

Staff

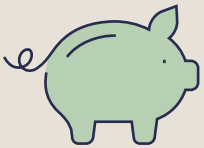
Benefits



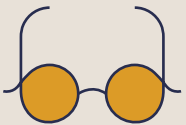
- Commitment to your ongoing Continued Professional Development



- Two family days



- Access to Local Government Pension scheme/Teachers' Pensions



- Eyecare vouchers through Specsavers



- Half-day Christmas Shopping Leave



- Annual Flu Jab offer for all staff



- Employee Assistance Programme to support your wellbeing



The Golden Thread Alliance Safeguarding and Child Protection Policy

This is a core policy that forms part of the induction for all colleagues. It is a requirement that all colleagues have access to this policy and confirm that they have read and understood its contents.

Approved by:	Board of Trustees
Last reviewed on:	September 2026
Next review due by:	September 2027

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Important contacts

The Golden Thread Alliance

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Director of Education	James Kendall	James.kendall@golden-thread.org
Director of Education	Michele Sowden-Mehta	Michele.sowden-mehta@golden-thread.org
Trust Safeguarding & Attendance Lead	Debbie Clarke-Basrai	Debbie.clarke-basrai@golden-thread.org

Culverstone Green Primary School

ROLE	NAME	CONTACT DETAILS
Headteacher/Lead DSL	Charlotte Casey	charlotte.casey@golden-thread.org
Deputy DSL	Michael Burbeck	Michael.burbeck@golden-thread.org
Deputy DSL	Vicki Brown	victoria.brown@golden-thread.org
Deputy DSL	Stephanie Barnes-Farnham	stephanie.barnes-farnham@golden-thread.org
Link Safeguarding Governor	Sarah MacGregor	sarah.macgregor@golden-thread.org

Fleetdown Primary Academy

ROLE	NAME	CONTACT DETAILS
Headteacher/Deputy DSL	Alice Harrington	Alice.harrington@golden-thread.org

ROLE	NAME	CONTACT DETAILS
Lead DSL	Nicola King	Nicola.king@golden-thread.org
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Deputy DSL	Jemma Hassett	Jemma.hassett@golden-thread.org
Deputy DSL	Rajinder Hothi	rajinder.hothi@golden-thread.org
Deputy DSL	Michaela Wright	michaela.wright@golden-thread.org
Link Safeguarding Governor	Bradley Journet-Exon	Bradley.journet-exon@golden-thread.org

Meopham Community Academy

ROLE	NAME	CONTACT DETAILS
Headteacher/Deputy DSL	Thomas Waterman	thomas.waterman@golden-thread.org
Lead DSL	Vikki Coombes	victoria.coombes@golden-thread.org
Deputy DSL	Sarah Dean	Sarah.dean@golden-thread.org
Deputy DSL	Daniel Taylor	Daniel.taylor@golden-thread.org
Deputy DSL	Paula Martin	Paula.Martin@golden-thread.org
Link Safeguarding Governor	Lisa Broad	Lisa.broad@golden-thread.org

Oakfield Primary Academy

ROLE	NAME	CONTACT DETAILS
Headteacher/Deputy DSL	Rajinder Kaur-Gill	Rajinder.kaur-gill@golden-thread.org
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Deputy DSL	Julia McCloskey	Julia.mccloskey@golden-thread.org
Deputy DSL	Claire Allen	Claire.allen@golden-thread.org
Deputy DSL	Nicola Dixon (EYFS/CP)	Nicola.dixon@golden-thread.org
Deputy DSL	Layla Collins	Layla.collins@golden-thread.org
Deputy DSL	Gemma Rutherford	gemma.rutherford@golden-thread.org

ROLE	NAME	CONTACT DETAILS
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Link Safeguarding Governor	Adam Legah	adam.legah@golden-thread.org

The Riverview Academy

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Headteacher/Deputy DSL	Jack Keen	jack.keen@golden-thread.org
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Deputy DSL	Michelle Baillie	michelle.baillie@golden-thread.org
Deputy DSL	Aimee Gallyot	aimee.gallyot@golden-thread.org
Deputy DSL	Emily Huxley	emily.huxley@golden-thread.org
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Deputy DSL	Gina Page	Gina.page@golden-thread.org
Deputy DSL	Victoria Heyworth	victoria.heyworth@golden-thread.org
Link Safeguarding Governor	Hits Patel	hits.patel@golden-thread.org

Temple Hill Primary Academy

ROLE	NAME	CONTACT DETAILS
Headteacher/Deputy DSL	Leon Dawson	Leon.dawson@golden-thread.org
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Deputy DSL	Jaya Dillon	Jaya.dillon@golden-thread.org
Deputy DSL	Emma Howe	Emma.howe@golden-thread.org
Deputy DSL	James Fordham	James.fordham@golden-thread.org
Deputy DSL	Emily Taylor	Emily.taylor@golden-thread.org

ROLE	NAME	CONTACT DETAILS
Deputy DSL	Amanda Miles	amanda.miles@golden-thread.org
Deputy DSL	Julie Rye	julie.rye@golden-thread.org
Deputy DSL	Rebecca Crouch	rebecca.crouch@golden-thread.org
Link Safeguarding Governor	Daniel Range	daniel.range@golden-thread.org

West Hill Primary Academy

ROLE	NAME	CONTACT DETAILS
Headteacher/Lead DSL	Katy Ward	Katy.ward@golden-thread.org
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Deputy DSL	Danielle Davenport	Danielle.davenport@golden-thread.org
Deputy DSL	Rachel Roe	Rachel.roe@golden-thread.org
Deputy DSL	Jacqui Scarboro	Jacqui.scarboro@golden-thread.org
Link Safeguarding Governor	Helena Oakes	helena.oakes@golden-thread.org

Wrotham Road Primary School

ROLE	NAME	CONTACT DETAILS
Headteacher/Lead DSL	Nicole Galinis	nicole.galinis@golden-thread.org
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Deputy DSL	Kate Fielder	kate.fielder@golden-thread.org
Deputy DSL	Rachel Evans	rachel.evans@golden-thread.org
Deputy DSL	Ratinder Bhathal	ratinder.bhathal@golden-thread.org
Deputy DSL	Emma-Jane Gent (Maternity Leave)	emma-jane.gent@golden-thread.org
Deputy DSL	Jonathan Smith	jonathan.smith@golden-thread.org
Deputy DSL	Nicole McIntosh	nicole.McIntosh@golden-thread.org
Deputy DSL	Safiyah Miah	Safiyah.Miah@golden-thread.org

ROLE	NAME	CONTACT DETAILS
Link Safeguarding Governor	Mark Whitehouse	mark.whitehouse@golden-thread.org

Local Support

LADO Education Safeguarding Advisory Service (LESAS)	If your concern relates to the welfare of a child	Please contact the Front Door Service via the Kent Integrated Children's Services Portal https://kccchildrens.kent.gov.uk/web/portal/pages/home
	Front Door Service No Name Consultation, if it is unclear whether to refer	03000 411 111
	If you need to make a referral to the LADO regarding an allegation against a colleague	Please complete a LADO referral via the Kent Integrated Children's Services Portal https://kccchildrens.kent.gov.uk/web/portal/pages/home
	If you need clarification on whether to make a LADO referral, need general education safeguarding or online safety advice, or would like to enquire about training or other safeguarding products	Please use the LESAS enquiry form LADO Education Safeguarding Advisory Service (LESAS) Enquiry Form
Integrated Children's Services Out of Hours	Where urgent safeguarding action is required and your request is submitted outside of normal working hours (from 5pm – 8.30am weekdays, weekends, bank holidays) please contact the Out of Hours Service	03000 419191
Early Help	Early Help and Preventative Services - KELS!	Early Help contacts - KELS!
Kent Police	999 if there is an immediate risk of harm	101 for non-urgent
Kent Safeguarding Children Multi-Agency Partnership (KSCMP)	www.kscmp.org.uk	kscmp@kent.gov.uk 03000 421126
Adult Safeguarding	Adult Social Care 03000 41 61 61 (text relay 18001 03000 41 61 61)	social.services@kent.gov.uk
Refer Kent	https://kentcountycouncil.refernet.co.uk/	

1. Aims

The Golden Thread Alliance aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All colleagues are aware of their statutory responsibilities with respect to safeguarding
- Colleagues are properly trained in recognising and reporting safeguarding issues

The Golden Thread Alliance recognises our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (colleagues, volunteers, governors, leaders, parents, carers, families, and pupils) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.

The Trust recognises that poor attendance, persistent absence, severe absence, repeated absence and children missing education may be indicators of abuse, neglect, exploitation, mental health concerns, unmet need and wider safeguarding vulnerability. Attendance information will always be considered within the wider safeguarding context.

The Golden Thread Alliance believes that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.

Colleagues working with children at The Golden Thread Alliance will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, colleagues will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.

The Golden Thread Alliance recognises the importance of providing an ethos and environment within school that will help children to be safe and to feel safe. In our schools children are respected and are encouraged to talk openly, and will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.

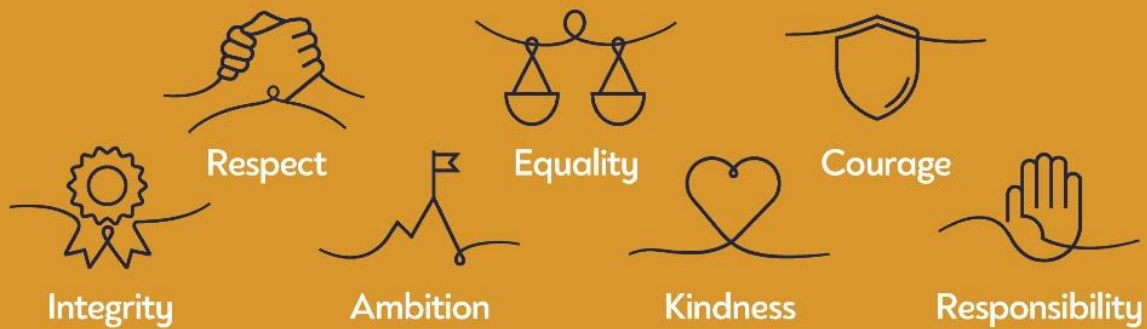
Our core safeguarding principles are:

- Prevention: positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
- Protection: following the agreed procedures, ensuring all colleagues are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
- Support: for all pupils, parents, carers and colleagues, and where appropriate specific interventions are required for those who may be at risk of harm.
- Collaborating with parents, carers and other agencies: to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

The procedures contained in this policy apply to all colleagues, including governors, temporary or third-party agency colleagues and volunteers, and are consistent with those outlined within 'Keeping Children Safe in Education' (KCSIE) 2026.

