



Bromley Schools' Collegiate Policy Document

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Safeguarding Policy

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2. Introduction

The Consortium Management Board and trustees of Impact Multi Academy Trust (the Lead MAT) are committed to safeguarding and promoting the welfare of children and young people and require all trainees, mentors, staff, trainers, examiners, visitors and volunteers to share this commitment to safeguarding.

This policy supplements, but does not replace, policies in place in placements schools. All trainees are required to familiarise themselves with each placement school's child protection and safeguarding policy, staff code of conduct and safer working practice guidance.

3. Aims

We aim to ensure that:

- All trainees and all associated with Bromley Schools' Collegiate are aware of their responsibilities with respect to safeguarding
- Trainees are properly trained in recognising and reporting safeguarding issues
- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All trainees have been deemed suitable to train to teach before being admitted to an ITT programme
- Effective systems are in place for reporting and recording concerns

4. Definition of safeguarding

Safeguarding and promoting the welfare of children is defined as the following:

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

Children includes anyone under the age of 18.

5. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all involved in the work of Bromley Schools' Collegiate, including contractors and visitors. Our policy and procedures also apply to trainees within placement schools, alongside school and trust safeguarding policies in place.

5.1 All trainees

All trainees will receive training in safeguarding within the central training programme prior to commencing placements. Training will cover [Keeping Children Safe in Education, 2025](#) and compliance with the most-up-to-date statutory guidance. They may additionally receive further in-school training and refresher training on placement.

All trainees will be aware of:

- The name(s) of staff responsible for child protection and their role and the name of the Designated Safeguarding Lead within their placement school(s).
- School systems which support safeguarding, including the school's Child Protection and Safeguarding Policy, the role and identity of the Designated Safeguarding Leads (DSL) and Deputy DSLs.

- Other relevant policies including the individual school's Behaviour Policy and any additional policies in place regarding online/e-safety.
- The early help process and their role in identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- What process to follow if they identify a safeguarding issue or a child discloses to them that they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs and indicators of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The wider environmental factors, which can influence behaviours of pupils creating safeguarding concerns. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. This contextual safeguarding will help assess whether wider factors are a threat to the safety and/ or welfare of the pupil.
- The risks children and young people face online how they can be supported and taught to stay safe online.
- Children and young people who may be more vulnerable, including those with special educational needs and disabilities, and how to support and safeguard them.
- Principles for information sharing which mean that in safeguarding children, information can be shared, without consent, where there is good reason to do so and where the sharing of information will enhance the safeguarding of the child (without delay and where gaining consent could put the child at risk).

5.2 The Designated Safeguarding Lead (DSL)

Each school has a DSL who is a member of the Senior Leadership Team (SLT). The DSLs take lead responsibility for child protection and wider safeguarding within schools.

The Designated Safeguarding Lead (DSL) is responsible for raising awareness of safeguarding, the co-ordination of child protection procedures and management of the liaison with social services and other agencies.

5.3 The Chair of the Consortium Board

The Chair will:

- Ensure the review of this policy, at least annually (and in response to any changes in guidance and, lessons learned)
- Remedy deficiencies in the Bromley Schools' Collegiate's safeguarding systems without delay, where necessary
- Work with the SCITT Director to ensure appropriate suitability checks are carried out for trainees prior to commencing an ITT course.
- Ensure allegations or concerns against adults are appropriately managed, liaising with the Local Authority Designated Officer (LADO) in the event of an allegation made against a trainee.

5.4 The Consortium Management Board

The Board has a duty to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

The Consortium Management Board will:

- Evaluate and approve the policy at each review
- Receive relevant updates on any safeguarding issues related to trainees
- Hold the SCITT Director to account for its implementation

5.5 The SCITT Director

The SCITT Director is responsible for the implementation of this policy, including:

- Ensuring that trainees:
 - are informed of systems which support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy
- Ensuring that all trainees receive appropriate safeguarding and child protection training within our programmes and as part of their induction
- Acting as the ‘case manager’ in the event of an allegation of abuse made against a trainee, where appropriate (see Appendix 1)

6. Legislation and statutory guidance

This policy is based on the Department for Education’s statutory guidance [Keeping Children Safe in Education 2025 Working Together to Safeguard Children](#), and the [DfE’s Academy trust governance guide](#)

This policy also links to the following legislation and guidance:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies to safeguard and promote the welfare of pupils at the school
- [The Children Acts 1989](#) and [2004](#), which provide a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children
- [Data Protection Toolkit for Schools](#), providing guidance to support schools with data protection activity, including compliance with the GDPR.
- [Teaching Online Safety in School 2019](#), which provides guidance to support schools to teach pupils how to stay safe online when studying new and existing subjects
- [Voyeurism \(Offences\) Act 2019 \(commonly known as the Upskirting Act\)](#)
- [Preventing Youth Violence and Gang Involvement](#)

This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

- This policy is also in accordance with the locally-agreed procedures of [Bromley Safeguarding Children Partnership \(BSCP\)](#), specifically:
- [London Borough of Bromley’s Thresholds of Need](#).

