

# Safeguarding Policy



**This policy was revised in September 2025 to reflect day-to-day practice within The Pegasus Academy Trust. It was previously revised in September 2024 to reflect the changes in “Working Together to Safeguard Children” published in December 2023.**

## **1. Introduction**

- 1.1** The purpose of The Pegasus Academy Trust's (PAT) and Thornton Heath Nursery School's safeguarding policy is to ensure every child who is a registered pupil at our schools is safe and protected. This policy will give clear direction to staff (including supply staff), volunteers, visitors, parents and carers about the expected behaviour and responsibility when managing safeguarding concerns. It should be read in conjunction with the following policies: Attendance; Anti-Bullying; Behaviour; Child Protection; Critical incident, E-Safety; Equalities, Health, Anti-Racist, Safety and Welfare; Staff Handbook; Whistleblowing and our Code of Conduct.
- 1.2** Our schools fully recognise the contribution they can make to protect children from harm and to support and promote the welfare of all who are registered pupils. The elements of our policy are prevention, protection and support. Our policy applies to all staff, parents, carers, governors, members of our academy councils, directors, volunteers, visitors and pupils.
- 1.3** At PAT we work with children, parents, carers and our local community to ensure the safety and welfare of children.
- 1.4** We are committed to:
  - a) building a 'culture of safety' in which children are protected from abuse and harm in all areas of its delivery;
  - b) responding promptly and appropriately to all incidents or concerns of abuse that may occur and to work with statutory agencies in accordance with the procedures at PAT;
  - c) promoting awareness of child abuse issues through training and learning programmes for adults. We are also committed to empowering young children to promote their right to be strong, resilient and listened to.
  - d) protecting children from maltreatment;
  - e) preventing impairment of children's health and development;
  - f) ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;
  - g) promoting positive mental health and understanding the role this plays in helping children and adults to function effectively;
  - h) undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successively.
- 1.5** This policy relates to the revised HM Government document “Working Together to Safeguard Children” which establishes the fundamental principle of a child-centred approach to safeguarding and child protection procedures and services. It sets out detailed procedures for increased emphasis on multi agency working at each stage and highlights the need for a strong culture of continuous learning and improvements.
- 1.6** We also adhere to “Keeping Children Safe in Education” (updated Sep 2025) which provides statutory safeguarding regulations for all staff. All staff within the PAT are given a copy of Part One of this on at least an annual basis through an on-line portal and must sign to confirm

receipt. The guidance set out in “Teaching Online Safety in School” (June 2019) is also followed to ensure all children and staff are aware of the ways in which pupils can be protected online whether they are working at home or in school. Annex C of KCSiE provides guidance and strategies for supporting safe, on-line working.

- 1.7** “Safeguarding” is taken to mean all agencies working with children, young people and their families take all reasonable measures to ensure that the risk of harm to children’s welfare is minimised and “where there are concerns about children and young people’s welfare, all agencies take all appropriate actions to address those concerns, working to agreed local policies and procedures in full partnership with other agencies”
- 1.8** The definition of 'safeguarding and promoting the welfare of children' now aligns with the updates in Working Together to Safeguard Children 2023. The new definition includes early intervention, protection from harm, online and offline, and promoting the best outcomes for all children. Key points are:  
-providing help and support to meet the needs of children as soon as problems emerge.  
-protecting children from maltreatment at home, whether that is within or outside the home, including online.
- 1.9** From 2025, the term “exploitation” is included in KCSiE. The headings reflect the potential for abuse, neglect, and exploitation. The definition of abuse has expanded to highlight that witnessing the ill-treatment of others, such as domestic abuse, is harmful to children.
- 1.10** Within the area in which our schools are located we have identified a range of local risks particular to Thornton Heath and South Norwood. These include gang and knife culture, drug culture including County Lines, the impact of homelessness, FGM, radicalisation, children with families in prison and grooming of our pupils by older students and adults. The Designated Safeguarding Leads (DSLs) within PAT have experience of dealing with each of these issues and when concerns arise they are dealt with appropriately.

