person being lesbian, gay or bisexual can sometimes be targeted by other children.
- offering support to children that are gender questioning with consideration to their individual needs, in partnership with their families and any clinical advice.
- Being aware that where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil’s needs. The schools will follow DfE guidance on Alternative Educational Provision: [Alternative provision - GOV.UK](https://www.gov.uk/government/guidance/alternative-educational-provision)

5. DEALING WITH A CONCERN AND RECORD KEEPING

- 5.1. If a member of staff has a concern about a child or if a child tells them they are being, or at risk of being, abused, exploited or neglected, staff will appropriately respond by listening and offering reassurance.

Staff should:

1. Make an accurate factual record as soon as possible including details of:
 - Dates and times of their observations/incident
 - Dates and times of any discussions in which they were involved
 - Any injuries
 - Explanations given by the child/ adult
 - What action was taken
 - Any actual words or phrases used by the child

The records will be automatically signed and dated by the author on MyConcern.

Concerns are logged on our electronic recording system MyConcern using the red 'report a concern' button.

2. Listen to wishes and feelings of the child, do not make any promises but keep the child informed (age appropriate) of the action that will be taken.
 3. Report it to the DSL/DDSLs.
 4. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
 5. In the absence of the DSL or DDSL, staff will refer directly to MASH or the child's social worker (if applicable) and the police (if appropriate) if there is a significant concern.
- 5.2. The DSL will ensure any decisions and justifications for those decisions will be recorded in writing with clear outcomes documented following any action taken.
- 5.3. Our schools will discuss any concerns we have with the child's parents. There may be occasions when this is not appropriate, and if so, school staff would consult with other agencies prior to involving parents. We will record any decision not to discuss with parents and why.
- 5.4. Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in each school. Safeguarding records are kept in accordance the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), which place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance '[For Organisations](#)' which includes information about your obligations and how to comply, including protecting personal information and providing access to official information.
- 5.5. All safeguarding records will be transferred in accordance with GDPR/KCSiE to the child's receiving school/setting within five school days.
- 5.6. Each Headteacher will be kept informed of any significant concerns by the DSL, if they are not the DSL and all other staff are informed on a need-to-know basis.

6. CONCERNS AND ALLEGATIONS ABOUT STAFF

For further details please refer to Appendix D

- 6.1. All staff understand the process and procedures to manage any safeguarding concern or allegation (no matter how small) about staff members (including supply staff, volunteers and contractors).
- 6.2. If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff (including supply staff, volunteers and contractors), then this should be referred to the Headteacher.
- 6.3. If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the Procedure for Recording Low-Level Concerns About a Member of Staff found in The MILL Academy Staff Code of Conduct.

7. INFORMATION SHARING

- 7.1. We recognise that all matters relating to Safeguarding are confidential.
- 7.2. All staff members have a professional responsibility to share information with other agencies to safeguard children.
- 7.3. All staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing to safeguard and promote children's welfare.
- 7.4. We will ensure that staff members are confident about what they can and should do according to the law, including how to obtain consent to share information and when information can be shared without consent.
- 7.5. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

8. MULTI AGENCY WORKING

- 8.1. We will develop and promote effective working relationships with other agencies, including agencies providing early help services to children, the police and Children's Social Care.
- 8.2. We will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children.
- 8.3. We will participate in Child Safeguarding Practice Reviews (CSPRs), other reviews and file audits as and when required to do so by the Oxfordshire Safeguarding Children's Partnership. We will ensure that we have a clear process for gathering the evidence required for reviews and audits and embed recommendations into practice and complete required actions within agreed timescales.

9. SAFER RECRUITMENT

- 9.1. **The MILL Academy** is committed to ensuring the development of a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff across our schools.
- 9.2. The Trust Board and Leadership Team are responsible for ensuring that the school follows safe recruitment processes outlined within guidance.
- 9.3. **The MILL Academy** is responsible for ensuring that all our schools maintain an accurate Single Central Record (SCR) in line with statutory guidance. This will be monitored and reviewed to ensure compliance by the Trust and each school's Leadership Team.
- 9.4. The Trust Board will ensure that at least one of the people who conducts a recruitment interview has completed safer recruitment training.
- 9.5. We are also committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2018 and related obligations under the

Childcare Act 2006 in schools. **(Applicable only to nursery, primary and childcare for children up to the age of 8).**

- 9.6. We will ensure that contractors and providers are aware of each school's safeguarding policy and procedures and that this will be referred to and followed if an allegation is made regarding a member of their agency. We will require that employees and volunteers provided by these organisations use our procedure to report concerns.
- 9.7. We will seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding checks in line with *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, 2025*. If assurance is not obtained, permission to work with our children or use our school premises may be refused.
- 9.8. When we commission services from other organisations, we will ensure that compliance with our policy and procedures is a contractual requirement.
- 9.9. We advise all staff to disclose any reason that may affect their suitability to work with children that could be a transferable risk to their role.

10. TRAINING

- 10.1. All staff in our schools receive appropriate safeguarding training at induction, which is updated at least annually, and all staff are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately.
- 10.2. Our DSLs undergo training to provide them with the knowledge and skills required to carry out their role. Our DSLs and any members of our DSL team undergo their DSL training every 2 years to fulfil their role.
- 10.3. In our schools, all staff receive appropriate safeguarding training at induction and this is updated at least annually.
- 10.4. Separate training is provided to all new staff on appointment as part of their induction process. This includes staff online safety which amongst other things is covered in the Staff Code of Conduct. This information will be regularly updated.
- 10.5 The **Trust Board** should ensure that all local committee members and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- 10.6. We will ensure that staff members provided by other agencies and third parties, e.g., supply teachers and contractors, have received appropriate safeguarding training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-school training if it takes place during their period of work for the school.

10.7. The Designated Safeguarding Lead at each school will update school staff and volunteers on any changes to safeguarding legislation and procedures and relevant learning from Safeguarding Practice Reviews (CSPR's) in line with Working Together 2023. These updates will occur annually or more frequently when necessary and will include safeguarding and child protection updates such as online safety (for example, via emails, e-bulletins and staff meetings) to provide them with the skills and knowledge to safeguard children effectively.

10.8. Each school will maintain accurate and up to date records of staff induction and training.

11. WHISTLEBLOWING IN A SAFEGUARDING CONTEXT

11.1. While the Trust has a separate whistleblowing policy, this is a summary that outlines the process when there is a concern about poor or unsafe practice and potential failures in each school's safeguarding provision. This does not replace the whistleblowing policy and should be read in conjunction the Trust's policy.

Whistleblowing is a term that is used where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed. All staff and volunteers should feel able to raise concerns and know they will be taken seriously by School Leaders.

There are a limited number of areas that can be called Whistleblowing, and the policy protects staff from being punished for raising concerns.

If you are concerned that any member of staff within the trust is not following safeguarding processes or behaving in a way that is placing children at risk, you should, in the first place, make the headteacher of the specific school aware.

Within the MILL Academy, the CEO, Ms Wendy Hemmingsley is the senior manager and responsible for all staff. If your concern is about a headteacher, you should raise this with Ms W Hemmingsley, the MILL Academy CEO.

If your concern is about the MILL Academy CEO, you should raise this with Ms Claire King, the Chair of the Trust Board.

If you would prefer to raise your concerns outside of the school, then you are able to contact the NSPCC whistleblowing line on 0800 028 0285 or email help@nspcc.org.uk.

12. SITE SECURITY

12.1. All staff members have a responsibility to ensure our buildings and grounds are safe, this includes ensuring the safety of any visitors into school.

12.2. The schools will not accept the behaviour of any individual, parent or anyone else, that threatens school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site.

13. QUALITY ASSURANCE

- 13.1. We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures.
- 13.2. The school's senior management and the Trust Board will ensure that action is taken to remedy any deficiencies and weaknesses identified in child protection arrangements without delay.

14. POLICY REVIEW

- 14.1. This policy will be reviewed every academic year. All other linked policies will be reviewed in line with the policy review cycle.
- 14.2. The Designated Safeguarding Leads will ensure that staff members, including volunteers and sessional workers are made aware of any amendments to policies and procedures. The DSL has delegated responsibility to the Compliance Officer to ensure volunteers and sessional workers are made aware of any amendment to safeguarding policies and procedures.
- 14.3. Additional updates to the safeguarding policy and appendix will take place when needed.

APPENDIX A

THE ROLE OF THE DESIGNATED SAFEGUARDING LEAD

Managing referrals:

- Refer cases to MASH and the Police, where appropriate, in a timely manner avoiding any delay that could place the child at increased risk.
- Refer to the Oxfordshire Threshold of needs to assist with decision making: [Threshold-of-needs.pdf](#)
- Act as a source of support, advice, and expertise to staff members on matters of child protection and safeguarding, including Contextual Safeguarding.
- Have responsibility to ensure there is at least one key adult for 'Operation Encompass'. Guiding principles of the scheme are here [Home : Operation Encompass](#) An annual information letter must be sent to parents.
- To ensure that the Local Authority are notified if children are persistently absent or missing education. [Children missing education - GOV.UK](#)

Record keeping:

- Keep detailed, accurate, secure records of all safeguarding and welfare concerns, discussions and decisions made, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as children's social care or the Prevent programme etc.
- Maintain a chronology of significant incidents for each child with safeguarding concerns, including a record of decisions made and the reasons for those decisions.
- Ensure such records are kept confidentially and securely and separate from the child's educational record.
- Schools should have at least two emergency contacts for every child.
- When a child leaves one of our schools, the Designated Safeguarding Lead will contact the Designated Safeguarding Lead at the new school and will ensure that the safeguarding file is forwarded to the receiving school within 5 school days. We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving school and/or evidence of recorded delivery.

