



Outcomes
First Group

Careers Policy

The Tower School

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1.0 INTRODUCTION

The Tower School is operated by Options Autism and is owned by Acorn Care and Education Ltd, a subsidiary company of Outcomes First Group (proprietary body). The Chairperson of the proprietary body is Richard Power (COO). The Tower School is an independent day school providing specialist education for pupils and young people aged 11 – 18 with a primary diagnosed need of Autism. Many will also have other diagnosed needs that may impact on their communication skills and relationships.

The Tower School has its own dedicated management team, under the leadership of Lauren Gibbs. Oversight of school management is provided by the Regional Director, Richard Adams-Murgatroyd for Options Autism, responsible to the Managing Director and Chief Operating Officer.

Key decisions are referred to the Outcomes First Group's Board of Directors, in addition, the group extends its robust governance through local governing committees, a national education performance board and an independent Safeguarding and Quality Committee with three independent members.

2.0 POLICY & STATUTORY REQUIRMENTS

This policy is based on the Department for Education's (DfE's) statutory Careers guidance and access for education and training providers.

This guidance refers to:

- The Education Act 1997
- The Education and Skills Act 2008
- The School Information (*England) Regulations 2008

This policy is also in line with the more recent Skills and Post-16 Act 2022, which came into force on 1 January 2023. It explains that our school must provide a minimum of **6 encounters** with technical education or training providers to all pupils in years 8 to 13.

This policy is also in line with the Education (Careers Guidance in Schools) Act 2022. This came into force on 1 September 2022, and amended the existing duty in The Education Act 1997, so that:

- Our school must now secure independent careers guidance from year 7 (instead of from year 8, previously)
- As a School in England, we're now required to provide and publish careers guidance.

The above guidance requires that schools publish information about their careers programme on their website. This policy includes this information and shows how our school complies with this requirement.

This policy complies with our funding agreement and articles of association.

We also act in line with our statutory duty under the 'Baker Clause', to be impartial and not show bias towards any route, be that academic or technical. This policy sets out how our school meets this duty.

The Tower School offers a broad and balanced curriculum and aims to provide Careers Guidance which is:

- Accurate and up to date
- Presented in an impartial manner
- Enables them to make informed choices about a broad range of career options
- Helps to encourage them to fulfil their potential

At The Tower School we recognise and celebrate that all of our young people are different and as a result their education and career pathways will be planned on an individualised basis. Careers education for pupils at The Tower School will be relevant, specific, planned, and delivered carefully to meet their individual needs.

Our provision for post-16 students is personalised and considers the individual needs of each pupil. For this reason, we offer a variety of routes and opportunities which are further detailed in our curriculum policy.

Post-16 students can access:

- Further opportunities to study BTEC programmes, GCSEs and Functional Skills
- Opportunities to re-sit GCSEs/Functional Skills or take additional GCSEs
- Local colleges with the support of The Tower School staff
- Internal and external work experience opportunities

3.0 THE GATSBY BENCHMARKS

We use the Gatsby Charitable Foundation's Benchmarks to develop and improve our careers provision and to ensure we fulfil our legal duties. For further information, please refer to our action plan.

The Gatsby Benchmarks are:

Document Name: Safeguarding Policy **Policy Owner:** Director of Safeguarding

Last Review Date: September 2026 **Next Review Date:** September 2027

1. A stable careers programme	Every school and college should have an embedded programme of career education and guidance that is known and understood by students, parents, teachers, governors and employers.	Every school and college should have an embedded programme of career education and guidance that is known and understood by students, parents, teachers, governors, employers and other agencies. Every school and college should have a stable, structured careers programme that has the explicit backing of the senior management team and has an identified and appropriately trained person responsible for it. The careers programme should be published on the school's or college's website in a way that enables students, parents, school/college staff and employers to access and understand it. The programme should be regularly evaluated with feedback from students, parents, school/college staff and employers as part of the evaluation process. Providers of technical (including higher technical) education, vocational education and apprenticeships should be given the opportunity to engage with students and their parents so that all routes at 16 and 18 are fully understood and so that students can make informed decisions at key transition points.
2. Learning from career and labour market information	Every pupil, and their parents, should have access to good-quality information about future study options and labour market opportunities. They will need the support of an informed adviser to make best use of available information.	By the age of 14, all pupils should have accessed and used information about all career paths and the labour market to inform their own decisions on study options. During their study programme all students should access and use information about all career paths and the labour market to inform their own decisions about study options. Parents should be encouraged to access and use information about labour markets and future study options to inform their support to their children.
3. Addressing the needs of each pupil	Pupils have different career guidance needs at different stages. Opportunities for advice and support need to be tailored to the needs of each pupil. A school's careers programme should embed equality and diversity considerations throughout.	A school's or college's careers programme should actively seek to challenge stereotypical thinking and raise aspirations. Schools and colleges should keep systematic records of the individual advice given to each student, and subsequent agreed decisions. All students should have access to these records to support their career development. The records of advice given should be integrated with those given at the previous stage of the student's education (including their secondary school) where these are made available. Records should begin to be kept from the first point of contact or from the point of transition.

		Schools should collect and maintain accurate data for each pupil on their education, training or employment destinations for at least three years after they leave school. This data should be used to review a school or college's careers provision and inform development and continuous improvement. Colleges should collect and maintain accurate data for each student on their education, training or employment destinations. This data should be used to review a school or college's careers provision and inform development and continuous improvement.
4. Linking curriculum learning to careers	All teachers should link curriculum learning with careers. For example, STEM subject teachers should highlight the relevance of STEM subjects for a wide range of future career paths.	By the age of 14, every pupil should have had the opportunity to learn how the different STEM subjects help people to gain entry to, and be more effective workers within, a wide range of careers. Throughout their programme of study (and by the end of their course) every student should have had the opportunity to experience how their subjects help people gain entry to (and be more effective workers within) a wide range of occupations.
5. Encounters with employers and employees	Every pupil should have multiple opportunities to learn from employers about work, employment and the skills that are valued in the workplace. This can be through a range of enrichment activities including visiting speakers, mentoring and enterprise schemes.	Every year, from the age of 11, pupils should participate in at least one meaningful encounter* with an employer. Every year, alongside their study programme, students in colleges should participate in at least two meaningful encounters with an employer. At least one encounter should be delivered through their curriculum area. Colleges should record and take account of students' own part time employment and the influence this has had on their development. *A 'meaningful encounter' is one in which the student has the opportunity to learn about what work is like or what it takes to be successful in the workplace.
6. Experiences of workplaces	Every pupil should have first-hand experiences* of the workplace through work visits, work shadowing and/or work experience to help their exploration of career opportunities, and expand their networks.	By the age of 16, every pupil should have had at least one experience of a workplace, additional to any part-time jobs they may have. By the age of 18, or before the end of their study programme, every student should have had at least one experience of a workplace, additional to any part-time jobs they may have

