Brontë Academy Trust

Great schools. Inspirational people. Strong foundations.

Bronte Academy Trust
MAT Child Protection and Safeguarding Policy

Reviewed By	Approved By	Date of Approval	Version Approved	Next Review Date
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STATEMENT OF INTENT

Bronte Academy Trust is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil inside and outside of our Trusts' premises. We implement a trust-wide preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken and that healthy relationships are promoted. The Trust is also committed to a zero-tolerance policy with regards to sexual harassment and violence.

This policy has been created to outline a clear framework to any aspects of safeguarding within the Trust and should be followed by:

- All members of staff
- Any school within the Trust
- Any local governing bodies and committees of the Trust
- Individual trustees and the board of trustees
- The Trust as a whole, including Trust staff
- Any associate members of the board of trustees and/or its committees

Each Academy (school) within Bronte Academy Trust has a Child Protection Policy which is published on their individual website and details their site-specific arrangements. This policy is updated annually in line with the DFE's 'Keeping Children Safe in Education' document.

A list of trust schools and their key Safeguarding personnel are included in **Appendix 1** of this document.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that trustees, headteachers and Trust staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to an appropriately trained person, e.g. the DSL or deputy DSL (DDSL) within their school.
- Ensuring pupils are taught how to keep safe and recognise behaviour that is unacceptable
- Identifying and making provision for any pupil who has been subject to, or is at risk of, abuse, neglect, or exploitation
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identity people who might pose a risk to children
- Ensuring that headteachers and any new staff and volunteers within the Trust are only appointed once all the appropriate checks have been satisfactorily completed

1. LEGAL FRAMEWORK

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended) ● Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crim Act 2015)
- Apprenticeships, Children and Learning Act 2009

- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

Statutory guidance

- DfE 'Keeping children safe in education' latest guidance
- DfE 'Working Together to Safeguard Children' latest guidance
- Home Office 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE 'Disqualification under the Childcare Act 2006'
- DfE 'Academy trust handbook 2026'
- HM Government 'Multi-agency statutory guidance on female genital mutilation'
- HM Government 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office 'Multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage'
- DfE 'Working together to improve school attendance'

Non - statutory guidance

- DfE 'What to do if you're worried a child is being abused'
- DfE 'Information sharing'
- DfE 'Academy trust governance guide'
- DfE 'Child sexual exploitation'
- DfE 'Recruit teachers from overseas'
- DfE 'Sharing nudes and semi-nudes; advice for education settings working with children and young people'
- DfE 'Teachers' 'Standards'
- DfE 'Meeting digital and technology standards in schools and colleges'
- DfE 'Filtering and monitoring standards for schools and colleges'
- DfE 'Restrictive interventions, including the use of reasonable force, in schools'

2. RELATED TRUST AND SCHOOL DOCUMENTATION

This policy operates in conjunction with the following school level and Trust wide policies:

- Allegations Against Staff Policy
- Anti-bullying Policy
- School Behaviour Policy
- Children Missing from Education Policy
- Cyber-security Policy
- DBS Policy
- Data Protection Policy
- Low Level Safeguarding Concerns Policy
- Online Safety Policy

- Prevent Duty Policy
- Looked after Children Policy
- Recruitment and Selection Policy
- Single Central Record Policy
- Records Management Policy
- Staff Code of Conduct
- Staff ICT and Electronic Devices Policy
- Suspension and Exclusion Policy
- Whistleblowing Policy
- User of Restrictive Intervention Policy

3 ROLES & RESPONSIBILITIES

Everyone has a role to play in ensuring the wellbeing and safety of children, young people, their families, and each other. Below is a brief description of those core responsibilities

3.1 All Staff

All staff will:

- Make sure they have undertaken the appropriate training for their role.
- Take responsibility to report any concerns, no matter what their role including Low Level Concern.
- Ensure they have a copy of part 1 & part 5 and Annex A/B of the latest version of 'Keeping Children Safe in Education' and that they have read and understand it.
- Be aware of the need to minimise their own vulnerability in not being alone with children or in situations that could render them vulnerable to poor practice and/or allegations against them; and
- Always be aware of the needs of young people and be vigilant for any possible signs of abuse.
- Never promise confidentiality
- Need to be aware of the local early help process and how to make referrals to the local authority

All staff must be aware of systems in school to support safeguarding:

- Bronte Academy Trust Safeguarding and Child protection Policy, their specific school Child Protection Policy.
- Behaviour policy which should include measures to prevent bullying, including cyberbullying, prejudice- based and discriminatory bullying
- Staff code of conduct, managing allegations against staff, reporting low level concerns & whistleblowing
- Safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods

All staff should receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.)

3.2 The Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) is a member of each school's Senior Leadership Team who is responsible for the strategic leadership of Safeguarding.
The DSL is the person to whom staff should pass their concerns and who will ensure a practical and efficient way of dealing with those concerns. The DSL will:

- The Designated Safeguarding Lead will adhere to the job description in the school's Child Protection Policy.
- Ensure an open and efficient route for staff to bring concerns to them of any sort and to have their concerns taken seriously.
- Ensure they are appropriately trained to carry out the role. ● Support staff in ensuring they receive appropriate training.
- Promote the procedural pathway within the Academy so staff are aware of the way to report concerns.
- Ensure the school's procedures are followed and adhered to when referring a child if there are concerns about possible abuse,
- Offer clear advice and support to staff bringing concerns or needing help.
- Consider whether concerns referred to him/her need to be referred to Children's Services Social Care.
- Offer appropriate feedback as necessary as to the progress of the concern.
- Maintain written records of concerns about a child/ young person even if there is no need to make an immediate referral and use the school's systems e.g. CPOMS or Safeguard as necessary.
- Work together with the Headteacher and Office Manager to ensure the school's Single Central Register is accurately maintained.
- Discuss with the Headteacher and/or Trust DSL/CEO any complex concerns.
- Ensure that all such records are kept confidentially and securely and are separate from pupil records.
- Ensure that an indication of further record-keeping is marked on the pupil record.
- Ensure those particularly complex cases are referred without delay, and especially where it involves a child or young person subject to a child protection plan.
- Follows the Local Safeguarding Partner's escalation policy where cases are not progressing in an acceptable manner.
- Gather, collate, and analyse as appropriate all relevant information for purposes of quality assurance.
- The designated safeguarding lead should take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems in place

3.3 Deputy Designated Safeguarding Lead(s)

Each Bronte Academy Trust school will appoint at least one Deputy Designated Safeguarding Lead who will formally provide cover and additional capacity for the DSL.
Each Deputy DSL will be trained to the same level as the DSL. In the event of the long-term absence of the DSL, the Headteacher will identify a Deputy DSL to undertake the duties of the DSL listed above.

3.4 The Head of School/Headteacher/Executive Headteacher

The Headteacher in each Bronte Academy Trust school is responsible for ensuring the Designated Safeguarding Lead is effective in their role of providing and accessing high quality services to safeguard and promote the welfare of children and young people accessing provision from their Academy including:

- Offer day-to-day support and guidance to the DSL as necessary.
- Oversee the promotion of safeguarding throughout the school, ensuring all staff are appropriately trained and aware of their responsibilities.
- Ensure cover is provided where necessary in the absence of the DSL.
- Offer supervision to the DSL in relation to their role and decisions made.

- Ensure that a senior member of staff is designated as the person in charge of Looked After Children and receives appropriate training.
- Encourage pupils and parents to inform the school of any concerns.
- Work with the representative of the Local Governing Body (LGB) to put mechanisms in place to ensure that pupils requiring safeguarding measures are monitored in relation to their situation and progress with their learning.
- Ensure all recruitment procedures follow safeguarding best practice based on advice from PACT HR.
- Contribute as appropriate to quality assurance processes; and
- Ensure sufficient allocation of time given to DSLs to undertake the role.
- Work together with the DSL to ensure the school's Single Central Register is accurately maintained.