## **2. Aims**

- 2.1** Our aims are to carry out this policy by:
- a) promoting children’s right to be strong, resilient and listened to by creating an environment in our setting that encourages children to develop a positive self-image which includes their heritage arising from their colour and ethnicity, their languages spoken at home, their religious beliefs, cultural traditions and home background;
  - b) promoting children’s right to be strong, resilient and listened to by encouraging them to develop a sense of autonomy and independence;
  - c) promoting children’s rights to be strong, resilient and listened to by enabling them to have the self confidence and the vocabulary to resist inappropriate approaches.
  - d) helping children to establish and sustain satisfying relationships within their families, with peers and with other adults;
  - e) promoting good mental health and being responsive to any staff, parent or child who is indicating they are having difficulties;
  - f) working with parents to build their understanding of, and commitment to, the principles of safeguarding all our children.

## **3. Roles and responsibilities**

- 3.1** At PAT there are a number of DSLs with responsibility for safeguarding. Lynne Sampson, one of the Executive Heads, has overall responsibility for safeguarding. Through appropriate training, knowledge and experience, DSLs are able to liaise with Children's Services and other agencies where necessary and make referrals to Children's Services.
- 3.2** Any concern for a child's safety or welfare will be recorded in writing and given promptly to a DSL.
- 3.3** A DSL will represent our school at child protection conferences and, where deemed necessary, core group meetings and will be responsible for ensuring that all staff members and volunteers are aware of our policy and the procedure they need to follow.
- 3.4** A DSL will ensure that all staff, volunteers and regular visitors have received appropriate child protection information during induction.
- 3.5** The directors of the Pegasus Academy Trust ensure that our safeguarding policy is in place and is reviewed regularly. The content of our policy has been written following consultation with the Local Authority and the requirements of the Safeguarding Children's Board Policies and Procedures.
- 3.6** Should an allegation be made against the one of the Executive Headteachers, the Chair of Directors will be responsible for liaising with the Local Authority.
- 3.7** At all times, the Executive Headteachers and Board of Directors will ensure that safer recruitment practices are followed. We require evidence of original academic certificates. We do not accept testimonials and insist on taking up references prior to interview. We will question the contents of application forms if we are unclear about them, we will undertake enhanced Criminal Records Bureau checks and use any other means of ensuring we are recruiting and selecting the most suitable people to work with our children.

#### **4. Training**

- 4.1** Every member of our staff, our governors, directors and members of our academy councils undertakes child protection training on at least an annual basis; this may be more frequent if there are changes to legislation or to local requirements. Our child protection policy and procedures are reviewed with all staff at the beginning of each academic year. Staff must sign to confirm that training has been attended. No member of staff may work in one of our schools until they have undertaken child protection training.
- 4.2** Each of the Trust's designated safeguarding leads has access to up to date information and should be used as a first point of contact for concerns and queries regarding any safeguarding concern.
- 4.3** When new staff join PAT they are informed of our safeguarding arrangements. They are given a copy of our Child Protection Policy, Behaviour Policy, Safeguarding Policy and the staff Code of Conduct along with Part one and Annex A of 'Keeping Children Safe in Education'. They are informed of the names our DSLs.