The Consortium Management Board recognises that trainees will be working in placement schools outside Bromley and that DSLs, safeguarding teams and trainees will need to refer to local procedures for reporting concerns to

Children's Social Care (MASH) and for Early Help in discussion with and liaison with the Designated Safeguarding Lead (DSL).

7. Equality statement

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

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

8. Confidentiality

Bromley Schools' Collegiate observes strict confidentiality in relation to personal data.

In partnership with our schools, we recognise that threats to safeguarding may sometimes require the sharing of sensitive data. In these instances, the principles below will be followed:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and the General Data Protection Regulations do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- Practitioners may share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and if to gain consent would place a child at risk.
- Trainees should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If trainees are in any doubt about sharing information, they should speak to the DSL (or deputy DSL) within their school
- Confidentiality is also addressed in this policy with respect to record-keeping, and allegations of abuse against staff in appendix 1

9. Training

9.1 All trainees

All trainees will undertake safeguarding and child protection training at induction to ensure they understand safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be in line with Keeping Children Safe In Education (KCSIE), 2025
- Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

All trainees will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Trainees will also receive regular safeguarding and child protection updates from the DSL within their placement school(s).

10. Mental Health and contextual safeguarding

Mental health is as important as physical health and we recognise the importance of good mental health for the safety and wellbeing of trainees, staff in school and pupils.

In line with Keeping Children Safe in Education (KCSIE) 2025, we recognise the strong link between pupils' mental health and safeguarding. Poor mental health may, in some cases, be an indicator that a child has experienced or is at risk of abuse, neglect, or exploitation. Equally, safeguarding incidents such as abuse, bullying, and exposure to online harms can have a significant impact on a child's mental health and wellbeing.

Expectations for Trainees

- Trainee teachers are not expected to diagnose or treat mental health conditions. Their role is to observe, record, and report concerns to the Designated Safeguarding Lead (DSL) or Deputy DSL within their placement school.
- Trainees should exercise professional curiosity when pupils display changes in mood, behaviour, or attendance that may indicate underlying mental health concerns.
- Where possible, trainees should familiarise themselves with the placement school's *designated mental health lead* or equivalent pastoral contact, and understand how this role links with safeguarding procedures.

Contextual Safeguarding

Trainees should also recognise that factors beyond the family or school environment may contribute to poor mental health and increased safeguarding risk. These can include peer relationships, community influences, social media, online harms, and exposure to violence or exploitation.

- When concerns arise, trainees must report them to the DSL, who will consider whether the concern should be addressed as part of early help, pastoral support, or a formal safeguarding referral.
- Trainees should remain mindful of the need to balance safeguarding vigilance with sensitivity, supporting pupils in a way that reassures them their concerns are taken seriously.

11. Online Safety

Online safety is based on addressing the following categories of risk.

The 4 key categories of risk

- **Content** – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

- Ensure trainees understand safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation.
- Ensure trainees, in partnership with placement schools, understand the expectations, roles and responsibilities around filtering and monitoring systems.
- Make sure trainees are aware of professional behaviours and expected conduct, for example that:
 - Trainees are allowed to bring their personal phones into school for their own use, but should limit such use to non-contact time when pupils are not present, and in line with school policies
 - Trainees will not take pictures or recordings of pupils on their personal phones or cameras

All schools and colleges must have “*appropriate filtering and monitoring systems*”

Awareness of systems and [DfE filtering and monitoring standards](#):

Trainees must familiarise themselves with the filtering and monitoring systems in operation at their placement school, including who has responsibility for oversight and how to raise concerns if systems are not effective.

Bromley Schools’ Collegiate expects all trainees to apply professional judgement when using IT systems in placement schools. Trainees should remain alert to attempts to bypass filters, or to inappropriate online activity by pupils, and report these promptly to the DSL.

Filtering and monitoring systems are not infallible. Trainees must use professional curiosity and report any concerns even if material is not blocked or flagged automatically.

Artificial Intelligence (AI) and emerging technologies:

AI-Generated Content Risks:

Trainees should be aware that emerging technologies, including artificial intelligence, may be used to generate inappropriate, abusive, or harmful content such as deepfake images or videos. Pupils may be exposed to or victimised through such technologies. These risks should be treated as safeguarding concerns and reported to the DSL.

Use of AI in Professional Practice:

Trainees must use AI tools in line with the Bromley Schools’ Collegiate AI policy and the policy in force within their placement school(s). AI should be used responsibly, ensuring that its use does not compromise safeguarding, confidentiality, or data protection. AI-generated materials must not be used to create or share images of pupils under any circumstances.

Future-Proofing:

The SCITT will review this policy annually to address emerging risks from new technologies, including artificial intelligence, virtual reality, and other digital environments that may present safeguarding concerns.

