



Hawthorn Academy

Safeguarding and Child Protection Policy

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1 Policy Statement

The **purpose** and **scope** of our safeguarding and child protection policy is:

To protect our pupils from harm and provide our pupils, staff, parents/carers, governing body and wider school community with the overarching principles, procedures, and good practice within our child centred and coordinated approach to safeguarding and child protection.

We shall strive to achieve this by addressing current legislation (and any amendments to the same), policies and guidance surrounding the protection of children in England, including but not limited to:

- The statutory guidance 'Working Together to Safeguard Children' (2023) and the DfE Statutory Guidance 'Keeping Children Safe in Education' (KCSIE) 2024.
- Berkshire Child Protection procedures are followed in line with Bracknell Forest Safeguarding Board (BFSB) expectations.
- Consideration of the Human Rights Act 1998, The Children Act 1989 (and 2004 amendment), The Equality Act 2010, Public Sector Equality Duty, statutory guidance on the Prevent duty and Female Genital Mutilation (FGM) when making individual decisions about pupils.
- Reflects our whole school approach and commitment to safeguarding and child protection.
- Clear procedures to support safeguarding and child protection.
- The underpinning of other relevant policies including attendance, behaviour, staff code of conduct, online safety, whistleblowing, and our formal complaints procedure (see appendix C).

We recognise that safeguarding is **everybody's** responsibility in our school and the responsibility we have under section 175 (*Section 157 for Independent Schools and Academies*) of the Education Act 2002 (as amended).

We believe that all staff in our school play an important role in identifying concerns early, providing help and support for our pupils, promoting their welfare, and preventing concerns from escalating. We all have a responsibility to support pupils holistically and providing a safe environment in which they can learn.

This policy is publicly available via our website and is reviewed annually (as a minimum) and will be kept up to date throughout the year, as required.

Signed by Headteacher: XX

Signed by Chair of Governors: XX

2 Roles and Responsibilities

All staff (including governors) are required to:

- Be able to identify who the Headteacher, the Designated Safeguarding Lead (DSL), the Safeguarding and Child Protection Governor and the Chair of Governor is.
- Contribute to providing a safe environment where our pupils can learn and flourish.
- Contribute to supporting the pupils' best outcomes.
- Recognise that high self-esteem, confidence, supportive friends, and good lines of communication with a trusted adult help to protect our pupils.
- Contribute to the preventative and safeguarding education embedded throughout our curriculum.
- Respond in accordance with our zero-tolerance approach to any sexual violence and sexual harassment, and to any indirect or direct discrimination of any kind.
- Be aware of indicators of the different forms of abuse, neglect and exploitation, and any other safeguarding issues that are prevalent at a local, contextual, or national scale at the time, this includes unexplainable and/or persistence absences from education.
- Respond and take action promptly regarding safeguarding and child protection concerns, and in line with the procedures outlined in this policy and local child protection procedures, ensuring good quality and secure record keeping and effective collaboration with other agencies takes place.

All staff who work directly with pupils will read and understand Part 1 and Annex B of KCSIE 2024 guidance. This also applies to the governing body. Staff who do not work directly with pupils will read and understand part 1 of this guidance. All staff will read and understand our staff code of conduct.

As a school, we will take the lead responsibility for those pupils we place in an Alternative Provision and ensure our approach is in line with Bracknell Forest Councils Alternative Provision Guidance.

The DSL will take lead responsibility for safeguarding and child protection (including online safety and our systems for filtering and monitoring on school devices and school networks to keep pupils safe online). The full responsibilities of the DSL are set out in their job description, but this includes:

- A good understanding of referral processes and threshold criteria, including how our local arrangements at Bracknell Forest Council work (see Appendix D).
- Making sure all staff are aware of how to raise safeguarding concerns.
- Ensuring all staff understand the indicators of child abuse, neglect, and exploitation.
- Acting as a source of support, advice, and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- A good understanding of local, contextual, and national safeguarding issues including child-on-child abuse, harmful sexual behaviour and the local response and support available to support all pupils involved in sexual violence and sexual harassment.

- Taking part in strategy discussions and multi-agency meetings, and/or supporting other staff to do so.
- Keeping safeguarding and child protection files up to date.
- Monitoring pupils on the safeguarding list, including those who are receiving Early Help, on a Child Protection (CP) plan, Child in Need (CiN) plan and/or a Child Looked After (CLA).
- Contributing to the assessment of pupils.

The DSL is supported by the Deputy Designated Safeguarding Lead(s) (DDSL) and the DDSL(s) will fulfil the role of DSL in their absence.

The Governing Body

The governing body fully recognises its responsibilities that they have in keeping pupils safe, this is set out in KCSIE (2024) and in the Governance Guide. In summary this includes:

- The safeguarding policies and procedures in our school are effective and comply with current legislation.
- All staff understand their roles and responsibilities and are able to discharge them.
- The board has sufficient knowledge and capacity to fulfil its safeguarding responsibilities.
- Governors will ensure they have strategic oversight of safeguarding and gain assurances that safeguarding is effective.
- A safeguarding governor is appointed to take leadership responsibility for safeguarding arrangements in their school. Employees of the school, therefore, *should not* take up this role, nor should associate board members.

In addition, our governors will:

- Read and understand KCSIE (2024) in its entirety. This is because the governing board as a whole is responsible for safeguarding, and making sure our policies, procedures and training are compliant. Governors need to be familiar with KCSIE in order to monitor our school effectively and this statutory guidance is updated annually.
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness and in line with DfE's filtering and monitoring standards and cyber security standards.
- Ensure an annual report is presented to the full governing body. This will include a section 11 self-assessment audit of safeguarding arrangements for the school.
- Seek assurances from the provider regarding keeping children safe in out-of-school settings.

Training

The school will raise staff awareness and incorporate signs of abuse, neglect, exploitation, specific safeguarding issues and online safety, including filtering and monitoring into briefings, staff induction training, and ongoing development training to all staff and governors. A thorough staff induction will take place for all new staff in line with the

requirements of KCSIE, including the completion of safeguarding training, increasing awareness of key policies and the systems we use at school to support effective safeguarding arrangements.