Multi-agency working and information sharing:

- The DSLs recognise and are committed to their responsibility to work with other professionals and agencies in line with statutory guidance.
- Our Schools are not the investigating agency when there are child protection concerns. We will, however, contribute to the investigation and assessment processes as required. We recognise the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other Early Help multi-agency meetings.

Raising Awareness:

Each DSL should:

- Ensure each member of staff has access to, and understands, the Trust's child protection policy and procedures, and that training is regularly updated and at least annually.

- Ensure the Trust's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Trust or headteachers regarding this.
- Ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of each school in this.
- Link with the safeguarding partnership arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- Help promote educational outcomes by sharing information about welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.
- Encourage a culture of listening to children and taking account of their wishes and feelings in any action the school takes to protect them.

Training knowledge and skills:

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) should also undertake Prevent awareness training.

Quality assurance:

- Monitor the implementation of and compliance with policy and procedures, including periodic audits of Safeguarding files (at a minimum once a year).
- Complete the 175/157 annual safeguarding report and submit to the Local Authority.
- Provide regular reports to the Trust detailing changes and reviews to policy, training undertaken by staff members and relevant data about vulnerable children.

Support for staff:

- The school will have a framework for providing an opportunity for staff who are working directly with vulnerable children to talk through and reflect on their involvement with the child's case.

APPENDIX B

SAFEGUARDING DEFINITIONS

Definitions:

- **Abuse:** a form of maltreatment of a child. 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 (e.g., via the internet). They may be abused by an adult or adults or another child or children.
- **Children** are any people who have not yet reached their 18th birthday; a 16-year-old, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger. KCSIE now applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021.
- **Child protection** is part of safeguarding and promoting the welfare of children and refers to activity undertaken to protect specific children who are suffering, or likely to suffer, significant harm, or significant harm is suggested.
- **Early Help** is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children rather than reacting later. It is particularly important that the designated safeguarding lead (and their deputies) know what the local early help process is and how and where to access support.
- **Safeguarding and promoting the welfare of children** is defined as:
 - providing help and support to meet the needs of children as soon as problems emerge.
 - protecting children from maltreatment, whether that is within or outside the home, including online.
 - preventing impairment of children's mental and physical health or development.
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
 - promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the child.
 - taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.
- **Significant harm** is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 47 of the Children Act 1989 states 'where the question of whether harm suffered by a child is significant turns on the child's health or development, his health or development shall be compared with that which could reasonably be expected of a similar child.'

- **Vulnerable children:** Any child may benefit from Early Help but all school staff should be particularly alert to the potential need for early help for a child who:
 - is disabled or has certain health conditions and has specific additional needs
 - has special educational needs (whether or not they have a statutory Education, Health and Care plan)
 - has a mental health need
 - is a young carer
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
 - is frequently absent from education, missing/goes missing from home, or care
 - has experienced multiple suspensions, is at risk of being permanently excluded from schools and in Alternative Provision or a Pupil Referral Unit
 - is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
 - is at risk of being radicalised or exploited
 - has a parent or carer in custody or is affected by parental offending
 - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
 - is misusing alcohol and other drugs themselves
 - is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
 - is a privately fostered child.

OSCP: [Early Help and the Locality Community Support Service \(LCSS\) - Oxfordshire Safeguarding Children Partnership](#)

CATEGORIES OF ABUSE:

- **Emotional abuse** is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child's emotional development and conveying 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.
- interactions that are beyond a child's developmental capability.
- overprotection and limitation of exploration and learning.
- preventing the child from participating in normal social interaction.

- seeing or hearing the ill-treatment of another.
- serious bullying (including cyberbullying).
- causing children frequently to feel frightened or in danger or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- **Neglect** is the persistent failure to meet a child's basic physical 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 misuse.

Once a child is born, it may involve a parent failing to:

- provide adequate food, clothing and shelter, including exclusion from home or abandonment
- protect a child from physical and emotional harm or danger
- ensure adequate supervision, including the use of inadequate care givers
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Educational neglect is also considered: [Neglect is also Child Abuse: Know All About It | NSPCC](#)

- **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning, 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.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (KCSIE 2025).

APPENDIX C:

ADDITIONAL INFORMATION

Appendix C contains important additional information about specific forms of abuse and safeguarding issues for our staff awareness and is in line with the current Keeping Children Safe in Education.

Child abduction and community safety incidents

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

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be treated as exploitation. As well as being physical, it can be facilitated and/or take place online.

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media). CCE indicators can also be indicators of CSE, as can children who have older boyfriends or girlfriends and children who suffer from sexually transmitted infections or become pregnant.

The Department of Education provide: [Child sexual exploitation: definition and guide for practitioners - GOV.UK](#)

A full list of indicators can be found here: [Child Sexual Exploitation - Oxfordshire Safeguarding Children Partnership](#)

County Lines

Is a term used to describe gangs, groups or drug networks that supply drugs from urban to suburban areas across the country, including market and coastal towns, using dedicated mobile phone lines or 'deal lines.' They exploit children and vulnerable adults to move the drugs and money to and from the urban area, and to store the drugs in local markets. They will often use intimidation, violence and weapons, including knives, corrosives and firearms. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery and missing persons and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and voluntary and community sector organisations. County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 - year olds](#).

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [Child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children who are absent from education

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are absent for prolonged periods or missing from education in their area.

Children who have unexplainable and/or persistent absences from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. School staff should follow the school's procedures for dealing with children who are persistently absent and children missing education to identify such abuse as early as possible and, in the case of absent pupils, this helps prevent the risk of them becoming a child absent from education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and have a social worker (such as a child who is a child in need, who has a child protection plan or is a child we care for), where being absent from education may increase known safeguarding risks within the family or in the community. See 'working together to improve school attendance' for further statutory guidance: [Working together to improve school attendance - GOV.UK](#)

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Online safety, remote learning, cybercrime and filtering and monitoring

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers a school or college to protect and educate pupils, students and staff in their use of technology and establishes mechanisms to identify, intervene in and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact:** being subjected to harmful online interaction with other users, for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm, for example: making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If you feel pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

The schools have Online Safety guidelines, which covers the use of mobile phones, cameras and other digital recording devices e.g. iPads. For online safety, there is support about children accessing the internet whilst they're at school using data on their phones. This considers that many children have unlimited and unrestricted access to the internet via 3G, 4G and 5G networks. This access means some children, whilst at school, sexually harass, bully and control others via their mobile and smart technology, share indecent images consensually and non-consensually and view and share pornography and other harmful content. This has been carefully considered within each school's ICT guidelines, including the management of devices, filtering and monitoring and access to smart technology. We recognise the importance of online safety, including making parents aware of what the school asks children to do online (e.g. sites they need to visit or who they'll be interacting with online).

The protocol for remote learning demonstrates an understanding of how to follow safeguarding procedures when planning remote education strategies and teaching remotely. The school maintains the capability to provide remote education when it is not possible for some or all of their pupils to attend in person.

<https://www.gov.uk/government/publications/providing-remote-education-guidance-for-schools>

Cybercrime

The school are aware that children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme.

Additional advice can be found at: [Cyber Choices](#), [When to call the Police](#) and [National Cyber Security Centre - NCSC.GOV.UK](#)

Filtering and monitoring

The Trust and Headteachers are doing all that they reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, they will ensure their schools have appropriate filters and monitoring systems in place and that there is regular review of their effectiveness.

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, they will also consider the age range of their pupils, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

The appropriateness of any filters and monitoring systems are a matter for individual schools and will be informed in part, by the risk assessment required by the Prevent Duty.

To support schools to meet this duty, the Department for Education's [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK](#) set out that schools should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs
- schools can use the department's [Plan technology for your school - GOV.UK](#) to self - assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.

The Trust and Headteachers should review the standards and discuss with IT staff and service providers what more needs to be done to support schools in meeting this standard.

Additional guidance on "appropriate" filtering and monitoring can be found at:

- UK Safer Internet Centre: [Appropriate Filtering and Monitoring - UK Safer Internet Centre](#). The UK Safer Internet Centre produced a series of webinars for teachers on behalf of the Department. These webinars were designed to inform and support schools with their filtering and monitoring responsibilities and can be assessed at [Filtering and monitoring webinars available - UK Safer Internet Centre](#)
- Southwest Grid for Learning [Safety and Security Online | SWGfL](#) has created a tool to check whether a school's filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content).
- Support for schools when considering what to buy and how to buy it is available via the: [schools' buying strategy](#) with specific advice on procurement here: [buying for schools](#).
- The Department for Education has published [Generative AI: product safety expectations - GOV.UK](#) to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

Domestic abuse

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the

behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting, emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

Operation Encompass

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8:00 to 13:00, Monday to Friday on 0204 513 9990

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children’s social care where a child has been harmed or is at risk of harm.