#### **5. Recruitment**

- 5.1** At PAT, Lynne Sampson, Heads of School (HoS) the Chair of Directors and other directors have undertaken accredited NCSL Safer Recruitment Training. We operate robust safer recruitment procedures and ensure all appropriate checks are carried out on new staff, members of the academy councils and volunteers. At least one interviewer at every interview will have received training in safer recruitment.
- 5.2** All applicants for employment will be required to complete an application form containing questions about their academic and employment history and their suitability for the role. Incomplete application forms will be returned to the applicant where the deadline for completed application forms has not passed. A curriculum vitae will not be accepted in place of the completed application form.
- 5.3** As stated in KCSiE 2022 and updated in KCSiE 2023, as part of the shortlisting process, we will consider carrying out an on-line search as part of our due diligence on candidates but will always them if we intend to do so. This may help identify any incidents or issues that have happened, and are publicly available on line, which we may want to explore with the applicant at interview.
- 5.4** The applicant may then be invited to attend a formal interview at which his/her relevant skills and experience will be discussed in more detail. Any gaps in terms of employment history will be challenged.
- 5.5** If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following:
- a) The agreement of a mutually acceptable start date and the signing of a contract incorporating the Trust's standard terms and conditions of employment;
  - b) The receipt of at least two references (one of which must be from the applicant's most recent employer) which the Trust considers satisfactory; and
  - c) The receipt of a Disclosure from the DBS with which the Trust is satisfied. If the offer is accepted and the above conditions are satisfied, the applicant will be issued with a contract of employment as confirmation of employment.
- 5.6** The Trust will apply for a DBS Certificate only for applicants offered a position. The information obtained will be used to help establish whether that person has a background that might make him/her unsuitable for the job or voluntary position in question. The Trust will not apply to the DBS to run a check without the knowledge and consent of the person concerned. The forms of unsuccessful applicants will be destroyed after a period of six months.
- 5.7** If a DBS Certificate reveals any convictions, the person concerned will be invited to attend an interview with one of the Executive Headteachers to discuss the conviction(s) and circumstances. Having a criminal record will not necessarily bar applicants from working within The Trust. This will depend on the nature, circumstances and background of the offence, and the time elapsed since the offence. However, failure to reveal information directly relevant to the position sought could lead to the withdrawal of any offer of employment.
- 5.8** We do not repeat DBS checks once completed, unless there is a break in service of more than three months or we have concerns about a member of staff's suitability to work with children.

- 5.9** Section 128 checks are carried out on all members of PAT's senior leadership team and directors. This ensures no individual who has been prohibited from the management of schools is involved in the work of PAT
- 5.10** Our induction programme for new staff includes safeguarding information relating to signs and symptoms of abuse, how to manage a disclosure from a child, how to record and to whom the pass information should be passed.
- 5.11** At the start of each academic year, staff are requested to sign our School Staff Suitability Form in which they declare whether they are known to any children's services department or to the police as being a risk or potential risk to children, whether there any convictions/cautions since your most recent DBS that they need to disclose and whether anyone living in their household operates childminding facilities and has been barred from working with children under the childcare Act 2006.
- 5.12** The form also asks new staff to confirm that they will disclose any future changes to their own circumstances including criminal charges and convictions. The signed lists are kept securely and the Executive Heads would speak to any member of staff whose declaration causes concern.

## **6 Whistleblowing procedures**

- 6.1** Procedures to deal with in school allegations against other members of staff
- a) It is important that staff and volunteers share in confidence, with the designated person, concerns they may have about another member of staff or volunteers;
  - b) All staff have a duty to report concerns about a member of staff or volunteers;
  - c) It is important that any concerns for the welfare of the child arising from suspected abuse, harassment or bullying, by a member of staff or volunteer should be reported immediately;
  - d) Staff and volunteers who report their concerns that a colleague is or may be abusing a child will be fully supported by the schools. The whistleblower will be treated as a witness, not a complainant;
  - e) Allegations of abuse against a member of staff or volunteer should be fully recorded and reported appropriately;
  - f) Every effort should be made to maintain confidentiality for all concerned, and consideration will be given to what support may be appropriate to children, parents, members of staff and volunteers. (See also the Trust's Whistleblowing policy)

## **7. Child protection conferences**

- 7.1** On rare occasions staff members (e.g. class teachers) may be asked to attend a child protection or child in need conference on behalf of the school in respect of individual children. Usually the person attending from school will be the Head of School, Deputy Head of School or Inclusion Manager. In any case, the person attending will need to have as much relevant up to date information about the child as possible. We understand the importance of involving social workers in the protection of children and seek to involve and inform them at all times.
- 7.2** A child protection or child in need conference will be convened if a referral has been made and the following investigation findings have considered the child to be at risk of harm, or the child is already on the child protection register and a review conference is held to monitor the

safety of the child and the required reduction in risk. Staff may be required to attend child protection or child in need conferences or core group meetings to represent the school.