Universal (Level 2) Safeguarding Training for all staff will take place at least every three years, formally by an internal **approved provider** but safeguarding training and awareness will take place regularly and at least annually throughout the academic year. This will include dissemination of key information from the DSL and DDSL(s), such as from DSL network meetings and briefings. Staff will complete and keep up to date with other key safeguarding training including, Prevent, FGM and Safer Recruitment.

The DSL and DDSL(s) will have undertaken, as a minimum, the 'Targeted (Level 3) Designated Safeguarding Lead Training' by **an external approved provider**. This will be updated every two years in accordance with guidance. Our governors will complete the Safeguarding for Governors every three years, Prevent and Safer Recruitment training.

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3 Key Contacts

Role	Name	Contact Details
Designated Safeguarding Lead (DSL)	Simmi Kalsi	Simmi.kalsi@hawthornacademy.org.uk 07449936550
Deputy Designated Safeguarding Lead (DDSL)	Gemma Wheatman	Gemma.wheatman@hawthornacademy.org.uk 07307192700
Members of staff who have also received the Designated Person training	Simmi Kalsi	Simmi.kalsi@hawthornacademy.org.uk 07449936550
Chair of Governors		
Nominated Safeguarding and Child Protection Governor		
The Designated Teacher (DT)	Simmi Kalsi	Simmi.kalsi@hawthornacademy.org.uk 07449936550
Local Authority Designated Officer (LADO)	Alison Small	lado@bracknell-forest.gov.uk 01344 351572
Children's Social Care – for reporting concerns	MASH	mash@bracknell-forest.gov.uk 01344 352005
	Emergency Duty Service – after hours, weekends and public holidays	01344 351999
Prevent		preventreferralsbracknell@thamesvalley.pnn.police.uk https://www.bracknell-forest.gov.uk/crime-and-emergencies/crime-and-community-safety/preventing-violent-extremism-0
Bracknell Forest Safeguarding Board (BFSB)		Bracknell Forest Safeguarding Board
Bracknell Forest Council Education Safeguarding Team		safeguarding.ourschools@bracknell-forest.gov.uk 01344 354078
Virtual School		virtual.school@bracknell-forest.gov.uk 01344 352777
Make Safe		makesafe@bracknell-forest.gov.uk 01344352020

4 Procedures

Our procedures are in accordance with the relevant statutory guidance including:

- KCSIE (2024)
- Working Together to Safeguard Children (2023)
- The Prevent Duty
- The Pan Berkshire Child Protection Procedures

To support our safeguarding and child protection procedures the key contacts information on page 8 will be regularly communicated to our pupils, staff, parents/carers, and governors.

Procedures in this policy are supported by other school policies (appendix D) and our approach to safeguarding of “**it could happen here**”. We recognise that some children have an increased risk of abuse and additional barriers and vulnerabilities including SEND children and those with a social worker or those who have had a social worker previously. Our procedures and school ethos are child-centred, and decisions are made in the best interests of the child, as we strive to protect, and raise educational outcomes and aspirations for each child equally regardless of any barriers they may face.

In all cases, if staff are unsure, they should always speak to the DSL or DDSL(s).

Our commitment to safeguarding our pupils and supporting our staff in their safeguarding responsibility applies during the school day, before and after school activities (on or off school site), and when our school facilities are used by another provider, such as a football coach.

Activities directly run under the supervision or management of school staff, the school's arrangements for safeguarding and child protection as written in this policy apply.

Where services or activities are provided separately by another body, the governing body will seek assurances that the provider concerned meets the requirements of keeping children safe in after-school clubs, community activities and tuition guidance (also referred to as out-of-school settings). This will include making sure that they have appropriate policies and procedures in place for safeguarding children and child protection and that there are arrangements to liaise with the school on these matters where appropriate. This will be included in a lease/licence or hire agreement, and any failure to comply would lead to termination of the agreement. If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

5 Confidentiality and Information Sharing

We recognise that the Data Protection Act (DPA) 2018 and UK GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe and that timely information sharing is essential to effective safeguarding.

We will ensure that our confidentiality protocols are in line with the following guidance:

[For organisations | ICO and DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers \(publishing.service.gov.uk\)](#)

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents/carers do not have an automatic right to see them. If any member of staff receives a request from a pupil or parents/carers to see child protection records, they will refer the request to the DSL or Headteacher.

We will ensure that the information is only shared on a 'need to know' basis, including Domestic Abuse notifications and Operation Encompass. Operation Encompass supports communication between the Police and School regarding where a child has experienced a domestic abuse incident, ensuring that as a school we are able to put in place support for the child, as appropriate.

Record Keeping

We will keep accurate, written records of all concerns about pupils (noting the date, location, details of the incident), details of how the concern was followed up and resolved, actions taken, the rationale for decision making, decisions reached and the outcome.

We will ensure concerns and referral records are kept securely, in a separate child protection file for each child. Records will also include a clear and comprehensive summary of the concern(s).

In all cases of sharing information, we take into consideration sharing only the information that is necessary, proportionate for the intended purpose, relevant, adequate, and accurate.

All relevant child protection records are sent to the receiving school or establishment within 5 days for an in-year transfer or within the first 5 days of the start of a new term when a pupil moves schools. These will be sent securely and separately from the main pupil file, and a confirmation receipt will be obtained. These records will include details of all referrals and involvement including as a minimum, from Children's Social Care, the Youth Justice Team, and Early Help (regardless of the outcome of these referrals).

6 Procedure for when you are concerned about a pupil

We define safeguarding as: protecting children from maltreatment (including within and outside of the home and online), ensuring they can develop mentally, physically, and socially in a safe environment, further enabling them to have the best outcomes. Staff will take action immediately and appropriately if they have any concerns about a child, providing help and support as soon as problems emerge.

