

Three Counties Academy Trust



Safer Working Practices Policy

#SG52

Last amended 20th March 2026 (v1.1)

Subject to annual review. To be reviewed no later than 19th March 2027

Version history

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Common abbreviations and acronyms

AA	Admissions Authority	GPA	Government Procurement Arrangement
AAI	Adrenaline Auto-Injector (Epi Pen)	HASH	Herefordshire Association of Secondary Heads
ACM	Asbestos Containing Materials	HBV	Honour Based Violence
AFH	Academies Financial Handbook	HR	Human Resources
AHT	Assistant Headteacher	H&S	Health and Safety
AIR	Attendance Intervention Reviews	HoS	Head of School
APIs	Application Programme Interfaces	HSE	Health and Safety Executive
BAME	Black, Asian and Minority Ethnic Backgrounds	ICO	Information Commissioners Office
BCP	Business Continuity Plan	IHP	Individual Healthcare Plan
BFR	Budget Forecast Return	IRMS	Information and Records Management Society
CYPMHS	Child and Young People's Mental Health Services	IWF	Internet Watch Foundation
CEO	Chief Executive Officer	KCSIE	Keeping Children Safe in Education
CFO	Chief Financial Officer	KS1/2/3/4	Key Stage 1/2/3/4
CIF	Condition Improvement Fund	LAC	Looked After Child
CIN	Child in Need	LADO	Local Authority Designated Officer
CLA	Children Looked After	LGB	Local Governing Body
CMIE	Child Missing in Education	LLC	Low-Level Concerns

COO	Chief Operating Officer	LSA	Learning Support Assistants
COSHH	Control and Substances Hazardous to Health	MASH	Multi-Agency Safeguarding Hub
CP	Child Protection	MAT	Multi-Academy Trust
CPD	Continuing Professional Development	MFA	Multi-Factor Authentication
CSCS	Children's Social Care Services	MFL	Modern Foreign Language
CSE	Child Sexual Exploitation	NCSC's	National Cyber Security Centres
CTIRU	Counter-Terrorism Internet Referral Unit	NPQEL	National Professional Qualification in Executive Leadership
CWD	Children with Disabilities	PA	Persistent Absence
DBS	Disclosure and Barring Service	PAN	Published Admission Number
DDSL	Deputy Designated Safeguarding Lead	PECR	Privacy and Electronic Communications Regulations
DfE	Department for Education	PEP	Personal Education Plan
DHT	Deputy Headteacher	PEEP	Personal Emergency Evacuation Plan
DSE	Display Screen Equipment	PEx	Permanent Exclusion
DSL	Designated Safeguarding Lead	PLAC	Previously Looked After Child
DPO	Data Protection Officer	PP	Pupil Premium
EAL	English as an Additional Language	PSHE	Personal, Social and Health Education
ECT	Early Career Teacher	PSED	Public Sector Equality Duty

EHA	Early Help Assessment	PTFA	Parent, Teacher and Friends Association
EHCNA	Education, Health and Care Needs Assessment	RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
EHCP	Education, Health and Care Plan	RHE	Relationships and Health Education
EHE	Elective Home Education	RSHE	Relationships, Sex and Health Education
ELSA	Emotional, Literacy and Support Assistant	SALT	Speech and Language Therapist
ESFA	Education and Skills Funding Agency	SARC	Sexual Assault Referral Centre
EVC	Educational Visit Coordinator	SBM	School Business Manager
EWO	Education Welfare and Safeguarding Support Officer	SCCs	Standard Contractual Clauses
EYFS	Early Years Foundation Stage	SDQ	Strengths and Difficulties Questionnaire
FBV	Fundamental British Values	SEMH	Social, Emotional, and Mental Health
FGM	Female Genital Mutilation	SENCO	Special Educational Needs Coordinator
FOI	Freedom of Information	SEND	Special Educational Needs and Disabilities
FSM	Free School Meals	SLA's	Service Level Agreements
FTS	Find a Tender Service	STEM	Science, Technology, Engineering and Maths
GAG	General Annual Grant	TA	Teaching Assistant
GDPR	General Data Protection Regulation	TCAT	Three Counties Academy Trust
GIAS	Get Information about Schools	VSH	Virtual School Headteacher

Statement of intent

Three Counties Academy Trust (TCAT) recognises that the welfare of all of our pupils is paramount; therefore, we are dedicated to fulfilling our duty of protecting all pupils. To achieve this, this policy will be implemented at all times to ensure that staff understand their responsibilities to safeguard and promote the welfare of pupils.