- 7.3** Clearly child protection conferences can be upsetting for parents. We recognise that we are likely to have more contact with parents than other professionals involved. We will work in an open and honest way with any parent whose child has been referred to Children's Services or whose child is on the child protection register. Our responsibility is to promote the protection and welfare of all children and our aim is to achieve this in partnership with parents and carers.

## **8. Children missing or absent from education**

- 8.1** There is a clear distinction between children missing education and those absent from education. Children absent from education are those who are absent for prolonged periods of time or absent on repeated occasions or both.
- 8.2** The term 'deliberately missing education' has now been replaced with 'unexplainable and/or persistent absences from education'. This change acknowledges that children missing school may be at risk of harm and can serve as a warning sign for various safeguarding concerns.
- 8.3** Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.
- 8.4** The Trust has its own Attendance and Admissions Officer/Education Welfare Officer to ensure that the attendance of all children is tracked and monitored closely. Any child who is absent without a reason being received is deemed "missing in or absent from, education". Our Attendance and Admissions Officer will attempt to make contact with the parents and, as appropriate will then make a Child Missing in Education (CME) referral to the local authority, [childrenmissingfromeducation@croydon.gov.uk](mailto:childrenmissingfromeducation@croydon.gov.uk), who will conduct further investigations.
- 8.3** We follow the procedures outlined in our attendance policy including undertaking first day calling and monitoring data to ensure we intervene early in cases of poor attendance and/or unexplained absences.
- 8.4** In response to "Keeping Children Safe in Education" and "Working together to Safeguard Children" PAT has:
- a) staff who understand what to do when children do not attend regularly;
  - b) appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions);
  - c) staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage;
  - d) procedures to inform the local authority when we plan to take pupils off-roll when they:
    - leave school to be home educated
    - move away from the school's location
    - remain medically unfit beyond compulsory school age
    - are in custody for four months or more (and will not return to school afterwards); or
    - are permanently excluded

- 8.5** We ensure that pupils who are expected to attend our schools, but fail to take up the place, are referred to the local authority. When a pupil leaves school, we record the name of the pupil's new school and their expected start date. When removing a child from roll at the standard and non-standard transition points we inform the local authority in accordance with statutory requirements and pass on all safeguarding files.
- 8.6** In order to keep children safe and provide appropriate care for them, the Trust requires parents and carers to provide accurate and up to date information regarding:
- a) full names and contact details of all adults with whom the child normally lives;
  - b) full names and contact details of all persons with parental responsibility (if different from above);
  - c) emergency contact details (if different from above) of at least two adults;
  - d) full details of any other adult authorised by the parent to collect the child from school (if different from the above).
- 8.7** Staff should be aware of the safeguarding responsibilities for children who are missing education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of them going missing in future.

## **9. Early Help**

- 9.1** Early help has been broadened to include a wider range of concerns. The new listing now includes children who:
- a) frequently go missing from education, home or care.
  - b) have experienced multiple suspensions or are at risk of permanent exclusion.
  - c) have a parent or carer in custody or are affected by parental offending.
- 9.2** As part of our responsibilities for safeguarding and promoting the welfare of children, we provide a co-ordinated offer of early help when additional needs of children are identified. These may include if a child:
- a) is disabled and has specific additional needs;
  - b) has special educational needs (whether or not they have a statutory education, health and care plan);
  - c) is a young carer;
  - d) is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
  - e) is frequently missing/goes missing from care or from home;
  - f) is misusing drugs or alcohol themselves;
  - g) is at risk of modern slavery, trafficking or exploitation;
  - h) is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
  - i) has returned home to their family from care;
  - j) is showing early signs of abuse and/or neglect;
  - k) is at risk of being radicalised or exploited;
  - l) is a privately fostered child.