12. Prevent Duty

We have zero tolerance of extremist behaviour and ensure that our curriculum, care and guidance empower trainees to reject violent or extremist behaviour.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

Schools are expected to assess the risk of children being drawn into terrorism including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Trainees should be aware when it is appropriate to make a referral to Channel and Prevent Multi-Agency Panel (PMAP). Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals. An individual's engagement with the programme is entirely voluntary at all stages.

We acknowledge protection from radicalisation and extremist narratives as a safeguarding issue. We recognise that we have a duty of care towards pupils and that safeguarding against radicalisation and extremism is one of those duties. Exposure of children to extremist ideology can hinder their social development and educational attainment alongside posing a very real risk that they could support or partake in an act of violence.

“Safeguarding vulnerable people from radicalisation is no different from safeguarding them from other forms of harm.” Home Office – The Prevent Strategy. Since 2012, it has been required by law for teachers “not to undermine fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.”

Teachers, including trainee teachers, must not promote partisan political views in the teaching of any subject and are required to ensure that whenever political issues are brought to the attention of pupils a balanced presentation of the opposing views is offered. This requirement applies not only during scheduled lessons but in all other contexts.

We recognise that a child who is abused or witnesses violence may find it difficult to develop and maintain a sense of self-worth. The child in these circumstances may feel helpless and humiliated and may feel self-blame or be withdrawn or isolated within the community. We recognise that the school may be the only stable environment in the lives of children who have been abused or who are at risk of harm. Research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive. Staff should be aware that safeguarding incidents/behaviours can be associated with factors outside the family home and school and also between children and should consider the safeguarding risk of the pupils' context.

13. Allegations against another pupil (child on child abuse)

Trainees should recognise that allegations can be made against other children in the form of child on child abuse. Child on child abuse is likely to include, but may not be limited to, bullying (including cyberbullying), physical abuse (hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm), sexual violence, harm and/or harassment, consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as youth-produced sexual imagery or sexting), upskirting (typically this involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm) and initiation type violence and rituals.

Bromley Schools' Collegiate is clear that abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh' or part of growing up. Downplaying certain behaviours, for example dismissing sexual harassment as 'just banter' or '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. We recognises that child on child sexual violence and sexual harassment will be dealt with within placement schools, in accordance with Keeping Children Safe in Education (2025).

We recognise that child on child abuse may take place on the school site as well as in the community.

- a) When an allegation is made by a pupil against another pupil, trainees should inform the DSL any decisions will be made on a case-by-case basis.
- b) A record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.
- c) Social Services may be contacted to discuss the case. The DSL/Deputy DSL will follow through the outcomes of the discussion and make a social services referral where appropriate.
- d) If the allegations indicate a potential criminal offence, the police should be contacted at the earliest opportunity and parents/carers informed (of both the alleged perpetrator and the alleged victim)
- e) Upskirting is a criminal offence under the The Voyeurism (Offences) Act which came into force in April 2019

14. Reporting and acting on concerns

All trainees have a duty to report their concerns, as soon as possible, to the DSL/Deputy DSL within their school. They can be contacted via telephone, email or in person. All trainees need to report the safeguarding concern using the system in place within the school.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

It is essential that all adults who come into contact with children and young people in schools are vigilant and exercise professional curiosity for the following reasons:

- Children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected.
- Children may not recognise their experiences as harmful
- Children may feel embarrassed, humiliated, or being threatened due to their vulnerability, disability or sexual orientation or language barriers.

Trainee teachers should report concerns, however minor, to the DSL, especially since they can help build a picture of need.

We value the importance of building trusted relationships with children and young people since these facilitate communication.

In cases where concerns have arisen about a pupil, group of pupils or staff member these must always be referred to the Designated/Deputy Safeguarding Lead. They in turn will seek advice from the MASH team, the Local Authority Designated Officer and/or the Education Safeguarding Officer within the LA as appropriate.

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

The child should be kept safe and immediate contact should be made with the DSL to share the concern(s).

Figure 1 after section 22.9 illustrates the procedure to follow if there are any concerns about a child’s welfare.

Referrals should be made to the Multi-Agency Safeguarding Hub (MASH) immediately

A referral should be made to children's social care and/or the police immediately if it is believed that a child is suffering or likely to suffer from harm, or in immediate danger (ie. meets the thresholds at Level 4 or top of Level 3 of the Continuum of Need as defined by [London Borough of Bromley's Thresholds of Need](#)).

A referral will normally be made by the DSL but anyone can make a referral to Children's Social Care or make contact with the police.

- Do not at this stage consider arranging a EHA assessment or a multi-agency response.
- Tell the DSL as soon as possible if you make a referral directly.
- See the referral requirements for specific safeguarding incidents below.

We recognise that a referral to social care may be made in response to extra-familial risks and that these should be communicated to parents/carers, as appropriate.