7. Encounters with further and higher education	All pupils should understand the full range of learning opportunities that are available to them. This includes both academic and vocational routes and learning in schools, colleges, universities and in the workplace.	By the age of 16, every student should have had a meaningful encounter* with providers of the full range of educational opportunities, including sixth forms, colleges, universities and apprenticeship providers. This should include the opportunity to meet both staff and students. By the age of 18, all students who are considering applying for university should have had at least two visits to universities to meet staff and students. By the age of 18, or before the end of their programme of study, every student should have had a meaningful encounter with a range of providers of learning and training that may form the next stage of their career. This should include, as appropriate, further education colleges, higher education and apprenticeship and training providers. This should include the opportunity to meet both staff and students.
8. Personal guidance	Every pupil should have opportunities for guidance interviews with a careers adviser, who could be internal (a member of school staff) or external, provided they are trained to an appropriate level.	Every student should have opportunities for guidance interviews with a Careers Adviser, who could be internal (a member of school staff) or external, provided they are trained to an appropriate level. These should be available whenever significant study or career choices are being made. They should be expected for all pupils but should be timed to meet their individual needs. Every student should have at least one such interview by the age of 16, and the opportunity for a further interview by the age of 18.

4.0 ROLES & RESPONSIBILITIES

4.1 Careers leader

Our careers leader is Ellen Leber, and they can be contacted by phoning 01992 926020 or emailing ellen.leber@thetowerschool.co.uk. Our careers leader is a member of the senior leadership team (SLT) and will:

- Take responsibility for developing, running and reporting on the school's career programme
- Plan and manage careers activities
- Manage the budget for the careers programme
- Support teachers to build careers education and guidance into subjects across the curriculum
- Establish and develop links with employers, education and training providers, and careers organisations
- Work closely with relevant staff, including our special educational needs co-ordinator (SENCO) and careers adviser, to identify the guidance needs of all of our pupils with

special educational needs and/or disabilities (SEND) and put in place personalised support and transition plans

- Work with our school's designated teacher for looked-after children (LAC) and previously LAC to:
 - Make sure they know which pupils are in care or are care leavers
 - Understand their additional support needs
 - Make sure that, for LAC, their personal education plan can help inform careers advice
- Review our school's provider access policy statement at least annually, in agreement with our governing board

4.2 Senior leadership team (SLT)

Our SLT will:

- Support the careers programme
- Support the careers leader in developing their strategic careers plan
- Make sure our school's careers leader is allocated sufficient time, and has the appropriate training, to perform their duties to a high standard
- Allow training providers access to talk to pupils in years 8 to 13 about technical education qualifications and apprenticeships, and set out arrangements for this in our school's provider access policy statement
- Network with employers, education and training providers, and other careers organisations
- Make sure that details of our school's careers programme and the name of the careers leader are published on the school's website

4.3 The governing board

The governing board will:

- Provide clear advice and guidance on which the school can base a strategic careers plan which meets legal and contractual requirements
- Appoint a member of the governing board who will take a strategic interest in careers education and encourage employer engagement
- Make sure independent careers guidance is provided to all pupils throughout their secondary education (11 to 18 year-olds) and that the information is presented impartially, includes a range of educational or training options and promotes the best interests of pupils
- Make sure that a range of education and training providers can access pupils in years 8 to 13 to inform them of approved technical education qualifications and apprenticeships
- Make sure that arrangements are in place for the school to meet the legal requirements of the 'Baker Clause', including that the school has published a provider access policy statement

5.0 CURRICULUM

Careers and work-related education in the curriculum provide contexts, resources and opportunities for:

- spiritual, moral, social and cultural development
- personal and social development
- health education
- academic and vocational learning
- functional skills

- sustainable living, personal finance, enterprise and employability skills, through PSHE and Pathways lessons.

6.0 DEFINITIONS

Careers education, for individual and groups, focuses on career learning, teaching and assessment. It enables learners to understand themselves, get information, explore opportunities and develop the skills they need to manage their careers.

Career(s) guidance, for individuals and small groups, focuses on careers information, advice and support. It may include counselling and coaching. It enables individuals to accomplish the unique tasks and issues they face in making progress and achieving their aspirations.

Careers education and guidance rely heavily on collaborative and partnership activities and interventions between a range of 'careers influencers' including learners themselves, parents and carers, other learning providers, and business and community organisations.

Work-related education enables pupils and young people to learn the knowledge, skills and attitudes that will enable them to understand and succeed in the world of work. It makes extensive use of employer engagement to deliver active and experiential learning activities in and beyond the classroom. The Tower School has forged strong links with our local community across a variety of sectors, allowing pupils to benefit from rich experiences and make informed choices about their next steps.

Making the most of careers information, advice and guidance (CIAG) - Individuals need to learn how to recognise trusted sources of information, advice and guidance and how to make effective use of all the sources of help and support available to them.

Preparing for employability - Showing initiative and enterprise - A priority for pupils and young people is to gain the skills and experience that will enable them to get jobs and sustain themselves in employment.

Showing initiative and enterprise - This area of learning encompasses everything from becoming a top entrepreneur to showing initiative and enterprise in everyday life. It helps individuals to learn about risk, effort and making the most of opportunities.

Developing personal financial capability - The increasing cost of training and further and higher education makes it essential for individuals to know about managing their money. They need to know how to make decisions about spending, saving and investing to ensure their economic wellbeing now and in the future.

Identifying choices and opportunities - Using networking, negotiation, information and evaluation skills enables individuals to maximise their choices and opportunities, including those that are unforeseen or unplanned. Individuals need to be able to recognise suitable progression pathways and qualifications.

Planning and deciding - Decision-making involves getting information, clarifying values and preferences, identifying options, weighing up influences and advice, solving problems, anticipating future decisions and having a 'back-up' plan. It also involves being able to cope with chance events and unforeseen consequences.

Handling applications and interviews - Promoting themselves in a way that attracts the attention of selectors and recruiters as well as managing the applications process involves developing a range of self-presentation and marketing skills that individuals will need throughout their lives.

Managing changes and transitions - Plans and decisions can break down if individuals fail to prepare for the career moves they need to make. Awareness of how to cope with life changes and transitions, partly gained from reflecting on previous moves, can support lifelong career development and employability.

7.0 PROVISION AT KEY STAGE 3 & 4

Key Stage 3

We recognise that pupils are making good progress if they can explain the requirements of a particular job that appeals to them and if they can mention an interest or skills that they possess to justify this as a choice for them. It also focuses on helping pupils to understand different viewpoints about careers and work besides their own and to open their minds to new possibilities. Pupils at Key Stage 3 benefit from activities that support personal reflection and help them to focus on what they have to offer in career terms and not just what they want to take, i.e. to see themselves as providers of skills and expertise that employers want and not just as consumers of careers that take their fancy.

