Excalibur Academies Trust

Child Protection and Safeguarding Policy

This Policy is valid from 1st September 2026 to 31st August 2027

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Revision	Date	Change	Origin of Change
1	2nd June 2026	Updated and re-written to reflect new statutory guidance in 2026	DfE website links
2	8th July 2026	Updated to reflect the publication of the final KCSiE draft on 7th July 2026	

Other Policies and Documents Associated
This policy should be read in conjunction with the following policies/procedures: • Safer recruitment guidance • Whistleblowing policy • Code of Conduct for Staff within our Employment Manual • Behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying) • Suspension and Exclusions Policy • Online Safety Policy • Attendance Policy (including the safeguarding response to children who go missing from education) • Health and Safety Policy • Low level concerns procedures within our Employment Manual, local authority flowcharts and Safeguarding Handbook • Equality, Diversion and Inclusion Statement and Strategy • Positive Handling Policy & Procedure • Critical Incident Policy • Safeguarding supervision procedure within the safeguarding handbook • Children with Medical Health Needs Who Cannot attend School Policy • Supporting Children with Medical Conditions Policy • Mobile Device Policy • Pupil Allergy Policy

Principals (and the CEO in relation to Central Trust members) must ensure that all policies and procedures are accessible, understood and followed by all staff.

Key Safeguarding Personnel at the Academy

Role	Name	Tel	Email
Principal	Alan Henderson	01672 516156	Emails can be sent to Trish Grimes, PA to the Principal tgrimes@stjohns.excalibur.org.uk
Designated Safeguarding Lead (DSL)	Sam Cartland	01672 516156	safeguarding@stjohns.excalibur.org.uk
Deputy Designated Safeguarding Lead(s) (DDSLs)	Sally Kirkup Sally Flippence Lucy Wilkins Ellie O'Brien Dean Evans	01672 516156	safeguarding@stjohns.excalibur.org.uk
Safeguarding Governor	Tom Barnes		thomas.barnes@gov.excalibur.org.uk
Chair of governors	Tom Barnes		thomas.barnes@gov.excalibur.org.uk
Designated teacher for Looked After Children	Sally Kirkup	01672 516156	skirkup@stjohns.excalibur.org.uk
Senior Mental Health Lead	Sam Cartland	01672 516156	safeguarding@stjohns.excalibur.org.uk
Allergy and Medical Conditions Lead	Gillian Deery	01672 516156	STJFirstAid@stjohns.excalibur.org.uk
Excalibur Board member responsible for safeguarding	Jeanette Longhurst		jeanette.longhurst@excalibur.org.uk
Central team member responsible for safeguarding	Felicity Hawkins		felicity.hawkins@excalibur.org.uk
The key safeguarding responsibilities within each of the roles above are set out in *Keeping Children Safe in Education* (2026)			

ESSENTIAL CONTACT DETAILS

Essential Contact Details

Children's Social Care Referrals to Multi-Agency Safeguarding Hub (MASH)	0300 456 0108
Out of hours	0300 456 0100
If you believe a child is at immediate risk of significant harm or injury, call the police	999
Designated Officer for Allegations (DOFA/LADO)	01225 713945
Early Help Single Point of Access	01225 718230

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PART 1: Policy

1.1 Definitions

Safeguarding is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- And taking action to enable all children to have the best outcomes.

Child Protection is defined in the Children Act 1989 (s.47) as when a child is suffering or is likely to suffer significant harm. Under statutory guidance and legislation action must be taken to safeguard and promote the child's welfare.

This policy applies to all staff in our academy.

For the purposes of this policy:

- **Staff** refers to all those working for or on behalf of the academy, full time or part time, in a paid or voluntary capacity. A volunteer is a person who performs an activity that involves spending time, unpaid in the academy (except for approved expenses).
- **Principal** refers to the lead practitioner in the school, whatever their title. It includes anyone deputising for the Principal in their absence.
- **Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.
- **Child** refers to all children on our academy roll and any child under the age of 18 who comes into contact with our academy. This includes unborn babies.
- **Student** refers to someone who engages in learning, especially when enrolled in a school/post-16 provision. We will use the term student within this policy so that we are including our students who are in Key Stage 5 and over the age of 18. *The terms student and child may be used interchangeably.*

Any safeguarding concerns or disclosures of abuse relating to a child at St John's, Marlborough or outside of academy hours are within the scope of this policy.

1.2 Introduction

At Excalibur Academies Trust and its schools, safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children, their families and carers, has a role to play.

In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should always consider what is in the **best interests** of the child.

We take an '**it can happen here**' approach where safeguarding is concerned.