14.2 If a child makes a disclosure to you

All trainee teachers must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

All trainees are expected to make a written record of any disclosures or concerns as soon as practicably possible after the concern arises. This written record should provide a clear and comprehensive summary of the concern as well as any action that they have taken or intend to take.

Body Maps may be used (according to a school's policy) to document and illustrate visible signs of harm and physical injuries on a child, and usually when the child has disclosed that someone has hurt them. The body map document should be used where an injury to the child is observed and, when completed, should be filed with the appropriate concern report.

Report the concern at the earliest opportunity to the DSL.

Alternatively, if appropriate, make a referral to children's social care (and the police, if appropriate) and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

14.3 If you have concerns about a child

(as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

Figure 1 after section 22.9 illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, report your concerns and/or speak to the DSL first to agree a course of action.

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

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

14.4 Escalation to Referral

If it is appropriate to refer the case to local authority children’s social care (High Level 3 or Level 4 in the [London Borough of Bromley’s Thresholds of Need Guidance](#)) or the police, the DSL will make the referral or support you to do so.

Referrals should be made to the Multi-Agency Safeguarding Hub (MASH) immediately.

If you make a referral directly you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded. If the child’s situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child’s situation improves.

Referrals can be made and advice sought from Health & Social Care within your Local Authority area.

Within Bromley

Telephone: 0208 461 7373/7379
Fax: 020 8313 4400
E-mail: candfhub@bromley.gov.uk
Address: The Civic Centre, Stockwell Close, Bromley, BR1 3UH
Out of Hours: Emergency Duty Team (5.00pm-8.30am and weekends) 0300 303 8671

Within other Local Authority Areas

Details for the children’s social care team within local councils can be found online <https://www.gov.uk/report-child-abuse-to-local-council>

The Schools' safeguarding personnel are aware that when making referrals to Social Services we must:

- Ensure all referrals are responded to
- Re-refer and/or contact the Designated Head of Service if the school does not consider the response to be adequate
- Use external agencies to support referrals that do not meet the threshold

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

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk are included in the Annex of [Keeping Children Safe in Education 2025 Part One: Information for all school and college staff](#)

Any teacher who either:

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

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

Unless they have been specifically told by the police not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff, including trainee teachers who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

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

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out or discovers that a pupil aged 18 or over appears to have been a victim of FGM must speak to the DSL who will follow our safeguarding procedures, to include making a referral if required.

14.6 If you have concerns about extremism

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

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

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

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

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

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

14.7 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 23.3. If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

14.8 Early help

If early help is appropriate (Level 1 to low Level 3 in [London Borough of Bromley's Thresholds of Need Guidance](#)) the DSL will generally lead and consider the following actions:

- Early help assessment (EHA)
- Submitting a referral form ([BCP Family Support Referral Form](#))
- Liaising with other agencies and setting up an inter-agency assessment as appropriate.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The EHA is designed as an assessment tool to facilitate early intervention and cooperation between agencies to improve outcomes for children/young people with additional needs.

A EHA might be used in the following circumstances:

- If there is concern about how the pupil is progressing in terms of their health, welfare behaviour, learning or any other aspect of their wellbeing.
- The school receive a request from the pupil or parent/carer for more support.
- The school is concerned about the pupil's appearance or behaviour, but their needs are unclear or are broader the school can address.
- The EHA can be used to help identify the needs of the pupil and/or to pool knowledge and expertise with other agencies to support the child/young person better.

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

14.9 Managing Reports of Sexual Violence and/or Harassment

There are four likely scenarios to consider when managing any reports of sexual violence and/or harassment. It is important in all scenarios that decisions and actions are regularly reviewed and updated to reflect on lessons learned. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour.

All concerns and reports of sexual violence and/or sexual harassment should be reported to the DSL, who will make appropriate decisions and take action.

Trainee teachers taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.

If the victim asks the school not to report or tell anyone about the sexual violence or sexual harassment there will be a need to balance the victim's wishes against the duty to protect the victim and other children. If a referral is made to local authority children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered.

The four scenarios are:

1. Manage Internally

- In some cases of sexual harassment, e.g. one-off incidents the safeguarding team may take the view that the children concerned are not in need of early help or referrals to statutory services and that it would be appropriate to handle the incident internally, through the behaviour policy and providing pastoral support.
- The principle that there is a zero tolerance approach to sexual violence and harassment and that it is never acceptable and will not be tolerated remains and underpins any action taken.
- All concerns, discussions, decisions and reasons for decisions should be recorded.

2. Early help

- In line with above, the safeguarding team may decide that the children do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges. It can be particularly useful to address non-violent Harmful Sexual Behaviours (HSB) and may prevent escalation of

sexual violence.

- Early help and the option to manage a report internally do not need to be mutually exclusive; a school could manage internally and seek early help for both the victim and perpetrator(s)
- The principle that there is a zero tolerance approach to sexual violence and harassment and that it is never acceptable and will not be tolerated remains and underpins any action taken.
- All concerns, discussions, decisions and reasons for decisions should be recorded.