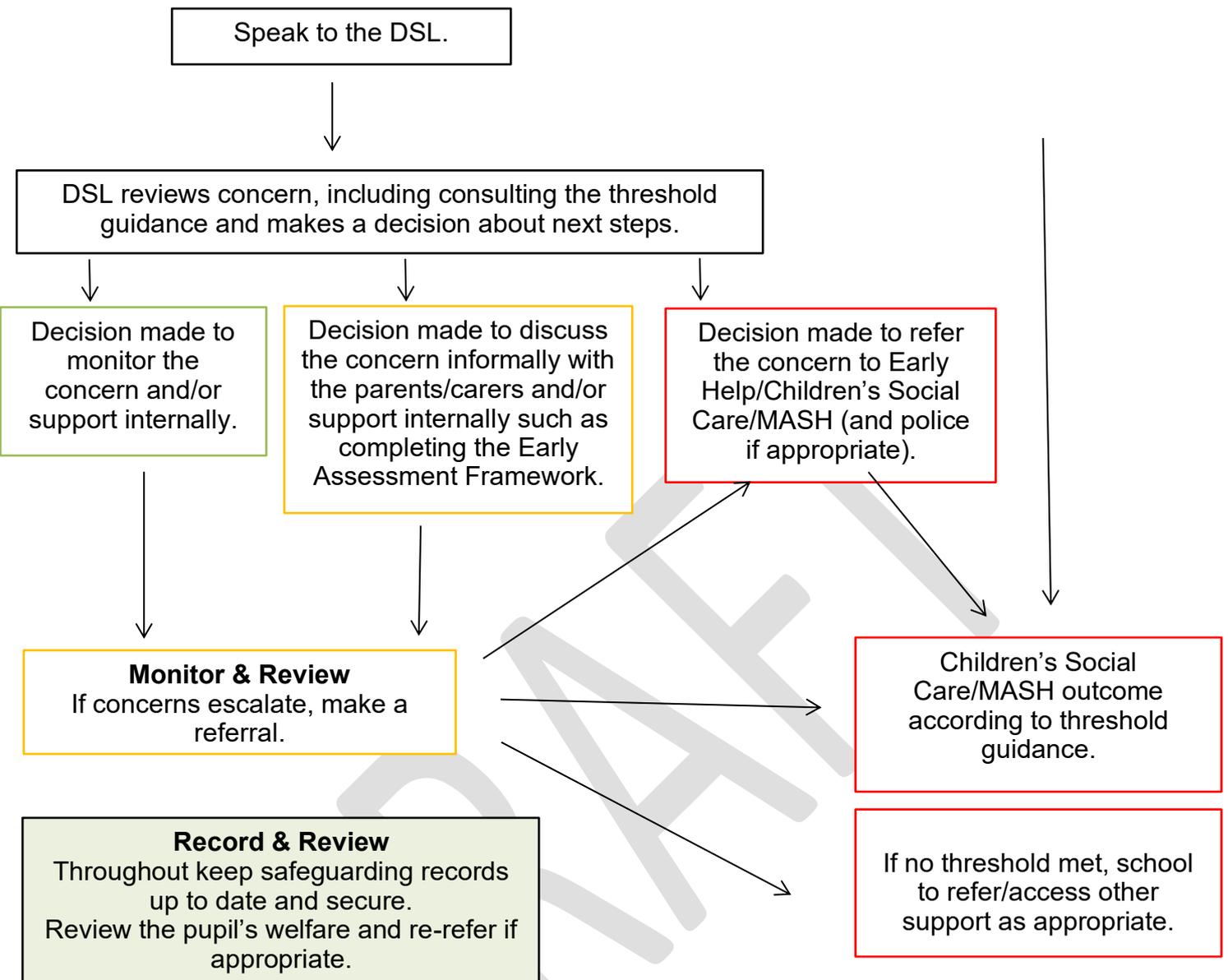
You have a concern about the pupil.



You believe a child is suffering or likely to suffer harm, or in immediate danger.



Immediately discuss with the DSL/DDSL, if not available or concerns are imminent, refer to Children's Social Care/MASH and/or police by contacting them by phone



7 Procedure for FGM, Preventing Radicalisation and Mental Health

There is an FGM 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). FGM is illegal in the UK and a form of child abuse.

The Prevent Duty (under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015)) requires schools to have due regard to the need to prevent people from becoming terrorists or supporting terrorism, extremist ideology, and racialisation.

Schools have an important role to play in supporting the mental health and wellbeing of their pupils. 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.

FGM	Radicalisation	Mental Health
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<p>If you discover that FGM has taken place, or a pupil is at risk of FGM any teacher must immediately report this to the police. Following this, contact will then be made to Children's Social Care.</p> <p>Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.</p> <p>Any other member of staff who discovers that an act of FGM appears to have been carried out they must speak to the DSL and follow our local safeguarding procedure.</p> <p>Any member of staff who suspects a pupil is <i>at risk</i> of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.</p>	<p>If there is an immediate threat, call 999.</p> <p>If you have concerns that a pupil may be at risk of radicalisation, discuss this with the DSL immediately.</p> <p>This may then include making a Prevent referral preventreferralsbracknell@thamesvalley.pnn.police.uk.</p> <p>For further information visit Preventing violent extremism Bracknell Forest Council (bracknell-forest.gov.uk)</p> <p>And/or contact justin.whitlock@bracknell-forest.gov.uk for further advice.</p>	<p>If you have a mental health concern about a pupil that is also a safeguarding concern and/or the wider safeguarding concern is further impacting on the pupil's mental health, follow the process on page 11.</p> <p>If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.</p>
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8 Child-on-Child Abuse

Our zero-tolerance approach to any form of child-on-child abuse is supported by our curriculum, PSHE curriculum and behaviour policy.

All staff recognise that children can abuse their peers (both online and offline) including, bullying, abuse in intimate personal relationships between children, physical abuse, sexual abuse, sexual violence and harassment, consensual and non-consensual sharing of nude and semi-nude images and/or videos, upskirting, initiation/hazing type violence and rituals.