Everyone who comes into contact with children has a role to play in identifying concerns, sharing information and taking prompt action. Victims of harm should **never** be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
Excalibur Academies Trust and its schools are committed to safeguarding and promoting the welfare of children by:

- The provision of a safe environment in which children and young people can learn and thrive.
- Acting immediately on concerns about a child's welfare.
- Fulfilling our legal responsibilities to identify children who may need Family Help/early help or who are suffering, or are likely to suffer, significant harm.

Equality statement

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. Our trust wide Equality, Diversity and Inclusion statement and strategy can be found here.

Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND) and those with medical conditions, in line with our Special Educational Needs and Disability Policy (here), Children with Medical Health Needs Who Cannot attend School Policy (EAT-Children-with-Health-Needs-Who-Cannot-Attend-School-Trust-Policy-Sep-25.pdf) and Supporting Children with Medical Conditions (Medical-Conditions-Policy-2026.pdf)

We adhere to the principles of anti-oppressive practice in line of the United Nations Convention of the Rights of the Child and the Human Rights Act 1998.

Current legislation and National / Local Guidance

All action taken by Excalibur Academies Trust and its schools will be in accordance with the following current legislation and national/local statutory guidance:

Working Together to Safeguard Children (2026), which sets out the multiagency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools.

Keeping Children Safe in Education (2026) is statutory guidance issued by the Department for Education which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.

What to do if you are Worried a Child is Being Abused – Advice for Practitioners

Local Guidance from the Local Safeguarding Partnership for safeguarding topics are available on the local website.

Wiltshire Wiltshire Safeguarding Vulnerable People Partnership (SVPP) - Home page

This policy has been written to reflect the school's compliance with the above documents. It does not seek to replicate the details contained within these documents. Staff should reference these when carrying out their duties.

All staff, including volunteers, are expected to refer to them, as needed.

This policy does not seek to detail procedures that staff should follow, except where these are required in the policy by *Keeping Children Safe in Education (KCSiE) 2026*. For Excalibur procedures, linked to safeguarding please refer to Excalibur Academies Trust's Safeguarding Handbook which accompanies this policy.

1.3 Overall Aims

This policy will contribute to the safeguarding of children at **St John's, Marlborough** by:

- Clarifying safeguarding expectations for members of the education setting's community, staff, governing body, pupils, and their families.

- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in the setting built on shared values:

  a) that children are treated with respect and dignity
  b) that children are taught to treat each other and staff with respect
  c) that children feel safe, have a voice and are listened to.

St John's, Marlborough is named as a relevant agency in the Local Safeguarding Partnership. This policy sets out its statutory duty to co-operate, follow and comply with published arrangements as set out by the Wiltshire Local Authority.

1.4 Professional expectations, roles, and responsibilities

Role of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding lead(s)

The Designated Safeguarding Lead and the Deputy Safeguarding Lead(s) are appointed in line with the requirements of *KCSiE* (2026).

The DSL and DDSL have responsibility for leading safeguarding and child protection within school, ensuring the school adheres to all the expectations and requirements detailed in *KCSiE (2026) Annex B.*

In Excalibur, all DSLs have the right to safeguarding supervision. This supervision is provided by trained Excalibur staff with some of our academies also sourcing external supervision. All supervision follows the Excalibur Academies Trust Safeguarding Supervision procedures.

All staff (including volunteers) will:

- Read and understand Part 1 of *Keeping Children Safe in Education* (2026). Those working directly with children will also read Annex A.

  **Please note that the 2025 Annex A (a condensed version of Part 1) has been removed in 2026. Annex A in the 2026 version was formally Annex B.*

- Comply with the policies and procedures of the school, including those related to safeguarding.

- Read and sign the annual declaration annually.

- Know how to contact the DSL and any deputies, and the Head of Safeguarding.

- Be clear as to the setting's policy and procedures about child-on-child abuse, children missing in education, those requiring mental health support, and the impact of technology in relation to online safety.

- Follow the academy's procedures for the use of artificial intelligence, mobile phones, cameras and other electronic devices with imaging and sharing capabilities e.g. smart watch.

In addition to the above:

The DSL and DDSL will:

- Read and understand *Keeping Children Safe in Education* (2026), in full.
- Be familiar with and follow the duties of the role as described in *KCSiE*, 2026, including Annex B.

- Will read through the Safeguarding Handbook and ensure it is available to all staff.

- Follow the safeguarding calendar within the safeguarding handbook.

- Ensure the first Academy Committee meeting each year includes training to contextualise the child protection and safeguarding practice at the setting.