## **10. Contextual safeguarding**

- 10.1** We recognise that safeguarding incidents and/or behaviours can be associated with factors outside of the school environment and/or can occur between children outside of the school. This is known as contextual safeguarding. It is key that all PAT staff are aware of the definition of contextual safeguarding and when reporting concerns, they include as much information and background detail as possible so the DSL can make a referral with a holistic view of the child. This will allow any assessment to consider all the available evidence and the full context of any abuse.
- 10.2** We recognise that children with special educational needs and/or disabilities (SEND) can face additional safeguarding challenges and these are discussed in staff training.
- 10.3** We recognise that a previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe and, when necessary, take prompt action.
- 10.4** We work with other agencies as required to respond to concerns about sexual violence and harassment. We seek consultation where there are concerns or worries about developmentally inappropriate or harmful sexual behaviour as required so that we ensure we are offering the right support to the child(ren). Support will depend on the circumstances of each case and the needs of the child, it may include completion of risk assessments to support children to remain in school whilst safeguarding other children and the victim.

## **11. Keeping staff safe**

- 11.1** There are sometimes occasions when some form of physical contact is inevitable, for example if a child has an accident or is hurt or is in a situation of danger to themselves or others around them. Staff in our schools know that they should avoid placing themselves in vulnerable situations and always ensure there are two members of staff present when for example a child needs to remove an article of clothing or needs changing following a toileting accident.
- 11.2** If staff, visitors, volunteers or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in school, who they are with and for how long. A visitor, volunteer or parent helper may only work in one of our schools if an appropriate risk assessment has been completed.
- 11.3** Doors, ideally, should have a clear glass panel in them and be left open. Sometimes allegations are made against adults who come in to contact with children. We have a responsibility to ensure that we adhere to the requirements of dealing with allegations of abuse against staff.
- 11.4** All adults who come into contact with children will be made aware of the steps that will be taken if an allegation is made. At PAT we adhere to the guidance laid down in Croydon council's guidance and if necessary we seek appropriate advice from the LADO (Local Authority Designated Officer). We will seek and work with the advice that is provided. Should an allegation be made against either Executive Headteacher, this will be reported to the Chair of our Directors who will liaise with Croydon's LADO.



## **12. Physical Intervention/Positive Handling**

- 12.1** Our policy on physical intervention/positive handling by staff is set out separately, within the Behaviour Policy and Restraint Policy. It complies with the DfE “Use of Reasonable Force – July 2013”. Such events should be recorded and signed by a witness where required in the policy.

## **13. Children at risk of fleeing from school premises**

- 13.1** In the event of a child attempting to flee from school premises we would aim to prevent them from doing so using appropriate physical intervention if necessary.
- 13.2** Where a child is known to be a flight risk we undertake a specific risk assessment outlining strategies to keep the child on site and make any necessary preventative measures while not compromising our accessibility arrangements.

## **14. Bullying and cyberbullying**

- 14.1** Our procedures on the prevention and management of bullying are set out in separate policies (e-Safety and Anti-Bullying) and acknowledge that to allow or condone bullying may lead to considerable under achievement for children.

## **15. Self Harming & Suicidal Behaviour**

- 15.1** Self-harm and suicide threats and gestures by a child put the child at risk of significant harm, and should always be taken seriously. They may also be indicative of psychological or emotional disturbance triggered by physical, sexual and / or emotional abuse or chronic neglect which may also constitute significant harm.

## **16. Young carers**

- 16.1** In many families, children contribute to family care and well-being as a part of normal family life. A young carer is a child who is responsible for caring on a regular basis for a relative (usually a parent, grandparent, sometimes a sibling or very occasionally a friend) who has an illness, disability or an alcohol or substance dependency. Many young carers may experience:
- a) social isolation;
  - b) a low level of school attendance;
  - c) some educational difficulties;
  - d) impaired development of their identity and potential;
  - e) low self-esteem;
  - f) emotional and physical neglect;
  - g) conflict between loyalty to their family and their wish to have their own needs met.

## **17. Mobile phones**

- 17.1** Due to the significant advances in mobile phone technology, there is the potential for both

mobile phones and cameras to be used inappropriately and compromise the confidentiality of the children in our care. In order to ensure the safety and wellbeing of the children in our Trust and to prevent images being recorded and inappropriately use we prohibit the use of personal mobile phones by staff when working with children both on and off site and prohibit the use of personal mobile phones and other mobile devices such as tablets by volunteers or visitors when on the school premises.