A bespoke helpline is available for children and young people who've experienced abuse at school, and for worried adults and professionals that need support and guidance. If you are concerned about something, you can contact the NSPCC helpline Report Abuse in Education on **0800 136 663** or email help@nspcc.org.uk

If a concern is raised relating to the nudes/semi nudes, we will respond in accordance with [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](http://Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk))

We recognise that some groups are potentially more at risk. Evidence shows that girls, children with special educational needs and disabilities (SEND), and children who are lesbian, gay, bisexual, or questioning their gender are at greater risk. Pupils with SEND or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers and we offer additional support for these pupils, this includes a safe space.

Safeguarding concerns involving pupils with SEND will require close liaison with the DSL and/or DDSL and the SENCo.

Sexual Violence, Sexual Harassment and Harmful Sexual Behaviour

We will respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college. We are clear that sexual abuse, violence, and harassment is not acceptable, and will never be tolerated and is not an inevitable part of growing up.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

Procedure for child-on-child abuse

We will follow the procedure on page 11, but we will ensure in all cases:

- The DSL is informed.
- All staff understand and will challenge inappropriate behaviour between children.
- Our response to child-on-child abuse will be immediate and supportive for all involved, and we will work with key agencies if appropriate to mitigate any further risks (such as; parents/carers, Police, Children's Social Care).
- We will reassure victims that they are taken seriously and will be supported and kept safe. A risk assessment if appropriate will be created for all involved.

9 Online Safety

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

1. **Content** – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, and extremism.
2. **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
3. **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
4. **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

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

Online Safety Procedure

- If staff have safeguarding concerns linked with online safety and/or filtering and monitoring, they must report these to the DSL promptly.
- This will then be recorded appropriately on our pupil recording system and online safety and filtering and monitoring log.

Our online safety procedure is further supported by:

- The DSL, SLT, Governors, and Trust IT department have a lead role in the effectiveness of our filtering and monitoring, but this is supported by our whole school community.
- We have robust processes (including filtering and monitoring systems).
- We protect and educate the whole school community in its responsible and safe use of technology, including mobile and smart technology.
- We set clear guidelines for the use of mobile phones for the whole school community.
- We establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.
- We regularly reviewing our filtering and monitoring systems (at least annually).
- Meeting the filtering and monitoring standards [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](#)
- Meeting the cyber security standards [Cyber security training for school staff - NCSC.GOV.UK](#). In addition, we will ensure at least one governor has completed the cyber security training.
- Regular staff training (at induction and throughout the year) on online safety, safeguarding issues linked to the online world and filtering and monitoring.
- Regular online safety education for staff, pupils and parents/carers.
- We communicate to our parents/carers on online safety and filtering and monitoring.

10 Other important procedures

Attendance

We will closely monitor the attendance of all our pupils, but specifically those pupils with additional vulnerability factors. We will monitor attendance in a continuum for example, those that are absent from school, those with unexplainable absences and/or those children persistently/severely absent from education.

We will ensure that we follow our attendance policy and procedures set out within this policy. Our attendance policy can be accessed via this link [\(insert link\)](#) which is line with [Working together to improve school attendance \(applies from 19 August 2024\) \(publishing.service.gov.uk\)](#)

We will work closely with Bracknell Forest Education Welfare Service regarding attendance.

When a child is missing from education, the school will follow the procedure as set out in Bracknell Forest Children Missing Education guidance.

For those pupils who have a social worker and/or a youth justice worker, if there are any unauthorised absences, suspensions, or a potential of a permanent exclusion we will inform Children's Social Care and any other professionals, as appropriate.

We will work closely with the Local Authority and ensure that our attendance system (Arbor) flags suspensions and any potential permanent exclusions for those children on a CiN and/or CP plan.

Exploitation

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) are forms of child abuse and if we suspect a pupil is being exploited, we will respond immediately which can include:

- Contacting the Police and/or Children's Social Care
- Completing the exploitation tool and sending this to the Bracknell Forest Make Safe Team (this is accessible via the Make Safe Team and under the 'Downloadable Resources' on the [Safeguarding our Schools Can Do Page](#))

Critical Incidents, including a child death

In the event of a critical incident, we will take immediate action which will include contacting the Bracknell Forest MASH team, to ensure an appropriate, multi-agency response. If we are aware of a child death (whether expected or unexpected), we will contact the MASH team and respond in line with the [Child Death Overview Panel | Bracknell Forest Council \(bracknell-forest.gov.uk\)](#) and [Child Death Overview Panel - schools bereavement pack \(bracknell-forest.gov.uk\)](#).

11 Working Together

We will take an active role and work collaboratively with key agencies regarding child protection, safeguarding, education, welfare, and attendance matters. We will provide written reports at child protection conferences and core groups.

Local key agencies include but not limited to:

- Safeguarding our Schools Team
- Education Welfare Service
- Youth Justice Team
- Bracknell Forest Multi-Agency Safeguarding Hub
- Children's Social Care
- Alternative Provision Providers
- SEMH Inclusion Team
- BFC Special Education Needs Department
- Public Health Team
- Virtual School
- The Make Safe Team

- Police
- LADO
- Child and Adolescent Mental Health Services (CAMHS)

For those pupils who have a social worker and/or youth justice worker, we will notify the Youth Justice Team and/or Children's Social Care if:

- A suspension and/or exclusion is a possible next step.
- If there are unexplainable and/or persistent/severe absences from education, unauthorised absence, or missing education where there are known safeguarding risks.
- There is a change in the pupil's behaviour and/or circumstances that raises safeguarding concerns.
- The provision in place requires review.

The statutory duty of the Virtual School is to promote the educational achievement of Children Looked After (CLA) and Previously Looked After Children (PCLA), including those in kinship care from September 2024. From September 2021 until March 2025 non-statutory guidance has extended the Virtual School Head role to also include strategic leadership in promoting the educational outcomes of the cohort of children with a social worker and those who have or have previously had a social worker (CWSW). The Virtual School role does not involve direct work but provides support to enable all stakeholders to continue to support this cohort.