3. Referrals to Social Care

- Where a child has been harmed, is at risk of harm or is in immediate danger, a referral should be made to Social Care.
- At the point of referral, the school will generally inform parents/carers of those involved, unless there are compelling reasons not to (if, for example, it will put the child at additional risk). Any such decision should be made in conjunction with Social Care.
- Where statutory assessments are appropriate, the DSL or deputies should be working alongside, and cooperating with, the allocated social worker.
- The school will not wait for the outcome of the investigation before protecting the victim and other children within school. The risk assessment will help inform any decisions. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the report and all other children at the school should be immediate.
- If the social care assessment concludes that statutory intervention is not appropriate, the school should be prepared to refer again if they believe that the child remains in immediate danger or at risk of harm.
- The principle that there is a zero tolerance approach to sexual violence and harassment and that it is never acceptable and will not be tolerated remains and underpins any action taken.
- All concerns, discussions, decisions and reasons for decisions should be recorded.

4. Reporting to the police

- Any report to the police will generally be in parallel with a referral to Social Care.
- Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police.
- Where a report has been made to the police, the school should consult with the police and agree what information can be disclosed to staff and others, on particular, the alleged perpetrator(s) and their parents/carers and the best way to protect the victim and their anonymity.
- At the point of referral, the school will generally inform parents/carers of those involved, unless there are compelling reasons not to (if, for example, it will put the child at additional risk). Where the parent/carer has not been informed it is especially important that the school supports the child in any decision that they make. This should be with the support of children's social care and any appropriate specialist agencies.
- Should it become clear that the police (for whatever reason) will not take further action, the school will continue to engage with specialist support for the victim and alleged perpetrator(s) as required.
- The principle that there is a zero tolerance approach to sexual violence and harassment and that it is never acceptable and will not be tolerated remains and underpins any action taken.
- All concerns, discussions, decisions and reasons for decisions should be recorded.

Unsubstantiated, unfounded, false or malicious reports

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL (or deputies) should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help and take action accordingly.

If a report is shown to be deliberately invented or malicious, the school should consider whether any disciplinary action is appropriate against the individual who made it as per the behaviour policy.

Ongoing Response

The needs and wishes of the victim should be paramount (along with protecting the child) in any response. Wherever possible, the victim, if they wish, should be able to continue in their normal routine.

We are aware that sexual assault can result in a range of health needs, including physical, mental and sexual health problems and unwanted pregnancy. Support should be given to the young people in signposting them towards relevant external agency support.

When it is clear that ongoing support will be required, school should ask the victim if they would find it helpful to have a designated trusted adult. The choice of any such adult should be the victim's (as far as reasonably possible).

Ongoing Considerations: Risk assessment

When there has been a report of sexual violence, the DSL will complete an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence will consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s)
- all the other children, (and, if appropriate, adult pupils and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms
- The time and location of the incident, and any action required to make the location safer.

Risk assessments will be recorded, shared with the children/young people and their parents/carers and kept under review. At all times, the school or college should be actively considering the risks posed to all their pupils and put adequate measures in place to protect them and keep them safe.

Victim and alleged perpetrator(s) sharing classes

This will inevitably involve complex and difficult decisions, including considering their duty to safeguarding children and their duty to educate them. It is important that each report is considered on a case-by-case basis and risk assessments are updated as appropriate. The best interests of the child should come first.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator(s) should be removed from any classes that they share with the victim, where this is possible. Alternatively it may be decided, in consultation with the victim, that they would want to swap or change classes however this decision must always be reached in agreement with the victim. The school also needs to consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school or college premises and on transport to and from school or college where appropriate. This is in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s).

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school should take suitable action, if they have not already done so. In all but the most exceptional of cases, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator(s) to remain in the same school would seriously harm the education or welfare of the victim (and potentially other pupils).

Where a criminal investigation into sexual assault leads to a conviction or caution, the school should, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion. Where the perpetrator(s) is going to remain at the school, the principle would be to continue keeping the victim and perpetrator(s) in separate classes and considering the most appropriate way to manage potential contact on both school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed.

The decisions reached and rationale will be recorded.

Reports of sexual assault and harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means that the offence did not happen or the victim lied. The process will have affected both the victim and the alleged perpetrator(s). Appropriate support should be given to both as required and consideration given to sharing

classes and potential contact as required on a case-by-case basis. The school should record and be able to justify their decision making.

Safeguarding and supporting the alleged perpetrator(s) and young people who have displayed harmful sexual behaviour

There is a difficult balancing act to consider. On one hand, there is a need to safeguard the victim (and wider pupil body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.