This is a great time to help pupils become connected with their communities and to understand the work that needs to be done to sustain the community in which they live and identify readily with former pupils alumni networking. Exploring the world of work is a valuable way of enlarging their vocabulary and understanding of publicly-held concepts about careers and work as well as developing their literacy and numeracy skills.

Key Stage 4 & 5

At Key Stage 4 & 5, pupils can develop their capacity for self-reflection and realistic appraisal of their choices and opportunities. The formation of relatively stable, long-term occupational interests is also a feature of their development that can be accelerated by well-designed careers and work-related education programmes.

Careers and work-related programmes can help to develop their reasoning about career progression. Students have developed their self-reflection and have formed some occupational interest, this can be enhanced by a well thought through careers programme and from the qualified careers adviser, educational visits, and internal and external work experience.

Accreditation Opportunities

Careers Education and Work-Related Learning is well promoted throughout the curriculum and also accredited through a number of courses offered in school. Some of which is specified below. More can be found in the Curriculum Policy.

The Tower School also offers BTEC qualifications and Preparation for Adulthood lessons which have been developed to give learners the opportunity to:

- Experience more than one vocational sector where they have not yet decided on a specific sector to follow
- Develop knowledge, understanding and skills of different vocational sectors to motivate them to progress to higher level qualifications or employment in a specific sector.

- Develop cross-cutting employability skills through carrying out practical activities in a vocational context
- Engage in learning which is relevant to them and provide opportunities to develop a range of skills and techniques, personal skills and attributes essential for successful performance in working life
- Achieve a nationally recognised Entry, Level 1 or Level 2 vocationally related qualification
- Progress to employment
- Progress to related general and/or vocational qualifications

8.0 MONITORING

The practical application of this policy will be reviewed annually or when the need arises.

A statement of the policy's effectiveness and the necessary recommendations for improvement will be presented to the Board of Directors for further discussion and endorsement.

9.0 ACCESS/OUTSIDE CAREERS SUPPORT

Employability skills and career exploration are needed for the confident growth of our students, to safely make the transition. Outside careers support comes in many forms and delivers CEIAG careers, education, information, advice and guidance needed for the students at this stage. Schools are required to ensure that there is an opportunity for a range of education and training providers

accessing the students from years 7 and above by informing them about technical Skills qualifications, apprenticeships and training available. The careers programme offers many events, whereby speakers from different organisations come into school and speak to the students and parents.

This is outlined in section 42B of the Education Act 1997.

This policy shows how our school complies with these requirements.

All students in years 9 to 14 at The Tower school are entitled to:

- Find out about technical education qualifications and apprenticeship opportunities as part of our careers programme, which provides information on the full range of education and training options available at each transition point.
- Hear from a range of local providers about the opportunities they offer, including technical education and apprenticeships
- Understand how to make applications for the full range of academic and technical courses
- A meeting with an qualified OFG Careers advisor
- A meeting with a Local Authority Careers Advisor
- Take part in work experience

A provider wishing to request access should contact:

Email: ellen.leber@thetowerschool.co.uk

A number of events, integrated into our careers programme, will offer providers an opportunity to come into school to speak to students and/or their parents/carers:

Opportunities for access:

- Year 7 - Career related activities & whole school Careers Day & Enterprise Day
- Year 8 - Career related activities & whole school Careers Day & Enterprise Day
- Year 9 - Career related activities & whole school Careers Day & Enterprise Day & External Careers Advisor interviews
- Year 10 - Career related learning & whole school Careers Day & Enterprise Day & External Careers Advisor interviews & work experience
- Year 11 - Career related learning & whole school Careers Day & Enterprise Day & External Careers Advisor interviews & tours of local LSEC college & work experience
- Year 12 - Career related learning & whole school Careers Day & Enterprise Day & External Careers Advisor interviews & tours of local LSEC college & work experience & Visit to local job fair & national Career events
- Year 13 & 14- Career related learning & whole school Careers Day & Enterprise Day & External Careers Advisor interviews & tours of local LSEC college & work experience & Visit to local job fair & national career events

Please see, The Tower school Safeguarding and Visitor policies:

Our safeguarding and visitor policies outline the school's procedure for checking the identity and suitability of visitors.

Education and training providers will be expected to adhere to this policy.

The Tower school will advise of procedures to be adhered to and introduction of management and teaching staff involved. They will advise on facilities and movement of the school.

The school's arrangements for managing the access of education and training providers for students will be from the Careers Leader – Ellen Leber

10.0 Reporting concerns

10.1 What to do if a pupil or student discloses

Well promoted, easily understood and easily accessible systems should be in place for pupils and students to confidently report abuse, neglect, exploitation, sexual violence and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback.

If a pupil/student discloses information to a team member, the team member must ensure that they:

- listen to the pupil/student and reassure them they are being taken seriously and that they will be supported and kept safe.
- never give them the impression they are creating a problem by reporting abuse, neglect, exploitation, sexual violence or sexual harassment. They must never be made to feel ashamed for making a report.
- do not dismiss what the pupil/student tells them. All concerns must be acted upon rigorously;
- do not promise to keep it a secret. The team member must explain that they have a duty to share information to keep them safe and protect them;
- write down what the pupil/student tells them. This must be accurate and in the pupil's/student's words;
- immediately report the concerns to the DSL or deputy. If neither is available, the member of team member must report the information to the Headteacher, Principal or equivalent or Regional Director.

10.2 Team members must be alert to not just potential familial abuse and allegations, but also to pupils and students making allegations against team members or other children. In these situations, the Group's Managing Allegation Procedures must be followed. (See Section 24 for further details).

10.3 All concerns, however small they may seem, **must** immediately be reported to the DSL. This must be done verbally and then followed up **on the same day** and documented on the school's electronic recording system. The team member has a responsibility to ensure that action has been taken about the concern on the **following day**, and that the concern is documented on the system. If action is not taken in a timely way as the team member sees fit, they have a duty to escalate their concerns to the Headteacher, Principal or equivalent or Regional Director.

10.4 Team members must prioritise the pupil's/student's immediate safety. They must remain professional and adhere to all safeguarding and confidentiality procedures. After sharing the information with the DSL or deputy, they must not share it with anyone else.

10.5 On receipt of the information, the DSL must consider all information and then, in cases of serious concern, report this within **one working day** to the host authority, placing authority, Regional Director, and where relevant, the Local Authority Designated Officer or local equivalent.

11.0 Managing Referrals to Disclosure and Barring Service (DBS) and professional bodies

11.1 As a result of an allegation or investigation a referral may be required. This can include referrals to Disclosure and Barring Service, Disclosure Scotland, Social Work England, Scottish Social Services Council (SSSC) and other professional bodies, including the Care Council for Wales (CCW), Teacher Regulation Authority/ General Teaching Council for

Scotland (GTCS).