- Inform the Head of Safeguarding of any strategic issues relating to safeguarding.
- Implement robust cover arrangements when they may be unavailable. This should include a secure shared mailbox and appropriate cover by the DDSL or wider safeguarding team.

The Principal will:

- Read and understand *Keeping Children Safe in Education* (2026), in full, and all associated policies.
- Act as DSL or appoint a DSL and DDSL(s).
- Meet regularly with the DSL and DDSL(s)to ensure they can fulfil their roles and quality assure the work they are doing.
- Ensure all staff and volunteers receive appropriate, regularly updated safeguarding and child protection training.
- Ensure all staff understand and comply with all school policies and Part One of *KCSIE*, 2026.
- Provide all staff with regular safeguarding and child protection updates (for example, via email, bulletins, online training and staff meetings) or delegate this to the DSL.
- Ensure that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Follow recruitment procedures in line with *KCSiE*, 2026.
- Follow the correct procedures regarding allegations made against members of staff additionally informing HR; following the low-level concerns flowchart.
- Act as the "case manager" in the event of an allegation of abuse is made against another member of staff in agreement with the Head of HR.
- Report any concerns about the work of Trust employees (who are not part of the school staff) to the CEO, HR and the Head of Safeguarding.
- Ensure that the use of volunteers, visitors, agencies, trainee teachers, students completing work experience and contractors in school, complies with *KCSiE*, 2026.
- Give staff the opportunity to contribute to policy and procedure arrangements and shape safeguarding arrangements and the Child Protection and Safeguarding Policy.

- Ensure section 128 checks have been carried out on their governors and staff in a management position.

- Complete the single central record monitoring pro-forma by the Trust and return within time allocated.

- Follow local arrangements regarding safeguarding partners and the arrangements for child safeguarding practice reviews.

- Ensure the relevant staffing ratios are met, where applicable.

The Senior Leadership (including designated teacher for children in care, sendco, senior attendance lead and senior mental health lead) will:

- Read and understand *Keeping Children Safe in Education* (2026), in full, and all associated policies.

- Familiarise themselves with their role within the local safeguarding arrangements. Also ensuring that those with a responsibility carry out their duties with a safeguarding consideration. This includes those that lead on:

  a) Behaviour
  b) Inclusion
  c) Special Educational Needs and Disabilities
  d) Attendance
  e) Suspensions and exclusions

The Academy Committee will:

- Read and understand Part 1 of *Keeping Children Safe in Education* (2026).

- Monitor pupil attendance, behaviour, mental health and wellbeing.

- The appointed Safeguarding Governor will liaise with the Principal and the DSL to produce, carry out and submit the LA safeguarding audit which needs to be shared with the Head of Safeguarding.

- They will also complete the mandatory tasks within the annual safeguarding planner.

The Excalibur Central Team will:

- Read and understand Part 1 of *Keeping Children Safe in Education* (2026), and Annex A.

- Liaise with Head of Safeguarding if they become aware of any concerns that are not being appropriate addressed or resolved in school.

The Trust Head of Safeguarding will:

- Support Principals and Academy Committees in implementing and monitoring this policy and ensure that each academy has read and understand *Keeping Children Safe in Education* (2026), in full.
- Support the Trust in providing model policies related to safeguarding and child protection.
- Provide support and advice for schools via the DSLs and Principals.
- Monitor the work of the school, including the Academy Committee and the Central Team, to ensure the school and the Trust are following this policy and has all the necessary policies, procedures and practices in place. This relates to areas such as safeguarding and child protection, attendance, behaviour and mental health and wellbeing.
- Report to trustees through the Education Scrutiny Committee.
- Liaise with the Board's safeguarding lead and the CEO to help them fulfil their duties.

Excalibur Academies Trust Board

The Board of Trustees will:

- Take overall strategic responsibility for the safeguarding practices across the Trust, holding the CEO to account.
- Read and understand Part 1of *KCSiE* 2026, and Appendix A – Key Guidance for safeguarding issues, and follow their duties as 'the proprietor'.
- Have a strategic overview of safeguarding and child protection issues across the Trust.
- Approve this policy at each review (or earlier if there are updates) and ensure it complies with the law.
- Hold the CEO to account for the implementation of the Child Protection and Safeguarding Policy and associated procedures.

1.5 Safeguarding training for staff

Training around safeguarding topics in (including online safety) will be integrated, aligned, and considered as part of a whole school safeguarding approach. Details of training required is in the trust's training handbook.