TCAT and our schools are committed to taking all reasonable steps to ensure the safety and wellbeing of pupils. The safeguarding culture of our schools are partly exercised through the development of respectful, caring and professional relationships between adults and pupils, as well as by all staff members demonstrating integrity, maturity and good judgement.

This policy brings together elements of policy and practice across a range of TCAT policies and will act as a tier 1 approach to ensuring staff follow policy and procedure. It should be used in conjunction with the listed policies where more detail is required.

NB. Where the term “parent” or “parents” is used this includes those who act as carers or have parental responsibility.

1. Legal framework

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

- Children Act 1989
- Education Act 2002
- The Education (Health Standards) (England) Regulations 2003
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The School Staffing (England) Regulations 2009 (as amended)
- Equality Act 2010
- The Education (Pupil Referral Units) (Application of Enactments) (England) (Amendment) Regulations 2012
- The Education (School Teachers' Appraisal) (England) Regulations 2012
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- DfE 'Keeping children safe in education'

Where legislation has been passed or updated during the shelf life of this policy, we will always apply the latest version available irrespective of the version quoted here.

This policy operates in conjunction with the following policies:

- Behaviour Policy
- Spiritual, Moral, Social and Cultural (SMSC) Education Policy
- Educational Visits and School Trips Policy (CU10)
- Gifts, Hospitality and Anti-Bribery Policy (FI13)
- Cyber-Security Policy (FI15)
- Staff ICT and Electronic Devices Policy (FI16)

- Data Protection Policy (FI20)
- Minibus Policy (GN10)
- Disciplinary Policy and procedure (HR3)
- Whistleblowing Policy (HR25)
- Staff Code of Conduct (HR26)
- Intimate Care Policy (SD4)
- Child Protection and Safeguarding Policy and Procedures (SG1)
- Prevent Duty Policy (SG2)
- Allegations of Abuse Against Staff Policy (SG5)
- Photography and Images Policy (SG9)
- Physical Intervention Policy (SG7)
- Reporting Low-Level Safeguarding Concerns Policy (SG11)
- Children Missing Education Policy (SG15)
- Home Visit Policy (SG23)
- Online Safety Policy (SG43)

Central TCAT policies have the policy number identified, e.g. "SG1". Where no policy number is identified this indicates the policy is a school specific policy available from an individual TCAT school's website.

2. Roles and responsibilities

The Trust Board and where delegated, Local Governing Bodies are responsible for:

- The overall implementation of this policy
- Ensuring that each TCAT school complies with its duties under the relevant child protection and safeguarding legislation
- Guaranteeing that appropriate safeguarding policies, as well as the staff code of conduct, are distributed, adopted and monitored
- Ensuring that the correct safeguarding and child protection procedures are implemented within every aspect of school life
- Guaranteeing that the policies, procedures and training opportunities across TCAT schools are effective and comply with the law

- Ensuring that a member of the Trust Board is nominated to liaise with the LA and/or partner agencies on issues of child protection, and in the event of allegations of abuse being made against the Executive Leadership, Headteachers/Heads of School, Members, Trustees or Local Governors
- Certifying that there are procedures in place to handle allegations against members of staff, volunteers and supply staff
- Confirming that there are procedures in place to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned

The Executive Headteacher/CEO is responsible for:

- Promoting a culture of openness and support across TCAT
- Ensuring that systems are in place for concerns to be raised across TCAT
- Adhering to statutory responsibilities to check staff that work with children across TCAT, taking proportionate decisions on whether to ask for any checks beyond what is required
- Having a clear expectation that staff will inform them of any relationship or association that may have implications for safeguarding all pupils
- Safeguarding the welfare of all staff and identifying whether arrangements are needed to support any members of staff

Headteachers/Heads of School are responsible for:

- Promoting a culture of openness and support within their school
- Ensuring that systems are in place for concerns to be raised within their school
- Ensuring that none of their staff members are placed in situations which make them particularly vulnerable
- Ensuring that the policies and procedures adopted by the Trust Board, particularly concerning referrals of cases of suspected abuse and neglect, are followed up by their staff members
- Keeping records of any significant judgements that their staff members have made, ensuring that all appropriate considerations have been made and justifications evidenced
- Recording any areas of disagreement and, if necessary, referring the matter to another agency, e.g. the LA.
- Guaranteeing that there are systems in place for pupils to express their views and give feedback within their school
- Appointing a member of their SLT to the role of DSL as an explicit part of the role-holder's job description

- Appointing at least one member of their staff to the role of deputy DSL
- Considering how pupils at their school may be taught about safeguarding through teaching and learning opportunities, as part of providing a broad and balanced curriculum
- Ensuring that all staff who need to share special category personal data are aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share (and withhold) information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent or if to gain consent would place a pupil at risk
- Having a clear expectation that staff will inform them of any relationship or association that may have implications for safeguarding their pupils
- Safeguarding the welfare of their staff and identifying whether arrangements are needed to support any members of staff

All staff are responsible for:

- Being accountable for the way in which they exercise authority, manage risks and use resources
- Keeping pupils safe by protecting them from abuse, neglect and other contextual safeguarding concerns
- Always acting in a correct and professional manner, treating pupils, colleagues and parents with respect and dignity
- Understanding the responsibilities that are part of their role and being aware that sanctions will be applied if these provisions are breached
- Always acting in pupils' best interests by considering whether their actions are warranted, proportionate, safe and applied equitably
- Not acting inappropriately in the presence of pupils, including the use of inappropriate language or discussing personal relationships
- Making carefully considered judgements, drawing on experience and knowledge, to secure the best interests and welfare of pupils
- Avoiding any conduct which could be misconstrued or lead a reasonable person to question their motivation and intention
- Discussing any misunderstandings, accidents or threats with their Headteacher/Head of School, DSL or deputy DSL
- Taking responsibility for their own actions and behaviour
- Not using their position of trust to gain access to information for their own advantage and/or causing detriment to others
- Ensuring that they do not use their position or power to intimidate, threaten, coerce or undermine pupils and parents
- Not using their status or standing to form or promote relationships with pupils that are inappropriate
- Making sure that pupils' feelings are taken into account when determining what action to take
- Providing a safe environment in which pupils can learn
- Identifying pupils who may need extra help or who are suffering, or likely to suffer, significant harm

- Taking appropriate action and working with other services as required
- Support social workers to take decisions about individual children, in collaboration with the DSL
- Promoting a professional image through dress and appearance which is appropriate for their role, compliant with professional standards and cannot be viewed as offensive, such as revealing or provocative clothing
- Informing their Headteacher/Head of School of any cautions, convictions or relevant orders accrued during their employment, and/or if they are charged with a criminal offence and understanding that information will be shared with the Executive Headteacher/CEO

3. Procedures

Staff members, volunteers and any other adults working with pupils follow the procedures set out in TCAT's Child Protection and Safeguarding Policy and Procedures at all times.

During their induction, staff will be made aware of the systems across TCAT and within their school that support safeguarding including, but not limited to, the following:

- Child Protection and Safeguarding Policy and Procedures
- Behavioural Policy
- Staff Code of Conduct
- The response to pupils who go missing from/in education
- The identity and role of their DSL and any deputies

All staff members will undergo child protection training as part of their induction, including training on online safety. This training is updated regularly. All staff will receive child protection and safeguarding updates via email and staff meetings as required, and at least annually. All staff will be made aware of their local early help process and understand their role in it.