- 11.2 The Headteacher, Principal or equivalent of the school is responsible for making the referral at the appropriate time. The timing of the referral can vary by nation and by the severity of the concern. The Headteacher, Principal or equivalent must be familiar with, and follow, the national requirements and make the referral at the appropriate time.
- 11.3 If an employee is dismissed from employment due to a safeguarding concern or allegation, a referral to the appropriate body must be made. **It is an offence in all UK nations not to make a referral to the appropriate disclosure body.**
- 11.4 If a referral is made, at the point of completion the Headteacher, Principal or equivalent must notify safeguarding@ofgl.co.uk and the Human Resources Advisor peopleadvice@ofgl.co.uk of the referral and any other possible referrals to any relevant professional body in the United Kingdom, relating to the allegation made.
- 11.5 If an employee is dismissed from employment due to a safeguarding concern or allegation, a referral to DBS/ Disclosure Scotland must be made.
- 11.6 Where a teacher is dismissed or their services are no longer used because of serious misconduct, or might have been dismissed, or services ceased to be used had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

12.0 Partnership working and sharing information

- 12.1 Partnership working and the sharing of information is key in keeping children and young people safe. Everyone who has a role to play in caring for children and young people has a duty to share good quality information with the relevant professionals in a timely manner.

12.2 General Data Protection Regulations

All schools must ensure that they comply with the Group's Data Protection Policy which incorporates the GDPR requirements. The GDPR works around the principles of consent and assumes the automatic right of privacy to all individuals. This applies to pupil's/student's personal information, as well as that of team members and parents/carers.

GDPR is not a barrier to sharing safeguarding information. Safeguarding concerns must always be passed on. It is not necessary to seek consent to share information for the purposes of safeguarding and promoting the welfare of a child or young person provided that there is a lawful basis to process any personal information required.

Information can be shared without consent where there is good reason to do so, and the sharing of information will enhance the safeguarding of a child or young person in a timely manner. It is legitimate to share information without consent where:

- it is not possible to gain consent;
- the school cannot reasonably be expected to gain consent; and
- if to gain consent would place a child or adult at risk.

Where there is any doubt, the DSL should contact the Group's Legal Team for clarification.

All team members must complete the GDPR training and have a responsibility to ensure that they comply with the GDPR requirements.

- 12.3 Schools/ colleges must ensure that they inform pupils and students, parents and carers of how

their personal information will be stored and used. The following guidance is recommended for education team members: [Data Protection in schools](#)

- 12.4** Schools and colleges must ensure that they hold emergency contact details of the parents/carers of pupils and students. This is to be done with the agreement of the parents/carers. In line with [KCSiE 2025](#) schools and colleges must hold more than one set of contact details for each pupil/student, where reasonably possible.
- 12.5** Data breaches must be reported immediately to Group's Data Protection Officer as set out in the Group's Data Protection Policy.

Please also see:

[Information Sharing Advice for Safeguarding Practitioners](#) (Please that this advice is currently under revision, an updated draft is being consulted on: [DRAFT Information Sharing Advice](#))

[Improving multi-agency information sharing \(publishing.service.gov.uk\)](#)

13.0 Child-on-child abuse

- 13.1** All team members should be aware that children and young people can abuse other children and young people (often referred to as child-on-child abuse), children and young people of differing ages, as well as similar ages, can abuse one another.

Local Safeguarding procedures must be followed, and any incidents of sexual violence will be reported to the police. Schools should be part of discussion with statutory safeguarding partners.

- 13.2** It is essential that all team members understand that abuse is abuse and the importance of challenging inappropriate behaviours between pupils and students. Team members should familiarise themselves with the **Child-on-Child Abuse Policy and Sexually Harmful Behaviour Guidance**.

[KCSiE 2025](#) states: “Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.”

- 13.3** Team members must ensure that they create a school/college environment where pupil/student safety is paramount and where unacceptable or unsafe behaviour is not tolerated. Team members must be aware and alert to incidents of online abuse between children, consensual and non-consensual sharing of nude and semi-nude images, sexual violence and sexual harassment between pupils/students and bullying.

This includes upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification, or to cause the victim humiliation, distress or alarm. Team members must be alert to possible signs of child-on-child abuse. Inappropriate language must be rigorously and consistently challenged.

- 13.4** All team members should understand, that even if there are no reports in their schools, it does not mean it is not happening, it may be the case that it is just not being reported. Team

members are advised to maintain an attitude of '**it could happen here**' and be vigilant to any signs.

- 13.5** It is important that team members are aware that pupils/ students may not find it easy to tell an adult about their abuse. Pupils and students can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a team member may overhear a conversation that suggests a pupil/student has been harmed or a pupil's or student's own behaviour might indicate that something is wrong. If team members have any concerns about a pupil's welfare, they should act on them immediately rather than wait to be told. **Team members must act immediately and report any concerns regarding child-on-child abuse to the DSL.**
- 13.6** It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously.
- 13.7** Team members should explain to pupils and students in an appropriate way that the law is in place to protect them rather than to criminalise them. This should be explained in a way that avoids alarming or distressing them.
- 13.8** Child-on-child abuse is most likely to include, but may not be limited to:
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
 - abuse in intimate personal relationships between peers;
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence, such as rape, assault by penetration and sexual assault
 - sexual harassment, e.g. sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
 - causing someone to engage in sexual activity without consent,
 - consensual and non-consensual sharing of nude and semi-nude images and or videos
 - upskirting
 - 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)

These forms of abuse can happen inside or outside of school both offline and online.

- 13.10** A contextual safeguarding approach must be taken when considering possible child-on-child abuse. Children and young people who display harmful behaviours must be seen as potential victims themselves, and the wider environmental risks must be taken into account. Team members must challenge any gender bias or derogatory language used by team members or pupils/students. Team members must not dismiss any concerns brought to them by pupils /students. Team members can report concerns verbally, but they must ensure that all concerns are recorded onto the school's electronic recording system by the end of the school day.

[Shore Space](#) is an online resource developed by the Lucy Faithfull Foundation in collaboration with the Home Office, offering a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

- 13.11** It is also important to understand intra familial harms and any necessary support for siblings following incidents, this applies whether siblings attend the same or a different school.

- 13.12** When making decisions about how to deal with allegations, the age and understanding of the young person who has displayed harmful behaviour must be taken into consideration, as well as any relevant personal circumstances and how this relates to their behaviour.

Schools must consider any disparity in age between the young person who has displayed harmful behaviour and the victim, the impact the behaviour has had on the victim, and any element of coercion or violence.

- 13.13** DSL must deal with any concerns of child-on-child abuse immediately and sensitively. As much information as possible must be gathered from the victim and the young person who has allegedly displayed harmful behaviour in order to gain the facts of what has happened.
- 13.14** The language used must be sensitive, non-judgemental and must not blame the victim. Victims must be supported and reassured that their safety and welfare within the school is the priority. Risk assessments must be implemented where necessary.
- 13.15** Where the DSL believes that there has been significant harm caused to the pupil, a referral must be made to the local authority immediately. In agreement with the local authority, parents/carers must be informed. Where possible, as best practice, parents/carers are to be informed face to face.