3.5 The School Senior Leadership Team

The School Senior Leadership Team will support the Headteacher to discharge the duties to safeguard children and young people.
The School Senior Leadership Team will:

- Promote the importance of safeguarding throughout the school.
- Oversee the effectiveness of safeguarding systems, especially procedures, and review and report any changes that are required.
- Support the work of the DSL to ensure an effective process for dealing with concerns; and
- Ensure that the school fulfils its statutory duty to co-operate with other agencies and that the chain of accountability is clear from front line to senior level.

3.6 The Trust

The Trust will provide strategic leadership within Bronte Academy Trust for all aspects of safeguarding children and young people. Bronte Academy Trust will quality assure the safeguarding arrangements in all trust schools.

The Trust will:

- Ensure that all policies and procedures are reviewed and updated in line with national and local requirements and appropriate changes disseminated to all schools.
- Ensure that there are systems in place to support the effective management of Safeguarding, especially the role of DSLs, and training for all staff and supervision as appropriate.
- Ensure that there is available to Headteachers someone who can offer appropriate external advice and support with safeguarding concerns especially when they are complex and/or relate to allegations against staff.
- Ensure Quality Assurance processes are in place and oversee the information they produce to measure the progress and effectiveness of existing safeguarding frameworks.
- Produce information to the Trust Board in relation to Safeguarding in order to ensure that the Board can demonstrate that it is discharging its safeguarding obligations appropriately.
- Ensure that all schools' DSLs and DDSLs are offered ongoing supervision and support as necessary. This framework ensures a safe child-centred approach to support colleagues and DSLs will collaborate at least once a term through Bronte Academy Trust's safeguarding network.
- Maintain a Trust level record of complex safeguarding concerns or incidents involving children or staff that are reported to the CEO/Lead DSL.
- Ensure that all such records are kept confidentially and securely and are separate from all files that are accessible by the central team.

3.7 The Chief Executive Officer

The Chief Executive Officer, as Accounting Officer, through line management, will provide appropriate challenge and support to the schools to ensure the Trust and the academy schools it is accountable for are taking all opportunities to safeguard and protect the children and young people that access their services.

4. GOVERNANCE OF SAFEGUARDING

Bronte Academy Trust schools must appoint a Safeguarding Named Governor on every Academy Governance Committee (AGC), whose role it is to:

- Keep the AGC up to date with statutory safeguarding and child protection guidance, including anything issued locally by your school's safeguarding partners
- Inform the AGC of whether it needs to make any changes (e.g. in light of new regulations)
- Provide support and challenge to the school's Safeguarding Team
- Understand how safeguarding works in practice in the school
- To provide strategic leadership of safeguarding

Bronte Academy Trust has an appointed Trustee to take leadership responsibility for the whole Trust's safeguarding arrangements. However, the full Board of Trustees remains responsible and accountable for safeguarding arrangements across the Trust. Thus, the Board should facilitate a whole Trust approach to Safeguarding, whereby safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy. AGCs should ensure all staff undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring).

The AGC will regularly review the effectiveness of school filters and monitoring systems. They should ensure that the leadership team and relevant staff are:

- Aware of and understand the systems in place
- Manage them effectively
- Know how to escalate concerns when identified.

Trustees and Governors have a specified responsibility for the strategic oversight of Online Safety. The day-to-day leadership of safeguarding is delegated to the CEO and Executive Leadership Team, who work closely with Heads of School and Designated Safeguarding Leads (DSLs) to ensure that all statutory safeguarding duties are fulfilled.

Safeguarding governance is strengthened through a programme of termly safeguarding quality assurance visits completed by the Safeguarding Governor at each school. These quality assurance visits are overseen and supported by the CEO and the Trust Safeguarding Trustee, providing assurance regarding the effectiveness of safeguarding arrangements across the Trust. As part of these visits, each school's SCR is reviewed for compliance. Quality assurance visit outcomes are reported to local Academy Governance Committees (AGCs) and to the Trust Board, ensuring appropriate scrutiny, challenge, and support.