DSLs and their deputies will undergo training every two years – the training will cover several areas including online safety and the Prevent duty.

All members of staff will continuously develop their understanding of the signs and indicators of abuse. All members of staff know how to respond to a pupil who discloses abuse following the procedure outlined in the Child Protection and Safeguarding Policy and Procedures.

All parents will be made aware of the responsibilities of staff members with regards to child protection procedures, and the Child Protection and Safeguarding Policy and Procedures will be made available to them.

If at any point there is a risk of immediate, serious harm to a child, an immediate referral will be made to children's social care, and the police if appropriate.

4. Confidentiality

TCAT recognises that all matters relating to safeguarding and child protection are confidential. All personal information recorded by staff members will be kept confidential and secure. Information will be disclosed about a pupil to other members of staff on a need-to-know basis only. Members of staff are expected to treat all information they receive about pupils and families in a discreet and confidential manner. All staff members will be made aware of what information can or must be shared (or withheld) and under what circumstances.

Advice will be sought from DSLs, their deputies or the SLT concerning sharing information which any TCAT school holds and information which has been requested. The correct procedures for discussing and responding to sensitive subjects, such as allegations against staff, will always be followed.

Staff have a professional responsibility to share information with other agencies in order to safeguard children. Staff cannot make promises to pupils that they will keep anything discussed a secret.

5. Curriculum

All lessons will have clear and written plans.

Pupils will be encouraged to use self-expression and staff members will not overstep personal and professional boundaries.

All curriculum materials will be justifiable and appropriate for the lesson plans. Care and consideration will be given to ensure that class materials and resources cannot be misinterpreted and that they clearly relate to the learning outcomes identified by the lesson plan.

Staff members will not enter into or encourage discussions which may offend or harm others. Fundamental British values will not be undermined at any time. Prejudicial views and personal opinions will not be expressed by staff members and staff members will not attempt to impose their

personal values, attitudes or beliefs on pupils. Extra care will be taken in areas of the curriculum where usual boundaries or rules are less rigorously applied, such as drama.

Care will be taken to comply with the school's Spiritual, Moral, Social and Cultural (SMSC) Education Policy, which will be rigorously reviewed to ensure that it is lawfully and consistently applied.

6. Gifts and favouritism

Each TCAT school will ensure that any gifts received or given which may be misconstrued are declared and recorded. TCAT has a Gifts, Hospitality and Anti-Bribery Policy that all staff will act in accordance with at all times.

Gifts will only be given to pupils as part of an agreed reward system or small gifts, such as sweets, which are distributed equally. All pupil selection processes are undertaken and agreed by more than one member of staff to ensure that the process used is fair and not exclusive. Staff members will not behave in a manner which is either favourable or unfavourable to individual pupils. Any reward given to a pupil will be in accordance with agreed practice, consistent with that school's Behaviour Policy, recorded, and not based on favouritism.

It is unacceptable for staff members to receive or give gifts on a regular basis or of any significant value. Staff will ensure that they do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment.

7. Contact and communication with pupils

Staff members will:

- Not seek to communicate or respond to contact with pupils, other than contact that is necessary to carry out their role
- Ensure that their communications are open and transparent, meaning that they cannot be interpreted as inappropriate behaviour
- Not provide their personal details, or the personal details of others, to pupils
- Ensure that they establish safe and responsible online behaviours, working to local and national guidelines
- Use technologies wisely and in accordance with TCAT's Staff ICT and Electronic Devices Policy
- Not contact a pupil over social media
- Ensure that any contact or use of technologies could not bring TCAT, their school or themselves into disrepute

Where possible, staff will be provided with TCAT-owned devices, such as cameras and mobile phones, rather than them being expected to use their own on, for example, school trips.