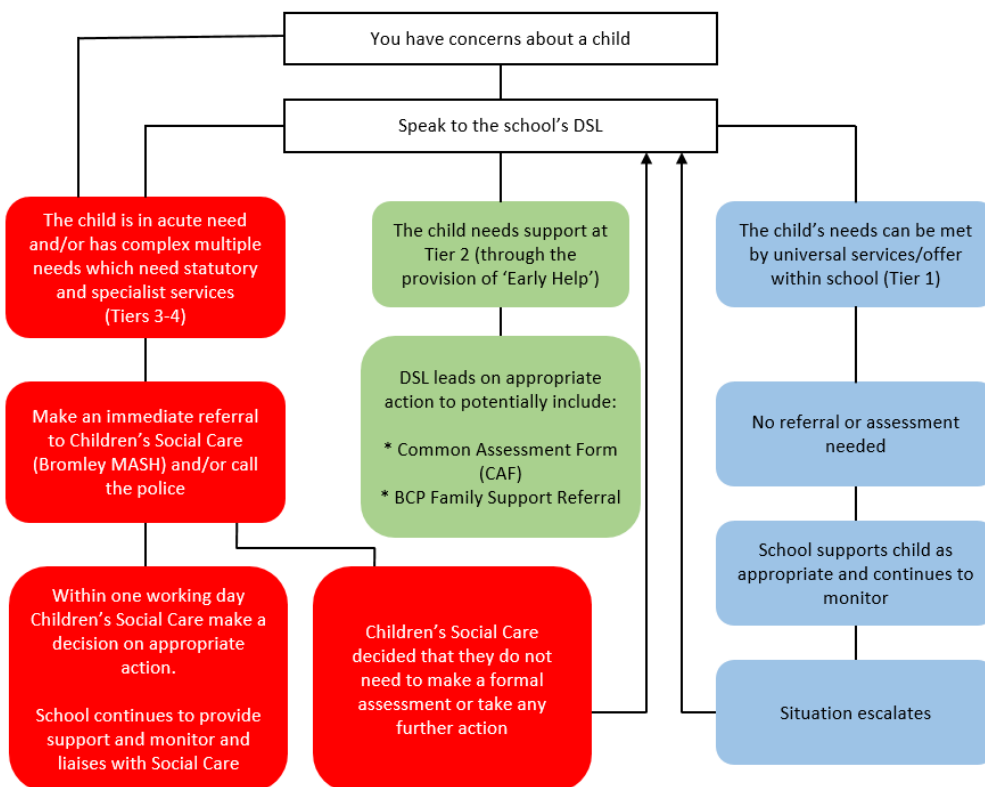
The importance of understanding intra-familial harms is recognised and schools will consider any necessary support for siblings following incidents.

There is a need to consider the proportionality of the response; support and sanctions should be considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet needs as well as potentially posing a risk of harm to other children.

It is important that the perpetrator(s) is/are also given the correct support to try and stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Figure 1: Procedure if you have any concerns about a child’s welfare

(Note – if the DSL is unavailable, this should not delay action. See sections 14.1 and 14.3 for what to do.)



15. Supporting Pupils

The DSL (or the responsible delegate) will:

- a) Meet regularly with a pupil that is subjected or at risk of a child protection plan.

- b) Notify Social Services as soon as there is significant concern.
- c) Encourage self-esteem and self-assertiveness.
- d) Promote a caring, safe and positive environment within the school.
- e) Liaise and work together with all other support services and those agencies involved in the safeguarding of children.
- f) Provide a variety of interventions for support both within school and via outside agencies. This may include counselling, pupil advising, mentoring, behaviour or anger management.
- g) Investigate and refer to the relevant agency, any of the following attendance issues: regular, repeated absence; a absence at the end of a holiday period; persistent lateness.
- h) Manage all information in line with Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers (2018).
- i) Have due regard to the relevant data protection principles, which allows for personal information to be shared (and withheld) for the purposes of keeping children safe (Data Protection Act 2018 and GDPR; KCSIE paras 114-122
- j) Recognise that all matters relating to Child Protection are confidential.
- k) Reassure pupils that their concerns are being taken seriously and that they will be supported and kept safe in order they do not feel like they are creating a problem by reporting abuse, sexual violence or sexual harassment.

15.1 Pupils with special educational needs, disabilities, or health issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions have additional needs and may be more vulnerable to safeguarding issues. It is accepted that their vulnerabilities may be missed owing to their SEN and therefore may need to receive more pastoral support to ensure these barriers are overcome.

Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Schools will provide extra pastoral support for pupils with SEN and disabilities.

Some children may be more vulnerable to safeguarding issues as a result of their special educational need. These may include children with SEMH:

In accordance with a school's Special Educational Needs Policy, pupils who may have SEMH concerns are identified and placed on the SEN register. Pupils might be identified by staff, parents, the pupils themselves or at transition. There are many reasons a pupil may experience SEMH issues ranging from bereavement to co-morbidity with other special educational needs including:

- ADHD - Attention Deficit Hyperactive Disorder
- ADD - Attention Deficit Disorder
- ODD - Oppositional Defiant Disorder
- Attachment Disorders
- Diagnosed Depression
- Diagnosed Anxiety
- Eating Disorders
- Low mood, depression and suicidal thoughts

Social, emotional and mental health concerns may sometimes be triggered by other safeguarding issues such as: domestic violence, abuse, sexualised behaviour and other childhood traumas.