The Trust Safeguarding Trustee, Executive Heads, and Designated Safeguarding Leads meet on a termly basis to review safeguarding processes and policies, analyse safeguarding data, patterns and emerging trends, and share best practice across the Trust. This collaborative approach supports continuous improvement and helps ensure consistency in safeguarding practice across all schools.

The role of the Safeguarding Trustee, supported by the full Trust Board, is to provide appropriate challenge and support to the Executive Team and to seek assurance that the Trust is fulfilling its safeguarding responsibilities as set out in Keeping Children Safe in Education. The Safeguarding Trustee will provide a written assurance report to the full Board on a termly basis. This report will include safeguarding assurances relating to the letting of school premises to any organisation or individual, in accordance with statutory guidance and the Trust's lettings arrangements.

5. SAFEGUARDING & CHILD PROTECTION POLICIES & PROCEDURES

Each school must have in place a school-specific Safeguarding and Child Protection Policy which makes clear the procedure to follow in dealing with child protection concerns and incidents. This Policy must be consistent with and reflect statutory and non-statutory guidance, local [safeguarding] partner arrangements and procedures and the school's own context. It will be reviewed regularly, i.e. at least annually, and signed-off by governors. All school-based staff should have a copy.

Each school will promote the protection and welfare of children in partnership with parents, carers and colleagues from other agencies. They will work professionally, transparently and in children's best interests at all times.

Parents and carers are informed of the school policy on safeguarding and child protection, including how we keep children safe online, through the school website.

Relevant safeguarding and child protection policies, procedures and documentation are included in the induction package for all new staff.

6. TRAINING & INDUCTION

It is the responsibility of each school's governors and the Headteacher to ensure that appropriate and up to-date trustee, governor and staff training takes place in-line with statutory requirements. A record of all training, should be retained centrally and available for inspection

All governors and trustees receive appropriate safeguarding and child protection training at induction. The induction training will cover:

- The Child Protection and Safeguarding Policy
- The Staff Code of Conduct
- Part one of ‘Keeping children safe in education’ (KCSIE) (or Annex A, if appropriate)
- The Behaviour Policy
- The Children Missing from Education Policy, including the safeguarding response to children who are absent from education
- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring
- Information about the role and identity of the DSL and deputy DSLs

This training equips them with the knowledge to provide strategic challenges to test and assure themselves that the safeguarding policies and procedures in place in schools are effective and support the delivery of a robust whole school approach to safeguarding. Their training is regularly updated

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment
- Contextual safeguarding

- How to keep LAC and PLAC safe
- CCE and the need to refer cases to the National Referral Mechanism
- Updated online safety training

Schools will adopt a proportionate, risk-based approach to the level of information that is provided to ancillary, temporary staff and volunteers, e.g. see the latest version of KCSIE, Annex A for example.

Designated Safeguarding Leads (DSLs) and Deputy DSLs will be trained to the same 'level', in line with the latest version of KCSIE, Annex C and advice from local safeguarding partners. This training will be updated at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up to date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements
- How LAs conduct child protection case conferences and a child protection review conference, to enable the DSL to attend and contribute to these effectively when required
- The importance of providing information and support to CSCS
- How to be alert to the specific needs of children in need, pupils with SEND and / or relevant health conditions, and young carers
- The importance of internal and external information sharing
- The Prevent duty

The content of safer recruitment training will comply with the latest version of KCSIE.

7. THE SINGLE CENTRAL RECORD (SCR)

Each school must maintain a single central record (SCR). Minimally, the SCR will comply with the latest version of ‘Keeping Children Safe in Education’ Part three. It will be checked by Ofsted and can be checked at any time by a nominated governor or Bronte Academy Trust representative.