Our Values

We value diversity in our schools and our communities. What brings us together is our shared commitment to our Golden Thread Values.



2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education](#) and [Working Together to Safeguard Children](#), and the [Academy trust governance guide - Guidance - GOV.UK \(www.gov.uk\)](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy also has regard to the Department for Education statutory guidance Information Sharing to Safeguard Children and Young People and the statutory Information Sharing Duty under Section 16LA of the Children Act 2004.

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

This policy complies with our Funding Agreement and Articles of Association.

The Golden Thread Alliance will respond to safeguarding concerns in line with the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) procedures www.kscmp.org.uk

3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online

- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Making or sharing of nudes and semi-nudes is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

Contextual Safeguarding recognises that abuse, neglect, harm and exploitation can occur outside the home, including within peer groups, schools, neighbourhoods, public spaces and online environments. Safeguarding responses should consider the wider context of a child's life and experiences.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 11)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, sexuality or are gender-questioning children
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 13)
- Are missing from education for prolonged periods and/or repeat occasions
- Whose parent or carer has expressed an intention to remove them from school to be home educated.

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all colleagues, volunteers, local governors and trustees across our trust and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

Trust and schools play a crucial role in preventative education. This is in the context of a whole-trust approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. This will be underpinned by the school's:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All colleagues

All colleagues will:

- Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance, *Keeping Children Safe in Education* (KCSIE) in full and review this guidance at least annually.

(London Grid for Learning provides translations of part 1 in numerous languages which can be found here; <https://lgfl.net/safeguarding/kcsietranslate>)

- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

School Leaders and DSLs are expected to read and understand KCSIE in its entirety.

All colleagues will:

- Read and understand directed parts of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.
- Make a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All colleagues will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the colleague handbook, the role and identity of the designated safeguarding lead (DSL) and deputy/deputies, the trust behaviour policy and school behaviour statement, and the

safeguarding response to children who go missing from education/who are absent from education

- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- Maintain professional curiosity and respectfully explore, question and share information where there are concerns regarding a child's safety, welfare, wellbeing, attendance or lived experience.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The safeguarding issues that often overlap and can put children at risk of harm, including:
 - Drug taking and/or alcohol misuse
 - Unexplainable and/or persistent absences from education
 - Serious violence, criminal exploitation (including that linked to county lines), and radicalisation
 - Consensual and non-consensual making or sharing of nudes or semi-nudes
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying
- The potential vulnerabilities of children who are questioning their gender
- That a child and their family may be experiencing multiple needs at the same time

- What to look for to identify children who need help or protection

Section 14 and appendix 4 of this policy outline in more detail how colleagues are supported to do this.

5.2 The Designated Safeguarding Lead (DSL)

The DSL in each school is a member of the Senior Leadership Team. The DSL names and contact details are listed at the beginning of this document. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for colleagues to discuss any safeguarding concerns. They will also ensure adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.

When the DSL is absent, the deputy/deputies will act as cover.

If the DSL and deputy/deputies are not available, the Trust Safeguarding Team will act as cover (for example, during out-of-hours/out-of-term activities).

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other colleagues on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other colleagues to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel Programme, Disclosure and Barring Service, and/or police), and support colleagues who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems (Netsweeper) and processes in place.

The DSL will also:

- Keep the Headteacher informed of any issues (if the DSL is not the Headteacher)
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

- Ensure that child protection files are kept up to date
- Where children leave the school, ensure that their child protection file is transferred to the new school

The full responsibilities of the DSL and deputy/deputies are set out in their job description.

5.3 The Board of Trustees

The Board will:

- Facilitate a whole-trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation
- Receive regular reports regarding safeguarding practice, attendance vulnerabilities, child protection activity, safeguarding trends, online safety incidents, allegations management and the effectiveness of safeguarding arrangements across the Trust.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a Trustee and Link Governor at each school to monitor the effectiveness of this policy in conjunction with the Board of Trustees and Local Governing Committees. This is always a different person from the DSL.
- Ensure all colleagues undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the trust has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave colleagues unable to fully support and protect pupils
- Ensure that the trust has appropriate cyber security systems in place
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness at least once every academic year. This includes:
 - Making sure that the leadership team and colleagues are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Ensuring that reviews are carried out by the Trust Safeguarding and Attendance Lead, with the support of the DSLs and Network Support Team (Gridserve). The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept

- Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT colleagues and service providers what needs to be done to support the trust/schools in meeting these standards

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-trust approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems (Netsweeper) and processes in place
- The trust has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about colleagues (including supply colleagues, trainee teachers, volunteers and contractors). The Trust Managing Allegations Policy within the colleague handbook covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The Trustee with responsibility for Safeguarding, Link Safeguarding Governors and Chairs will read Keeping Children Safe in Education in its entirety. Members, Trustees and Governors who are not appointed to these roles will read Parts 1 and 2 of the guidance only.

Section 15 has information on how Trustees and Governors are supported to fulfil their role.

5.4 Local Governing Committees

Governors on Local Governing Committees will review the school-specific elements of the policy after the trust level policy has been reviewed and approved.

They will also hold the Headteacher to account for the implementation of the policy.

They will appoint a member of each Local Governing Committee to act as the Governor responsible for safeguarding, to liaise with the school DSL on local safeguarding issues and report to the safeguarding trustee.

5.5 The Headteacher

The Headteacher/head of each school is responsible for the implementation of this policy, including:

- Ensuring that colleagues (including temporary colleagues) and volunteers:
 - Are informed of our systems which support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents and carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, mobile phones and cameras in the setting

5.6 Virtual School Heads

Virtual School Heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

Each school has appointed a designated teacher as follows, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children, including those in kinship care, in line with [statutory guidance](#) who will liaise with the Virtual school heads (please see section 13).

6. Confidentiality

The Golden Thread Alliance recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE.

6.1 Information Sharing Duty

From 30 September 2026, the Trust will comply with the statutory Information Sharing Duty under Section 16LA of the Children Act 2004. The Trust recognises that effective safeguarding and promotion of children's welfare depends upon timely, proportionate and lawful information sharing between relevant agencies.

Where information held by the Trust may assist another safeguarding partner to assess need, assess risk, make decisions, provide support, undertake early help, Family Help or take action to

safeguard and promote the welfare of a child, the expectation is that such information will be shared. Information may be relevant whether concerns relate to child protection, attendance, wellbeing, exploitation, contextual safeguarding, online safety or other welfare matters.

The Trust recognises that information may be relevant even where it is historical, contextual, partial or forms part of a pattern of concerns. Information will only be withheld in exceptional circumstances where a practitioner determines that sharing would be more detrimental to the child than not sharing, and the rationale for that decision will be clearly recorded.

The Golden Thread Alliance has an appropriately trained Data Protection Officer (DPO) as required by the UK General Data Protection Regulations (UK GDPR) to ensure that each school is compliant with all matters relating to confidentiality and information sharing requirements. The Trust DPO is Claire Misy (claire.misy@golden-thread.org).

The Golden Thread Alliance and all schools shall regard the following;

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If colleagues need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Colleagues should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, colleagues may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL should consider that:
 - Parents and carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred

to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all colleagues will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which colleagues should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The Trust has regard to the statutory guidance Information Sharing to Safeguard Children and Young People and recognises that practitioners should consider whether information may assist another agency to safeguard or promote the welfare of a child. Data protection legislation does not prevent the lawful sharing of information for safeguarding purposes. If colleagues are in any doubt about sharing information, they should speak to the DSL (or deputy)

Where a child leaves the school the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving

7. Recognising Abuse and Taking Action

All colleagues are expected to be able to identify and recognise all forms of abuse, neglect, modern slavery and exploitation and shall be alert to the potential need for early help for a child who:

- Has a disability or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education health and care plan)
- Has a mental health need
- Is a young carer
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is bereaved
- Is showing early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, care or home

- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised into terrorism
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending

Colleagues, volunteers, trustees and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”. Should The DSL or Deputies not be available, colleagues may contact the Trust Safeguarding Lead for advice in their absence or see below for pupils in immediate danger.

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

If colleagues have concerns about a child's welfare, they are expected to act on them immediately. The DSL or a deputy should always be available to discuss safeguarding concerns. If, in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by colleagues. In this event, colleagues should take advice from [Kent Children's Social Care](#) or report using the [Kent Integrated Children's Services Portal](#), otherwise known as the “Front Door”, with any action taken shared with the DSL at the earliest opportunity.

In the absence of a DSL, deputy or senior leaders, colleagues should make a referral to Kent Children's Social Care and/or the police **immediately** if they believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**

Referrals link for professionals; <https://kccchildrens.kent.gov.uk>

Referrals link for the public; <https://www.kent.gov.uk/social-care-and-health/report-abuse> 03000 411111 social.services@kent.gov.uk text relay 018001 03000 411111, out of hours 03000 419191.

Referrals for children residing in other local authorities; <https://www.gov.uk/report-child-abuse-to-local-council>

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Only prompt the child where necessary with open questions to clarify information. For example, who, what, where, when; or Tell, Explain, Describe (TED)
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words and language. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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.

Any other colleague who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Colleagues should not examine pupils.

Any colleague who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures which can be found here <https://www.proceduresonline.com/kentandmedway/chapters/contents.html>
<https://www.kent.police.uk/ro/report/ocr/af/how-to-report-a-crime/>

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help assessment

If an early assessment help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Colleagues may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

In Kent, Early Help and Preventative Services and Children's Social Work Services are part of Integrated Children's Services (ICS). Specific information and guidance to follow with regards to accessing support and/or making referrals in Kent can be found here: <https://www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services>

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

The Kent Escalation and Professional Challenge policy sets out the escalation pathway to be followed in the event of professional disagreements which cannot be resolved between individual practitioners and can be found here <https://www.kscmp.org.uk/procedures>.

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of being becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school colleagues and local governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

7.6 If you have a concern about mental health

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.

Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, colleagues will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education colleagues are well placed to recognise, including:

- Significant changes in behaviour
- Ongoing difficulty sleeping
- Withdrawal from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

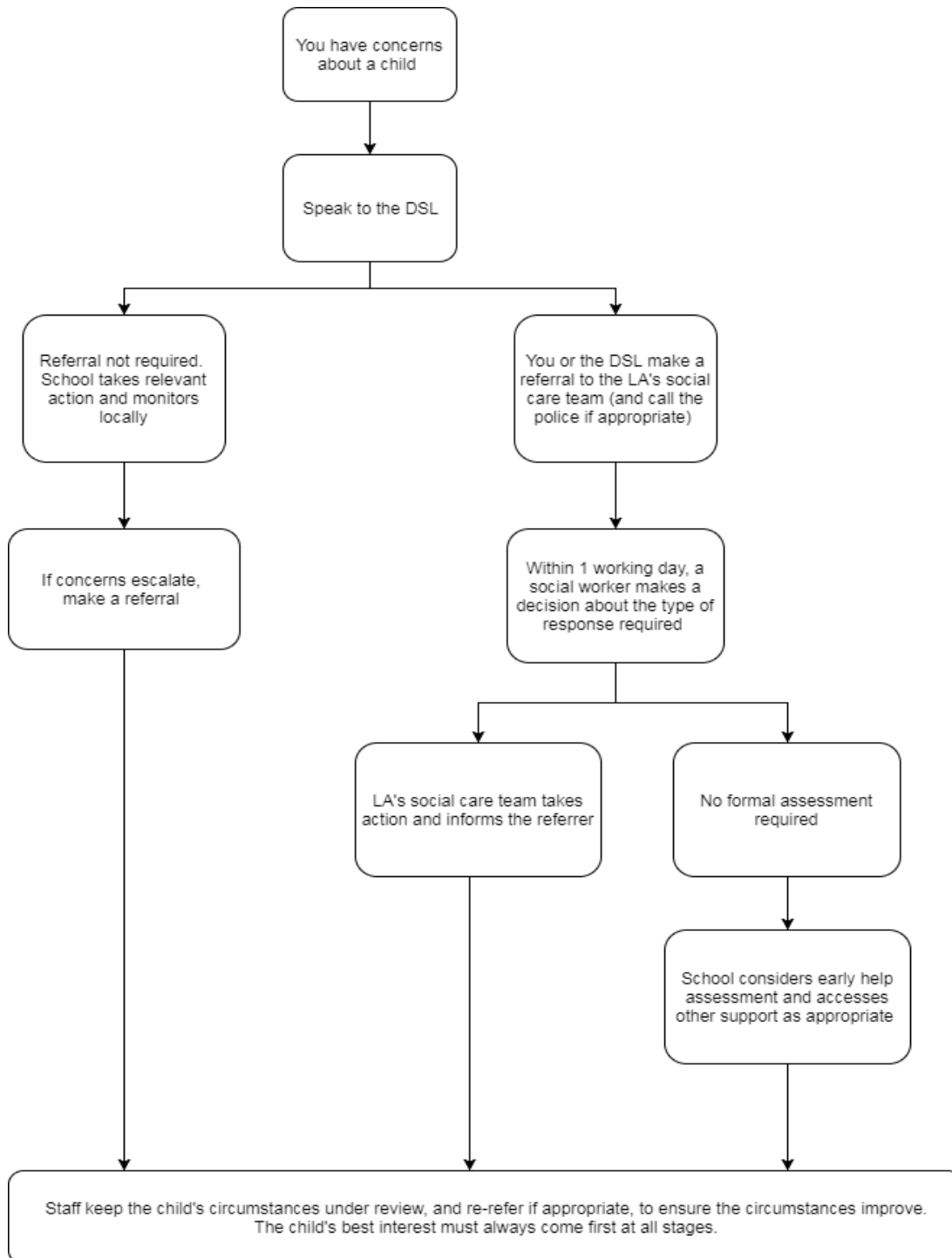
If the child needs help urgently for their mental health, but it's not an emergency, school colleagues can get help from NHS 111 online or call 111 and select the mental health option.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

DSLs and school colleagues should refer to the DfE guidance on [mental health and behaviour in schools](#) for more information.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.7 Concerns about a colleague, supply teacher, volunteer or contractor

Any concerns or allegations about colleagues will be recorded and dealt with appropriately in line with part four of Keeping Children Safe in Education and the [Local Kent Arrangements](#), including discussions as necessary with the Local Authority Designated Officer (LADO).

More detailed information can be found in the Managing Allegations and Low-Level Concerns Policy within the People Manual.

Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.

Where headteachers are unsure how to respond, for example if the school is unsure if a concern meet the harm 'thresholds', advice will be sought via the [LADO Education Safeguarding Advisory Service enquiry form](#).

After resolving or concluding allegations or low-level concerns about colleagues, the headteacher, along with the LADO, if involved, will review the case to identify lessons learned and any possible improvements.

In the situation that the school receives an allegation relating to an incident that happened when an individual or organisation was using their premises for the purposes of running activities with our pupils (for example community groups, sports associations, or service providers that run extra-curricular activities), we will follow our safeguarding policies and procedures, including informing the LADO.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale.

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours, misogyny/misandry and an unsafe environment for pupils.

For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes, including where generated by AI), which may be driven by misogyny/misandry

See appendix 2 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE 2026 (in particular, part two and five). Pupils who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by:

- o Taking reports seriously and colleagues listening carefully
- o Avoiding victim blaming
- o Providing appropriate pastoral support
- o Working with parents and carers
- o Reviewing educational approaches
- o Following procedures as identified in other policies e.g. behaviour policy
- o Where necessary and appropriate, informing the police and/or ICS

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, making or sending sexual images

- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure colleagues reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment
- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure colleagues are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – colleagues should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - Colleagues may overhear a conversation
 - A child's behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

The DSL will take the lead role in any disciplining of the alleged perpetrator(s), where needed. We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Making or sharing of nudes and semi-nudes

[UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people guidance](#) outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing; it should be read and understood by all DSLs working with all age groups.

Your responsibilities when responding to an incident

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

- Share information about the incident with other colleagues, the pupil(s) it involves or their, or other, parents and carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school colleagues – this may include the colleague who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents and carers of the pupils involved (in most cases parents and carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Headteacher and colleagues as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents and carers

The DSL will inform parents and carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through contacting the non-emergency number (101).

Recording incidents

All incidents of sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 15 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the making or sharing of nudes and semi-nudes as part of our relationships education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment. This also includes making such images, including where generated by AI
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child

- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Share our child friendly safeguarding policy with the children at least twice a year, so they know how to report and to whom
- Ensure our PSHE and RSE curriculums regularly address reporting
- Provide opportunities to talk to colleagues discreetly through use of 'chatter' or 'worry' boxes
- Offer children a choice of adult to talk to should they appear distressed or wish to report
- Where appropriate, appoint class councilors each term who play a role in supporting their peers in reporting their concerns
- Ensure all colleagues receive training on how to deal with and support pupils who express concerns and ensure that they feel safe in doing so as part of the annual safeguarding CPD,
- Colleagues are trained to support pupils when they make a disclosure to understand they will not be in trouble and will be kept safe.
- Encourage children to know who their trusted adults are
- Resources such as NSPCC PANTS are used to teach children that they should tell a safe adult they trust, if anything makes them feel upset or worried.

8. Safer Recruitment

8.1 Safer Recruitment and Safeguarding Checks

The Golden Thread Alliance is committed to ensure that we develop a safe culture and that all steps are taken to recruit colleagues and volunteers who are safe to work with our pupils and colleagues.

- The Golden Thread Alliance will follow relevant guidance in Keeping Children Safe in Education (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)
- The Governing Body and leadership team are responsible for ensuring that the schools follow safe recruitment processes as outlined within guidance.
- The Governing Body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.
- The schools maintain an accurate Single Central Record (SCR) in line with statutory guidance.
- The Golden Thread Alliance are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We advise all colleagues to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands, and warnings.
- Where a school places a pupil with an alternative provision provider, the school will continue to be responsible for the safeguarding of that child.
- The school will undertake appropriate checks to ensure the provider meets the needs of the pupil, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.
- Where a school organises work experience placements, they will follow the advice and guidance as identified in Part three of KCSIE.

For further information regarding Safer Recruitment, please refer the Safer Recruitment Policy.

9. Online Safety and the Use of Mobile Technology

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

To address this, The Golden Thread Alliance aims to:

- Have robust processes in place (including filtering and monitoring) to ensure the online safety of pupils, colleagues, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community, including the expectation that our school is a mobile phone-free environment by default
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this, 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
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated by and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train colleagues, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and their expectations, roles and responsibilities around filtering and monitoring. All colleagues will receive refresher training as required and at least once each academic year
- Educate parents and carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure colleagues are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Colleagues are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Colleagues will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents, carers, colleagues, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all colleagues, pupils, parents and carers are aware that colleagues have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all colleagues, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

Procedures

- The DSL has overall responsibility for online safety within the school but will liaise with other colleagues, for example IT technicians and curriculum leads as necessary.
- The DSL will respond to online safety concerns in line with our child protection and other associated policies, including the school's individual Anti-bullying policy and behaviour policies.
- Internal sanctions and/or support will be implemented as appropriate.
- Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- The Golden Thread Alliance uses a wide range of technology. This includes: computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
- All school owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.

The Golden Thread Alliance recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2026 and EYFS 2026, The Golden Thread Alliance has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community. For further information regarding Online Safety, please refer to the Online Safety Policy.

9.1 Artificial Intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Colleagues, pupils, parents and carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

The Golden Thread Alliance recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Our schools will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour policy.

Colleagues should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the trust/school. Our trust/school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

10. Notifying Parents and Carers

Where appropriate, we will discuss any concerns about a child with the child's parents and carers. The DSL will normally do this in the event of suspicion or disclosure.

Other colleagues will only talk to parents and carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents and carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents and carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents and carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents and carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

11. Pupils with Special Educational Needs, Disabilities or Health Issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

To address these additional challenges, our schools will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the SENCO to plan support as required.

Our schools have robust intimate/personal care policies which ensure that the health, safety, independence and welfare of children is promoted, and their dignity and privacy is respected. Arrangements for intimate and personal care are open and transparent and accompanied by robust recording systems.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO). The school will consider extra pastoral support and attention for these children, and ensure any appropriate support for communication is in place.

12. Pupils with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

13. Young carers

The trust recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

14. Pupils with a Social Worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all colleagues will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

15. Looked-After and Previously Looked-After Children

We will ensure that colleagues have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate colleagues have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school Heads

Each school has have appointed a designated teacher as follows, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

SCHOOL	NAME	CONTACT DETAILS
Culverstone Green Primary School	Charlotte Casey	charlotte.casey@golden-thread.org
Fleetdown Primary Academy	Nicola King	Nicola.king@golden-thread.org
Meopham Community Academy	Daniel Taylor	daniel.taylor@golden-thread.org
Oakfield Primary Academy	Jill Gosbee	Jill.gosbee@golden-thread.org
The Riverview Academy	Felicity Walsh	Felicity.walsh@golden-thread.org
Temple Hill Primary Academy	James Davies	James.davies@golden-thread.org

SCHOOL	NAME	CONTACT DETAILS
West Hill Primary Academy	Katy Ward	Katy.ward@golden-thread.org
Wrotham Road Primary School	Emma-Jane Gent	Emma-jane.gent@golden-thread.org

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the Designated Teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school Heads to promote the educational achievement of looked-after and previously looked-after children, including those in kinship care, which may also include discussing how pupil premium plus funding can be best used to support these children and meet the needs identified in their personal education plans.