If the local authority does not believe it meets their threshold for further action and the DSL is not in agreement, this must be challenged with the local authority.

13.16 After the outcome/conclusion of the incident:

- a contextual safeguarding approach must be taken;
- schools must take all necessary action to learn from the incident and prevent future incidents occurring, such as through targeted education around specific types of child-on-child abuse;
- support for the victim must be offered and provided where possible. Appropriate risk assessments must be implemented to provide reassurance and safety for the victim;
- schools must ensure that they **do not** adopt a victim blaming approach;
- the DSL must complete an investigation into the incident; The investigation must consider the incident itself as well as whether it is an isolated incident, and the personal circumstances of the young person who is alleged to have displayed harmful behaviour;
- if necessary, appropriate referrals must be made to support services for the young person who has displayed harmful behaviours;
- a risk assessment must be completed and implemented for the young person who has displayed harmful behaviours in order to safeguard them and other pupils and students.

14.0 Bullying (Please also see the *Anti-bullying Policy*)

- 14.1** Severe or persistent forms of bullying can result in Significant Harm, which is why those providing services for children and young people should have adequate policies, procedures and training to counter bullying. Bullying occurs when a person or group of people behave in ways which are designed to cause distress or to hurt a person or group of people. Bullying can be overt and plain for all to see. It can be subtle and insidious. Bullying can become part of the culture, recognised or believed by all or a significant number of people as 'acceptable'.

- 14.2** The Group has a zero-tolerance approach to bullying. Team members must help pupils and students to understand what bullying is and how to report it. Bullying must be dealt with as a safeguarding matter. Team members must report any bullying concerns to the DSL **on the same day**. The concerns must be documented appropriately.
- 14.3** Schools have a responsibility to ensure that those pupils/students who bully, are supported and helped to understand the impact of their actions.

- 14.4** Please see the following government guidance on preventing and tackling bullying in schools: [Preventing and tackling bullying](#) , [Mental health and behaviour in schools](#)
[Behaviour in schools: advice for headteachers and school staff](#)
See [Rise Above](#) for links to materials and lesson plans

15.0 Preventative Strategies

- 15.1** It is important that pupils/students are taught about how to keep themselves and others safe, including online. This preventative education will be effectively tailored to the specific needs and vulnerabilities of individual pupils /students.

For pupils and students who are non-verbal or have limited receptive and expressive communication and learning disabilities, more direct on-going observation is often required to support them and keep them safe, along with the direct modelling of safe behaviour by those responsible for their care and education. The support required must be tailored to the individual pupil's/ student's needs and be included in their Care Plan.

- 15.2** The school will take all appropriate action to ensure that pupils and students learn about appropriate relationships, keeping safe, online safety as well as sex and healthy relationships. Relationship, sex education (RSE) and health education lessons will focus on important age-appropriate issues in line with the [RSE and health education](#) statutory guidance. Team members must ensure that pupils and students have the opportunity to learn about safe relationships as well as who they can talk to if they have any concerns. Support and training materials for can be found here: [Teaching about relationships sex and health](#)

LGBTQ+ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

- 15.3** Pupils and students will be supported by team members to understand what abuse, neglect and exploitation are. Pupils and students must be listened to and enabled to report any abuse or neglect at the earliest opportunity. They should be given information about how to report abuse or any concerns about possible abuse and be able to access relevant websites in private and helplines such as Childline to seek advice and help.
- 15.4** The school/ college recognises that some pupils/students are more vulnerable by virtue of their complex health or behavioural needs, or disabilities. In these instances, all team members have a responsibility to be the 'eyes and ears', and report all concerns to the DS Lead.
- 15.5** Please also refer to Part Five of [KCSiE 2025](#): Child-on-Child Sexual Violence and Harassment.

16.0 Online Safety and Security

Please also see the *Web Filtering & Monitoring Policy*, *Staying Safe Online Policy* and *Mobile and Smart Technology Policy*.

- 16.1** There is a whole setting approach to online safety to help equip pupils and students with knowledge and understanding to stay safe online. The school/college helps and supports its pupils/students to recognise and avoid online safety risks and to help build their digital resilience. This is integrated into everyday learning and covered in detail as part of the RSE and health education curriculum.

There are a range of resources to provide support for online safety in schools at: [childnet.com](https://www.childnet.com)

Pupils/ students who are non-verbal or have limited receptive and expressive communication and learning disabilities will need further support. (Please see 15.1).

- 16.2** The school will work with parents and carers to help keep pupils/students safe online. Parents and carers will be informed about what their children and young people are being asked to do online, including the sites they will be asked to access and if their child/young person will be interacting with others online. The *Web Filtering & Monitoring Policy* includes information about the systems used to filter and monitor online use.

- 16.3** The Group requires safe and secure systems to be put in place within schools that limits the exposure to such risk. The Group operates a highly secure web filtering system on the internet link to the school to safeguard the school's computers and internet use and also offers safeguards on mobile phones and tablets used over the school's Wi-Fi network.

Web filtering and monitoring helps to keep pupils and students safe from illegal and inappropriate content and that they are protected from extremism online when using the school's Wi-Fi. The school works with the Group's IT Section to ensure that the filtering and monitoring systems are appropriate for the school, and are informed in part, by the risk assessment required by the Prevent Duty. The filtering and monitoring systems are reviewed at least annually.

South West Grid for Learning <https://swgfl.org.uk/> have created a [testing tool](#) that can be used to check the filtering system is blocking access to illegal child sexual abuse material, unlawful terrorist content and adult content.

- 16.4** If a team member has reason to believe that a pupil/student is experiencing harm or is at risk of harm, the reporting process set out in this policy in Section 10 must be followed immediately.

- 16.5** If a team member becomes aware of an online incident that is a cause for concern, they should:
- Provide reassurance to the pupil/student.
 - Take immediate action to report any criminal offences to the police and social care.
 - Inform the pupil's/student's placing authority and family as appropriate.
 - Review the supervision and support arrangements for the pupil/student accessing the internet.
 - Check the privacy and security settings on the pupil's/student's devices and account.

- Agree what action will be taken to prevent recurrence and reduce risk, the risk assessment should be reviewed and updated. Further online safety learning requirements should be considered for the pupil/student.

- 16.6** Digital technology and its related risks are developing rapidly. An annual review of the school's approach to online safety will take place, supported by an annual risk assessment that considers and reflects the risks children and young people face. A free online safety self-review tool for schools can be found at <https://360safe.org.uk/> or [LGfL online safety audit](#)
- 16.7** UKCIS provide a range of resources to support schools and colleges to further develop a whole setting approach towards online safety, including: [Using external expertise to support online safety education](#)

Further helpful resources for online safety:

UK Safer Internet Centre: [Appropriate Filtering and Monitoring](#), [Sextortion](#)

UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings](#)

DFE Advice [Harmful Online Challenges and Online Hoaxes](#)

National Crime Agency's CEOP education programme: [ThinkuKnow](#) and [Cyber Choices](#)

LGFL [Undressed](#) provides advice about how to teach children and young people about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

17.0 Children and young people who are absent from education

The DFE's statutory guidance [Working together to improve school attendance](#) sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns.