Schools have a legal duty to report 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

The legal duty to refer applies equally in circumstances where an individual is deployed to another area of work that is not regulated activity, or they are suspended

8. SAFER RECRUITMENT

The Trust’s full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in ‘regulated activity’ If, as a result of their work, they:

- Are responsible on a daily basis for the care of supervision of children
- Regularly work in the school at times when children are on the premises

- Regularly come into contact with children under 18 years of age

The DfE's **DBS Workforce Guides** will be consulted when determining whether a position fits the child workforce criteria.

The board of trustees will conduct the appropriate pre-employment checks for all prospective Trust employees, including internal candidates and candidates who have lived or worked outside the UK. This responsibility may be delegated by the trustees as required.

The appropriate DBS and suitability checks will be conducted for all trustees and local governors, volunteers, and contractors within the Trust.

The chair of trustees will undertake a suitability check by the DfE and an enhanced DBS check that will be conducted regardless of checks previously performed by other organisations or how recently these took place.

The Trust will refer to the DBS anyone who harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity, or they are suspended

9. LOW LEVEL CONCERNS / MANAGING ALLEGATIONS AGAINST ADULTS

The Trust takes allegations against members of staff very seriously and acknowledges that if concerns are not addressed as early as possible, they can create unsafe working environments and leave staff and children increasingly vulnerable.
The Trust has a 'Managing Allegations against Staff' Policy which should be followed in all cases where concerns are identified in relation to an adult working within the Trust, whose conduct affects/could affect pupil(s) welfare or may result in a potential safeguarding issue.

9.1 Low Level Concerns

Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early ● minimise the risk of abuse, and
- ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

9.2 What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in KCSIE. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that: is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Concerns about colleagues in the context of pupil welfare and Safeguarding may arise in several ways. Examples of behaviour that could require reporting a low-level concern could include, but are not limited to:

- poor attitude or practice that potentially impacts on the general wellbeing of children that need addressing
- aspects of poor practice witnessed by others
- staff speaking or behaving against the ethos of the Trust
- non-compliance with Trust's policies and procedures relating to Safeguarding
- being repeatedly over-friendly with children
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door

More specifically, allegations may be made against an adult working within the Trust by a child or colleague in relation to abuse. All the above will be seen as reportable matters and discussions must take place without delay with the Headteacher

9.3 Reporting low-level concerns

Where a low-level concern has been identified, this must be reported as soon as possible to the Headteacher/Trust DSL. However, it is never too late to share a low-level concern if this has not already happened. The DSL / Head of School will then use the Trust Low Level Concerns Reporting form to report the concern.

Where the Head of School / DSL is not available, the information will be reported to the deputy designated safeguarding lead who is a member of the senior leadership team.

Low-level concerns are not limited to Bronte Academy Trust employees but also includes supply staff, volunteers, contractors and any other adult who has direct or indirect contact with children. In this circumstance the normal reporting procedure applies by reporting to the DSL / Head of School who will complete the Trust Low Level Concerns Reporting form.

9.4 Reporting Staff Welfare Concerns

It is important to safeguard staff welfare and wellbeing. All staff have a duty to support each other. Where a staff member has a concern about a colleague's wellbeing or welfare, they must report this as soon as possible to the Headteacher.

Speaking directly with the Headteacher, Line manager, CEO or Lead DSL for the trust is always the best option.

Where a staff member wants to report any concern to the Headteacher and remain anonymous then their anonymity needs to be respected.

9.5 Allegations that may meet the harms threshold

However, certain allegations in relation to staff must be immediately reported by the Headteacher to the Trust Designated Officer (CEO) who is the statutory lead for dealing with and advising about such issues, specifically where a member of staff has:

- behaved in a way that has harmed a child or may have harmed a child and/or.
- possibly committed a criminal offence against or related to a child and/or.
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or

- behaved or may have behaved in a way that indicates they may not be suitable to work with children

The last bullet point above includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk.