Mental Health:

- All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, it can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children’s experiences can impact on their mental health, behaviour and education.

- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

[Promoting children and young people's mental health and wellbeing - GOV.UK](#)

The Department of Education has published advice and guidance [Preventing bullying - GOV.UK](#) and [Mental health and behaviour in schools - GOV.UK](#). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience amongst young people including its guidance [Promoting children and young people's mental health and wellbeing - GOV.UK](#). Their resources include social media, forming positive relationships, smoking and alcohol. See [Every Mind Matters](#) for links to all materials and lesson plans.

Modern slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance. [Modern slavery: how to identify and support victims - GOV.UK](#)

Preventing radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a school's safeguarding approach.

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

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism

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

The statutory Prevent guidance summarises the requirements on schools in terms of four general themes:

- risk assessment
- working in partnership
- staff training
- IT policies

Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify

individual children who may be at risk of radicalisation and what to do to support them. Schools and colleges should have clear procedures in place for protecting children at risk of radicalisation. It is not necessary for schools and colleges to have distinct policies on implementing the Prevent duty.

The Prevent duty builds on existing local partnership arrangements. For example, The Trust and Headteachers of all schools should ensure that their safeguarding arrangements consider the policies and procedures of Local Safeguarding Children Board (LSCBs).

Designated safeguarding leads and other school leaders should familiarise themselves with the revised [Prevent duty guidance: England and Wales \(2023\) - GOV.UK](#)

Prevent

The **Prevent** guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering is in place. It is also important that schools teach pupils about online safety more generally. Further information and guidance are available on the OSCP website: [Radicalisation - Oxfordshire Safeguarding Children Partnership](#)

The Department for Education has also published advice for schools on the Prevent duty and is intended to complement the Prevent guidance and signposts other sources of advice and support. [The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK](#)

Channel

School staff should understand when it is appropriate to make a referral to the Channel team. Channel is a programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be susceptible to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages and an individual will be required to provide their consent before any support delivered through the programme is provided.

The designated safeguarding lead (or a deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel and Prevent Multi-Agency Panel \(PMAP\) guidance - GOV.UK](#) and [Prevent duty training: Learn how to support people susceptible to radicalisation | Prevent duty training](#)

Sexual harassment, violence, harmful sexual behaviours

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence is rape, assault by penetration, sexual assault, causing someone to engage in sexual activity without consent (when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003).

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

Harmful Sexual Behaviours exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable.

Schools should be aware of the importance of:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it
- recognising, acknowledging and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them.

Our schools will follow Part 5 of Keeping Children Safe in Education 2025 when responding to all signs, reports and concerns of child-on-child sexual violence and sexual harassment.

So-called 'honour'– based abuse (including female genital mutilation and forced marriage)

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. [Female genital mutilation: resource pack - GOV.UK](#)

Mandatory Reporting Duty for teachers - Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) placed a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school’s designated safeguarding lead and involve the Integrated Front Door as appropriate.

Forced Marriages

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

APPENDIX D:

CONCERNS AND ALLEGATIONS ABOUT STAFF INCLUDING SUPPLY STAFF, VOLUNTEERS AND CONTRACTORS

The Local Authority Designated Officer for Allegations (LADO) must be told of allegations against adults working with children and young people within one working day. This includes allegations relating to individuals or organisations using the school premises for the purpose of running activities for children (for example community groups, sports associations or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO.

This includes all cases that meet the harm threshold where a person is alleged to have:

- behaved in a way that has harmed, or may have harmed a child
- possibly committed a criminal offence against, or related to, a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children and is known as transferable risk.

There are two levels of allegation/concern:

- allegations that may meet the harms threshold (see definition above)
- allegation/concerns that do not meet the harm threshold – referred to as ‘low level concerns’

The Trust and Headteachers should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold. Concerns may arise in several ways and from a number of sources. For example: suspicion, complaint or disclosure made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks undertaken.

It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

Low Level Concerns

Creating a culture in which all concerns about adults, including allegations that do not meet the harm threshold, are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children
- having favourites

- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating pupils

Such concerns should always be recorded and reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified

Pre-appointment checks and Safer Recruitment

Any offer of appointment made to a successful candidate, including one who has lived or worked abroad, must be conditional on satisfactory completion of the necessary pre-employment checks.

When appointing new staff, schools must:

- verify a candidate's identity. Identification checking guidelines can be found on the [How to prove and verify someone's identity - GOV.UK](#) website
- obtain (via the applicant) an enhanced DBS certificate (including barred list information for those who will be engaging in regulated activity)
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role
- verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, follow advice on the [Checking a job applicant's right to work - GOV.UK](#) website
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate and verify professional qualifications, as appropriate
- verify professional qualifications, as appropriate. The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.
- carry out an online search on shortlisted candidates to help identify any issues that are publicly available online. Shortlisted candidates will be informed before online searches are carried out. Ensure that evidence of these checks has been retained

In addition:

- independent schools, including academies and free schools, must check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State
- maintained schools must check that the Governing body is not subject to a section 128 direction made by the Secretary of the State
- ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State for prohibition checks or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012
- all schools providing childcare must ensure that appropriate checks are carried out to ensure that individuals employed to work in reception classes or in wraparound care for children up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations.

Single Central Record

Schools and colleges must keep a single central record.

The single central record must cover the following people:

- for schools, all staff, including teacher trainees on salaried routes, agency and third-party supply staff, even if they work for one day

The minimum information that must be recorded in respect of staff members (including teacher trainees on salaried routes) is set out below. For agency and third-party supply staff, schools and colleges must include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, the date this confirmation was received and whether details of any enhanced DBS certificate have been provided in respect of the member of staff.

The single central record must indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed or certificate obtained:

- an identity check, (identification checking guidelines can be found on the GOV.UK website)
- a standalone children's barred list check 90
- an enhanced DBS check (with children's barred list check) requested/certificate provided
- a prohibition from teaching check
- further checks on people who have lived or worked outside the UK
- a check of professional qualifications, where required,
- a check to establish the person's right to work in the United Kingdom,
- independent schools (including academies and free schools) must record details of the section 128 checks undertaken for those in management positions.

The details of an individual should be removed from the single central record once they no longer work at the school.

Our school follows Part 3 of Keeping Children Safe in Education 2025 and this should be read on conjunction with the Safer Recruitment policy.



STAFF CODE OF CONDUCT

Policy author	CEO: Wendy Hemmingsley
Last reviewed	September 2025
Review frequency	Annual
Next review date	September 2026
Approved by	The MILL Academy Executive Team

Introduction

The MILL Academy (the Trust) is a school trust currently comprising of: The Henry Box School, Queen Emma's Primary School and Finstock Church of England Primary School. The MILL Academy Trust is run by a Board of Trustees. The MILL Academy Trust endeavours to provide the best education possible for all of its pupils in an open and transparent environment.

All adults who work in schools must act professionally and create an environment that secures the safety and well-being of children and young people and the best outcomes for them. This relies on effective interactions and good relationships between adults and children. People who work with children and young people can be vulnerable and The MILL Academy Trust Code of Conduct provides advice and guidance to ensure that staff are aware of appropriate, professional behaviour. It also gives clear advice on what could be considered to be unwise behaviour or even misconduct. Our Code of Conduct aims to protect the safety and well-being of both children and all staff who work in the Trust

Purpose of Guidance

It is important that all adults working with children understand that the nature of their work and the responsibilities related to it, place them in a position of trust. This guidance provides clear advice on appropriate and safe behaviours for all adults working with children in paid or unpaid capacities.

The guidance aims to:

- keep children safe by clarifying which behaviours constitute safe practice and which behaviours should be avoided;
- assist adults working with children to work safely and responsibly and to monitor their own standards and practice;
- set clear expectations of behaviour and practice relevant to the staff of The MILL Academy Trust;
- support employers in giving a clear message that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken;
- minimize the risk of misplaced or malicious allegations made against adults who work with children and young people;
- reduce the incidence of positions of trust being abused or misused.

Guiding Principles

- Everyone who comes into contact with children and their families has a role to play in safeguarding children (DfE 'Keeping Children Safe in Education: Information for All Trust and College Staff, September 2025).
- The welfare of the child is paramount (Children Act 2004).
- It is the responsibility of all adults to safeguard and promote the welfare of children and young people. This responsibility extends to a duty of care for those adults employed, commissioned or contracted to work with children and young people.
- Staff must be responsible for their own actions and behaviour and should not conduct themselves in a way which could lead others to question their motivation and intentions.
- The same professional standards should always be applied regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity.
- Staff should work and be seen to work in an open and transparent way.