- 17.1** All team members must be aware of the risks associated with children and young people being absent from school or college. Prolonged or frequent absences can be a warning sign for a range of safeguarding issues, including neglect and exploitation - particularly county lines. It is important that the school or college's response to persistently absent pupils/students and children missing education must support the identification of such abuse, and in the case of absent pupils of compulsory school age, helps prevent the risk of them becoming a child missing education in the future.

It is important to be aware that children and young people already known to local authority social care, such as a looked after child, previously looked after child, a child in need or with a child protection plan, may be at increased risk from known safeguarding risks if they are absent from education may increase known safeguarding risks.

Where there are serious concerns that a missing child or young person may be at risk of serious harm, this must be escalated in line with the Serious Incident Notification Policy within **24 hours**.

- 17.2** Early identification and timely intervention are key to protecting vulnerable children and young people. Schools and colleges must follow the procedures set out in their Attendance Policy to monitor and manage attendance. The attendance of pupils of compulsory school age will be managed in line with legal requirements and statutory guidance as detailed in the School Attendance Policy.

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17.3 Attendance must be monitored through the setting's Senior Leadership Team meetings and governance.

17.4 The DSL must contact the main emergency contact as detailed on the pupil's/student's file should there be concerns regarding the pupil/student absent from education.

Team members must report all unauthorised absences to the DSL, who must make contact with the pupil's parent/carer immediately to establish the pupil's whereabouts. The DSL must inform the placing authority of pupils/students who are frequently absent.

17.5 The DSL is responsible for investigating any unexplained absences. Reasonable enquiries must be made to locate a pupil/student who is absent from education. The DSL **must** refer any safeguarding concerns regarding the absence of the pupil/student to the local authority. Cases where there are concerns regarding forced marriage or FGM must be referred to the police immediately. All information **must** be documented appropriately.

17.6 Pupils and students who are repeatedly absent from education are at increased risk of harm. Attempts must be made to talk to them about why they are absent from education. Records must be kept of those discussions.

Any safeguarding information which the pupil/student discloses must be shared **immediately** with the local authority. If the pupil/student discloses immediate safeguarding concerns, the DSL must share this information with the police.

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

18.1 Exploitation is a form of child abuse and can include sexual and/ or criminal exploitation. It occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and /or for financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

18.2 CSE and CCE can affect boys and girls and can include children and young people who have been moved (referred to as trafficking) for the purpose of exploitation. The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that both boys and girls can be at risk of criminal exploitation. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

18.3 Schools must write and implement a local exploitation procedure which team members must be familiar with. All team members **must** read the Group's Exploitation policy as well as refer to [KCSiE 2025](#)

18.4 All team members **must** know the definitions, signs and indicators of CSE, CCE and County Lines. DSL must provide ongoing training and learning to team members around exploitation. All team members **must** have training in exploitation.

18.5 Team members **must** report any concerns regarding exploitation **immediately** to the DSL and document their concerns appropriately **on the same day**. Where there are immediate concerns relating to a child's safety due to exploitation, DSLs must make a same day referral to the local authority and report the concerns to the police as well as to the Regional Director.

18.6 It is the responsibility of all team members to help children and young people know about

grooming and exploitation. Schools and colleges must ensure that pupils/students know who to talk to if they have any concerns for themselves or others.

Please also see [multi-agency principles - child exploitation and extra-familial harm](#)

[The Children's Society - Preventing Child Sexual Exploitation](#)

The [NWG Network](#) provides Information to help educate and prevent child exploitation and abuse across the UK. The Group has membership of the network for all team members which can be accessed through the chat/help facility on the [Welcome to the NFG Network](#) page, or by emailing network@nwgnetwork.org

19.0 Serious violence

19.1 All team members should be aware of indicators, which may signal children and young people are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a child or young person has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

19.2 All team members should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Further guidance for professionals can be found here:

[Advice to schools and colleges on gangs and youth violence](#)

[Criminal exploitation of children and vulnerable adults: county lines](#)

[County Lines Toolkit for Professionals](#) includes information on the signs of a child's involvement in county lines, published by the Home Office and The Children's Society.

20.0 'Honour'-based abuse including FGM and Forced Marriage

20.1 Honour based abuse (HBA) can be described as practices which are used to control behaviour within families or other social groups in order to protect perceived cultural and religious beliefs and/or honour. The term 'honour-based abuse and violence' relates to the offender/s interpretation of the motivation for their actions. It is a violation of human rights and for young victims it is a form of child abuse and is a child protection matter.

20.2 HBA can affect people of all ages but often begins early in the family home. Girls and women are particularly at risk; however, boys and men are also affected and may be at heightened risk if there are factors around disability, sexuality and mental health. Those subjected to it may find it particularly difficult to seek help as usual avenues seeking help, through parents or other family members may be unavailable.

20.3 HBA can take many forms, it can include: forced marriage; female genital mutilation; Breast ironing; virginity testing and/or physical, sexual and economic abuse and coercive control. Victims can experience multiple forms of abuse and multiple perpetrators can be involved.

20.4 If team members have a concern regarding a child or young person who might be at risk

of HBA or who has suffered from HBA, they must speak to the DSL (or deputy). As appropriate, the DSL (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

- 20.5 Teachers and support staff, along with regulated health and social care professionals in England and Wales, have a specific legal duty to report concerns regarding Female Genital Mutilation (FGM), ([under Section 5B of the Female Genital Mutilation Act 2003, section 74 of the Serious Crime Act 2015](#))** If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. In suspected cases of FGM, team members must refer to the local authority as well as the police. The DSL will assist and support team members with this.
- 20.6** Team members must read and be familiar with statutory guidance regarding reporting FGM 'FGM Fact sheet': [Female Genital Mutilation: the facts](#)
- 20.7** Since February 2023, the legal minimum age to enter into a marriage in England and Wales is 18. In these nations, it is a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

The Forced Marriage Unit can be contacted for advice or information on 020 7008 0151 or email fmv@fcdo.gov.uk. A [Forced marriage resource pack](#) has been designed to highlight examples of best practice and to help ensure that effective support is available to victims of forced marriage.

Multi-agency statutory guidance for dealing with **forced marriage**, can found at: [The right to choose government guidance on forced marriage](#)

- 20.8** The DSL must ensure that immediate concerns regarding potential abuse, harm, honour-based abuse, CSE and Trafficking or Radicalisation are shared **immediately** with the Regional Director and Chair of Governors, and that team members have documented them appropriately.