As a school, we have an appointed Designated Teacher (a senior teaching staff member) and will work collaboratively with the Virtual School to improve the educational outcomes for these pupils by monitoring attendance, progress, and attainment, ensuring the Personal Education Plan's (PEPs) are completed in a timely manner and meetings take place. The DT will act as an advocate for the CLA and PCLA and will also work with partners to raise aspirations for this cohort of children. As a school, we will communicate in a timely manner with the Virtual School regarding any concerns and notify of any suspensions or risk of a permanent exclusion in order to discuss next steps.

As a school will be aware of the requirement for children to have an Appropriate Adult while being questioned or detained by the Police (Police statutory guidance, PACE Code C 2019).

We will follow Resolving Professional Difference of Opinion and Escalation policy as necessary [Resolving Professional Difference of Opinion and Escalation \(proceduresonline.com\)](https://proceduresonline.com) to ensure we can learn and understand the decision-making process of other agencies as well as challenge sensitively to ensure our pupil's welfare and safety is paramount.

Communication with Parents/Carers

When working with parents/carers, our approach will be in line with the four principles set out in the statutory guidance; Working Together to Safeguard Children 2023.

In addition:

- Ensure that parents/carers are informed of the responsibility placed on the school and staff in relation to child protection.
- Undertake appropriate discussion with parents/carers, including prior to involvement of another agency unless the circumstances preclude this action. If the school believes that notifying parents/carers could increase the risk to the child or exacerbate the situation, advice will be sought from Children's Social Care.
- Regularly communicate key safeguarding education relevant to parents/carers, including how to support their child in being safe at school, in the community and online. We will also make them aware of our filtering and monitoring systems.

12 Safer Recruitment, low-Level concerns, and allegations against staff and volunteers (ASV)

We will operate safer recruitment practices including ensuring appropriate DBS, identity checks and reference checks for all staff and volunteers are undertaken according to the government statutory guidance in part three and part four of KCSIE (2024) and the **Local Authority's Safer Recruitment Toolkit**. Our recruitment procedures aim to deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in our school.

One member of staff on the recruitment panel will have completed Safer Recruitment training and the school will consider digital screening of all potential new staff at the shortlisting stage in accordance with Safer Recruitment protocols.

All allegations against staff and volunteers will be managed confidentially and taken seriously. Where necessary, advice will be sought from both the Local Authority Designated Officer (LADO) and Human Resources.

We will adhere to the School Low Level Concerns policy where there may be a concern regarding a member of staff, supply staff, volunteer, or contractor when:

- The concern may be inconsistent with the staff code of conduct.
- The concern does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

The purpose of this low level concerns policy is to embed a culture of openness, trust, and transparency in which the school's values and expected behaviour set out in the staff code of conduct are lived, monitored, and reinforced constantly by all staff.

If we are in any doubt as to whether the information which has been shared about a member of staff conduct, low-level concern or whether this meets the harm threshold, we will consult with the Trust's HR manager and the LADO as appropriate.

We will ensure that all staff read and understand our staff code of conduct, low level concerns policies and whistleblowing policy.

Low Level Concerns should be reported to the DSL. Low-level concerns and allegations against staff will be recorded securely and will be managed confidentially, and on a need-to-know basis only.

All staff and volunteers will be aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Trust).

The school will ensure that communication between pupils and adults, is via school devices and platforms only and that communication is transparent and takes place within clear and explicit professional boundaries and are open to scrutiny.

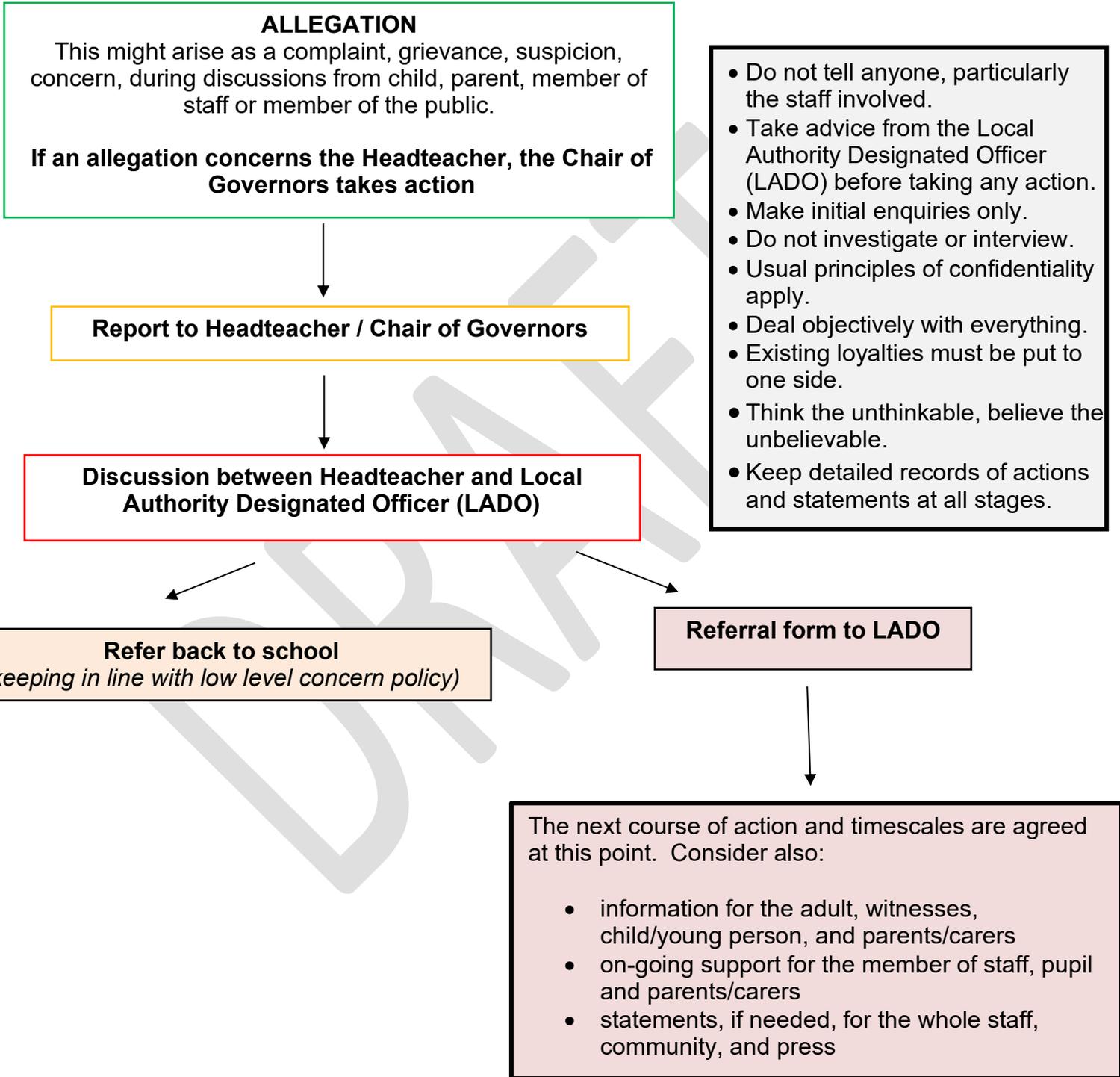
All staff members have a responsibility to ensure our buildings and grounds are safe, this includes ensuring the safety of any visitors into school.