- Any incidents that causes concern must be recorded and records kept of decisions made in accordance with Trust policy.
- Adults should continually monitor and review their practice and ensure they follow the guidance contained in this document.
- All staff should know who the **Designated Safeguarding Leads (DSL)** are and they should be familiar with the Trust’s Safeguarding policy and understand their role in safeguarding the well-being of children and young people.
- **The Nolan Principles - The Seven Principles of Public Life**
The Seven Principles of Public Life (also known as the Nolan Principles) apply to anyone who works as a public office-holder. This includes all those who are elected or appointed to public office, nationally and locally, and all people appointed to work in the Civil Service, local government, the police, courts and probation services, non-departmental public bodies (NDPBs), and in the health, **education**, social and care services. All public office-holders are both servants of the public and stewards of public resources. The principles also apply to all those in other sectors delivering public services.

The seven principles are:

1. Selflessness

Holders of public office should act solely in terms of the public interest.

2. Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

3. Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

4. Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

5. Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

6. Honesty

Holders of public office should be truthful.

7. Leadership

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

Duty of care

- When accepting a role that involves working with children all staff must accept the responsibilities and trust inherent in the role.
- All staff have a duty of care to children and must always act and be seen to act in their best interest.
- All staff whether paid or voluntary, have a duty to keep young people safe and protect them from physical and emotional harm. This is secured through the development of respectful, caring and professional relationships between staff and students and behaviour by staff that demonstrates integrity, maturity and good judgement.
- The Trust has a duty of care towards its employees and will provide a safe working environment and guidance about safe working practices in line with the Health and Safety at Work Act 1974. The act also requires employees to take care of themselves and anyone else who may be affected by their actions.
- There will be situations in which staff must make decisions or take actions where no guidance exists. Staff must always act to secure the best interests and welfare of children in their charge and will therefore be seen to be acting reasonably.

Power and Positions of Trust

- A relationship between a student and a member of staff is not a relationship of equals. Staff have a responsibility to ensure that they do not use their power to intimidate, threaten, coerce or undermine students. They should not use their status or standing to form an inappropriate relationship with students.
- Staff should avoid behaviour or situations that could be misinterpreted by others and report and record any incident that they are concerned could be misinterpreted.
- When a person aged 18 or over is in a position of trust with a child under 18, it is an offence for that person to engage in sexual activity with that child. Further guidance is found in the Sexual Offences Act 2003.

Confidentiality

- All staff have daily responsibilities that mean they will have access to confidential; information about children. Our system of confidentiality works on a 'need to know' basis and confidential information must not be discussed casually with colleagues. In some circumstances however, information may need to be anonymous. Information must never be used to intimidate, embarrass or humiliate students. Always be cautious about passing information about children to other people. Always follow GDPR and ensure you are up to date with this.
- There are circumstances in which staff **MUST** share information about a child with an appropriate person – for example when abuse or neglect is suspected, **this must be reported to a Designated Safeguarding Lead (DSL)**. If in any doubt always consult a member of the Trust or School Leadership Team. Any legal or press enquiries must always be passed to a member of the Trust Leadership Team. All staff must make sure that students understand that information that they disclose to you about any matter cannot be kept confidential and that **you cannot offer them a special confidential relationship**. If you do so you are putting yourself at risk in terms of how this could be interpreted by others.

- The Data Protection Act of 1998 governs the storing and processing of information about students and if clarification is required, consult **the DSL**.

Propriety and Behaviour

- All adults working with children and young people have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. It is therefore expected that they will adopt high standards of personal conduct in order to maintain the confidence and respect of the public in general and all those with whom they work.
- There may be times, for example, when an adult's behaviour or actions in their personal life come under scrutiny from local communities, the media or public authorities. This could be because their behaviour is considered to compromise their position in their workplace or indicate an unsuitability to work with children or young people. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour.
- Conduct outside of work: unlike some other forms of employment, working at The MILL Academy Trust means that an employee's conduct outside of work could have an impact on their role. The MILL Academy Trust staff must not engage in conduct outside work which could seriously damage the reputation and standing of the Trust or the employee's own reputation or the reputation of other members of the Trust's community. Employees should be aware that any conduct that we become aware of that could impact on their role within the Trust or affect the Trust's reputation will be addressed under our disciplinary procedure. This includes use of social media even where comments are not publicly available. We therefore expect employees to make us aware immediately of any such situations that have happened outside of The MILL Academy Trust.
- Employees may take up additional employment, paid or unpaid, providing it will not create a conflict of interest, cause the Trust reputational harm or adversely affect an employee's ability to carry out their duties and responsibilities for the Trust effectively and efficiently e.g. significant increase in workload.

Private tutoring of children that attend Trust Schools is not permitted as this is in direct conflict with The Nolan Principles (see pages1-2).

- Paid or unpaid employment includes, but is not limited to:
 - taking up employment with any employer on any type of contractual arrangement;
 - running your own business;
 - private tutoring;
 - holding directorships or trusteeships;
 - participating or having any other interest in organisations that may be a competitor or supplier to the Trust.
- Prior permission must be sought from the School's Headteacher before taking up any additional employment.
- Carrying out public duties (e.g. jury service) does not count as additional employment.

- Employees must not use any Trust property or facilities to support additional employment and any customer must be informed that the private nature of the work is not connected with the Trust and School.
- Adults in contact with children and young people should therefore understand and be aware, that safe practice also involves using judgement and integrity about behaviours in places other than the work setting.
- The behaviour of an adult's partner or other family members may raise similar concerns and require careful consideration by an employer as to whether there may be a potential risk to children and young people in the workplace.
- Employees must not market their private business using school/Trust data.
- Employees must not exploit their school/Trust contacts with staff/parents/families/students/carers to market or sell services/products from their own personal business enterprises for personal financial gain.

Personal Conduct, Dress and Appearance

- Staff should think carefully about revealing details of their personal lives to students, for example, the context in which it is happening, and should not discuss their personal lives within the hearing of students.
- Staff should not make, or encourage others to make, unprofessional, personal comments which scapegoat, demean or humiliate or might be interpreted as such. This includes staff to staff communications.
- No child or young person should be in or invited into the home of a member of staff unless the reason for this has been firmly established and agreed with parents/carers and the Headteacher. Staff should be vigilant in maintaining privacy and mindful of the need to avoid placing themselves in vulnerable situations.
- Dress is a matter of personal choice; however, staff should ensure that their dress and appearance is appropriate to their professional role, which may be different from that adopted in their personal life. Staff should be dressed safely and appropriately so that appearance promotes a positive and professional image, and does not render them vulnerable or open to criticism. Dress should not be offensive, revealing, sexually provocative, cause embarrassment or give rise to misunderstanding.

Dress Code

Purpose

Appearance

Religious and cultural dress

Implementing and review

Purpose

We encourage everyone to maintain an appropriate standard of dress and personal appearance at work and to conduct themselves in a professional manner.

The purpose of our dress code is to establish basic guidelines on appropriate clothing and appearance at our workplace, so that we:

- promote a positive image and staff look professional;
- respect religious, racial and gender-specific clothing requirements and those of staff with disabilities where possible;
- take account of health and safety requirements; and
- help staff decide what clothing it is appropriate to wear to work.

Different departments may have specific requirements that result in particular clothing demands, for example, because their work raises health and safety risks. It is important that all staff dress in a manner appropriate to their working environment and the type of work they do.

We expect staff to take a common-sense approach to the dress code. Any enquiries regarding the operation of our dress code (including whether an article of clothing is suitable to wear to work) should be made to their line manager or the HR Officer.

Appearance

- While working for us you represent us with students, parents and the public. Your appearance contributes to our reputation and the development of the Trust. It is important that you appear clean and smart at all times when at work.
- All members of staff are supplied with an identity badge that must be worn and visible at all times when you are at work.
- With the exception of PE teachers, staff should not wear casual or gym wear to work. This includes track suits, sweat-shirts, casual or sports t-shirts or shorts, combat trousers, jogging bottoms, denim, or leggings.
- Clothing should not be dirty, frayed or torn. Tops should not carry wording or pictures that might be offensive or cause damage to our reputation. It is inappropriate to wear clothing such as cut-off shorts, crop tops, see through material or clothes that expose areas of the body normally covered at work.
- Footwear must be safe and clean and take account of health and safety considerations. Trainers, and flip-flops are not acceptable.
- Where we provide safety clothing and equipment, including protective footwear, it should be worn or used as appropriate and directed.
- Staff should not wear excessive or unconventional clothing or jewellery that could present a health and safety risk.
- Hair should be neat tidy and well groomed. Hair styles and colours which are considered extreme may be deemed as unacceptable.
- We recommend that tattoos where appropriate should remain covered at all times if they compromise a professional appearance.
- A professional appearance must be maintained at all times i.e. shirt, trousers, skirt, suits and dresses.

Religious and cultural dress

- Staff may wear religious and cultural dress (including clerical collars, head scarves, skullcaps and turbans) unless it breaches this policy or compromises the health and safety of the wearer, their colleagues or any other person.
- Where necessary the HR Officer can disseminate appropriate information explaining cultural dress and customs.
- Priority is at all times given to health and safety requirements. Where necessary, advice will be taken from our Health and Safety Officer.