16. Pupils who are lesbian, gay or bisexual

The trust recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. See our behaviour policy for more detail on how we prevent bullying based on sexuality.

Any concerns should be reported to the DSL.

17. Pupils who are questioning their gender

17.1 Supporting pupils who are questioning their gender

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour policy for more detail. The trust will ensure that children and their families are aware that, while the trust will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and colleagues in relation to their religion or belief.

When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach.

The DSL will lead in these cases.

17.2 Involving parents/carers in cases of pupils questioning their gender

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a school colleague about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

17.3 Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, when a pupil or their parent or carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents and carers to determine what is in the best interests of the child and other children.

School colleagues will not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents and carers have been involved (as set out in Keeping Children Safe in Education).

In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children. The school will make decisions in line with the following principles:

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The school will ensure that the decision-making process is documented and records are kept.

The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

17.4 Rules on single-sex spaces

Pupils are not allowed into toilets, changing rooms, showers or residential accommodation designated for the opposite biological sex, with no exceptions.

17.5 Rules on single-sex sports

The trust/school may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The trust/school can separate children according to their biological sex in these circumstances.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and pupils must not be allowed to participate in sports designed for the opposite sex.

18. Complaints and Concerns About School Safeguarding Policies

All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. Each school has a complaints policy available to parents, carers, pupils, colleagues and visitors who wish to report concerns or complaints. This can be found on individual school websites or can be obtained from the school on request.

18.1 Complaints against colleagues

Complaints against colleagues that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against colleagues (see People Manual).

18.2 Other complaints

Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk.

Colleagues can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.

Colleagues can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.

The leadership team at The Golden Thread Alliance will take all concerns reported to the school seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.

19. Record Keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Where safeguarding information is shared with another agency, or where a decision is made not to share information, the rationale for the decision should be appropriately recorded. Records should evidence professional judgement, information considered, action taken and any outcomes.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained in line with the data retention policy.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

19.1 Local record keeping arrangements

All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded in writing on the school safeguarding system, MyConcern and passed without delay to the DSL. Our records will include a clear and comprehensive summary of any concerns, details of how concerns were followed up and resolved, and a note of any action taken, decisions reached and outcomes.

Records will be completed as soon as possible after the incident/event, using the child's words and will be dated by the colleague. Child protection records will record facts and not personal opinions. A body map will be completed if visible injuries have been observed.

If there is an immediate safeguarding concern the colleague will consult with a DSL before completing the form as reporting urgent concerns takes priority.

If colleagues are in any doubt about recording requirements, they will discuss their concerns with the DSL.

Child protection records will be kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the school. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.

Colleagues will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, the Information Commissioner's Office (ICO) and the DfE 'Information Sharing Advice for Safeguarding Practitioners' (2018) guidance provides further details regarding information sharing principles and expectations.

20. Training

20.1 All colleagues

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

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-trust safeguarding approach and wider colleagues training, and curriculum planning
- Be in line with advice from the three safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for colleagues around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

All colleagues will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being becoming involved with or supporting terrorism and to challenge extremist ideas.

Colleagues will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and briefings).

Volunteers will receive appropriate training, if applicable.

20.2 The DSL and Deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training, including on extremist and terrorist ideologies.

20.3 Trustees and local governors

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

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

21. Missing Child Arrangements

Colleagues are expected to be vigilant at all times to ensure the safety and welfare of children. Should a child go missing from a class or other activity, the Headteacher should be notified immediately. The school grounds should then be searched, and contact made home in the event that the child is not found. If the child is not at home, the school should contact the police immediately and then notify the Director of Education.

In the absence of the Director of Education; the CEO, The Trust Safeguarding Lead, or the CEO should be notified.

When a missing child has been located and safely returned to school or home, the Director of Education or CEO may commission an investigation into the circumstances of the child missing in order to identify any factors that need to be addressed by the school or communicated to parents and carers to prevent any reoccurrence.

22. Monitoring Arrangements

This policy will be reviewed annually by The Trust Safeguarding Lead, in conjunction with Headteachers and DSLs. At every review, it will be approved by the Board of Trustees.

23. Links with Other Policies

This policy links to the following policies and procedures:

- Behaviour
- People Manual
- Complaints
- Health and safety
- Attendance
- Online Safety
- Mobile phone use

- : Equality
- : Relationships and sex education
- : First aid
- : Curriculum
- : Designated teacher for looked-after and previously looked-after children
- : Privacy notices
- : Whistleblowing
- : ICT Acceptable Use

Appendix 1: Types of Abuse

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 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. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Verbal abuse such as criticism, belittling, or name-calling

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- 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, a person of any gender can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy 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)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: Specific Safeguarding Issues

Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from children and young people using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chat rooms or on gaming platforms and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Moved from a public to a private/E2EE platform
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education for prolonged periods and/or on repeat occasions can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

If a pupil is absent for a prolonged period of time, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents, carers and alternative emergency contacts.

We will consider patterns and trends in a child's absences and their personal circumstances and use our professional judgement when deciding if the child's absence should be considered as prolonged.

Consideration will be given to the child's vulnerability, parent's and carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.

Colleagues will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a colleague suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child Criminal Exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by a person of any gender, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a colleague suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into 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. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by a person of any gender, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. Most sexual abuse is committed by individuals known to the victim.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced

to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. . It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a colleague suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-Child Abuse (including harassment and violence)

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

Our trust has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If colleagues have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic Abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the 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.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Police must notify a school/education setting of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. The police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for information sharing.

The DSL will provide support according to the child's needs and update records about their circumstances. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All colleagues will be alert to the possibility of a child being at risk of HBA or already having suffered it. If colleagues have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that colleagues have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a colleague discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations

- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent, carer or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents and carers stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced Marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Colleagues will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a colleague suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing Radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence.

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

- **Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL will undertake Prevent awareness training and make sure that colleagues have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Colleagues will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance

- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – colleagues should have confidence in their instincts and seek advice if something feels wrong.

If colleagues are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Colleagues should **always** take action if they are worried.

Harmful sexual behaviour, Sexual Violence and Sexual Harassment Between Children in Schools

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents
- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents
- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of

behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)

- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

Children who are victims of HSB will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that colleagues make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, colleagues will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing additional training to colleagues could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual or gender questioning children are at greater risk.

Colleagues should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

If colleagues have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious Violence

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence

- Having been involved in offending, such as theft or robbery
- Having previously been a victim or previously perpetrated violence

Colleagues will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a colleague has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

- The DSL will: Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

Checking the Identity and Suitability of Visitors

All visitors will be required to verify their identity to the satisfaction of colleagues during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in on arrival and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and the organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a colleague at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or colleagues.

Appendix 3: Support Organisations

NSPCC 'Report Abuse in Education' Helpline

- 0800 136 663 or help@nspcc.org.uk

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardos: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrenssociety.org.uk
- Centre of Expertise on Child Sexual Abuse: <http://www.csacentre.org.uk/>

Support for Colleagues

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Learners

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

Support for Adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org

- Advice now: www.advicenow.org.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>

Contextual Safeguarding Network

- <https://contextualsafeguarding.org.uk/>

Kent Resilience Hub

- <https://kentresiliencehub.org.uk/>

Substance Misuse

- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Talk to Frank: www.talktofrank.com

Domestic Abuse

- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: <https://respectphoneline.org.uk>

Criminal and Sexual Exploitation

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org
- County Lines Toolkit for Professionals:
<https://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit>

Honour Based Abuse

- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/783684/FGM_The_Facts_A6_v4_web.pdf
- Mandatory reporting of female genital mutilation: procedural information:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573782/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf

Child-on-Child abuse, including bullying, sexual violence and harassment

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com/
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk

Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/online-safety and www.net-aware.org.uk

- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk
- Cyber Choices: <https://nationalcrimeagency.gov.uk/cyber-choices>
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Mental Health

- Mind: www.mind.org.uk
- Moodspark: <https://moodspark.org.uk>
- Young Minds: www.youngminds.org.uk
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Children with Family Members in Prison

National information Centre on Children of Offenders (NICCO): <https://www.nicco.org.uk/>

The Golden Thread Alliance

Safer Recruitment Policy

Date Reviewed	<i>Autumn 2026</i>
Next Review Date	<i>Autumn 2027</i>

This policy has been adopted by all schools within The Golden Thread Alliance

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Policy Statement

This policy has been adopted by the Board of Trustees of The Golden Thread Alliance to provide a policy framework for the recruitment and selection of colleagues to all posts within the approved staffing structure of The Golden Thread Alliance. The Golden Thread Alliance is committed to safeguarding and promoting the welfare of children and young people and requires all colleagues, volunteers, agency and third-party colleagues to share and demonstrate this commitment.

The Board of Trustees of The Golden Thread Alliance fully understand their responsibilities in ensuring that recruitment procedures are free from unlawful discrimination in line with the Equality Act 2010. The Board of Trustees also fully appreciate the importance of fair, open and effective procedures to enable The Golden Thread Alliance to recruit people with the right skills, aptitudes and attitudes.

The Board of Trustees of The Golden Thread Alliance will ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), DfE Keeping Children Safe in Education (KCSIE), DfE Working Together to Safeguard Children-2018, Disqualification under the Childcare Act (DUCA) 2006 and related updates, the Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS).

The Board of Trustees of The Golden Thread Alliance fully understand their responsibilities in managing the personal data of job applicants in accordance with applicable data protection laws, including the UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025.

All colleagues, Board of Trustees and volunteers are expected to share a commitment to safeguard children and vulnerable groups and, as part of that commitment, follow 'Safer Recruitment' guidance in line Keeping Children Safe in Education – statutory guidance for schools and colleges.

As part of our commitment to safeguarding children and vulnerable groups, Enhanced DBS checks and/or Barred List checks on all posts must be carried out where they are required.

All colleagues and Board of Trustees involved in recruitment and selection decisions are required to work in ways that are entirely consistent with this policy at all times.

The Golden Thread Alliance will ensure that all selection panels will comprise at least one member who has successfully completed safer recruitment training. In addition, The Golden Thread Alliance will ensure that training is provided for all colleagues and Board of Trustees involved in the recruitment and selection of colleagues and that it is appropriate to their role. This forms part of the School Staffing (England) Regulations 2009.

Guidance Note:

More information about posts which require an Enhanced DBS and how to check the Barred List can be found at www.gov.uk/disclosure-barring-service-check.

As united as we are different.

1. Scope

This Policy applies to all employees, along with volunteers, contractors and agency staff working within The Golden Thread Alliance where appropriate.