The school 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.

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13 Procedure for managing safeguarding concerns and allegations made about staff, including supply teachers, volunteers, contractors, and out-of-school setting providers

All staff must know how to recognise an allegation and who to report to.



NSPCC Whistleblowing
Helpline 0800 028 0285

14 Appendix A

Abuse, Neglect and Exploitation (extracted from Keeping Children Safe in Education (2024))

Abuse is 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

19 Safeguarding and Child Protection Policy

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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

All staff are aware that CCE and CSE are forms of child abuse.

15 Appendix B

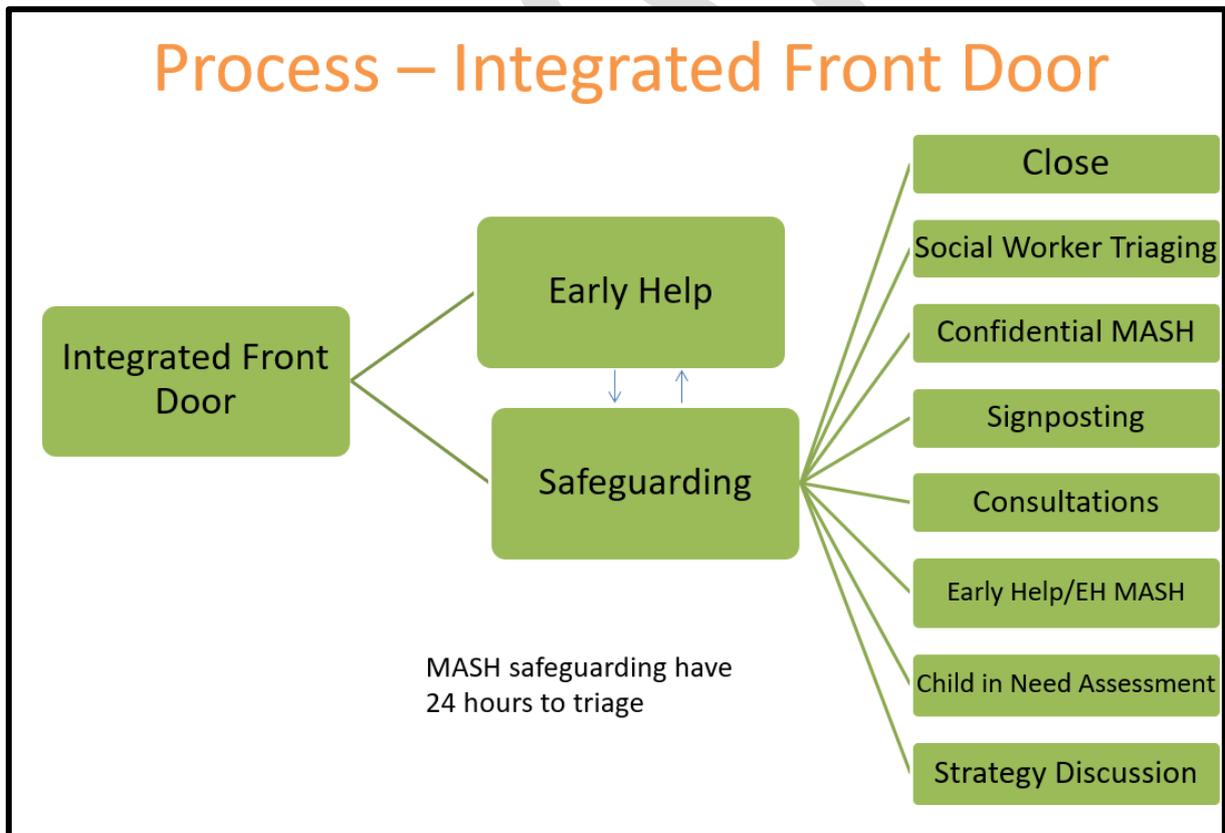
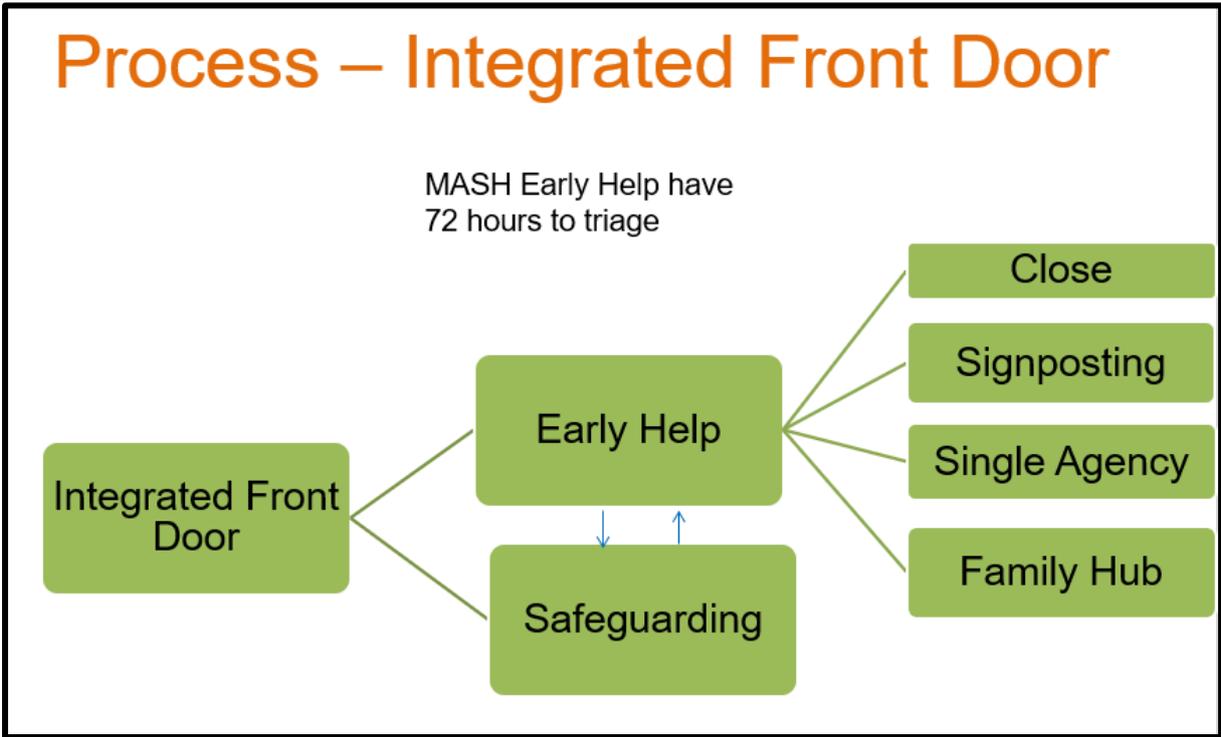
Linked policies (this is not intended to be an exhaustive list):