Implementing and review

- Line Managers are responsible for ensuring that staff observe the standards set by this dress code.
- Failure to comply with the dress code may result in action under our Disciplinary Procedure.
- In serious cases, where an employee's appearance is, in the Headteacher's view, unacceptable the employee may be required to return home to change. In these circumstances the employee will not be paid for the duration of his/her absence from work.
- On professional development days and holiday periods staff should wear smart casual dress. This excludes outward facing staff who continue to have direct contact with members of the public i.e. main office staff, who should continue to wear smart dress as above.
- We will review the dress code periodically to ensure that it meets our demands, in particular with regard to health and safety of our staff and all those they deal with.

Gifts, rewards, favouritism, infatuation

- It is acceptable to receive small tokens of appreciation from children or parents at Christmas or as a thank-you but staff should be careful not to accept any gift that could be considered a bribe to lead the giver to expect preferential treatment. Gifts of a significant value should not be accepted neither should gifts on a regular basis.
- It is not acceptable to give gifts to students. Any recognition given to students should be part of the Trust's rewards system and available to all students to avoid charges of favouritism.
- It is not uncommon for students to become attracted to members of staff and all staff should be aware that such situations carry a high risk of words of actions being misinterpreted. If a member of staff finds themselves or a colleague in this situation they should talk to a member of the Trust/School Leadership Team as soon as possible to allow steps to be taken to avoid hurt and distress to both parties.

Social Contact, Physical Contact

- Staff must not establish social contact with students outside of Trust to establish a friendship or to strengthen a relationship. Social contact can be misconstrued. Staff should report any situation that they feel could compromise themselves or the Trust to a School Leader.
- Staff should not give out personal details such as their home phone number, address or e-mail address to students unless the need to do so is communicated to senior staff.

- A no touch approach is not always appropriate or practical in some circumstances i.e. a young child has injured themselves or you need to break up a fight, but generally please operate a 'no touch' approach at all times. It is important to understand that well intentioned physical contact can be misinterpreted by the student or an observer. Staff must use their professional judgement at all times. Physical contact must never be secretive or represent an abuse of authority, never indulge in 'horseplay'.
- Extra caution is required when it is known that a child has suffered from previous abuse or neglect. The child might associate physical contact with these circumstances and this makes staff vulnerable to allegations of abuse.
- **Physical education and other activities requiring physical contact** – staff who teach PE or who offer music tuition will on occasions need to initiate physical contact with students in order to support the students to perform a task safely/appropriately. This must be done with the student's agreement and should be for the minimum time necessary.
- **Showers and changing** – students need privacy and respect when changing clothes or taking a shower but there needs to be an appropriate level of supervision to safeguard young people, to ensure health and safety and to make sure that bullying or teasing doesn't occur. Staff should avoid physical contact when students are changing, avoid intrusive behaviour in changing rooms, announce their intention of entering, and avoid staying in the room unless student needs dictate. Staff must not change in the same room as students or take showers with students.
- Distressed students may need comfort and reassurance and this may involve age appropriate physical contact. Staff should remain self-aware at all times and ensure that contact is not threatening, intrusive or open to misinterpretation. Always ask a member of the senior team if you are not sure what is appropriate.

Care, control and physical intervention

The circumstances in which staff can intervene with a student are covered in the 1996 Education Act. Staff may intervene to prevent a student from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. Staff must have regard to the health and safety of themselves and others. In all situations where physical intervention is used, the incident and actions must be recorded.

Under no circumstances can physical force be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence.

For a detailed guide on intervention consult the ***School procedure on 'Physical Intervention' and all staff should adhere to this policy.***

Behaviour Management

Students must be treated with respect and dignity and we must expect students to treat staff in the same way. Procedures for dealing with breaches of the Trust's behaviour code are covered in the 'Behaviour Blueprints' for each school and the School's 'Attendance, Behaviour and Exclusions' policy

and these must be followed. Always try to defuse a situation before it escalates and the use of humour is often helpful. Corporal punishment is unlawful; staff should not use degrading treatment for punishment. The use of sarcasm, demeaning or insensitive comments towards students is not acceptable. It is important to inform parents of sanctions and work with them to secure the changes in behaviour required.

Sexual Contact

Any sexual contact by a member of staff towards a child or young person is illegal and this is not dependent on whether the young person consents or not. Sexual activity also includes the watching or production of pornographic material. Staff should ensure that their relationships with children and young people take place within the boundaries of a respectful, professional relationship and take care that their language or conduct does not give rise to comment or speculation. Attitudes, demeanour and language all require care and thought, particularly when members of staff are dealing with adolescent boys and girls.

One to One situations

Staff should avoid meeting students in remote, secluded areas of the school and should ensure that they can be seen when they are seeing a child on their own, for example for extra help after school or in the lunch hour. Keep the door open or sit where you can both be seen through the door pane. Staff are particularly vulnerable in areas such as counselling rooms.

Home Visits

Under no circumstances should an adult visit a child in their home outside agreed work arrangements or invite a child to their own home or that of a family member, colleague or friend. If in an emergency, such a one-off arrangement is required, the adult must have a prior discussion with a member of the School Leadership Team. In general staff other than the Inclusion Team and the Family Support Team would have no reason to visit the home.

Home visits should follow the School's lone worker guidelines. The following procedures should always be adhered to:

- agree the purpose for any home visit with senior management, unless this is an acknowledged and integral part of their role e.g. social workers
- adhere to agreed risk management strategies
- always make detailed records including times of arrival and departure and work undertaken
- ensure any behaviour or situation which gives rise to concern is discussed with their manager and, where appropriate action is taken

Educational visits and after school clubs

Staff need to take particular care when supervising students in less formal situations such as after school activities, visits and residential. It is important to make sure that the less formal situation doesn't lead to situations where behaviour is misinterpreted and an inappropriate relationship established. Where overnight stays are involved and boys and girls are going, it is important that staffing reflects the gender balance of the students. All trips should be organised in line with school policy outlined in '**Educational Visits Guidance**'. **Lists of students and their whereabouts should be left with the Educational Visits Co-ordinator and with the School Office** so that they can be consulted by staff at school and the list

should include an estimated time of arrival back at Trust. **This includes arrangements for sports teams.** A contact mobile number for the supervising member of staff must be left with the names list.

Transporting Children

There may be situations in which staff agree to transport children in their own vehicle. It is not advisable to transport a single child in a car unless there is no alternative. If a member of staff transports children in his or her car it must be with the agreement of the parents (unless there is an emergency situation and they cannot be contacted). The car must be roadworthy and appropriately insured to include the transport of children as part of your daily job. Staff must check the detail of their individual insurance policy. No member of staff will be expected to use their own vehicle to transport children as part of Trust activities. The use of volunteer parents, in exceptional circumstances, should be discussed with the Headteacher in advance and the same safeguarding applied.

First Aid, Administration of Medication and Intimate Care

- All PE staff are first aid trained. The school provides staff training through the professional development programme. Staff should be cautious about administering first aid and in general should send for trained staff who have undergone more extensive training than the standard staff training. Wherever possible first aid should be administered with another adult present. Suitable records must be kept including accident forms, if appropriate, and parents informed as soon as possible. Always try to reassure students and explain what is happening to them.
- No medication can be kept or administered by staff. All medication must be sent to the Nurse, if applicable, or the Trust Office and administered from there by the child themselves. Permission forms have to be received from the parents/carers of any child taking medicine in school.
- Staff organising trips should make sure that a first aid trained staff member accompanies the trip and should check with the school to ensure that the member of staff has the required level of first aid training.
- Children who receive intimate care have a right to safety, privacy and dignity. A care plan must be drawn up and agreed with parents for students who require regular intimate care. Students must always be encouraged to be as independent as possible. We must always be mindful of the additional vulnerability of students with disabilities and learning needs. All guidelines and policies relating to intimate care are kept with the School Office.

The Curriculum and Sensitive Issues

- Many areas of the curriculum can include subject matter which is sexually explicit or of a sensitive nature. It is very important that this work should clearly relate to learning outcomes that can be identified in lesson plans and schemes of work to ensure that they are not misinterpreted. Curriculum leaders should provide guidance to colleagues regarding such issues. Unplanned discussion about sexual and sensitive matters can also take place and response needs careful, sensitive and professional judgement. Always talk to a School Leader staff if guidance is needed or staff are concerned by matters that have been raised in lessons. Be particularly alert to any conversations or knowledge shown that could indicate

child protection concerns or are offensive to the member of staff. Always seek the support and guidance of line managers or senior colleagues. Staff must be careful to avoid a situation in which they are drawn into offensive or inappropriate discussions or could be accused of encouraging such discussion.

- All staff must abide by the school Personal Development Policy. Parents have the right to withdraw their child from all or part of sex education but not from the aspects of the science curriculum relating to the biological aspects of human growth and development.