2. Adoption Arrangements and Date

This policy was adopted by The Golden Thread Alliance in Autumn 2022 and supersedes any previous Recruitment Policy.

This policy will be reviewed by The Golden Thread Alliance annually or earlier to reflect any changes in guidance or notable incident. This will involve consultation with the recognised unions, where necessary.

3. Equal Opportunities Statement

The Golden Thread Alliance is committed to ensuring that each stage of the recruitment and selection process is accessible to all. We will review the recruitment policy and procedure regularly to ensure that it takes account of the Equality Act 2010 and does not discriminate against applicants on the grounds of race, religion or belief, disability, age, pregnancy and maternity, gender reassignment, marriage and civil partnership, sex or sexual orientation.

4. 'Prevent'

The Golden Thread Alliance has a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015") to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

In carrying out its obligations under 'Prevent' The Golden Thread Alliance will assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. The Golden Thread Alliance will not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partnership status, disability or age.

5. Prior to Advertising

When a vacancy occurs, the Headteacher will review the need for the post and consider all options (internal and external) before deciding that there is a need to recruit. If there is a need to recruit, the job description and person specification should be reviewed prior to seeking the approval of the Chief Operating and Financial Officer, or Deputy Chief Financial Officer, to commence recruitment.

Consideration should also be given to the working hours and contractual arrangements for each post to ensure that posts are open to applicants wishing to work on a part-time or job-share basis where possible and practical.

6. Job Description

The job description is a statement of purpose and scope and defines both the job role and expectations. It will:

- Summarise the job purpose/impact
- Set out key responsibilities and accountabilities
- Set out reporting and line management arrangements

An up-to-date job description and person specification will be available for each vacancy advertised.

Managers will refer to the Professional Standards for Teachers and to the Teachers' Pay and Conditions Document (which sets out the expected attributes of Main Scale, Post Threshold, Advanced Skills and Excellent Teachers) when creating job descriptions for teaching posts.

All job descriptions should clearly state to what extent the role will involve contact with children, whether they will be engaged in regulated activity relevant to children, and the post holder's responsibility for promoting and safeguarding the welfare of children and young people.

7. Person Specification

The person specification is a description of the qualifications, experience, knowledge, skills, competencies and other attributes of the ideal person to fill the role.

It can classify each attribute as either 'Essential' to do the job or as a 'Desirable' attribute for the post holder to have and indicate how each attribute will be assessed e.g. application form, interview, reference, test etc.

All attributes should be measurable and quantifiable and should take care not to unlawfully discriminate against particular groups of people, either directly or indirectly.

8. Advertising

All vacant posts will be advertised in a fair, open and honest manner and will be advertised by means of The Golden Thread Alliance website or internal email as a minimum. In most cases, vacant posts will be advertised externally. All adverts need to ensure that shortlisted candidates are informed that they will be subject to an online check, following the changes to KCSIE.

All adverts should include the safeguarding responsibilities of the post as set out in the job description and person specification and state whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. This means that when applying for certain jobs, activities, some spent convictions and cautions are 'protected', so they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. Guidance about whether a conviction or caution should be disclosed can be found on the [Ministry of Justice website](#).

The Golden Thread Alliance

To demonstrate to potential job applicants our commitment to safeguarding and the welfare of children, the following statement should be included on any relevant advertisements and documentation sent out to applicants:

The Golden Thread Alliance is committed to safeguarding and promoting the welfare of children and young people and expects all colleagues and volunteers to share this commitment. This post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020 and therefore is subject to an Enhanced DBS Disclosure. In line with KCSIE guidance, paragraph 220, all candidates who are shortlisted will be subject to an online search. This search is not part of the shortlisting process itself and all shortlisted candidates will have the opportunity to address any issues of concern resulting from the search.

9. Applications

All applicants must complete the relevant application form in full to enable the panel to shortlist in a fair and objective manner. Applicants will no longer be asked to complete a separate Criminal Convictions Self Disclosure form as part of their application. Due to changes in the latest version of Keeping Children Safe in Education, this will be done at the shortlisting stage to ensure that processing of criminal data is targeted and proportionate. Please see 11. Shortlisting for more information.

The Golden Thread Alliance may reasonably decide to reject an application where incomplete and/or ambiguous information is provided. As stated in Keeping Children Safe in Education, applications by CV or letter alone will not be considered, and all short-listed applicants are required to sign and date their application at interview.

The Golden Thread Alliance should include a statement in the application form, or elsewhere in the information provided to applicants, that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children. The Golden Thread Alliance should also provide a copy of the school's child protection policy, and policy on employment of ex-offenders in the application pack or refer to a link on its website.

10. Shortlisting

Shortlisted candidates will be asked to complete a separate Criminal Convictions Self-Disclosure form and must be signposted to publicly available guidance and support on which cautions or convictions they must disclose and be given time to obtain advice. This information is available on the [Ministry of Justice website](#).

Candidates will be required to declare any unspent convictions or conditional cautions, any spent adult cautions (simple or conditional) or convictions that are not protected as defined by either the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended in England, Scotland and Wales, or the Rehabilitation of Offenders (Northern Ireland) Order 1978 as amended in Northern Ireland.

Candidates will also be asked to declare:

- Whether they have ever been known to any Children's Services department or Police as being a risk or potential risk to children.
- Whether they have ever been the subject of any investigation and or sanction by a professional body due to concerns about their behaviour towards children.
- Whether they have any overseas convictions; and
- Whether they are included on the DBS Children's Barred List
- If the role involves working with pupils under five and/or pupils under eight in wraparound care whether they have any orders relating to the care of children as set out in schedule 1 of the Childcare Disqualifications Order (2018).

Failure to declare relevant information may disqualify the candidate from the appointment and, if appointed, may render the individual liable to immediate dismissal without notice.

In accordance with Keeping Children Safe in Education shortlisted candidates will be subject to an 'online' search. Applicants should have been made aware of this requirement prior to or at the time of application. Such checks can be carried out via online search engines; however, this is only with regards to information that is within the public domain. The aim of the search is to ensure there is no information held in the public domain relating to the candidate that would make the school question their suitability to work with children and/or could harm the reputation of the school should the candidate become part of the school's workforce. The search can be carried out by a member of the People Team who is not part of the recruitment process, with any information collated being recorded and passed to the recruitment panel. The candidate should be asked to explain any findings by the recruitment panel either prior to (if deemed appropriate), or during the interview process. The recruitment panel will then carry out a risk assessment as required. This process will be carried out for all shortlisted candidates regardless of the job role being applied for.

It is recommended that at least two people are involved in the shortlisting process, one of whom should be the line manager. At least one person involved in the process should have completed safer recruitment training.

All shortlisting decisions will be made with clear reference to the skills and qualities set out in the person specification.

The equal opportunities monitoring form will be separated from the main application form to reduce any likelihood of conscious or unconscious bias.

11. References

In order to comply with Keeping Children Safe in Education, it is the policy of The Golden Thread Alliance that all references will be obtained, and concerns resolved, before confirming an appointment. This will be done either by letter seeking to verify the skills, experience, competencies and employment history of the applicant, or by a standard reference form.

The Golden Thread Alliance

It is The Golden Thread Alliance's practice, with the consent of the applicant, to take up references before interview for all posts. If applicants have indicated that they do not consent to references being sought prior to interview, further information should be sought, and agreement obtained where possible.

On receipt, references will be checked to ensure that all specific questions have been answered satisfactorily. Any discrepancies or anomalies will be verified with the reference provider and addressed during the applicant's interview.

Specific questions should be included to explore the applicant's suitability to work with children and, if the referee has any concerns, they should be asked to give their reasons.

In order to comply with the Equality Act 2010, reference requests sent prior to an offer of employment will not request details of attendance or absence however; further information will be requested and compared with the medical questionnaire following the applicant's acceptance of a conditional offer of employment – see 14 below.

Applicants will be required to specify the details of two referees, one of which should be the current or most recent employer and completed by a senior person. References will only be obtained directly from the referee: testimonials or open references (those addressed 'To whom it may concern') will not be considered. References from family members will not be accepted. Referees will be provided with a copy of the job description and person specification to assist them in their response.

References for candidates working in an education setting will be sought from the Headteacher where possible or another Senior Leader who is able to provide accurate information in respect of disciplinary action and any safeguarding concerns. In other settings, it would be appropriate to seek a reference from the line manager of the applicant. Electronic references must originate from a legitimate source. All references will be verified and referees will be contacted to clarify vague or insufficient information.

Where a candidate is not currently working in a school or childcare setting but has done so in the past, one reference should be from their most recent children's workforce employer in line with Safer Recruitment guidelines.

We reserve the right to request that the applicant provides alternative referees where the initial referees are deemed inappropriate for our purposes e.g. where the current or most recent employer is not provided.

We will seek to confirm whether the candidate has been subject to any formal disciplinary procedures within the last two years and to establish any details, outcomes or 'live' sanctions which are in place.

We will compare information on a candidate's application form with that in the reference to identify any inconsistencies and take up any discrepancies with the candidate.

In cases where there have been disciplinary concerns which involved children or safeguarding that have been substantiated, the referee will be required to confirm details.

In accordance Keeping Children Safe in Education, cases in which an allegation is proven to be false, unsubstantiated or malicious should not be included in employer references.

When recruiting to teaching posts, we will seek to confirm whether candidates have been subject to formal capability proceedings in the past two years as part of our appointment process.

In the case of recruitment to all other posts, we will ask referees to confirm whether candidates have been subject to formal capability proceedings in the past two years as part of our appointment process.

12. Interview and Selection

The Golden Thread Alliance is committed to ensuring that all interviewees are assessed according to their ability to meet the criteria of the job description and person specification and to fulfil their obligation regarding keeping children safe.

Applicants may have indicated on their application form that they have a disability and, in order to promote fairness and to meet our obligations under the Equality Act 2010, the letter of invitation will encourage applicants to contact The Golden Thread Alliance if they require any adjustments to enable them to attend the interview.

Candidates are required to bring evidence of relevant qualifications to the interview where the original documents must be checked, and signed and dated copy retained. When attending for interview, each candidate should be asked to sign a copy of their application form and their self-disclosure form in the presence of the person undertaking the document and identity checks.

The interview panel will include at least one member who has undertaken safer recruitment training in accordance with the School Staffing (England) Regulations 2009 and should not include an employee where one of the applicants is a relative, partner or close friend. The interview will include questions in relation to safeguarding.

The panel will take notes during the interview to enable a scoring matrix to be completed and, at the conclusion of the interviews; the panel will consider each of the candidates against the criteria for the post before reaching their decision.