21.0 Preventing Radicalisation and the Prevent Duty

Team members must be familiar with the Protecting Children & and Young People from Radicalisation Policy

- 21.1 We fully recognise our responsibility to have arrangements in place to safeguard and protect children and young people from radicalisation. Section 26 of the Counterterrorism and Security Act 2015 places a statutory responsibility on schools and colleges to 'have due regard to the need to prevent people from being drawn into terrorism'. This is known as the [Prevent Duty](#)
- 21.2 All team members must be aware of the signs and indicators of radicalisation. Team members must be proactive in reporting any concerns, regardless of how small they may be, to the DSL who must assist team members to report all concerns regarding radicalisation to the Police as well as the Regional Director. Team members must document their concerns appropriately.
- 21.3 To safeguard children and young people who are vulnerable to radicalisation, DSLs will need to take a risk-based approach and consider an individual's behaviour in the context of wider influencing factors and vulnerabilities. Further information can be found at: [Understanding and identifying radicalisation risk in your education setting](#)
- 21.4 DFE has produced a Self-assessment tool to help schools and colleges in England review their responsibilities under the Prevent duty, which can be found here: [Prevent duty self-assessment tool for schools and further education providers](#) The tool helps schools to understand how well embedded their existing policies and practices are, and to encourage a cycle of continuous review and improvement. It contains requirements and recommends good practice activities to meet those requirements.
- 21.5 All team members must be aware of the local procedures relating to reporting radicalisation concerns.

22.0 Pupils and students requiring support with their Mental Health

- 22.1 We recognise that schools and colleges have an important role in supporting the health and wellbeing of their pupils and students.
- 22.2 Mental ill-health can be an indicator of a child or young person suffering or at risk of abuse, neglect or exploitation. All schools and colleges should have systems in place for identifying mental health problems and referring to appropriate agencies for additional support.

This will ordinarily be with the consent of the child/young person and their family. All details of concerns and any referrals or other support arranged for the child/young person should be documented on the school's/ colleges electronic recording system.

- 22.3 The [Mental Health and Behaviour in Schools guidance \(2018\)](#) provides guidance advice on how to create a whole school culture in promoting positive mental health outcomes for children and young people. This guidance is written for schools, but the interventions and support included may be helpful for colleges and other post 16 provision.

Public Health England provide [Every Mind Matters](#) to help teach RSE and health education, providing simple, practical advice for a health mind.

23.0 Physical Interventions

All team members must read and know the setting's Physical Intervention Policy and the Use of Restrictive Practices and Restraint Terms of Reference Policy.

- 23.1** While every school/college creates an atmosphere of nurturing, unconditional positive regard and warmth, the Group recognises that on occasion it may be necessary to use physical intervention to keep a child or young person safe. Physical intervention must be a last resort and must always be proportionate. Once the child/young person is safe and calm, it is essential that there is a debrief with them. It should be an open discussion with the team member encouraging the pupil/student to talk about how they feel and understand what happened.

The intervention and the follow-up action must be recorded on the school's/college's electronic recording system.

- 23.2** If a pupil/student makes an allegation after a physical intervention, it is important that the team member writes down as much information as possible. Team members must complete body maps immediately after the event and make an appropriate electronic record. Team members must also verbally inform the DSL (or deputy) and record it onto the school's/college's electronic recording system. **Medical attention must always be sought for the young person.** Team members must inform their parents or carers/ those with parental responsibility.

Allegations of harm relating to physical interventions must be reported to the Regional Director, the Director of Safeguarding/Safeguarding Adviser (safeguarding@ofgl.co.uk) and the Local Authority Designated Officer or local equivalent.

24.0 Allegations against team members

Please also see the Managing Allegations Against an Employee Policy

- 24.1** An allegation is any concern, complaint or disclosure that indicates a team member has:

- Behaved in a way that has harmed a child or young person or may have harmed a child or young person
- Possibly committed a criminal offence against or in relation to a child or young person
- Behaved towards a child/young person or children/young people in a way that indicates he or she may pose a risk of harm to children/young people; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children and young people.

- 24.2** All allegations must be treated seriously. Team members must maintain an open mind and suspend all judgement. Allegations must never be dismissed. When managing allegations, it is important that team members maintain a level of professional curiosity. Team members have a responsibility to look after themselves and not to place themselves into situations which could present as unsafe. Team members must report any concerns to the Regional Director and the DSL.

- 24.3** When a pupil/student makes an allegation about a member of team member, the team member receiving the complaint must:

- write everything down and document it on the school's/college's electronic recording system.
- immediately report the allegation to the DSL (or deputy).

The DSL must:

- take all allegations seriously regardless of whether a pupil/student has made previous allegations;
- report allegations to the Local Authority Designated Officer or local equivalent within one working day;
- ensure that they follow the Group's Managing Allegations Against an Employee Policy.

- 24.4** Part four of [KCSiE 2025](#) outlines the importance of retaining oversight of any concerns or allegations about agency or supply staff or any team member employed by a third party working in the school or college setting. Whilst the individual may not be employed by the Group, **schools and colleges must ensure** that allegations are managed properly.

[KCSiE 2025](#) states: *'In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Governing bodies and proprietors should discuss with the supply agency or agencies where the supply teacher is working across a number of schools or colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school or college, whilst they carry out their investigation.'*

- 24.5** If the allegation is regarding the Headteacher, Principal or equivalent then the Regional Director must be informed immediately. They will then seek advice from the Local Authority Designated Officer local equivalent.

24.6 All allegations made against team members must be reported to:

- the Regional Director
- Human Resources (peopleadvice@ofgl.co.uk)
- Director of Safeguarding/Safeguarding Adviser (safeguarding@ofgl.co.uk)

The Group recognises that managing allegations can be challenging and will support with the process. Please refer to the Managing Allegations Procedure for further details.

- 24.7** It is the responsibility of the DSL to ensure that all allegations are managed in line with local safeguarding partnership procedures.

25.0 Low-level concerns

Team members must read and follow the *Low Level Concerns Policy*

- 25.1** Team members must understand what low-level concerns are and be aware of the process for addressing low-level concerns.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that **an adult working in or on behalf of the school or college** may have acted in a way that is inconsistent with the Group's code of conduct, including inappropriate conduct outside of work, but does not meet the allegations threshold or is not considered serious enough to consider a referral to the local authority designated officer or local equivalent. ([KCSiE 2025](#))

Examples may include but are not limited to:

- being over friendly with children/young people; erosion of boundaries
- taking photographs of children/young people on their mobile phone;

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- having favourites; engaging with a child or young person on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language.

25.2 The Headteacher, Principal or equivalent is the ultimate **decision maker in respect of low-level concerns**

All low-level concerns must be shared with the Headteacher, Principal or equivalent, or the DSL. The **DSL must inform the Headteacher**, Principal or equivalent of all the low-level concerns, in a timely fashion according to the nature of each particular low-level concern.