Photography, Videos and other Creative Arts

- Staff should not take, display or distribute images of children unless they have **consent from parents or carers and the child to do so**. The Trust does not wish to reduce the use of photographs or films of Trust events in display, publicity materials or items such in the School Newsletter, but the guidance included in this document should be adhered to.
- There is the potential for any images of children and young people to be used inappropriately. We must take every precaution to ensure that this doesn't happen whilst still making sure that we use photographic and video records as a way of celebrating success and achievement.
- Staff should be aware that past experiences could make some children feel uncomfortable about being photographed or filmed, and should be sensitive to signs of discomfort and anxiety.
- Images used for publicity purposes require the consent of the individual and parent or legal carer if under 18. This is also required for images on websites and images displayed in public places where visitors have access such as a reception area. All parents are consulted so that they can indicate if their child's photograph cannot be used in displays and publicity materials. This information is held in SIMs and staff requiring permission for use of images should check with **the Data Team** to ensure that parents have not refused consent. Such procedures are not meant to deter staff from using images but are intended to protect both children and staff.

The following guidelines **must be adhered to at The MILL Academy Trust**:

- If photographs are used the student should not be named on websites or in places with regular public access such as a reception area.
- If students are named, for example on displays of work, avoid use of photographs.
- All staff must be particularly careful with material stored on school laptops. Staff should download all photographs taken on school trips and at events that include children to the network.

Safe use of the Internet and mobile phones

- Mobile phones and the use of the internet by students should be in accordance with the school's guidance on the safe use of ICT in student planners and revisited in ICT lessons. All staff should be familiar with this document and ensure that students using ICT in lessons, accessing websites and using e-mails are closely monitored.

- Under no circumstances should staff access inappropriate images in school and should be aware that if an illegal act is committed through downloading, storing or disseminating inappropriate materials involving children they are likely to be barred from working with children and young people. Accessing inappropriate materials including adults', would also be considered a very serious matter and a breach of professional standards.

Staff must not to share personal e-mail address or mobile phone numbers with students. School e-mail addresses should be used by staff at their discretion to communicate with students and/or their parents and carers. Staff should also exert extreme caution in the use of **social networking sites**, such as Facebook, which can easily be accessed by students and enable access to personal information that could be used inappropriately. Staff are strongly advised not to make comments on students' personal networking sites. Staff should always ensure that their communication with students remains at a professional and transparent level so that their intentions cannot be misinterpreted. Further guidance is available in OCC's **Simple Guidance for Staff in Education Settings on the Use of Social Network Sites** (attached).

Whistleblowing

Whistleblowing is the mechanism by which adults can voice their concerns, made in good faith, without fear of repercussion. Staff should acknowledge their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant external agencies. This is particularly important where the welfare of children may be at risk. Staff should follow guidance in the Trust's **Whistleblowing** policy.

Sharing Concerns and Recording Incidents

- All staff must be aware of the Trust's child protection procedures. This includes procedures for dealing with allegations against staff. If a member of staff is the subject of an allegation s/he is advised to contact his/her Union immediately.
- In the event of an incident occurring and an allegation being made against a member of staff, the information must be clearly and promptly recorded and reported to a member of the senior team. Early contact with parents/carers could avoid misunderstandings.
- Staff should feel confident, to discuss with either the headteacher, a member of the School Leadership Team, or their line manager, any difficulties that may affect their relationships with students or their ability to undertake their roles as effectively as is the norm so that support can be offered or action taken.
- It is essential that accurate and comprehensive records are maintained wherever concerns are raised about the conduct or actions of adults working with or on behalf of children and young people.

In broad terms, the Trust would expect staff to report the following:

- criminal offences
- any reasonable suspicions or evidence of physical, emotional or sexual abuse of children

- failure to comply with financial and legal obligations
- actions which endanger the health or safety of staff and students or the public
- actions which are intended to conceal any of the above

It will not always be clear that a particular action falls within one of these categories and members of staff will need to use their own judgement. However, the Trust prefers that any suspicions are reported rather than ignored. If members of staff make a report in good faith, and even if it is not confirmed by investigation, they will not be liable to any disciplinary action or be otherwise disadvantaged in their employment. However, it should be noted that if they make a report maliciously, mischievously or for personal gain they may be liable to disciplinary action.

Procedure for Recording Low-Level Concerns About a Member of Staff (NSPCC May 2025)

1. Purpose

This procedure ensures that all low-level concerns about the conduct of staff or volunteers are recorded, reviewed, and responded to appropriately, in line with our safeguarding culture and duty to protect children. It aims to promote transparency, uphold professional standards, and prevent potential harm.

2. Definition of a Low-Level Concern

A **low-level concern** is any concern, no matter how small, that an adult working in the organisation may have acted in a way that:

- is inconsistent with the staff code of conduct or organisational values,
- is inappropriate or causes unease, even if not serious enough to meet the threshold for referral to external agencies,
- may suggest a pattern of behaviour that could lead to abuse.

This includes behaviour that:

- is thoughtless or inadvertent,
- may be inappropriate in context,
- may be intended to enable abuse.

Examples include (but are not limited to):

- Being over-friendly or having favourites,
- Taking photos of children on personal devices,
- Isolating children in unsupervised or secluded spaces,
- Humiliating or belittling behaviour,
- Contact with children outside normal working hours or channels.

3. Who Should Report a Low-Level Concern?

- Any member of staff, volunteer, or visitor who has a concern about an adult's behaviour.
- Staff should also feel empowered to self-report if they believe their own actions may have been misinterpreted.

4. How to Report a Low-Level Concern

- Report concerns **as soon as possible** and on the same day where possible.

Complete a **Low-Level Concern Record Form** here:

**The MILL Academy and
The Henry Box School**



**Finstock Church of England Primary
and Queen Emma's Primary**



<https://forms.office.com/e/tWMmnLj9vc>
<https://forms.office.com/e/cjg5swdncW>

Submit the completed form to the Headteacher via this form.

5. How the Concern Will Be Managed

The Headteacher will:

- Review the concern and assess whether it meets the threshold for further action.
- Log it securely in the **Low-Level Concerns Register**.
- Consider patterns, previous concerns, or escalation.
- Speak with the individual involved, if appropriate, to clarify context and intent.
- Seek further information or advice from the Local Authority Designated Officer (LADO) if unsure.

The concern may lead to:

- Informal support, guidance or reflective discussion,
- A recommendation for training or further induction,
- Adjustments to practice or supervision,
- Escalation if new information comes to light.

6. Record-Keeping

All low-level concerns must be recorded and stored securely and confidentially.

Records should be:

- Factual, proportionate, and non-judgmental,
- Retained in accordance with the school's safeguarding and data protection policies.

They are **not** kept on an employee's main personnel file unless part of a formal disciplinary process.

7. Safeguarding Culture and Staff Training

This procedure is part of a broader commitment to a **culture of vigilance, transparency, and accountability**.

Staff will receive training on:

- Recognising and reporting low-level concerns,
- Professional boundaries and the staff code of conduct,
- The importance of early intervention and recording.

8. Review

This procedure will be reviewed annually or following any significant safeguarding incident or change in statutory guidance.

Social Media and Online Conduct Guidance

Purpose

This guidance provides clear advice for school staff and volunteers on the safe and professional use of social networking and communication technologies.

Key Principles

1. Protect Your Professional Reputation

- Avoid posting anything that could bring your school, colleagues, pupils or parents into disrepute.
- Think before you post – even private comments can be shared or misinterpreted.
- Avoid joining or engaging with groups or pages that may undermine your professional image.
- Assume everything you post could become public.

2. Privacy & Security

- Set social media accounts to the **highest privacy settings** (e.g. ‘friends only’).
- Use **strong, unique passwords** and enable two-factor authentication.
- Never share login details or leave accounts logged in on shared devices.
- Review your online presence regularly (e.g. Google your name).

3. Communication with Pupils & Parents

- **Do not ‘friend’, follow, or message pupils** (current or former under 18s) on personal accounts.
- Do not engage in online communication with parents unless agreed by school leadership.
- Only use **school-approved** platforms for educational communication (e.g. school email or learning platforms).
- Keep communication professional, transparent, and open to scrutiny.

4. Safe Use of School Equipment & Data

- Use only school devices and accounts for storing or sharing pupil data or photographs.
- Do not store school data on personal devices unless encrypted and permitted by policy.
- Ensure personal use of school laptops does not violate your ICT or safeguarding policies.
- **Never access or store inappropriate or illegal content** on any school device.

5. Social Media & Safeguarding

- Online contact with pupils can be misinterpreted or abused—**avoid it entirely**.
- Do not give personal contact details to pupils.
- Be cautious with language and tone online—avoid humour or comments that could be misunderstood.
- Report any online safeguarding concerns immediately to the DSL.

Best Practice

✔ Do	✘ Don't
Use professional school accounts for work communication	Use personal social media to contact pupils or parents
Regularly check and update your privacy settings	Post anything that could damage the school's reputation
Store school data securely on school systems	Save or copy school data to personal devices or cloud storage
Refer to your school's Acceptable Use Policy (AUP)	Assume your social media is truly private
Report online concerns to the DSL or senior leader	Respond to inappropriate online messages from pupils

Photographs & Video

- Use **school equipment** only to take pictures of pupils.
- Store images securely on school systems—not personal devices or cloud services.
- Follow the school's consent procedures for sharing images.