Internal decisions in such cases should not be finalised without the advice of the Trust Designated Officer. The reasons why staff may not wish to report their colleagues must be understood. It would not be unusual for people to know and believe that practice is not acceptable but feel unable to respond because of the fear:

- They might have the concerns wrong.
- For their own job and prospects if they report another colleague.
- Of isolation by other staff.
- About what might happen to the member of staff in the long term.

It is particularly difficult if staff members are also close friends and/or partners in a relationship. It must be recognised that a child's welfare remains paramount at all times, and it can be extremely easy to lose sight of the impact on others of being on the receiving end of unacceptable and sometimes illegal behaviour.

Issues about attitude and poor practice may be dealt with internally and as part of the member of staff's development and competence. However, if such concerns are persistent and any plan with that member of staff has not affected change, advice should be sought, and appropriate people included in the decision-making process.

9.6 Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

ALLEGATION

Behaviour which indicates that an adult who works with children has:

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

LOW-LEVEL CONCERN

Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with an organisation's Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

APPROPRIATE CONDUCT

Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.

LOW-LEVEL CONCERN

Any concern - no matter how small, even if no more than a 'nagging doubt' - that an adult may have acted in a manner which:

- Is not consistent with an organisation's Code of Conduct, and/or
- Relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about the adult's suitability to work with children.

These categories help ensure concerns are identified, recorded and managed proportionately, in line with *Keeping Children Safe in Education* (KCSIE).

9.7 Recording low-level concerns

All low-level concerns should be reported to the DSL, or where they are not available, to a senior leader who is a DDSL. They will report the concern using the Low-Level Concerns reporting form which is held in confidential trust files. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted.

This form is stored confidential, held securely, and complies with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (see paragraph 109 for more information).

Records are reviewed at the Central Team level so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harm threshold, in which case it should be referred to the LADO.

Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

Information and records will be held in line with the Bronte Academy Trust Data Retention Policy

9.8 Responding to concerns about adults in school

If in doubt, consult the LADO

For full detail, see Keeping Children Safe in Education (2025), Part Four.

Concern or allegation shared with the DSL or DDSL

QUESTION 1
Is it about a current member of staff, supply staff, volunteer or contractor?

No →

Not about current staff
- Non-recent allegation by a child → LADO
- Adult disclosing abuse in their own childhood → advise them to report it to the police
- Other adults, e.g. parents → DSL

Yes ↓

QUESTION 2
Is the concern about the Headteacher?

Yes →

Refer to the Chair of Governors
They follow this process instead.

No ↓

QUESTION 3 · THE HARM THRESHOLD
Has the person:
- behaved in a way that has harmed a child, or may have harmed a child?
- possibly committed a criminal offence against or related to a child?
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children?
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children?

Yes to any →

DSL or DDSL contacts the LADO without delay
- Do not investigate first
- Follow the allegations procedure
- Supply staff: also tell the agency

No to all ↓

QUESTION 4 · LOW-LEVEL CONCERN
Has the person acted in a way that is not consistent with the Code of Conduct, and/or that relates to conduct outside work which has caused a sense of unease about their suitability to work with children?

No →

Appropriate conduct: no further action
Record the decision and the reasons for it.

Yes ↓

It is a low-level concern: what to do

1. Complete the Low-Level Concerns reporting form
- Name of the person sharing it
- Details, context and action taken
- Whether they wish to stay anonymous (respect this where reasonably possible)

2. Address the behaviour
Speak to the person, address the unprofessional behaviour and support them to correct it at an early stage.

Supply staff or contractors: also inform their employer, so any pattern can be identified.

3. Keep the record secure
Keep the form in confidential Trust files, held securely in line with the Data Protection Act 2018 and UK GDPR. Retain it in line with the Bronte Academy Trust Data Retention Policy.

4. Trust Safeguarding Team reviews records
They look for patterns of concerning, problematic or inappropriate behaviour.

Pattern of concern → school decides action, e.g. disciplinary procedures	Pattern meets the harm threshold → refer to the LADO	Wider cultural issues → revise policies or provide extra CPD

What is a low-level concern?