All staff:

- Will receive appropriate safeguarding and child protection (including online safety) refresher training at least annually (via formal training, online training,

email e-bulletins and staff meetings). Staff training includes clear references to the Whistleblowing Policy and guidance for escalating concerns.

- Must complete FGM awareness training and will understand their legal duty under the Mandatory Reporting Duty. This will be included in the face-to-face training session in September.

- Must complete PREVENT awareness training. This is to ensure that they can comply with the legal expectations under the PREVENT duty. This will be via an online training module on The Key.

- As appropriate, will receive team teach training in relation to use of reasonable force and positive handling.

Designated Safeguarding Lead and Deputy Designated Safeguarding Lead:

- Will undergo formal training to provide them with the knowledge and skills required to carry out the role. This includes online safety. The training will be updated every two years. Deputies will be trained to the same level as the DSL. This training will primarily be led by the local authority and local safeguarding partnership.

- Will liaise with the Local Safeguarding Partnership to ensure that their knowledge and skills are updated via bulletins, attend DSL network meetings, and take time to read and digest safeguarding bulletins.

Staff with other Responsibilities:

- The Designated Teacher for Children in Care will undergo appropriate training to fulfil their role to promote the educational achievement of registered pupils who are in care. This training will be led by the Local Authority Virtual School.

- The Senior Mental Health Lead will have access to appropriate training.

Recruitment Training:

- The Board will ensure that at least one person on any recruitment panel of a Principal, Head of School or central team member will have undertaken safer recruitment training, in line School Staffing (England) Regulations 2009.

- The Principal will ensure that at least one person on any recruitment panel within school will have undertaken safer recruitment training, in line School Staffing (England) Regulations 2009.

- All new staff are on-boarded and receive induction in line with *KCSiE* part 1.

1.6 Safeguarding in the curriculum

St John's, Malborough is dedicated to ensuring that students are taught about safeguarding, including online safety. We recognise that a one size fits all approach may not be appropriate for all students, and a more personalised or contextualised

approach for more vulnerable students, victims of abuse and some SEND children might be needed.

This is part of a broad and balanced curriculum and their personal development offer.

We follow the curriculum requirements as set out in *KCSiE* 2026. The curriculum is shaped to respond to safeguarding incident patterns in the setting identified by the Designated Safeguarding Lead and safeguarding team (e.g. to respond to an increase in bullying incidents).

School will provide engagement opportunities with parents and carers to consult on key aspects of the curriculum, according to the local context.

1.7 Whistleblowing

The Trust has a Whistleblowing policy (here) detailed within its Employment Manual, available to all Trust employees and volunteers.

1.8 Safer recruitment and safer working practice

St John's, Marlborough pays full regard to the safer recruitment practices detailed in *Keeping Children Safe in Education* (2026; Part 3)

PART 2: Procedures

All procedures can be found in detail in the Safeguarding Handbook. This is available to all staff as an internal document.

2.1 Reporting concerns

All staff are clear about recording and reporting concerns in a timely way. In the case where a student is in immediate danger, staff should phone the police.

All staff are aware of and follow the procedures to respond to a concern about a child detailed in the Safeguarding Handbook. This includes responses to child-on-child harm and students who present with a mental health need.

At **St John's, Marlborough** students can raise their concerns by speaking to any member of school staff or emailing safeguarding@stjohns.excalibur.org.uk. All concerns will be treated seriously.

2.2 Information Sharing

St John's, Marlborough is committed to have due regard to relevant data protection principles which allow for sharing (and withholding) personal information as provided for in the Data protection Act 2018 and UK General Data Protection Regulations. This includes how to store and share information for safeguarding purposes, including information which is sensitive and personal and should be treated as 'special category personal data'.

Staff at the setting are aware that:

- 'Safeguarding' and 'individuals at risk' is a processing condition that allows practitioners to share special category personal data.
- Practitioners will seek consent to share data where possible in line with Information Sharing for Safeguarding Practitioners 2024

When deciding what information to share, we will consider how relevant and necessary it is to share this information, including current safeguarding risks. It must be clearly presented and appropriately contextualised.

There may be times when it is necessary to share information without consent such as:

- To gain consent would place the child at risk;
- By doing so will compromise a criminal investigation;
- It cannot be reasonably expected that a practitioner gains consent; or
- If by sharing information it will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent.

There are also times when **St John's, Marlborough** will not provide pupil's personal data where the serious harm test under legislation is met, (by sharing the information the child may be at further risk). When in doubt **St John's, Marlborough** will seek legal advice; working alongside the Data Protection Officer.