- Attendance policy
- Behaviour policy
- School complaints procedure
- Equality, information and objectives statement.
- Health and safety policy and other linked policies and risk assessments, including first aid
- Data protection policy
- Supporting pupils with medical conditions
- Offsite activities and educational visits policy and risk assessments
- Online safety policy (including filtering and monitoring)
- Intimate care policy
- Physical intervention policy
- Premises management documents
- Relationships and sex education policy
- Safer Recruitment
- Special educational needs and disabilities policy
- Staff code of conduct
- Disciplinary policy and procedure
- Whistleblowing policy

16 Appendix C

Specific Safeguarding Issues (this is not an exhaustive list, please refer to Keeping Children Safe in Education, in particular Annex B)

Bullying including cyber bullying
Child abduction and community safety incidents
Child Sexual Exploitation (CSE)
Child Criminal Exploitation (CCE)
Children and the court system
Children missing from Education
Children of substance misusing parents/carers
County lines
Domestic abuse
Substance abuse
Fabricated or induced illness
Formal complaint policy
Children with family members in prison
Faith abuse
Female Genital Mutilation (FGM)
Forced Marriage Gangs and Youth Violence
Gang Activity
Gender based violence/violence against women and girls (VAWG)
Hate crime
Mental health
Homelessness
Health and well-being
So called 'Honour-based' abuse
Child-on-Child abuse
Consensual and non-consensual sharing of indecent images/nude/semi-nude images/videos
Sexual violence and sexual harassment between children in schools
Private fostering
Preventing radicalisation (The Prevent Duty)
Online abuse including indecent images/nude/semi-nude images/videos
Teenage relationship abuse
Trafficking
Missing children and vulnerable adults
Child sexual abuse within the family
Poor parenting, particularly in relation to babies and young children
Serious violence
Cyber crime



18 Appendix E

Hawthorn Academy recognises the importance of contextual safeguarding in protecting the welfare and safety of our pupils. Contextual safeguarding expands the traditional focus of safeguarding beyond the family home to include the influence of wider environmental factors, such as peer groups, local neighbourhoods, and online activity. This is especially critical in a specialist setting such as ours, where pupils often face complex vulnerabilities that require a nuanced and trauma-informed approach.

Understanding Our Context

As a school catering to pupils aged 11–18 with Social, Emotional and Mental Health (SEMH) needs, many of our young people have experienced:

- Adverse Childhood Experiences (ACEs) including domestic abuse, neglect, or exposure to substance misuse;
- Disrupted family relationships and challenging home environments;
- Placement in care, or frequent changes in caregiving arrangements;
- Mental health difficulties, including anxiety, depression, and self-harming behaviours;
- Exclusion from or difficulties in mainstream education, leading to low self-esteem, mistrust of adults, and limited engagement with authority figures.

Key Areas of Contextual Risk

Our safeguarding approach considers the wider social risks our pupils face, which may include:

- **Domestic Violence and Abuse:** Many pupils have witnessed or been affected by domestic violence, which can create long-lasting emotional and behavioural impacts. We remain vigilant to signs of re-traumatisation or hypervigilance that can emerge in relationships or group settings.
- **Challenging Family Dynamics:** Pupils may return to homes where boundaries, supervision, or emotional support are inconsistent or absent. Some families may struggle to engage with statutory services or may themselves be experiencing trauma or instability.
- **Peer Influence and Exploitation:** Vulnerable young people may be susceptible to peer pressure, criminal exploitation, or county lines involvement. These risks can be heightened by feelings of social rejection, a need for belonging, or lack of protective adult relationships.
- **Online Harm:** Pupils may access or be exposed to harmful online content, including misogynistic, violent, or extremist material. Exposure to online bullying, grooming, or sexual exploitation remains a significant safeguarding concern.