"Low-level" does not mean insignificant. It means the behaviour does not meet the harm threshold. A low-level concern is any concern, no matter how small, even if no more than a "nagging doubt", that an adult may have acted in a way which:
- is not consistent with the Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

10. MONITORING AND REVIEW

This policy will be updated as needed to ensure it is up to date with safeguarding issues as they emerge and evolve, including any lessons learnt.

The Trust will ensure that any child protection incidents at any of its schools will be followed by a review of the safeguarding procedures within that school and a prompt report to the governing board.

Declaration of Responsibility

This Accounting Policy was reviewed and formally adopted by Bronte Academy Trust on

.....12 November 2026.....Date



.....Signed Chair of Trustees



....Signed Chief Executive Officer

Appendix A Staff Disqualification Declaration

Name of Trust: Name of School

Name of staff member Position

Orders and other restrictions	Yes/No
Have any orders or other determinations related to childcare been made in respect of you?	
Have any orders or other determinations related to childcare been made in respect of a child in your care?	
Have any orders or other determinations been made which prevent you from being registered in relation to childcare, children's homes or fostering?	
Are there any other relevant orders, restrictions or prohibitions in respect of you as set out in Schedule 1 of the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018?	
Are you barred from working with children by the DBS?	
Are you prohibited from teaching?	
Specified and statutory offences	
Have you ever been cautioned, reprimanded, given a warning for or convicted of:	
● Any offence against or involving a child?	
● Any violent or sexual offence against an adult?	
● Any offence under The Sexual Offences Act 2003?	
● Any other relevant offence?	
Have you ever been cautioned, reprimanded for or convicted of a similar offence in another country?	
Provision of Information	
If you have answered yes to any of the questions above, provide details below. You may provide this information separately, but you must do so without delay.	
Details of the order restriction, conviction or caution:	
The date(s) of the above:	
The relevant court(s) or body/bodies:	
You should also provide a copy of the relevant order, caution, conviction, etc. In relation to cautions and / or convictions, a DBS certificate may be provided.	
Declaration	
In signing this form, I can confirm that the information provided is true to the best of my knowledge and that: ● I understand my responsibilities to safeguard children ● I understand that I must notify the headteacher/head of school immediately of anything that affects my suitability to work within the Trust. This includes any cautions, warnings, convictions, orders or other determinations made in respect of me that would render me disqualified from working with children	
Signed:	
Print name:	
Date:	

Appendix B - List of named personnel with Designated responsibility for Child Protection for Bronte Academy Trust and each school as of 1st September 2026

Executive Safeguarding Lead	Prevent Lead	Safeguarding Trustee	Chair of Trust Board
Asa Firth CEO	Asa Firth CEO	William Gore	Richard Norris

School	DSL DDSL	Email/Tel No. for DSL	Designated Safeguarding Governor	Chair of Governors
Oakworth	DSL: Ed Whitehead DDSL: Sam Layfield DDSL: Ruth Gavin DDSL: Danielle Blott DDSL: Georgina Kenney DDSL: Yvonne Hands DDSL: Philippa Walsh	Tel: 01535 642309 email:ed.whitehead@bronteacademytrust.org.uk	Chris Goodwin	James Hobson
Haworth	DSL: Ed Whitehead DDSL: Arnold Raistrick DDSL: Lucy Williams DDSL: Laura Stoker DDSL: Rachel Kitson	Tel:01535 642359 email:ed.whitehead@bronteacademytrust.org.uk	Dianne Killock	Andy Longden
Oldfield	DSL: James Travers DDSL: Lucie Keefe DDSL: Lisa Balderstone DDSL: Danielle George	Tel:01535 642394 email:james.travers@bronteacademytrust.org.uk	Sophie Jonas	Denise Booth
Lees	DSL: James Travers DDSL: Lucie Keefe DDSL: Claire Muldowny DDSL: Louise Kelly DDSL: Tamsin Blayney DDSL: Danielle George	Tel:01535 643320 email:james.travers@bronteacademytrust.org.uk	Gareth Williams	Jenny Mercer