Specifically, when interviewing candidates, the panel:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently
- Explore questions arising from references that have been provided
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

13. Pre-employment Checks

All offers of employment will be conditional on the successful completion of the pre-employment checks listed below and will include confirmation of salary, start date and any information that the successful applicant needs to provide before commencing employment e.g. DBS form and pre-employment questionnaire.

All offers of employment will be subject to and conditional upon:

- Enhanced DBS check
- DBS Barred list check where applicable (i.e. if working in regulated activity)
- Verification of identity including Date of Birth
- Verification of entitlement to work in the UK
- Verification of any relevant qualifications and teaching status, where applicable, using the Department for Education's 'Check a teacher's record' service. Receipt of two satisfactory references
- Prohibition checks for those in teaching work and those with previous teaching experience (including unqualified teachers, HLTA's, ATs etc.)
- A Section 128 Prohibition from Management check for all colleagues employed in management positions, members, trustees and local governors. Whilst they are not employees, from September 2019, Keeping Children Safe in Education also recommends that maintained school governors have Section 128 checks, as a Section 128 direction prohibits someone from serving as a maintained school governor.
- Overseas checks as appropriate including-
- Obtaining an enhanced DBS certificate with barred list information even if the teacher has never been to the UK.
- Criminal records checks for overseas applicants – Home Office guidance can be found [here](#) and for teaching positions From 1st January 2021, the Teacher Regulation Agency will no longer maintain a list of EEA teachers with sanctions.
- Criminal records checks for overseas applicants – Home Office guidance can be found on [GOV.UK](#); and for teaching positions
- Obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach.
- Disqualification checks under the 2018 Childcare Disqualification Regulations for individuals employed to work in reception classes, or in wraparound care for children up to the age of 8 in schools providing childcare.
- Satisfactory pre-employment health clearance, verifying physical and mental fitness to carry out their work responsibilities.
- Online search to identify if there are any concerns which would lead the school to question the candidate's suitability to work with children, which will have been discussed with the candidate either before or at the interview

If these are not satisfactory an offer of employment may be withdrawn or where an individual has commenced work, employment may be terminated.

13.1 Right to Work

In order to comply with the Asylum and Immigration Act 1996 – Prevention of Illegal Working – interview candidates will be asked to bring certain documentation to the interview which shows their eligibility to work in the UK. No offer of employment can be made unless one of the original documents listed on the Home Office Right to Work Checklist is produced.

The candidate's original documents must be checked, and a signed and dated copy retained in line with The Golden Thread Alliance retention policy. Documents relating to unsuccessful candidates will be retained with the interview papers and destroyed six months from the date on which the position was offered and accepted by the successful candidate.

The [Home Office Right to Work Checklist](#) shows the acceptable identity documentation as currently defined by the Home Office.

13.2 DBS and Barred List Checks

All those directly employed by Schools and Academies in paid positions are required to obtain an enhanced Disclosure and Barring Service (DBS) check.

It is an offence to employ, in a school or academy, an individual who is barred from working with children. A check against the Children's Barred List will be requested as part of the enhanced DBS Disclosure for all employees engaging in regulated activity with children, as defined in section 13.3 of this policy. Whether an individual is supervised does not, in itself, determine whether the activity is regulated activity

It is The Golden Thread Alliance's practice that individuals obtain a satisfactory enhanced DBS check before commencing work. In exceptional circumstances where the applicant is required to commence work before the full disclosure certificate is received, where working in regulated activity, a barred list check must be carried out before employment commences and a risk assessment and supervision must be in place until a satisfactory DBS check is obtained.

The Golden Thread Alliance will obtain an enhanced DBS certificate (including barred list information) for all volunteers who are working in regulated activity.

The Golden Thread Alliance will obtain an enhanced DBS certificate for all Members, Trustees and Local Governors. A check against the Children's Barred List will only be carried out for Members, Trustees and Local Governors if they are engaging in regulated activity in addition to their governance duties.

For existing colleagues, The Golden Thread Alliance will carry out new checks when an individual working within the Trust moves from a post that was not regulated activity with children into work which is considered to be regulated activity with children or where there has been a break in service of 12 weeks or more or there are concerns about an individual's suitability to work with children.

In cases where we are notified that a DBS check is positive for criminal convictions, cautions, warnings etc, the contents of the certificate will be discussed with The Golden Thread Alliance's People Director.

13.3 Regulated Activity

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. HM Government has produced a Factual note on regulated activity in relation to children: scope. Regulated activity includes:

a) teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;

b) work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children. From 1 September 2026, supervision does not prevent relevant activity from being regulated activity. Where a person teaches, trains, instructs, cares for or supervises children, the activity may be regulated activity if the relevant frequency or period conditions are met, regardless of whether the individual is supervised.

Work under (a) or (b) is regulated activity only if done regularly, on more than three days in any 30-day period, or, for activities under (a), overnight between 2am and 6am where there is an opportunity for face-to-face contact with children..² Some activities are always regulated activities, regardless of frequency or whether they are supervised or not. This includes:

c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:

- personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;³
- health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

²The Safeguarding Vulnerable Groups Act 2006 provides that the type of work referred to at (a) or (b) will be regulated activity if "it is carried out frequently by the same person" or if "the period condition is satisfied". Paragraph 10 of Schedule 4 to this Act says the period condition is satisfied if the person carrying out the activity does so at any time on more than three days in any period of 30 days and, for the purposes of the work referred to at (a), apart from driving a vehicle only for children, it is also satisfied if it is done at any time between 2am and 6am and it gives the person the opportunity to have face to face contact with children.

³It is not intended that personal care includes such activities as, for example, parent volunteers helping with costumes for school plays or helping a child lace up football boots.

13.4 Prohibition of Teachers

The Golden Thread Alliance will verify that anyone appointed or who may on occasions be required to carry out teaching work (including TA's, HLTA's and unqualified teachers) has not been prohibited from doing so by the Secretary of State in accordance with the Teachers' Disciplinary (England) Regulations 2012. All those in teaching work, or those with previous teaching experience, will require a prohibition check. Teaching and Support colleagues will be checked on the Department for Education's 'Check a teacher's record' service to ensure that they have the required teaching qualifications, have successfully completed statutory induction where it is necessary i.e., for teachers who obtained QTS after May 1999, and have not been prohibited from teaching. Checks will also be made against previous names.

A person who is prohibited must not be appointed to a role that involves teaching work.

13.5 Section 128 Management Checks

Section 128 directions are made by the Secretary of State under Section 128 of the Education and Skills Act 2008, barring individuals from taking part in the management of Independent schools, Academies and Free Schools. The Golden Thread Alliance will undertake a Section 128 check for those taking up management positions to ensure they are not prohibited under the provisions. This includes Board of Trustees, Directors, Members, Trustees and Local Governors. Management positions are also likely to include, but are not limited to, Headteachers and Deputy/Assistant Headteachers. This check shall also be undertaken on colleagues who are internally promoted or transferred to management positions.

13.6 Overseas Checks

In accordance with Keeping Children Safe in Education, The Golden Thread Alliance will ensure that individuals who have lived or worked outside the UK will undergo the same checks as all other colleagues in schools. This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity), even if the individual has never been to the UK.

In addition, The Golden Thread Alliance will make any further appropriate checks so that any relevant events that occurred outside the UK can be considered. The same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or rest of the world will be applied. This should include:

- obtaining a criminal record check for time spent abroad where by reason of the individual's living or having lived overseas, obtaining an enhanced DBS certificate is not sufficient to establish his or her suitability to work and/or where the individual has lived outside of the UK for a period of more than six months in the last five years. Further information on how to obtain such a check can be found at: <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants> for teaching positions obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach. Applicants can find contact details of regulatory bodies in the

EU/EEA and Switzerland on the Regulated Professions database. Applicants can also contact the UK Centre for Professional Qualifications who will signpost them to the appropriate EEA regulatory body.

The overseas checks will be carried out in addition to obtaining an enhanced DBS check as the DBS check alone is not sufficient to establish the candidate's suitability to work with children.

Since 6 April 2017 for all Tier 2 Visa applicants, it is a requirement that they must provide a criminal record certificate from any country where they have lived for 12 months or more (whether continuously or in total) in the last ten years.

13.7 Proof of Qualifications

Proof of qualifications will be checked to ensure that they match with the candidate's application form. The name of the qualification, awarding institution, date of qualification and candidate name will be checked. A signed and dated copy of the certificate will be retained as evidence of when the check was carried out, and by whom.

In the case of teachers, Qualified Teacher Status (QTS) will be checked using the Department for Education's 'Check a teacher's record' service

In the event of any concerns regarding the validity of the qualification, a candidate may be required to obtain confirmation or clarification in writing from the exam board or awarding institution.

13.8 Follow-up References

If required, following a written conditional offer of employment to the successful candidate, a supplementary reference request may be sent to their original referees. This is an opportunity to request information about sickness absence and attendance records which cannot be requested prior to an offer of employment in order to comply with the Equality Act 2010.

The offer of employment is conditional of both parts of the reference being satisfactory.

13.9 Pre-Employment Medical History Questionnaire

The Golden Thread Alliance will require all successful applicants to complete a medical history questionnaire to verify their medical fitness. There is also a requirement for schools to ensure that colleagues appointed to teaching posts have the necessary physical and mental fitness to teach under the Education (Health Standards) (England) Regulations 2003.

Completed medical history questionnaires will be considered in conjunction with the follow-up references which specifically explore sickness absence and attendance issues and, where appropriate, further advice about fitness to carry out a role will be sought from Occupational Health. In order to comply with the Equality Act 2010, reasonable adjustments will be made to enable a candidate to take up their role.

In circumstances where the candidate is assessed as medically unfit to carry out the role, or where it is not possible to make reasonable adjustments, an offer of employment may be withdrawn.

13.10 Childcare Disqualification

The Golden Thread Alliance will ensure that colleagues, who work in childcare provision, or who are directly concerned with the management of such provision, will have the appropriate checks carried out to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2018. The Childcare Disqualification check only applies to colleagues engaged to provide early years childcare i.e. colleagues working directly with children under five years of age or those providing 'wrap around' care with children up to eight years of age.

Checks will include: -

- Completion of a self-disclosure form prior to interview that asks whether the individual has any orders relating to the care of children as set out in schedule 1 of the Childcare Disqualifications Order (2018).
- Requesting an up-to-date enhanced DBS certificate (with barred list check for those who will engage in regulated activity)
- Cross referencing the results of the checks with the list of relevant offences at [Disqualification under the Childcare Act 2006 - statutory guidance Appendices \(publishing.service.gov.uk\)](#) that would disqualify someone.

14. Withdrawal of Offers

In the event that the pre-employment checks are unsatisfactory, or where the identity, qualifications or right to work in the UK of a successful candidate cannot be verified, The Golden Thread Alliance will consider withdrawing the conditional offer of employment. Where the successful candidate has started in post and information becomes available which would have caused the offer to be withdrawn, employment may be terminated. In these circumstances advice should be sought from The Golden Thread Alliance's People Team.