For more information please refer to the SEND Policy for the school.

15.2 Pupils with a social worker

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

The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Where schools are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes.

For example, it will inform decisions about:

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

15.3 Looked-after and previously looked-after children

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

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

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

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

As part of their role, the designated teacher will:

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

16. Notifying parents or carers

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

Other staff, including trainee teachers, will only talk to parents or carers about any such concerns following consultation with the DSL.

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

In the case of allegations of abuse made against other children, the school will normally notify the parents or carers of all the children involved.

17. Supporting Trainees

We recognise that trainees working in school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting. We will support such trainees by providing an opportunity to talk through their anxieties with the DSL or DDSL within school or a member of the central team and to seek further support as appropriate.

18. Low-level concerns

At Bromley Schools' Collegiate and within our placement schools we have created and embedded a culture of openness, trust, transparency and professional curiosity. Expected behaviours are set out in the staff code of conduct within each placement school. Trainees must comply with any placement school-specific policy on reporting low level concerns.

It is accepted that there are occasions when school staff, as professionals, have to act in a particular way in order to protect the health, safety and welfare of their pupils. Such situations could put the adult in a potentially vulnerable position and perhaps cause them, with hindsight, to consider that they might have chosen to act in a different manner.

There may be occasions when an incident occurs which is out of the ordinary and which causes a trainee to have doubts about the behaviour of an adult towards a pupil or another child [Such doubts which fall below the threshold for a Safeguarding Concern Report and so may be referred to as low-level concerns].

The reporting of low level concerns enables schools to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the schools are clear about professional boundaries and act within these boundaries, and in accordance with our ethos and values.

There may also be occasions when a trainee teacher, has concerns about how their own behaviour in a specific situation might be misinterpreted. It is important that any occasions or incidents which might give rise to such concerns are reported to the DSL within school and shared with your mentor. In the vast majority of cases, there will be a perfectly innocent and reasonable explanation for what has occurred.

The procedure for self-reporting or reporting a concern of this nature is called a 'low level concern' and should be reported to the DSL within school, or according to any school specific procedures.

The circumstances in which trainees should raise a low level concern are as follows:

- any incident where they feel that their actions or behaviour towards a pupil could be misinterpreted;
- any incident which a trainee is aware of actions of a colleague towards a pupil which could be misinterpreted;
- any incident of which a trainee is aware where the interactions of a colleague with a pupil are not appropriate to the pupil's age or need at that time;
- inadvertent email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols;
- any unsupervised contact with a pupil other than in the context of a one-to-one lesson or discussion about academic, extracurricular or pastoral issues or other situations which fall within expected boundaries of professional conduct;
- any incident where a member of staff has been alone with a pupil or pupils in a vehicle where this has not been authorised in advance;
- any inadvertent **and** potentially inappropriate social contact with pupils outside of school (such as restaurants or pubs);
- one-to-one contact with a pupil on a school trip [residential / non-residential] which falls outside expected boundaries of professional conduct;

This is not intended to be an exhaustive list but is representative of the circumstances where a low level concern is expected to be made.

Anything which causes a trainee to have a 'nagging doubt' about the way in which other adults behave or interact with pupils (or their own actions could be viewed) should be notified, in order to protect both pupils and the trainee and members of staff involved.

NB. Where there is evidence that a professional boundary has been broken and the threshold for a Safeguarding Concern Report has been met, low level concerns must be bypassed and the usual Safeguarding Concern reporting lines must be followed.

Distinguishing Allegations and Low-Level Concerns

In line with *Keeping Children Safe in Education (KCSIE) 2025*, concerns about adults working with children fall into two categories:

1. Allegations that meet the harm threshold

These are concerns that a trainee, member of staff, or volunteer 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 in a way that indicates they may not be suitable to work with children (including behaviours in their private life that raise safeguarding concerns)

Allegations of this nature must be reported immediately to the Headteacher of the placement school and the SCITT Director, and will be managed in line with statutory guidance and the Local Authority Designated Officer (LADO) procedures.

2. Low-Level Concerns

A low-level concern is any concern, no matter how small, that an adult working with children (including trainees) may have acted in a way that is inconsistent with the Staff Code of Conduct, or that could be interpreted as falling short of expected professional standards.

Examples include:

- Being over-familiar with pupils
- Using inappropriate language
- Breaching professional boundaries (e.g. texting a pupil, being alone without good reason, social contact outside school)
- Conduct that may give rise to a “nagging doubt” about professional behaviour

Low-level concerns do not meet the threshold for LADO involvement, but they must still be reported, recorded, and addressed. This ensures early intervention, maintains professional boundaries, and prevents a culture in which abuse could be normalised or minimised.