Staff Responsibilities

- Follow the Trust's **AUP and safeguarding policies** at all times.
- Be aware that failure to comply may result in disciplinary action.
- Understand that your online behaviour, even outside work, must align with your professional responsibilities.

Need Support?

- Refer to HR, DSL, Headteacher or Union for further advice.

Remember:

“Don't post anything you wouldn't want your headteacher, a parent, or your pupils to see.”

Using email

All emails sent from a school or college account should be regarded as public, especially as a 'data subject access' request could be made under the Data Protection Act. Emails should always be in professional language and appropriate to being an employee. It should also be noted that where a private email account is used for issues associated with work, it has in some cases been deemed as a work account and therefore also subject to the rules of professional language and conduct.

In short, do not send an email that you would not be happy for your employer or a colleague to read. Please see the Trust's Email Protocol below:

Trust Email Good Practice Protocol

Subject: Trust Email Good Practice Protocol

Please be reminded that all emails sent from a school or college account should be regarded as **public**. Under the Data Protection Act, emails may be disclosed following a subject access request. Therefore, all communication should be professional in tone and content.

Professionalism and Email Accounts

Only use your **school email account** for work-related communication. Using a personal account for work matters may still be considered subject to professional expectations and public access.

In short: **If you wouldn't want a colleague or your employer to read it, don't send it.**

Email Best Practice

General Guidelines

- Always include a **clear subject line** (include student name/form when relevant).
- Keep emails **clear, factual, and professionally worded**, with correct spelling and punctuation.
- Seek guidance from your line manager if unsure about email content.
- Never forward or send inappropriate, offensive, or discriminatory content.
- Do not unlawfully forward confidential or copyrighted information.

School Email Use

- **Do not use personal accounts** to contact students or parents.
- Be mindful of your screen (e.g. when your whiteboard is on).
- The Trust reserves the right to monitor internal emails. There is no reasonable expectation of privacy.

Targeting Emails

- Only copy in those who **need** the information.
- Avoid copying in line managers unnecessarily.
- Use **'All Staff'** emails only if you are the Headteacher, HR, or SLT.
- Do not send general notices via 'All Staff' – use school briefings instead.

Replying and Forwarding

- Always **reply to the correct sender** and check recipients before responding.
- Do not forward emails without the sender's permission (except where necessary).
- Do **not BCC** recipients – use CC transparently.
- Emails to the School Office may be shared internally as needed.

Timing and Email Curfew

To support staff wellbeing:

- **No emails or Teams messages** should be sent between **7:00pm – 7:00am**, or during weekends (**7:00pm Friday – 7:00am Monday**).

- You may draft messages during these hours, but schedule them to send after 7:00am.
- Expect responses **within 48 hours**; avoid chasing before then.
- For urgent matters, use a different form of communication.
- Staff may not monitor emails during holidays.
- Avoid using personal devices to access work emails where possible.

Professional Tone

- Emails represent you and the school – always use **professional, clear, and neutral language**.
- Avoid emotional or ambiguous wording.
- Use tools like **Grammarly** to help with spelling and grammar: [Grammarly Website](#)

Legal Consideration

Emails have the same legal status as signed documents and may be used as evidence. Keep this in mind when writing or responding.

Home School Communications Protocols are available on our school websites.

Source Documents

- Keeping Children Safe in Education, DfE, September 2025
- Guidance for Safe Working Practices for the Protection of Children and Staff in Educational Settings. February 2005. Produced by The National Network of Investigation and Referral Support Co-ordinators (IRSC) established by the DfES.
- Guidance for Safer Working Practice for Adults who Work with Children and Young People. Updated from the above
- Gov.Uk The 7 Principles of Public Life
- NSPCC May 2025



WHISTLEBLOWING POLICY

Policy Author	Director of Finance and Academy Services
Last review date	October 2024
Review frequency	2 years
Next review	October 2026
Approved by	Board of Trustees

1. INTRODUCTION

- 1.1 The aim of this procedure is to set out how the MILL Academy (the Trust) will deal with concerns raised by employees which relate to suspected wrongdoing or dangers at work.
- 1.2 Allegations of child abuse against teachers and other employees and volunteers will be dealt with in accordance with 'Keeping Children Safe in Education - statutory guidance for schools and colleges'.
- 1.3 This policy does not form part of any employee's contract of employment and may be amended at any time. This Policy applies to all the MILL Academy schools, Trustees, staff, students, members of Local Committees, other stakeholders including those contracted to provide services to the Trust and its schools and any members of the public.

2. POLICY STATEMENT

- 2.1 As employees may be the first to realise that there may be something wrong within the Trust, it is important that they feel able to express their concerns without fear of harassment or victimisation. Otherwise, they may find it easier to ignore the concern rather than report it. The Public Interest Disclosure Act 1998 recognises this fact and is designed to protect employees, who make certain disclosures of information in 'the public interest', from detriment and/or dismissal. This policy builds on the provisions of the Act.
- 2.2 The Trust is committed to maintaining the highest standards of honesty, openness, probity and accountability.
- 2.3 The aims of this Policy are:
 - i Provide avenues for employees to raise concerns internally as a matter of course, and receive feedback on any action taken
 - ii Provide for matters to be dealt with quickly and appropriately and ensure that concerns are taken seriously and treated consistently and fairly
 - iii Reassure employees that they will be protected from reprisals or victimisation for whistleblowing where they have a genuine concern
 - iv Allow employees to take the matter further if they are dissatisfied with the Trust's response.
- 2.4 The Trust will ensure that your concerns are dealt with fairly and properly. Anyone found to be victimising you for whistleblowing will be subject to the Trust's disciplinary procedures.

3. LEGISLATION

- 3.1 The requirement to have clear whistle-blowing procedures in place is set out in the [Academy Trust Handbook](#). This policy has been written in line with the above document, as well as [government guidance on whistle-blowing](#). The policy also takes into account the [Public Interest Disclosure Act 1998](#).

4. PURPOSE OF THE POLICY

- 4.1 This Policy is designed to allow you to raise serious concerns of a public-interest nature (as defined in paragraph 7.2) in relation to the Trust. It also describes how the Trust will investigate, and where appropriate, act upon your concerns.
- 4.2 The Trust will consider concerns that are not of a public-interest nature, or which fall into an area covered by other the Trust policies or procedures. These concerns will be considered under the relevant policy rather than the Whistleblowing Policy. Examples include:
- Grievances by staff connected with their employment.
 - Complaints by students about their courses of study or research and the service the Trust provides.
 - Appeals against assessment decisions.
 - Appeals from disciplinary procedures for staff and students.
 - Harassment and bullying.

5. WHAT IS WHISTLEBLOWING?

- 5.1 The [Public Interest Disclosure Act 1998](#) (PIDA) came into force on 2 July 1999. It encourages people to blow the whistle about malpractice in the workplace and is designed to ensure that organisations respond by acting on the message rather than against the messenger.
- 5.2 The PIDA applies to employees blowing the whistle about crime, civil offences (including negligence, breach of contract, etc.), miscarriage of justice, danger to health and safety, fraud or financial irregularity or the environment, and the cover-up of any of these.
- 5.3 The PIDA gives legal protection to staff (including employment agency supplied workers and those on work experience) against being dismissed or penalised by employers as a result of disclosing information which, in the reasonable belief of that member of staff, is in the public interest and tends to show one or more specified types of malpractice, wrongdoing or dangers. This is known as 'whistleblowing'.
- 5.4 The PIDA protects disclosures to prescribed bodies such as the Health and Safety Executive, the Financial Conduct Authority, the Environment Agency, the Serious Fraud Office, the Office of Fair Trading, the Director of Public Prosecutions and HM

Revenue & Customs, where the whistleblower has a reasonable belief that the information and their allegation is in the public interest.

- 5.5 Although not covered by the Act, the Trust extends the principle of protection to students against being penalised as a result of disclosing such information.
- 5.6 Wider disclosures (e.g. to the police, media, Members of Parliament and non-prescribed regulators) are protected only if, in addition to the tests for regulatory disclosures, they are reasonable and meet one of the three preconditions below and are not made for personal gain:
- i You believe you would be victimised if the matter was raised internally or with a designated regulator;
 - ii You believe a cover-up was likely and there was no regulator;
 - iii You had already raised the matter internally or with a prescribed regulator.
- Wider disclosures made without any one of these three preconditions will be regarded as a disciplinary matter by the Trust.

6. WHO IS COVERED BY THIS POLICY?

- 6.1 This Policy makes provision for any member of the Trust staff, student, members of a Local Governor Committee and other stakeholders, including those contracted to provide services to the Trust and any members of the public who may have concerns arising from a visit to the Trust, to raise concerns about malpractice, impropriety or wrongdoing within the Trust and to do so with the knowledge that, if in the public interest, their action will be viewed positively. Whistleblowers will be protected from victimisation.