15. Single Central Record

In accordance with the terms of the School Staffing (England) Regulations (as amended), The Golden Thread Alliance will retain details of recruitment and vetting checks undertaken in a Single Central Record (SCR). Details of each individual academy will be recorded on a separate Single Central Record that is accessible for inspection. This data will be collated, used and stored and deleted in line with GDPR.

16. Complaints

An individual who feels that their treatment during the recruitment and selection process is unfair may raise a formal complaint. This can be done by writing to the Headteacher, Chief Executive Officer or the Chair of Trustees setting out the key points of their complaint. The complaint will be investigated in line with The Golden Thread Alliance's Complaints Procedure.

Existing employees of The Golden Thread Alliance should raise their concerns through the Grievance Procedure.

17. Induction

Induction is essential in ensuring that new employees are properly equipped for work, their role in the life of The Golden Thread Alliance and feeling part of The Golden Thread Alliance community.

The Golden Thread Alliance will put in place an induction programme for all colleagues joining The Golden Thread Alliance. This will vary taking into account previous experience and the nature of the role but will ensure that all colleagues and volunteers receive guidance on safe working practices and the safeguarding policies of The Golden Thread Alliance.

18. Record Keeping

Accurate and contemporaneous records including copies of application forms and interview notes will be kept throughout the process and will be retained for a minimum of six months from the appointment date in line with The Golden Thread Alliance's document retention schedule.

At the end of the appointment process all copied identity documentation (passport/birth certificate etc.) relating to unsuccessful candidates should be securely destroyed however, copies of application forms, interview, references, details of any online checks and any resulting risk assessments carried out and details of scoring should be retained for six months. All personal data will be stored and destroyed in line with GDPR.

Please note that original and copy DBS forms must not be retained on personal files and that the details should, instead, be recorded on the Single Central Record. Details of any online checks do not need to be recorded on the Single Central Record.

In the case of a DBS containing disclosures, should it be appropriate to retain a copy for the purpose of completing a risk assessment, the copy should not be kept for longer than six months. When the DBS copy is destroyed, the risk assessment shall be the record of the fact that vetting was carried out, the result and the recruitment decisions made.

19. Existing Colleagues and Volunteers

There are limited circumstances where The Golden Thread Alliance will need to carry out new checks on existing colleagues or volunteers. This will include where an individual working or volunteering within the Trust moves from a role that was not regulated activity with children into work which is considered to be regulated activity, where there has been a break in service of 12 weeks or more, or where there are concerns about an individual's suitability to work with children. In these circumstances, the relevant checks appropriate to the role and regulated activity will be carried out.

The Golden Thread Alliance will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

20. Agency and Third-Party (supply staff)

The Golden Thread Alliance will obtain and retain written notification from any agency, or third party organization used to supply staff they use that the organisation has carried out all required pre-appointment checks as set out in Keeping Children Safe in Education including written notification that an enhanced DBS certificate has been obtained, either by the employment business or another such business), on any individual prior to working at The Golden Thread Alliance that The Golden Thread Alliance would otherwise perform. Where applicable, the written notification must also confirm whether the enhanced DBS certificate included a check of the children's barred list. A copy of the enhanced DBS certificate must be seen by The Golden Thread Alliance on arrival.

Where the position requires a barred list check, this must be obtained by the agency or third party prior to appointing the individual. The Golden Thread Alliance will also check that the person presenting themselves for work is the same person on whom the checks have been made by verifying their identity on arrival.

21. Contractors

The Golden Thread Alliance will ensure that any contractor, or any employee of the contractor, who is to work at The Golden Thread Alliance has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information). For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular or close contact with children, an enhanced DBS check (not including barred list information) will be required. In considering whether the contact is regular, or whether checks are required, consideration should be given to the nature, frequency and level of access to children, irrespective of the number of sites worked across. .

Under no circumstances should a contractor in respect for whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity. The Golden Thread Alliance is responsible for determining the appropriate level of supervision depending on the circumstances, and a risk assessment must be in place for any contractors on whom checks are determined as not necessary.

Where a self-employed individual will be engaging in regulated activity with children, The Golden Thread Alliance will undertake the necessary safer recruitment checks and obtain an enhanced DBS check including Children's Barred List information. Where a self-employed individual is not engaging in regulated activity but their work provides an opportunity for regular contact with children, the Trust will obtain an enhanced DBS check without Children's Barred List information, where the role is eligible for such a check

The Golden Thread Alliance will always check the identity of contractors and their staff on arrival at The Golden Thread Alliance to ensure they are the individuals on whom checks have been completed.

22. Trainee/Student Teachers

Where applicants for initial teacher training are salaried by The Golden Thread Alliance, we will ensure that all necessary checks are carried out. Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

23. Volunteers

The Golden Thread Alliance will:

- Require all new volunteers to complete an application form
- Carry out safer recruitment checks including references before commencing in a volunteer role.
- Ensure that a volunteer who is engaging in regulated activity has the appropriate checks completed before commencing that activity. Where any required checks are outstanding, the volunteer must not undertake regulated activity and must remain appropriately supervised. Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity. A volunteer who teaches, trains, instructs, cares for or supervises children will be considered to be engaging in regulated activity where they carry out this activity frequently, on more than three days in any 30-day period, or overnight between 2am and 6am where there is an opportunity for face-to-face contact with children. This applies whether the volunteer is supervised or unsupervised.
- Carry out checks as appropriate for any individuals who have lived or worked outside of the UK

When determining whether the frequency threshold is met, relevant activity undertaken by a volunteer across more than one school or setting must be considered collectively when assessing whether the activity has taken place on more than three days in any 30-day period.

Volunteers who assist on an occasional or one-off basis, for example at a PTA event or on an occasional school trip, will not necessarily be engaging in regulated activity. The Trust will consider the nature and frequency of the activity undertaken in each case to determine whether it meets the definition of regulated activity and, consequently, the level of DBS check required

A volunteer who undertakes relevant activity between 2am and 6am, where the activity gives them the opportunity to have face-to-face contact with children, will be engaging in regulated activity regardless of how frequently the activity is undertaken. This may include volunteers accompanying children on overnight or residential trips. Where this applies, an enhanced DBS check including Children's Barred List information will be required.

The Trust will review the activities undertaken by existing volunteers against the current definition of regulated activity. Where an existing volunteer is identified as engaging in regulated activity and their previous DBS check did not include a check of the Children's Barred List, the Trust will ensure that the appropriate barred list check is completed.

24. Members, Trustees and Governors

All Trustees, Local Governors and Members will have an enhanced DBS check without barred list information.

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

The Chair of the Board will have their DBS check countersigned by the secretary of state.

All, Trustees, Local Governors and Members will also be required to have a Section 128 check (to check prohibition on participation in management under Section 128 of the Education and Skills Act 2008).

All Trustees, Local Governors and Members must provide proof of Right to Work in the UK.

25. Duty to Refer to the DBS

The Trust will make a statutory referral to the DBS if a colleague or volunteer:

- is dismissed or removed from regulated activity because they have harmed a child or pose a risk of harm, or
- resigns or otherwise leaves their role in circumstances where they would have been dismissed had they not left.

This duty applies regardless of whether the individual is known to be on a barred list at the time.

26. Confidentiality and Data Protection

The Golden Thread Alliance recognises its obligations under applicable data protection laws, including the UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025, and the rights of individuals in relation to their personal data. All records relating to the recruitment process will be gathered, processed, held, shared and retained in accordance with these requirements.

Please refer to The Golden Thread Alliance's Data Protection Policy and Privacy Notice for further details.

27. Internal Recruitment

Existing colleagues are not required to complete a full application form, as this information will be on file. Existing colleagues can submit a letter expressing their interest in the post. They must outline their skills and experience, explaining why they believe they should be considered for the post.

Internal applications shall be treated the same as external applications, including being subject to shortlisting and interview processes. References for internal candidates will be scrutinised to the same degree as external candidates. Where possible, the reference should be provided by a current colleague who is not interviewing the candidate, such as their line manager.

28 Recruitment of Ex Offenders

The Golden Thread Alliance is committed to safeguarding and promoting the welfare of children. As part of our safer recruitment practice, we ensure that all vetting and employment decisions involving applicants with criminal records comply with Keeping Children Safe in Education (KCSIE), the DBS Code of Practice, and relevant legislation including the Rehabilitation of Offenders Act 1974 (Exceptions Order). This means that, where a role involves regulated activity, applicants are required to disclose relevant convictions and cautions if shortlisted for employment in one of our schools.

We recognise the importance of fair, consistent, and lawful treatment of applicants who may have criminal records and ensure that disclosures are handled sensitively, securely, and only when legally required.

28.1 Protections and Exemptions

Relevant offences' will always be disclosed on a DBS certificate, and should always be included in self-declarations – see the [government's list](#) for further details.

It is a criminal offence for any person who is barred from working with children to apply for a position in a school. The Golden Thread Alliance will make a report to the DBS and/or the police as appropriate, if it receives an application from a barred person.

'Protected offences' are certain old or minor offences that may not be disclosed on a DBS check. Guidance as to whether a caution or conviction is 'protected' can be found in:

- The Ministry of Justice's [Guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975](#)
- The government's tool to [check whether to disclose cautions or convictions](#)

Applicants **should not** list any 'protected' offences on their self-declaration form, and we will not take them into account if we are made aware of them. Applicants should not disclose any cautions or convictions that are classed as 'protected' under the current DBS filtering rules.

The Golden Thread Alliance follows the latest DBS filtering guidance (post-2020 amendments), which removed the 'multiple conviction rule' and filters all reprimands and youth warnings. Protected matters will not be considered even if they are disclosed

Shortlisted applicants are required to complete a self declaration form to disclose all relevant convictions, cautions, reprimands, or warnings that are not protected under current DBS filtering rules. This information is:

- requested after shortlisting only
- viewed only by those responsible for safeguarding or recruitment
- managed in line with data protection requirements unless needed in a safeguarding investigation.