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

2.3 Multi-agency working

St John's, Marlborough is a relevant agency in the Wiltshire Safeguarding Vulnerable People Partnership and will work together with appropriate agencies to safeguard and promote the welfare of children including identifying and responding to their needs. This follows the statutory guidance Working Together to Safeguarding Children 2026

Occasions that warrant a statutory assessment under the Children Act 1989:

- If the child is in need under s.17 of the Children Act 1989 (including when a child is a young carer and or subject to a private fostering arrangement).
- Or if the child needs protection under s.47 of the Children Act 1989 where they are experiencing significant harm, or likely to experience significant harm.

Referrals in these cases should be made by the DSL (or Deputy DSLs) to Children's Social Care in the local authority in which that child resides. The list of safeguarding contact and other key agencies are listed in Appendix B – Reporting concerns.

Where the child already has a social worker, the request for services should go immediately to the social worker involved or, in their absence, to their team manager. If the child is a child in care, notification should also be made to the Local Authority Virtual School.

St John's, Marlborough will co-operate with any statutory safeguarding assessments conducted by children's social care: this includes ensuring representation at appropriate inter-agency meetings such as child protection conferences and core group meetings.

Additional considerations:

- Where a student and/or their family is subject to an inter-agency child protection plan or a multi-agency risk assessment conference meeting, the setting will contribute to the preparation, implementation, and review of the plan as appropriate.
- In situations where a child in care may be put on to a part-time timetable, attend an alternative provision or be suspended or excluded, the school will consult with the relevant Virtual School following local procedures.

- If a crime has been suspected or committed that involved the bringing of an offensive weapon on to the school site, the setting will liaise with the Local Authority Violence Reduction Unit who will consider a proportionate response. This includes following the Government Guidance for Child Knife Possession Offences (Feb 2026)

- If there is a risk of harm, the police should be called via 999. For other concerns of criminality, the non-statutory guidance 'When to Call the Police' from the NCPCC can be helpful or contact the local PCSO/School Police Beat Officer/School Officer.

- In the rare event that a child death occurs, or a child is seriously harmed, **St John's, Marlborough** will notify the Local Partnership as soon as is reasonably possible and the Excalibur CEO and Head of Safeguarding. This would be deemed a critical incident and follow our trust critical incident procedures.

2.4 Suspensions, permanent exclusions, and commissioning of Alternative Provision

(To be read in conjunction with the Behaviour Policy and Suspensions and Exclusions Policy).

When the setting is considering suspending or permanently excluding a student where additional vulnerability is identified, it is important that the student's welfare is a paramount consideration. The Principal will consider their legal duty of care when sending a student home.

St John's, Marlborough will exercise their legal duties in relation to their interventions. This includes:

- whether a statutory assessment should be considered in line with the principles of Children Act 1989

- that decisions are made in an anti-discriminatory manner in line with the Equality Act 2010 (including having regard to the SEND Code of Practice)

- and takes into consideration the student's rights under the Human Rights Act 1998

- interventions will be consistent with statutory guidance School suspensions and permanent exclusions - GOV.UK (www.gov.uk)

2.5 Actions to take

- An assessment of need should be undertaken with multi-agency partners with a view to mitigate any identified risk of harm.

- If the child is subject to a child protection plan or where there is an existing child protection file, we will call a multi-agency meeting.

Commissioning Alternative Provisions (updated with information added to Keeping Children Safe in Education 2026)

In the event where **St John's, Marlborough** commissions an Alternative Provision, they will follow local guidance to ensure the clear agreement of roles and responsibilities to maintain safeguarding arrangements for students who are not taught on site.

Wiltshire Alternative Provision resource page | Right Choice

St John's, Marlborough will continue to be responsible for the safeguarding of the child and should be satisfied that the placement meets the child's needs. Written confirmation from the alternative provider will be obtained detailing the appropriate safeguarding checks on staff (these are checks that we would otherwise perform for our own staff).

The academy will obtain written confirmation from the alternative provider that they will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

St John's, Marlborough will know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. The academy will regularly review the alternative provision placements they have in place. Reviews should be frequent enough (at least half termly) to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs.

Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed. This concern will be communicated to our Head of Safeguarding.

Our Alternative Provision Procedures adhere to the following guidance documents:

Alternative provision - GOV.UK

Education for children with health needs who cannot attend school - GOV.UK

Voluntary national standards for non-school alternative provisions

2.6 Children Missing from Education/Absent from Education

(To be read in conjunction with the Attendance Policy)

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils,

helps prevent the risk of them becoming a child missing from education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Staff should follow procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions. These should be reported to the DSL and reviewed.