Any planned social contact with pupils or parents will receive prior approval from the Headteacher/Head of School, e.g. when it is part of a reward scheme. Staff will not be involved in communication of a personal nature with pupils or parents during school hours. Staff members will inform their Headteacher/Head of School of any regular contact they have with a pupil that could give cause for concern. Staff members will inform their Headteacher/Head of School of any relationship with a parent that extends beyond the usual parent/professional relationship.

The Headteacher/Head of School or another member of the SLT will be informed of any requests or arrangements where parents wish to use a member of staff's services outside of the workplace, such as private tutoring. The issue will be discussed, and the Headteacher/Head of School's approval will be needed prior to the event.

If a pupil or parent seeks to establish social contact in-person or using technology, or if this occurs coincidentally, staff members will inform their Headteacher/Head of School and exercise their professional judgement to decide how to act under those circumstances.

8. Intimate and personal care

Intimate and personal care will be conducted in line with TCAT's Intimate Care Policy.

Pupils will be encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practicable. Pupils who may require intimate care will have a written plan in place and all pupils where appropriate will be actively consulted regarding their own care plans. The supervision needs of pupils will always be considered, and staff members will only remain in the room when their support is required.

A signed record will be kept of all intimate and personal care tasks undertaken and, where these have been carried out in another room, will include times left and returned. TCAT recognises the importance of pupils being entitled to respect and privacy at all times, especially when in a state of undress.

Staff members will:

- Adhere to TCAT's Intimate Care Policy at all times
- Always explain to the pupil what is happening before a care procedure begins

- Make colleagues aware of the task being undertaken
- Consult with a colleague where any variation from the agreed plan is necessary and record or report the justification for any variations, sharing the information with the pupil and their parents
- Avoid any visually intrusive behaviour and announce themselves before entering changing rooms
- Not partake in any of their personal care in the presence or sight of pupils
- Not assist with intimate tasks that the pupil is able to undertake independently

9. Physical contact

TCAT's Physical Intervention Policy outlines what is considered as appropriate contact between staff and pupils and includes clear expectations of behaviour and conduct.

Physical contact will take place only when it is necessary in relation to a particular activity. It will take place in a safe and open environment, and the extent of the contact will be made clear and undertaken with the permission of the pupil. Any incidents of physical contact outside of the provisions outlined in the Physical Intervention Policy between pupils and staff are recorded.

Staff will regularly be given appropriate training on the use of physical intervention. Staff members will be informed of relevant information regarding vulnerable children in their care on a need-to-know basis.

Physical contact will never be secretive, be conducted for the gratification of the staff member, or represent a misuse of authority. If a member of staff believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive, the incident and circumstances will be immediately reported to their Headteacher/Head of School or DSL and recorded. Where appropriate, the DSL will consult with the LADO.

Physical intervention can be used to prevent a pupil from:

- Committing a criminal offence
- Injuring themselves or others
- Causing damage to property
- Engaging in behaviour prejudicial to good order

Great care and consideration will always be exercised to ensure physical intervention is not used in a manner which could be considered unlawful. Where it can be anticipated that physical intervention is likely to be required, a plan will be put in place which the pupil and parents have agreed to.

10. Home visits

All home visits will be justified and recorded in detail and unannounced home visits will be avoided wherever possible. A risk assessment will be undertaken prior to a planned home visit, which will include an evaluation of any known factors regarding the pupil, parent and any others living in the household, and TCAT's Home Visit Policy will be followed.

Headteacher's/Head of School will ensure that staff members are not exposed to unacceptable risk. Staff members will have access to a mobile phone and an emergency contact during any home visit. If a parent is not in attendance during a home visit, staff members will not enter a pupil's house, unless it is in an emergency.

Staff will:

- Agree the purpose of a home visit with their Headteacher/Head of School prior to the visit
- Adhere to all agreed risk management strategies
- Ensure that there is visual access and/or an open door in one-to-one situations
- Make detailed records of the home visit, including times of arrival and departure
- Discuss any behaviour or situation which raises concern with their Headteacher/Head of School

Consideration will be given to visits outside of 'office hours' or in remote or secluded locations. If little or no information is given during the assessment prior to a home visit, the visit should not be made alone.