- 17.2** The Trust accepts that employees/volunteers/parents will bring their mobile phones/devices to work and onto the school premises. Smart watches may be worn however they must be switched to airplane mode when entering school to deactivate the ability to receive and respond to texts, take incoming phone calls and take photographs
- 17.3** Mobile phones should not be used in a space where children are, or could be, present (e.g. classroom, playgrounds or corridors).
- 17.4** Mobile phones and cameras should only be used away from the children and where possible, off site.
- 17.5** Staff/volunteers are not permitted to make or receive call or texts while in classrooms/learning areas or the playground. Calls/texts/personal emails can be made at break and lunchtimes in the staffroom, empty classrooms and offices if they are not being used by other staff and if no children are present.
- 17.6** Staff/volunteers should ensure that mobile phones are locked and turned off or silent at all times while on school premises. They should be kept in a bag that is locked in the classroom cupboard, away from public view.
- 17.7** Staff/volunteers/parents/visitors are not at any time permitted to use recording equipment on their mobile phones/devices - for example: to take photographs or videos of children.
- 17.8** Each school's main telephone number can be used for emergencies by staff or volunteers or by people who need to contact them.
- 17.9** We prefer that parents, carers and visitors do not use their mobile phones when on school premises and have signs requesting this. However, we recognise that a complete ban on the use of mobile phones is unrealistic and impossible to regulate as many people see them as essential means of communication at all times. We therefore monitor usage of mobile phones, while in school to ensure it is courteous and appropriate to the school environment.
- 17.10** We allow parents and carers to photograph or video school events such as shows or sports day using their mobile phones – but insist that parents do not publish images (e.g. on social networking sites) that include any children other than their own. 17.

## **18. Sexting**

- 18.1** There is no clear definition of 'sexting' although many professionals consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet.' However, many young people are more likely to interpret sexting as 'writing and sharing explicit messages with people they know'. Similarly, many parents think of sexting as flirty or sexual text messages rather than images.

- 18.2** We take any direct disclosure by a young person should be taken very seriously and our designated lead professionals would follow the procedures outlined in our child protection policy when considering a referral.
- 18.3** A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves. Parents (or carers) should be informed and involved in the process at an early stage unless informing the parent will put the young person at risk of harm.
- 18.4** Any decision not to inform the parents would generally be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when the parents should be informed.

## **19. Low level concerns about staff behaviour**

- 19.1** Within The Pegasus Academy Trust we recognise the possibility that adults working in our schools, including members of our academy councils, our directors, volunteers, supply teachers and agency staff may harm children. Any concerns about the conduct of other adults in the school should be referred to the Head of School without delay. Concerns about the Head should be referred to the Executive Heads and any concern about the Executive Heads should be referred to the Chair of the Board of Directors.
- 19.2** Concerns may come from various sources, for example, a 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.
- 19.3** Lynne Sampson, the Executive Head who is also the Trust's Senior Safeguarding Lead decides whether a concern is an allegation or low-level concern. She will usually consult Jolyon Roberts, with whom she shares the role of Executive Head and/or the Trust's independent HR consultant. The term 'low-level' concern does not mean that it is insignificant; it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO).
- 19.4** Allegations

It is an allegation if the person\* has:

- a) behaved in a way that has harmed a child, or may have harmed a child and/or;
- b) possibly committed a criminal offence against or related to a child and/or;
- c) behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- d) behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside school).

(\*Person could be anyone working in our schools including supply teachers, volunteers and contractors.)

Allegations should be reported to the LADO 'without delay'. Before contacting the LADO, we would conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

We understand that the LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the Trust, or a combination of these.

## **19.5 Low-level Concerns**

A concern may be graded low-level if it concern does not meet the criteria for an allegation; and the person\* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- a) being over friendly with children;
- b) having favourites;
- c) taking photographs of children on their mobile phone;
- d) engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- e) using inappropriate sexualised, intimidating or offensive language.