St John's, Marlborough will follow the guidance detailed in Children Missing in Education 2025 and Working Together to Improve School Attendance 2026 will include notifying the local authority in which the child lives:

- of any pupil who fails to attend school regularly,
- or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.
- All schools are legally required to share attendance and sickness returns with their local authority. This process will be defined by the local authority in accordance with the statutory guidance *Working Together to Safeguarding Attendance 2026.*

Elective Home Education

St John's, Marlborough will notify the Local Authority of every student where a parent has exercised their right to educate their child at home. Safeguarding files should be shared with the Local Authority Elective Home Education service and consideration of whether additional support from children's social care should be made in line with the Children Act 1989.

2.7 Respond to incidents of child-on-child harm (including harassment and violence)

All staff should recognise that children can abuse their peers (including online). It is important that incidents of abuse and harm are treated under the safeguarding policy in conjunction with the behaviour policy and anti-bullying policy. However, concerns regarding the welfare of students requires records to be kept on the child's safeguarding file.

Further examples of child-on-child harm can be found in the Safeguarding Handbook. It is recognised that child-on-child abuse can happen inside and outside of school or online.

At St John's, Marlborough

- We have a 'zero tolerance' approach to abuse. Incidents are taken seriously. These will never be tolerated or passed off as 'banter,' just having a laugh' or 'part of growing up.' Banter and teasing can and should be acknowledged and recognised as bullying behaviour and require proportionate intervention.

- Even with a zero-tolerance approach, we take steps to educate and take action to mitigate the risk of contributing to a culture of unacceptable behaviours or a culture that normalises abuse.

- It is understood that child-on-child harm may reflect equality issues in terms of those who may be targeted are more likely to have protected characteristics.

- Early identification of vulnerability to child-on-child harm is made by reviewing attendance, behaviour, attainment and safeguarding records at least on a termly basis.

- All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and the perpetrator.

- We understand that harmful sexual behaviour exists on a continuum and may escalate into sexual harassment or sexual violence.

- Early intervention in inappropriate behaviour is key to prevent escalation. For example a behaviour like misogyny could escalate to more serious sexual harassment and violence.

There are clear systems in place (which are well promoted, easily understood and easily accessible) for students to confidently report abuse knowing their concerns will be treated easily as reflected in section 2.1 Reporting concerns of this policy. Academy will handle initial reports of harm by:

- Securing the immediate safety of students involved in an incident and sourcing support for other students affected.

- Listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc.

- Ensuring that victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. They will never be made to feel ashamed for making a report.

- Ensuring the child's wishes are taken into consideration in any intervention and any action is taken to ensure safety of the student and other members of the wider peer cohort.

- Not promising confidentiality as it is highly likely that information will need to be shared with others.

- Report and record the incident following; your usual safeguarding procedures.

Actions to take in relation to sexual violence and sexual harassment.

Reference to *Keeping Children Safe In Education* (2026, Part 5) should be made in relation to taking protective action. Schools should also refer to the sexual harassment section of the Safeguarding handbook for more information. **St John's, Marlborough** will follow this guidance when responding to incidents of sexual violence and sexual harassment. This also refers to the escalating nature of misogyny.

Contextual safeguarding approach to child-on-child harm:

St John's, Marlborough will minimise the risk of child-on-child abuse by taking a contextual approach to safeguarding by increasing safety in the contexts of which harm can occur – this can include the school environment itself, peer groups and the neighbourhood.

Following any incidents of child-on-child harm, the DSL/Deputies will review and consider whether any practice or environmental changes can be made in relation to any lessons learned. E.g. this could be noted in a risk assessment after the incident; including what action was decided upon as well as the date, time and location of the incident. This can include making changes to staffing and supervision, making changes to the physical environment and considering the utilisation and delivery of safeguarding topics on the curriculum. Please refer to our Suspension and Exclusion policy in relation to our processes when there is a temporary separation of pupils for safeguarding purposes.

2.8 Preventing Radicalisation – The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare).

The guidance is set out in terms of four general themes:

- risk assessment,
- working in partnership,
- staff training, and
- IT policies.

Our academy also has a prevent risk assessment that is updated annually.

2.9 Responding to allegations of abuse made against professionals.

Staff must report any concerns or allegations about a professional's behaviour (including supply staff, trainee teachers, volunteers, and contractors) where they may have:

- 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 he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Immediate action must be taken: see Safeguarding Handbook.

Low-level concerns

This should be read in conjunction with the staff Code of Conduct, *Keeping children Safe in Education* (2026) and Excalibur's Low Level Concerns Procedure. A low-level concern is not insignificant. This process should be used in events where a concern about professional conduct does not meet the threshold set out at the beginning of this section. All low-level concerns should be reported to the Principal, or if about the Principal the concern is reported to the Head of Safeguarding and Wellbeing.