11. Transport

The safety and welfare of pupils is the responsibility of each TCAT school until pupils are with their parents and both TCAT and our schools are committed to taking all possible safety measures to ensure the safety of pupils.

Headteacher's/Heads of School will obtain evidence that any vehicle used by their school is safe, e.g. that it has a valid MOT certificate. Headteacher's/Heads of School will ensure that any staff member driving a TCAT vehicle has the appropriate licence and insurance for the vehicle. Headteacher's/Heads of School will ensure that drivers are fit to drive and that their judgement is in no way impaired and ensure that there is a valid insurance policy in place that covers the driver and the vehicle for the intended use. A risk assessment will be completed that covers the possible risks concerning travel using various modes of transport, and the control measures that can be introduced to mitigate those risks.

Consideration will be given to the potential distraction of the driver and the supervision of passengers. Headteacher's/Heads of School will identify the specific needs of pupils travelling and assess if any require close supervision. If close supervision is necessary, another adult will travel in the vehicle. All plans for transporting pupils will be agreed upon by the Headteacher/Head of School in advance of the journey.

Staff members will not offer pupils transport outside of their normal working duties, other than in an emergency or if a pupil is at risk. These circumstances will be recorded and reported to their Headteacher/Head of School and the pupil's parents.

Pupils' specific or additional needs will always be taken into account and details of all journeys will be recorded, including the nature of the journey, the route and the expected time of arrival. Any impromptu or emergency arrangements will be recorded and suitably justified.

12. Educational visits

During educational visits, a staff member will always have another adult present, unless otherwise agreed with their Headteacher/Head of School. A risk assessment will be undertaken prior to the trip, in accordance with TCAT's Educational Visits and School Trips Policy.

Parental consent will be obtained prior to school trips.

Staff members will remain professional at all times and will not behave in an inappropriate manner. Staff members will not share a bedroom with pupils, unless it involves a dormitory situation in which the arrangements have previously been discussed with the Headteacher/Head of School, parents and pupils. Sleeping arrangements for residential visits will be confirmed with parents prior to the visit, ensuring that there is a safe staff:child ratio and a suitable gender mix of staff members.

Staff will take particular care when supervising pupils in the less formal atmosphere of an educational visit where a more relaxed discipline or informal dress and language code may be acceptable; however, staff will ensure that their behaviour will not be interpreted as seeking to establish an inappropriate relationship or friendship.

13. First aid and medication

First aid and medication will be administered in line with TCAT's Supporting Pupils with Medical Conditions Policy. Each TCAT school will ensure that there are designated trained individuals to undertake first aid responsibilities, including paediatric first aid if relevant. Staff training will be monitored and updated as required.

Staff members will always act in the best interest of the pupil and explain to the individual what is happening. All plans and action taken will be conducted in line with pupils' individual health care (IHC) plans.

A record will be kept of any medication administered and by whom and parents will be informed when first aid or medication has been administered and the reason for it. Following discussion with parents, pupils who are competent will be encouraged to take responsibility for managing their own medicines and procedures. Concerns regarding the amount or type of medication being administered to a pupil will be discussed immediately with the DSL.

Under no circumstances will staff members work with pupils whilst taking medication, unless medical advice confirms that they are able to do so.

Staff medication on the premises will always be stored securely and out of reach of pupils.

14. Images and videos

All staff will act in accordance with TCAT's Photography and Images Policy.

Images will only be published or distributed if parents, or pupils dependent on their age, have given their explicit written consent and all images or videos will only be retained if there is a clear and agreed purpose for doing so. Imagery and videos will be kept in an appropriate and secure place in school.