- Triggers and Trauma Responses: Some topics—such as family breakdown, substance use, abuse, or bereavement—can trigger trauma responses, especially if discussed in lessons or brought up by peers. Staff are trained to recognise and manage potential triggers in both the curriculum and informal settings.

DRAFT

19 Appendix F

Links to Further Guidance:

[Behaviour in schools guidance \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Berkshire Child Protection Procedures <http://berks.proceduresonline.com/>

Bracknell Forest Alternative Provision Guidance [Welcome to Alternative Provision | Can-Do | Bracknell Forest \(bracknell-forest.gov.uk\)](https://bracknell-forest.gov.uk)

[Bracknell Forest Safeguarding Board](https://bracknellforestsafeguarding.org.uk)

Bracknell Forest Safeguarding Board Child Neglect Strategy [child_neglect_strategy_2023-26_final.pdf \(bracknellforestsafeguarding.org.uk\)](https://bracknellforestsafeguarding.org.uk)

Bracknell Forest Safeguarding Board Procedures [Welcome to the Bracknell Forest Multi-Agency Safeguarding Children Procedures \(proceduresonline.com\)](https://proceduresonline.com)

Bracknell Forest Threshold Guidance [BF Children's Threshold Guidance 2023 \(bracknellforestsafeguarding.org.uk\)](https://bracknellforestsafeguarding.org.uk)

[Criminal exploitation of children and vulnerable adults: county lines - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

DfE harmful online challenges and hoaxes [Harmful online challenges and online hoaxes - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

DfE Keeping Children Safe in Education (September 2024) [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

[DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Early Years Foundation Stage Statutory Framework [Statutory framework for the early years foundation stage for group and school providers \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Farrer & Co [addressing-child-on-child-abuse.pdf \(farrer.co.uk\)](https://farrer.co.uk)

Governance Guides [Maintained schools governance guide - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk) and [Academy trust governance guide - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[HM Government - Multi-agency statutory guidance on Female Genital Mutilation \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

[Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/keeping-children-safe-during-community-activities-after-school-clubs-and-tuition)

[Keeping children safe: code of practice \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidance/keeping-children-safe-code-of-practice)

[Mental Wellbeing Young People - Public Health Portal - Bracknell Forest Council | \(bracknell-forest.gov.uk\)](https://bracknell-forest.gov.uk/public-health-portal)

Multi Agency Statutory Guidance on Female Genital Mutilation (July 2020) – [Multi-agency statutory guidance on female genital mutilation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/multi-agency-statutory-guidance-on-female-genital-mutilation)

NSPCC Harmful Sexual Behaviour Framework
<https://learning.nspcc.org.uk/research-resources/2019/harmful-sexual-behaviour-framework>

[Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/prevent-duty-guidance-england-and-wales-2023)

[Promoting the education of looked-after children and previously looked-after children \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidance/promoting-the-education-of-looked-after-children-and-previously-looked-after-children)

Serious Violence Home Office Strategy
<https://www.gov.uk/government/publications/serious-violence-strategy>

[Sharing nudes and semi-nudes: advice for education settings working with children and young people \(updated March 2024\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)

Special educational needs and disability code of practice: 0 to 25 years
[SEND Code of Practice January 2015.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidance/send-code-of-practice-january-2015)

[Supporting pupils at school with medical conditions \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidance/supporting-pupils-at-school-with-medical-conditions)

[Teaching online safety in schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/teaching-online-safety-in-schools)

What to do if you're worried a child is being abused (Advice for Practitioners, March 2015) - [Stat guidance template \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidance/what-to-do-if-youre-worried-a-child-is-being-abused)

[Working together to improve school attendance \(applies from 19 August 2024\) \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidance/working-together-to-improve-school-attendance)

[Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidance/working-together-to-safeguard-children-2023)

[Working together to improve school attendance \(applies from 19 August 2024\) \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidance/working-together-to-improve-school-attendance)

20 Appendix G

At Hawthorn Academy, we recognise the lifelong impact of early adversity and trauma on a child's emotional development, behaviour, learning, and ability to form trusting relationships. As a trauma-informed SEMH school, we take proactive steps to build safety, connection, and regulation into every aspect of our safeguarding approach.

Key Principles of Our Trauma-Informed Approach:

- **Emotional Safety:** Pupils are supported through clear routines, co-regulation, and predictability. Staff use relational language and restorative practice to repair ruptures.
- **Trust and Transparency:** Staff are trained to understand how trauma may affect perception, memory, and behaviour. All safeguarding decisions are explained in ways that promote understanding and reduce anxiety.
- **Empowerment and Choice:** Pupils are supported to express their views, have their feelings validated, and experience agency in how support is provided.
- **Relational Practice:** Strong, attuned relationships underpin safeguarding. Staff take a relational stance when responding to incidents, recognising behaviour as communication.
- **Staff Support and Reflection:** We provide regular professional reflection time, team debriefs, and emotional supervision to ensure staff wellbeing and sustained relational consistency.

Implementation in Safeguarding Practice:

- Trauma-informed strategies are embedded into our Behaviour and Relationships Policy and delivered through our Here, Now, Next Curriculum, covering PSHE and RSE.
- DSLs monitor safeguarding patterns to identify pupils showing trauma responses (e.g. withdrawal, hypervigilance, avoidance, control-seeking).
- Where necessary, plans are co-constructed with therapeutic staff to support emotional regulation and repair.
- Key staff use tools such as Zones of Regulation, sensory circuits, visual timetables, and safe spaces to support proactive regulation.

Our trauma-informed safeguarding model is part of Hawthorn Academy's commitment to ensuring that every pupil feels safe, understood, and valued, whatever their history.