7. PROTECTED DISCLOSURES

- 7.1 The Trust will provide protection if you raise legitimate concerns about specified matters, known as 'protected' disclosures (see 7.2).
- 7.2 A 'protected' disclosure is the disclosure of information made in the public interest. Whistleblowers are protected in law when the disclosure refers to the following:
- Criminal offence
 - Failure to comply with any legal or professional obligation or regulatory requirements
 - Miscarriage of justice
 - Danger to health and safety
 - Damage to the environment
 - Bribery
 - Financial fraud or mismanagement
 - Negligence
 - Breach of internal policies and/or procedures
 - Institutional discrimination or harassment

- Professional malpractice
- Public Examination fraud
- Improper conduct or unethical behaviour
- Unauthorised disclosure of confidential information
- Deliberate concealment or covering up any of the above matters.

7.3 If you are uncertain whether something is within the scope of this Policy, you should seek advice from the Clerk to the Trustees, Director of Finance and Academy Services or the HR Manager.

7.4 Separate policies and procedures are in place to cover areas such as:

- Equality and Diversity;
- Health, Safety and Wellbeing;
- Disability;
- Bullying and harassment;
- Financial Procedures (including Prevention of Fraud and Gifts and Hospitality);
- Disciplinary Procedures;
- Grievances;
- Academic appeals;
- Pay Policy.

7.5 The Whistleblowing Policy is not designed to permit or encourage questioning of legitimate financial or business decisions properly taken by the Trust. You may not use the Whistleblowing Policy to bring about the consideration (or reconsideration) or any matters of private interest which may be properly and appropriately addressed under other the Trust policies and procedures, such as those listed in 7.4.

8. CONFIDENTIALITY

8.1 Staff, students and other stakeholders should feel able to voice whistleblowing concerns under this Policy. If you want to raise concerns confidentially, the Trust will make every effort to keep your identity secret. This may not be possible if it is incompatible with a fair investigation or if there is another overriding reason for the disclosure. If it is necessary for anyone investigating your concerns and/or the subject of your concerns to know your identity, the Trust will discuss this with you first.

8.2 You are encouraged not to make disclosures anonymously. Proper investigation may be more difficult or impossible if further information cannot be obtained and it is also difficult to establish whether any allegations are credible. The Trust will consider the seriousness of the issues you raise.

8.3 If you are a member of staff, advice can be sought from Protect (formerly Public Concern at Work) <https://protect-advice.org.uk>, the independent whistleblowing charity which offers a confidential helpline.

9. HOW TO RAISE A WHISTLEBLOWING CONCERN

9.1 To whom and how should a report be made?

In the first instance you should raise any concerns informally with your line manager, Head of Department, tutor, or a member of the Leadership Team at your School. The person notified may be able to agree a way of resolving the concerns quickly and effectively or may refer the matter to the Reporting Officer for whistleblowing concerns.

If your concerns have not been or cannot be resolved informally, you should put them in writing to the Director of Finance and Academy Services, as the Trust's Reporting Officer. The Reporting Officer will acknowledge receipt of the report within five working days and keep a record of action taken.

In cases of disclosure relating to the Director of Finance and Academy Services disclosure should be made to the Chief Executive Officer, who will be the Reporting Officer in such a case.

In cases of disclosure relating to a Headteacher, the Reporting Officer will advise the Chair of the Board of Trustees and keep them informed.

9.2 Investigation and outcome

Preliminary enquiries will be carried out by the Reporting Officer in order to ascertain whether a full investigation is necessary. The preliminary enquiries will take no longer than ten working days.

If, after preliminary investigation, your concerns are judged by the Reporting Officer to be not of a public-interest nature, no further action will be taken. In this case, the Reporting Officer will notify the Chair of the Board of Trustees of your concerns and of the decision to take no further action. If the Chair of the Board of Trustees disagrees with the Reporting Officer's decision, then an investigation will be undertaken and the Chair will appoint another person to manage the investigation.

When appropriate, you will be informed of the final decision to take no further action.

If the Reporting Officer or Chair of the Board of Trustees decides that an investigation should be undertaken, the investigation will be carried out internally or the matter will be referred to an external body for investigation.

If your concerns are referred to an external body, the external body's practice and procedure will supersede the Trust's procedure for investigation.

Subject to any legal requirements, the Reporting Officer will aim to keep you informed of the progress of the investigation, likely timescale and any final action taken. However the need for confidentiality may prevent the Reporting Officer from giving specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If an investigation is undertaken, the person or persons you have identified as the subject of your concerns will be informed of each allegation made against them and of any evidence.

When the investigation has been concluded the Reporting Officer or Chair of the Board of Trustees will let you know the outcome and submit a report to the Board of Trustees.

If the Trust concludes that you have made a malicious allegation or with a view to personal gain, you will be subject to disciplinary action.

10. APPEALS - IF THE WHISTLEBLOWER IS NOT SATISFIED

10.1 The Trust cannot guarantee the outcome you may be seeking when you raise your concerns, but we will deal with your concerns fairly and in an appropriate way. If you are not satisfied with the way in which your concerns have been handled there is a right of appeal on one of the following three grounds only, to the Chief Executive (or Chair of the Board of Trustees if your allegation relates to the Chief Executive):

- i you believe that the procedures have not been followed properly; or
- ii you have evidence of prejudice or bias; or
- iii you have further evidence which was not available at the time when you originally raised your concerns.

10.2 The Chief Executive (or Chair of the Board of Trustees) will decide if the case meets the grounds for appeal set out above and if it does, an independent member of the Board of Trustees will be appointed to hear the appeal.

10.3 The Chief Executive will let you know the outcome of the appeal and will submit a report to the Board of Trustees.

11. OUTLINE PROCEDURE:

STEP 1	You should raise your concerns informally with your line manager, Head of Department, tutor, or a member of the Strategic Leadership Team at your School in the first instance
STEP 2	If your concerns are not resolved by Step 1, write to the Director of Finance and Academy Services as Reporting Officer, to report your concerns. Reporting Officer to acknowledge receipt of report within 5 working days.

STEP 3	Reporting Officer to carry out preliminary enquiries to ascertain whether full investigation is necessary. Preliminary enquiries to take no longer than 10 working days.
STEP 4	If Reporting Officer considers concerns to be not of a public interest nature, no further to be action. Board of Trustees to be notified of decision. If the Chair of the Board disagrees with decision then an investigation will be undertaken. You will be notified of the Chair's decision.
STEP 5	If an investigation is to be undertaken, the matter will be referred to an external body. The Reporting Officer will aim to keep you informed of progress.
STEP 6	When the investigation has been concluded the Reporting Officer or Chair of The Board of Trustees will inform you of the outcome and submit a report to the Board of Trustees.
STEP 7	If you are not satisfied there is a right of appeal (on the grounds stated in point 8.1 only) to the Chief Executive. The Chief Executive or Chair of the Board of Trustees will appoint an independent member of the Board of Trustees to hear the appeal and you will be informed of the outcome and a report submitted to the Trustees Board.

12. RAISING CONCERNS OUTSIDE THE TRUST

- 12.1 The aim of this procedure is to provide an internal mechanism for reporting, investigation and remedying any wrongdoing in the workplace. In most cases, the employee should not find it necessary to alert anyone externally.
- 12.2 The law recognises that in some circumstances it may be appropriate for the employee to report their concerns to an external body, such as a regulator. It will very rarely if ever be appropriate to alert the media.
- 12.3 Employees are strongly encouraged to seek advice before reporting a concern to anyone external.
- 12.4 If an employee is not satisfied with the Trust's response, the senior manager dealing with the case should ensure that they are made aware with whom they may raise the matter externally:
- [Protect](#) – Tel: 020 3117 2520
 - Recognised trade union
 - External auditor
 - Relevant professional bodies or regulatory organisations
 - Solicitor
- 12.5 Concerns about safeguarding practices can be raised externally using the [NSPCC whistleblowing](#) helpline. Employees can call 0800 028 0285 or email help@nspcc.org.uk

- 12.6 The senior manager dealing with the case should stress to the employee that if they choose to take a concern outside the Trust, it is the employee's responsibility to ensure that confidential information is not disclosed, i.e. confidential information, in whatever format, is not handed over to a third party.

13. THE BOARD OF TRUSTEES RESPONSIBILITY

- 13.1 A record of all whistleblowing disclosures and any subsequent actions will be made by the Reporting Officer, who will retain such material for a period of not less than seven years. In all cases, a report detailing all disclosures and the outcomes of any investigations will be made to the Board of Trustees as a means of allowing them to monitor the effectiveness of the policy.
- 13.2 This Policy and procedures will be reviewed by the Trust every 2-years or earlier if there are relevant changes to legislation or statutory guidance.

14. APPLICATION OF THIS POLICY AT THE TRUST SCHOOLS

- 14.1 The Board of Trustees through the Clerk will advise each school's Headteacher and Local Committee of the policy and any subsequent changes to it. The policy will become effective in all Schools from the date that this policy is approved.
- 14.2 The policy or an electronic link to the policy shall be made available to all staff. The School shall make all staff aware of the existence of the policy and it shall be made available to staff in any staff handbooks and in induction packs.