Protected cautions and convictions are those filtered by the DBS and must not be disclosed or considered

28.2 Responsibilities

28.2.1 The Headteacher

- Uphold The Golden Thread Alliance's commitment to the fair treatment of all job applicants
- Make sure all job application forms contain clear and relevant information about what cautions or convictions applicants are expected to disclose, and what safeguarding checks The Golden Thread Alliance will carry out, and at what stage in the application process
- Make sure staff involved in the recruitment process have received appropriate guidance and training about their legal duties in employing ex-offenders, and assessing the relevance and circumstances of offences

28.2.2 Colleagues involved in the recruitment process

- Treat applicants fairly, including in relation to any history of offending
- Maintain privacy for applicants, making sure that information about applicants' criminal records won't be seen by anyone outside of the recruitment process
- Make sure that all shortlisted applicants complete a self-declaration form before the interview stage, and that all job offers are conditional, subject to appropriate safeguarding checks
- Hold discussions with applicants about their disclosures, where relevant, and make decisions about suitability based on the circumstances and background of offences
- Seek specialist legal/HR advice where relevant

28.2.3 All job applicants

- Familiarise themselves with the requirements for self-disclosure, and whether they have any previous convictions or cautions that must be disclosed
- Complete self-declaration forms honestly and completely, disclosing all required spent and unspent convictions and cautions (excluding 'protected' offences)
- Participate in disclosure discussions following either or both of their self-declaration and DBS check

28.3 The process for disclosing and assessing previous convictions

All application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position.

28.3.1 Self-declaration

All shortlisted applicants will be asked to complete a self-declaration form before the interview stage. Applicants must complete these forms accurately, and reveal all relevant convictions, as well as any other information that would make them unsuitable to work with children. Failure to reveal any relevant information could lead to the withdrawal of an offer of employment.

All job application forms will include information about this requirement.

Applicants will not be asked for information about previous convictions or cautions before this stage, and any such information that is disclosed before shortlisting stage won't be taken into account in the shortlisting process.

We will store all sensitive personal data securely, only share it with relevant staff members, and destroy it securely when we no longer need it.

Self-declaration forms will be reviewed by a colleague who is not involved in making recruitment decisions, and any irrelevant information will be deleted; for example, 'protected' convictions that legally can't be taken into account.

Further disclosure discussions (see sub-section 4.3) may be needed following safeguarding checks. A conditional offer may only be confirmed once staff are happy that any previous convictions don't make applicants unsuitable for the role.

The self-declaration form will only ask for information the school is legally permitted to request under the ROA Exceptions Order.

28.3.2 DBS Checks

Successful candidates are subject to DBS and other safeguarding checks, as set out in statutory guidance, Keeping Children Safe in Education. Staff should consider whether:

- The checks reveal any new information that might prohibit or otherwise make a candidate unsuitable for the role
- The checks match any information disclosed in an applicant's self-declaration

Further disclosure discussions may be needed following safeguarding checks. A conditional offer may only be confirmed once staff are happy that any previous convictions don't make applicants unsuitable for the role.

28.3.3 Disclosure Discussions

Where a disclosure or the results of a DBS check reveal that an applicant is barred from the role or ineligible to be employed in that role, their recruitment process will not proceed any further, and they will be informed that they legally cannot be considered for the job.

In all other cases, previous convictions will not necessarily prevent applicants from being employed by The Golden Thread Alliance. Colleagues will determine, with support from HR specialists, whether disclosures warrant a discussion between The Golden Thread Alliance and the candidate.

Where relevant, disclosure discussions will happen as part of the interview process and take the applicant's explanation into consideration. For example, we will consider:

- The seriousness of any offence and relevance to the post applied for
- How long ago the offence occurred

- Whether it was a one-off incident or a history of incidents
- The circumstances around the incident
- Whether the applicant accepted responsibility for their actions

It will then be assessed whether applicants' previous convictions or cautions make them unsuitable for the role.

We will not ask applicants about protected convictions and cautions.

- A section 128 check will be requested for all roles that relate to the management of the school including but not limited to governors, trustees, directors and headteachers.

If discrepancies arise between an applicant's self-declaration and their DBS certificate, a discussion will be held with the applicant to clarify the information, and a documented risk assessment will be completed before any decision is made.

28.4 Data Protection and Handling Disclosure Information

We comply fully with the DBS Code of Practice and data protection legislation. We will:

- not retain copies of DBS certificates
- store only essential information (certificate number, date, level of check, outcome)
- maintain secure, restricted access to sensitive information
- destroy any disclosure information securely when no longer required

29 Related Documents

This policy should be read alongside:

- Child Protection and Safeguarding Policy
- Data Protection Policy
- Equal Opportunities Policy



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hello@golden-thread.org



As united as we are different.

Privacy Notice (How We Use Job Applicant Information)

This Privacy Notice has been adopted by all schools within The Golden Thread Alliance – Culverstone Green Primary School, Fleetdown Primary Academy, Meopham Community Academy, Oakfield Primary Academy, The Riverview Academy, Temple Hill Primary Academy, West Hill Primary Academy and Wrotham Road Primary School.

This Privacy Notice for job applicants explains how we collect, store and use personal data about individuals as part of our recruitment process. It provides a guide to our legal obligations and their own rights. Like any organisation which handles personal data, our Trust is the 'Data Controller' as such, we are registered with the ICO (Information Commissioner's Office) and we comply with UK General Data Protection Regulation (UK GDPR). Our Data Protection Officer (DPO) is SchoolPro TLC Ltd (see 'Contact' below).

As part of any recruitment process, we collect and process personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

The Categories of Job Applicant Information That We Process Include:

We collect a range of information about you, this includes:

- Your name, address and contact details, including email address and telephone number.
- Relevant documentation which confirms your identification and proof of address.
- Details of your education, qualifications and training, including membership of professional bodies.
- Information about your current level of remuneration, including benefit entitlements.
- Information about your continuous service in Local Government Employment.
- Details of your skills, experience, current employment and previous employment.
- Details of relationships you may have with current employees within the Trust.
- Relevant information to enable us to undertake safer recruitment in education checks, including details of referees.
- Whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process.
- Information about your entitlement to work in the UK.
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.
- Information on any incidents or issues that may have been identified in online checks of publicly available information.

Why We Collect and Use Job Applicant Information

We use job applicant data to:

- Take steps at your request prior to entering into a contract with you
- Enter into a contract with you
- Ensure that we are complying with our legal obligations

Under the UK General Data Protection Regulation (UK GDPR), the legal basis / bases we rely on for processing personal information for general purposes are:

(6a) Consent: job applicants, employees and others who work in the school have given clear consent for us to process their personal data for the purposes indicated above. For example, if your application is unsuccessful, we may keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before we keep your data for this purpose and you are free to withdraw your consent at any time.

(6c) A Legal obligation: the processing is necessary for us to comply with the law.

(6d) A duty to safeguard pupils: the processing is necessary in order to protect the vital interests of the data subject (children); (e.g. we are required to have evidence that staff have DBS clearance).

(6e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.

The lawful bases for processing personal data are set out in Article 6 of the UK General Data Protection Regulation.

- Education Act 1996
- Employment Legislation
- Equality Act 2010

Special Categories of data are set out in Article 9 of the UK General Data Protection Regulation.

The Golden Thread Alliance will work within the conditions of GDPR – Article 9 of the UK GDPR:

(9.2a) explicit consent. In circumstances where we seek consent, we make sure that the consent is unambiguous and for one or more specified purposes, is given by an affirmative action and is recorded as the condition for processing. Examples of our processing include job applicant dietary requirements, health information we receive from our job applicant who require a reasonable adjustment to access our site and services, or information requested for the purposes of equal opportunities monitoring.

(9.2b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.

(9.2c) where processing is necessary to protect the vital interests of the data subject or of another natural person. An example of our processing would be using health information about a job applicant in a medical emergency.

(9.2f) for the establishment, exercise or defence of legal claims. Examples of our processing include processing relating to any employment tribunal or other litigation.

(9.2g) reasons of substantial public interest. As a school, we are a publicly funded body and provide a safeguarding role to young and vulnerable people. Our processing of personal data in this context is for the purposes of substantial public interest and is necessary for the carrying out of our role. Examples of our processing include the information we seek or receive as part of investigating an allegation.

(9.2j) for archiving purposes in the public interest. The relevant purpose we rely on is Schedule 1 Part 1 paragraph 4 – archiving. An example of our processing is the transfers we make to the County Archives as set out in our Records Management Policy.

We process criminal offence data under Article 10 of the UK GDPR.

Our Data Protection Policy highlights the conditions for processing in Schedule 1 of the Data Protection Act 2018 that we process Special Category and Criminal Offence data under.

Collecting Job Applicant Information

We collect this information in a variety of ways. For example, data might be collected via SAM Recruit (our recruitment system), contained in application forms or CVs, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

We will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, and information from criminal records checks.

We may carry out an online search of publicly available information about shortlisted candidates as part of our due diligence and safer recruitment processes, in accordance with the current version of Keeping Children Safe in Education (KCSIE). Any data collected during this search will be retained in line with our retention schedule which is available on request.

Storing Job Applicant Information

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please see our Data Protection Policy and our Data Retention Policy by visiting www.golden-thread.org.

Data will be stored in a range of different places, including on your application record, in People Management Information Systems and on other IT systems (including email).

Who We Share Job Applicant Information With

Your information will be shared internally for the purposes of the recruitment exercise. This includes colleagues who carry out recruitment and onboarding processes, the People team and interviewers involved in the recruitment process and managers in the business area with a vacancy.

Information is also shared between SAM Recruit as we will be using this system and processing the data for application and onboarding processes.

To meet our duties under Keeping Children Safe in Education, we are required to obtain references from your former employers as part of the interview process. We will not share your data with third parties for this purpose without your consent.

The organisation will share data with third parties with employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

Requesting Access to Your Personal Data

The UK-GDPR gives you certain rights about how your information is collected and used. To make a request for your personal information, contact Kate George, Executive Assistant via email.

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request, data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent.

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance.



Alternatively, you can contact our Data Protection Officer which is SchoolPro TLC Ltd via DPO@schoolpro.uk.

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

If you are not happy with the outcome, you may raise a complaint with the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>.
- Call 0303 123 1113.
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

What If You Do Not Provide Personal Data?

You are under no statutory or contractual obligation to provide data to us during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

Withdrawal of Consent and the Right to Lodge a Complaint

Where we process your personal data based on your consent, you have the right to withdraw that consent at any time.

To request the withdrawal of your consent, please contact Kate George, Executive Assistant at kate.george@golden-thread.org. We will respond to your request promptly and ensure that your data is no longer processed on the basis of consent, unless another lawful basis applies.

Under Section 164A of the Data Protection Act 2018, you have a statutory right to complain if you believe your personal data has been handled inappropriately.

If you wish to raise a concern about how we process your personal data, please contact Kate George directly at kate.george@golden-thread.org. We will acknowledge your complaint within 30 days of receipt and take appropriate steps to investigate and respond without undue delay.

If you are not satisfied with our response, you may escalate your complaint to the Information Commission at: [Information Commissioner's Office](#)

Last Updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated in September 2026.



Contact

If you would like to discuss anything in this privacy notice, please contact: Kate George, Executive Assistant, kate.george@golden-thread.org.