Key Principles

- All concerns, whether they meet the harm threshold or are considered low-level, must be reported promptly.
- Where it is unclear whether a concern meets the harm threshold, it should be treated as a potential allegation until assessed by the DSL/Headteacher/SCITT Director.
- Low-level concerns should be recorded in line with data protection principles, with clear outcomes and review.
- Reporting low-level concerns is not punitive — it is intended to safeguard children and protect trainees and staff by ensuring transparency and accountability.

19. Allegation Management

For details regarding the management of allegations of abuse against staff and trainees see Appendix 1.

20. Further information

[Keeping Children Safe in Education 2025 Part One: Information for all school and college staff](#) and the annex within this document contains important information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read this annex.

APPENDIX 1: Allegations of abuse made against staff (including trainees)

All allegations against a member of staff, including a trainee teacher, should be taken seriously and reported to the Headteacher straight away. Do not investigate, as this is confidential information and should not be discussed with anyone, including the member of staff who has had the allegation made against them.

All references in this policy to a member of staff, relate to trainee teachers.

The policy refers to a staff member's behaviours inside school and also their behaviour with regard to their own child/children/foster children or adopted children. Bromley Schools' Collegiate and the placement school(s) have the right to know whether a trainee has been investigated by the police or social care in order to assess whether there may be implications for children with whom the person is currently working.

- a) The Headteacher (within the placement school) on all such occasions will discuss the content of the allegation with the LADO (Local Authority Designated Officer for Managing Allegations Against Adults Working with Children) and will inform and liaise with the SCITT Director.
- b) The school will manage allegations against staff and other adults working with children in accordance with the agreed procedures for Managing Allegations of Abuse Against Adults Working with Pupils, Section 4 KCSiE and as set out in the LADO procedures for the relevant Local Authority.

It is essential that any allegation of abuse made against a teacher or other member of staff in school (including trainees, volunteers and/or supply staff) is dealt with fairly, quickly and consistently in a way which provides both effective protection for the pupil whilst supporting the person who is the subject of the allegation. All allegations should be followed up and the following procedures adhered to. Bromley Schools' Collegiate will follow the protocols in place within the relevant local authority. We recognise that trainees and volunteers who are currently working in a school are counted as a staff member should an allegation be made.

A 'case manager' will lead any investigation as follows:

Staff Group who the concern is against	Case Manager	
Trainee*	Headteacher (in placement school)	*Seek advice and guidance from the SCITT Director
Mentor	Headteacher (in placement school)	
BSC Staff	Chair of Consortium Board/Lead Headteacher	

Our procedures for dealing with allegations will be applied with common sense and judgement.

In the event of an allegation being made against a trainee teacher, the case should be referred to the Headteacher **immediately** and the SCITT Director should be informed immediately.

An allegation made in respect of any of the following should be reported to Local Authority Designated Officer on the same day:

- An allegation that a member of staff has behaved in a way that has harmed a pupil or may have harmed a pupil.
- An allegation that a member of staff may have committed a criminal offence against or relating to the pupil.
- An allegation that a member of staff has behaved towards a pupil or pupils that indicates she/he is unsuitable to work with children.
- An allegation that a member of staff is having a sexual relationship with a pupil. Employees of the school are in positions of trust in respect of the pupils, even if consensual (see ss16-19 Sexual Offences Act 2003).

The parents or carers of the pupil involved should be informed as soon as possible. They should be kept informed of the investigation made by the school and told the outcome if there is not a criminal prosecution.

The Headteacher **should** inform the accused trainee as soon as possible after first discussing the matter with the Local Authority Designated Officer and discussing the case with the SCITT Director.

If the allegation is suspected to involve gross misconduct or it is in the interests of the school, a pupil, an employee or the member of staff, the SCITT Director **may** immediately suspend the placement whilst the investigation proceeds, following discussion with the Headteacher of the placement school and Lead Headteacher (Chair of Consortium Board). Withdrawal from placement is not a disciplinary action and will be reviewed to ensure that it is not unnecessarily protracted.

Whilst withdrawn from placement, the trainee should be informed of the progress of the case and wherever possible a timescale for action should be agreed. They will additionally be provided with a point of contact within the Collegiate and signposted to relevant support.

Where withdrawal from placement is being considered, an interview should be arranged. Normally, the interview should be undertaken outside pupil contact time. The Headteacher should consult with and seek advice from the Local Authority Designated Officer.

If the trainee withdraws from the course, every effort should be made to reach a conclusion regarding the allegation. Any child protection allegations will still be followed up in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible if the criteria are met.

Unsubstantiated, false or malicious allegations

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Headteacher will consider whether to take disciplinary action in accordance with the School's Behaviour Management Policy.

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

Confidentiality

It is important that in accordance with Keeping Children Safe in Education (September 2025); the schools make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.