- 19.6** If the concern has been raised via a third party, the Executive Head or designated investigation officer should collect as much evidence as possible by speaking
- a) directly to the person who raised the concern, unless it has been raised anonymously;
  - b) to the individual involved and any witnesses.

- 19.7** Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

- 19.8** Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

- 19.9** Low-level concerns should be recorded in writing, including the name\* of individual sharing their concerns, details of the concern, the context in which the concern arose and the action taken.

(\* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

- 19.10** We ensure that records are kept confidential, held securely and comply with the Data Protection Act 2018. We keep all records for seven years.

- 19.11** We review records so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and then meets the criteria for an allegation, then the matter is referred to the LADO. A review of records might identify that there are wider cultural issues within our schools that enabled the behaviour to occur. This would result in the revision of policies or processes to minimise any future risk.

## **20. On-line Safety including filtering and monitoring**

- 20.1** Our Trust has a clear E-Safety Policy. We understand that many children have unlimited and unrestricted access to the internet via mobile phone networks. This access means that some of our children have the potential to sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.
- 20.2** Within The Pegasus Academy Trust we manage this risk and protect children from inappropriate content, without unreasonably impacting teaching and learning, through our filtering and monitoring systems. We also aim to keep children safe when they are accessing online learning and are not in school. Annex B of KCSIE provides additional information and support for schools and parents to keep children safe online.
- KCSIE 2025 also introduced the need to be aware of risks online relation to “misinformation,” “disinformation” and “conspiracy theories.” (paragraph 135).
- 20.3** “Securly” is the filtering and monitoring product we use on Chromebooks. It has the benefit of alerting DSLs if for example children access the Childline website, or search about self harm. The Trust’s filtering and monitoring systems are provided through London Grid for Learning and are reviewed at least annually.
- 20.4** The following links explain our filtering and monitoring systems in depth:

[LGfL-Appropriate-Filtering-for-Education-Settings-Filtering-Provider-Response-June-2021LGfL.pdf \(d1xsi6mgo67kia.cloudfront.net\)](https://cloudfront.net/d1xsi6mgo67kia/LGfL-Appropriate-Filtering-for-Education-Settings-Filtering-Provider-Response-June-2021LGfL.pdf)

<https://cyberdistribution.co.uk/student-safety/>

## **21. Records and monitoring**

- 21.1** Any adult who is concerned about the welfare or safety of any child records their concerns and passes them immediately to a DSL who may then ask them to complete an expression of concerns form or may do this themselves keeping all original documentation. Any information recorded is kept in a separate named file, in a secure drawer and not with the child’s academic file. These files are the responsibility of the DSL and information will only be shared within school on a need to know basis for the protection of the child.
- 21.2** Any safeguarding information is kept securely in each school’s safeguarding files and is added to as necessary. Copies of referrals, invitations to child protection conferences, core groups and reports are stored here and are kept locked at all times. Any safeguarding information is recorded using CPOMS (Child Protection Online Management System) and is added to as necessary. Copies of referrals, invitations to child protection conferences, core groups and reports are stored here. Original notes from disclosures are also scanned into the system as evidence of the initial concern. Our record keeping will also include reasons which informed the decision making process.
- 21.3** If a child leaves our school the DSL makes contact with the DSL at the following school and the file will be forwarded in an envelope marked “confidential.”

## **22. Hiring to out of school providers**

- 22.1** The Trust's Extended Schools' Lead works with the Senior DSL Lead to ensure that hirers/outside providers and the Trust's own extended schools' staff who work with children meet the guidance for out of school settings as outlined in the DfE guidance " Keeping children safe during community activities, after school clubs and tuition."
- 22.2** Our Extended Schools' Lead and the Deputy Extended Schools' Lead are qualified DSLs and one of them is always present during before and after school activities. All members of staff, whether directly employed by the Trust or outside providers, undertake specific child protection and safeguarding training.
- 22.3** The Extended Schools' Lead and Executive Head regularly review the performance of staff and volunteers after appointment.