If there are concerns about the headteacher, Principal or equivalent these concerns should be referred to a senior member of the Group (such as the Regional Director, Operations Director, Managing Director, Chief Operating Officer or Chief Executive Officer). If there is a conflict of interest in reporting the matter to any of these internal colleagues, the concern should be reported directly to the local authority designated officer or local equivalent.

- 25.3** Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.
- 25.4** Written records must be kept of the concerns in chronological order to establish a full picture of what is happening and if any child or young person may be at risk. Records should be reviewed regularly so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the Headteacher, Principal or equivalent should decide on an appropriate course of action.
- 25.5** Where there are three or more recorded low-level concerns in relation to the same team member, the Headteacher, Principal or equivalent must notify HR peopleadvice@ofgl.co.uk so the collective concerns can be reviewed and further action taken as required. Advice and support can also be sought from safeguarding@ofgl.co.uk All reviews must be clearly recorded on HR file and on the low-level concern log.

26.0 Working with the Local Authority Designated Officer or local equivalent

In all referrals, the DSL is the lead professional within the school/ college for ensuring that a timely response is received from the local authority. If a response is received which the DSL believes is inappropriate and does not prioritise the child or young person's safety, this must be escalated to the Headteacher, Principal or equivalent or Governors of the school/ college to agree further action.

27.0 Whistleblowing

- 27.1** We recognise that on occasion team members may feel that they are unable to tell someone within their immediate place of work about any safeguarding concerns that they may have. We also recognise that pupils and students will be unable to voice their concerns if they are in an environment where team members do not feel able to voice their concerns.
- 27.2** Team members have a duty first and foremost to the pupils/students in their school/college. Any concerns, regardless of how small they may seem, must be reported. DSLs and Headteachers, Principal or equivalent have a responsibility to ensure that they create an environment where team members feel safe to openly voice any concerns and feel listened to. It is also important that team members feel supported if concerns are raised about them. If team members see or hear about other colleagues' practice which they are concerned about, which potentially may cause emotional or physical harm to a pupil/student, or if the standard of

care being provided falls short of expectations, they must report this.

- 27.3** The Group has an anonymous telephone support system (Safecall) where team members are able to share any concerns that they may have, safely and without fear of reprisal. All whistleblowing concerns will be taken seriously and treated as such. Team members can call Safecall on **08009151571**, report online [Safecall](#) or email outcomesfirstgroup@safecall.co.uk

28.0 Alternative provision and work experience placements

Where a child or young person attends alternative provision e.g. college, horse-riding centre etc or a work experience placement, the school/college continues to be responsible for the safeguarding of that child/young person. The school/college must ensure that the provision has sufficient safeguarding arrangements in place and is able to meet the individual pupil's/student's needs.

Schools and colleges should obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school/college would otherwise perform in respect of its own staff. This includes written confirmation that the alternative provider will inform the commissioning school/college of any arrangements that may put the child/ young person at risk (i.e. staff changes), so that the commissioning school/college can ensure itself that appropriate safeguarding checks have been carried out on new staff.

Please also see the Alternative Provision Policy and the Work Experience Policy, and the DFE's statutory guidance to which schools and colleges must have regard to:

- [Alternative Provision](#) and
- [Education for children with health needs who cannot attend school](#)

29.0 Digital and Remote Learning

Where digital learning and remote learning options are provided for pupils and students, all team members should be mindful that the group's and school's/college's **safeguarding policies & procedures and Code of Conduct & Ethics Policy continue to apply at all times when working online or offline at any location.**

- 29.1** Acorn Digital Learning provides online teaching for those who currently find themselves without access to a school setting, or are unable to attend school for medical, mental health, anxiety or behavioural reasons. Acorn Digital Learning have produced a Live Online Risk Assessment, and Student Remote Learning policy and template can be utilised as required. Please email acorndigitallearning@ofgl.uk for information.
- 29.2** Data protection and GDPR considerations must be taken into account. This includes rules on signing pupils and students up to online services, and team members accessing personal data when working at home. It is recommended that team members are regularly reminded of the data protection and GDPR policies and procedures, whether they are working from the school/college or remotely.
- 29.3** The guidelines for digital learning below must be followed:
- Ensure parents and carers are aware of online safety advice and resources such as [Thinkuknow](#) and [Safer Internet Centre](#), [Net-aware](#), [Digital Parenting Pro](#)
 - If team members are concerned about a comment made online by a pupil/student or the work they share, the team member should report it to the DSL.
 - Team members, pupils and students should be fully dressed and take into account the background/ surroundings. Team members should use a communal area, and anything in the background that could cause concern or identify family members/ personal information, should be removed or a sheet used.

- The teacher may need to give guidance to pupils to remove items from view. If a pupil/student is inappropriately dressed or in an unsuitable setting (e.g. a bedroom) they must be removed from the video call.
- Team members must not enter into one-to-one tuition voice or video call with an individual pupil or student without SLT agreement. If there is a need for single pupil/student interaction, please ensure that a colleague is added to the call, or that a parent is present with the pupil/student.
- If a team member urgently needs to call a parent or pupil/student from their personal phone, the number must be withheld by dialling 141 first and a record of the call must be made e.g. an email to the Headteacher, Principal or DSL to explain the purpose of the call and any actions taken as a result of it.
- Home filters may block different content at a different level to the school's/college's filtering software; if this appears to be the case for one pupil/student in the group the teacher should revert to or suggest an alternative resource.
- Take care that any material provided to pupils/students to watch is age and developmentally appropriate. For instance, do not ask Year 9 pupils to watch a film with a 15 rating.
- Team members should model good online behaviour in all ways, including the language used to interact with pupils/students and colleagues, which should be respectful at all times. School and college leaders should make clear to team members the operating times for online learning (for example, only during the normal school day); no team member should engage with or respond to a pupil/student outside these times.
- Clear guidelines for connecting to a virtual classroom session will be given by the school/college, and the teacher will check their understanding.
- The same principles apply to virtual meetings between team members and parents as face-to-face meetings.

Further helpful resources for digital learning:

- DfE advice: [teaching online safety in schools](#)
- UK Council for Internet Safety (UKCIS) guidance: [Education for a connected world](#)
- UKCIS [External visitors guidance](#)

30.0 Home visits

Where team members need to make home visits, they should be mindful of their own wellbeing and safety if conducting visits to the homes of pupils/students and their families. Team members must follow the Lone Working Policy and any local procedures and guidance, including informing at least one other team member of their whereabouts and the time they plan to return to the school/college. Wherever possible, arrange for a colleague to accompany you. This is particularly important for visiting households with identified risks to the safety of professionals. You should discuss and assess those risks with the appropriate local authority.

31.0 Policy Review

This policy will be reviewed annually, as a minimum to ensure it is kept up to date with safeguarding issues as they emerge and evolve. Where necessary, updates will be made during the year.



Outcomes
First Group