2.10 Mental health and wellbeing

Schools and colleges have an important role to play in supporting the mental health and wellbeing of their students. Mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or the risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation, and or may require Family Help/early help support.

Academy staff will play an important role to fulfil the following:

- promoting good mental wellbeing and preventing the onset of mental illness,
- observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one,
- ensuring early targeted support is provided, and
- liaison with/referral to specialist services where needed.

St John's, Marlborough will commit to undertake the following.

- The appointment of a senior mental health lead who can support the development of knowledge and act as a point of expertise to promote the wellbeing and mental health of students. This colleague will have sufficient training in mental health and safeguarding for them to carry out their role effectively.

- Early identification of vulnerability to mental health problems by reviewing attendance, behaviour, attainment, and safeguarding records at least on a termly basis.

- Ensure that students can report and share concerns in line with section 2.1 Reporting concerns of this policy.

- Staff will follow a safeguarding process in terms of reporting concerns outlined so the DSL/Deputy DSLs (and wider members of the safeguarding team such as the SENDCo) can assess whether any other vulnerabilities can be identified and proportionate support considered.

- Staff will ensure the immediate health and safety of a student who is displaying acute mental health distress. This may require support from emergency services via 999 if the leaner is at risk of immediate harm.

- Consider the range of locally available support for example the Mental Health Support Team already working in the school, early support hubs and young futures hubs.

- DSLs/Deputies will consider whether a case can be managed internally, through Family Help/early help, or should involve other agencies as required in line with section 2.3 Multi-agency working.

- The setting will communicate and work with the student and parents/carers to ensure that interventions are in the best interests of the child.

- DSLs will liaise with staff to ensure reasonable adjustments are made and develop ways to support achieving positive educational outcomes.

- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem – DSLs and the senior leadership team should be able to access specialist advice through targeted services or through their locality (please see link below).

Wiltshire-Wiltshire CAMHS | Oxford Health CAMHS

Contextual safeguarding approach to mental health

St John's, Marlborough will ensure that preventative measures in terms of providing safeguarding in the curriculum, providing opportunities for students to identify when they may need help, and to develop resilience.

The setting will take a 'whole school approach' to:

- deliver high-quality teaching around mental health and wellbeing on the curriculum;
- having a culture that promotes mental health and wellbeing;
- having an environment that promotes mental health and wellbeing;
- making sure pupils and staff are aware of and able to access a range of mental health services;
- supporting staff wellbeing; and
- being committed to pupil and parent participation.

2.11 Online Safety

Online safety is an integrated and interwoven theme with other safeguarding considerations. It is essential that the DSL takes a lead on ensuring that interventions are effective. This means coordinating support and engaging with other colleagues in the setting who may have more technological expertise such as the IT team.

St John's, Marlborough is committed to addressing online safety issues around content, contact, conduct and commerce. This includes:

- Ensuring that online safety is concerned in relevant policies and procedures.
- Online safety is interwoven in safeguarding training for staff and safeguarding on the curriculum for students.
- Acknowledging that child on child abuse can happen via mobile and smart technology between individuals and groups. This should be approached in the same process outlined in section 2.7 Respond to incidents of child-on-child harm and read in conjunction with the **St John's, Marlborough's** policy on online safety.
- Provision of education via remote learning will comply with governmental advice Safeguarding and remote Education-gov.uk
- Ensuring their setting has appropriate filtering and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. They should also ensure that the filtering monitoring standards are understood and met.
- The effectiveness of the setting's ability to safeguard students in respect to filtering and monitoring, information security and access management alongside the above will be reviewed at least annually.

- **Harmful interactions with generative AI applications, AI-generated explicit imagery, deepfakes, manipulation, bullying or any other AI-related safeguarding concern must be reported to the DSL without delay.**

- **St John's, Marlborough** aims to harness the benefits of AI while mitigating potential risks and ensuring that staff and students are given a model in which AI can be employed safely. This includes assessing the risks of generative AI Our AI Reasonable use policy outlines our approach to implementing and using AI in our settings. The academy is expected to follow the regulatory principles as detailed in:

Generative AI: product safety expectations - GOV.UK

Generative AI in education

Safe use of generative AI in education: module 3 - GOV.UK

2.12 Gender Guidance

Sport, toilets, changing facilities and showers

The Academy will manage participation in sport and the use of toilets, changing rooms and showers in accordance with Keeping Children Safe in Education 2026, the Equality Act 2010, the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014.