Staff members will be able to justify images of pupils in their possession and will avoid taking images during one-to-one situations. Images of pupils will not be taken for personal use. No pupil will be photographed in a state of undress or semi-undress, or in a situation which could be

considered as indecent or sexual. Staff members will not take images of a pupil's injury, bruising or similar (e.g. following a disclosure of abuse), even if they have been requested to do so by children's social care and staff members will not make audio recordings of any disclosure made by a pupil. Staff will act in a sensitive manner towards any pupil who appears uncomfortable and will be able to recognise the potential for misinterpretation.

A member of the SLT will be made aware whenever photography equipment is being used and for what purpose. Images of pupils will not be taken using personal equipment, unless previously agreed upon by the Headteacher/Head of School.

Staff will ensure that pupils cannot be exposed to indecent or inappropriate images. All films or video material shown to pupils will be age appropriate. If indecent imagery is discovered at any TCAT school or on TCAT-owned equipment, then an immediate referral will be made to the LADO, and the police will be contacted where appropriate. Accessing, making, storing or disseminating indecent images and other material, whether using TCAT's or personal equipment, on or off the premises, is illegal.

Personal equipment containing pornography or links to it will never be brought into the workplace. If it is discovered in the workplace, the staff member responsible may be subject to disciplinary action. Staff members are made fully aware of the consequences of breaching TCAT policies in relation to photography, imagery and video. If a member of staff breaches this policy or the Photography and Images Policy, the Headteacher/Head of School will conduct a full investigation, and the staff member may be subject to TCAT's Disciplinary Policy and Procedure.

When using images for publicity purposes the following guidance will be followed:

- If the image is used, staff will avoid naming the pupil, or, as a minimum, use first names rather than surnames
- If the pupil is named, their image will not be used
- Images will be securely stored and used only by those authorised to do so

TCAT schools will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual images) as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

15. Use of technology

TCAT promotes the use of technology and understands the positive effects it can have on enhancing pupils' learning and community engagement. All TCAT schools will adhere to our Online Safety Policy at all times.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online. Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online
- The procedure to follow when they have a concern regarding a pupil's online activity

TCAT will ensure that suitable filtering systems are in place on ICT equipment to prevent children accessing inappropriate material, in accordance with TCAT's Cyber-Security Policy. TCAT will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what pupils can be taught online.

Staff will be aware of the filtering systems in place and will know how to escalate concerns where they are identified. In order to meet the filtering and monitoring standards, staff should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems
- Annually review filtering and monitoring systems
- Block harmful and inappropriate content without unreasonably impacting teaching and learning
- Ensure that effective monitoring strategies are in place that meet safeguarding needs

TCAT's Child Protection and Safeguarding Policy and Procedures should reflect the setting's approach to filtering and monitoring on TCAT devices and networks.

Further information regarding TCAT's approach to online safety can be found in our Online Safety Policy.

16. Sharing concerns and recording incidents

All allegations against staff, supply staff, volunteers and contractors will be managed in line with TCAT's Allegations of Abuse Against Staff Policy, a copy of which will be provided to, and understood by, all staff. TCAT will ensure all allegations against staff, including those who are not employees of TCAT, are dealt with appropriately and that TCAT liaises with the relevant parties.

When managing allegations against staff, TCAT will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns", as defined in our Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child, or may have harmed a child
- Committed or possibly committed a criminal offence against or related to a child
- Behaved towards a child 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 concerns will be handled in line with TCAT's Reporting Low-Level Safeguarding Concerns Policy.

Monitoring and review

This policy will be reviewed in line with the published schedule at the front of this document and at any point material changes require it by the Executive Headteacher/CEO in collaboration with the Board appointed Trustee, the Trust Board and Executive and Senior Leadership.

Any changes made to the policy will be amended by the Executive Headteacher/CEO and will be communicated to Executive Leaders, the TCAT Central Team and to Headteachers/Heads of School, who, in turn, will alert school-based staff.

The next scheduled review date for this policy is 19th March 2027.

Signed by:

_____ Executive Headteacher/CEO

Date: _____

_____ Board appointed Trustee

Date: _____