Where the nature of a sport means that physical strength, stamina or physique creates a safety or competitive disadvantage, pupils may be grouped according to biological sex. Where single-sex provision is necessary for safety, no exceptions will be made. In other circumstances, requests concerning participation will be considered individually, taking account of safety, fairness, the welfare and best interests of the child and other children, and the Academy's equality and human rights duties.

The Academy will provide separate toilet facilities for boys and girls (aged 8 and over) where required by law. Pupils will not use toilets designated for the opposite biological sex. Where a pupil does not wish to use the facilities designated for their biological sex, the Academy will consider whether a suitable self-contained individual facility can be provided without compromising the safety, privacy, comfort or dignity of that pupil or any other child.

Pupils aged 11 or over at the start of the school year will not be required or permitted to undress in front of pupils of the opposite biological sex and will not use changing or shower facilities designated for the opposite sex. Where necessary, the Academy will consider an alternative fully enclosed facility or use of the facilities at a different time. Any individual arrangements will be clearly recorded, communicated to relevant staff on a need-to-know basis and reviewed regularly.

8.2 Residential visits and sleeping arrangements

All residential visits, exchanges, sports tours, camps and other overnight activities will be subject to a documented safeguarding and educational-visits risk assessment.

Children will not share overnight accommodation with children of the opposite biological sex. This applies to shared bedrooms, dormitories, tents and other communal sleeping arrangements.

Where a child does not wish to share accommodation with children of the same biological sex, the Academy will consider whether suitable separate accommodation can reasonably be provided. Any alternative arrangement must preserve the safety, privacy, comfort and dignity of the child and all other children.

Sleeping arrangements will be agreed and documented before departure and will not be changed informally by individual staff during the visit. Any safeguarding concern arising during a residential activity will be reported to the visit leader and DSL without delay.

Children who are questioning their gender and requests for support with social transition

The Academy will provide a respectful and supportive environment for children who are questioning their gender. Bullying, harassment and discrimination will not be tolerated, and any related safeguarding or wellbeing concerns will be addressed promptly.

The Academy will not initiate social transition. Individual members of staff must not independently make changes relating to social transition, including changes to names, pronouns, uniform, facilities, sport or other arrangements.

Where a child or their parent or carer requests support involving social transition, the matter will be referred to the Headteacher/Principal and the DSL. The request will be considered through a careful, documented, regularly reviewed and case-by-case process.

Parents or carers will be involved as a matter of priority and their views will be given proper consideration. In the rare circumstances where there is reason to believe that involving parents or carers may place the child at increased risk, the DSL will determine what safeguarding action is necessary before parents are contacted or any decision is made.

Decisions will take account of:

- the welfare and best interests of the child and other children;
- the child's age, development, wishes and individual circumstances;
- any wider mental health, medical, neurodevelopmental or safeguarding needs;
- relevant clinical or other professional advice;
- the impact of agreeing or declining the request;
- the Academy's safeguarding responsibilities; and
- its duties under the Equality Act 2010 and Human Rights Act 1998.

The Academy will explain that support with social transition will not include access to toilets, changing rooms, showers or residential accommodation designated for the opposite biological sex, or participation in sport designated for the opposite sex where single-sex participation is necessary for safety.

The child's biological sex will be recorded accurately. Information will only be shared with staff who need it to safeguard and support the child and other pupils. Decisions and their rationale will be recorded and reviewed where circumstances change, including where a child wishes to reverse or amend an earlier arrangement.

2.13 Serious Violence

Serious violence is a safeguarding concern and may involve physical assault, carrying, threatening with or using weapons, often in the context of peer conflict, bullying, gang involvement or criminal exploitation.

Staff will remain alert to indicators that a child may be at risk of, or involved in, serious violence. These are detailed in our safeguarding handbook.

The risk of serious violence may be increased for children who have experienced disrupted education, including repeated suspensions, permanent exclusion or time in alternative provision, or who have a history of offending. Staff will also remain alert to periods when children may be at increased risk, including immediately before or after the Academy day.

Any concern that a child is carrying, using or threatening to use a weapon, or intends to do so, must be reported immediately to the DSL or a Deputy DSL.

The DSL will assess the risk to the child and others, taking account of all available safeguarding and contextual information.

Depending on the level of risk, the Academy will:

- put in place an appropriate safety and support plan;
- take action to de-escalate peer conflict;
- consider the safety of other pupils and staff;
- share relevant information with children's social care, the police and other agencies; and
- provide or seek early, evidence-based support, including access to trusted adults, mentoring, therapeutic support or other targeted interventions.

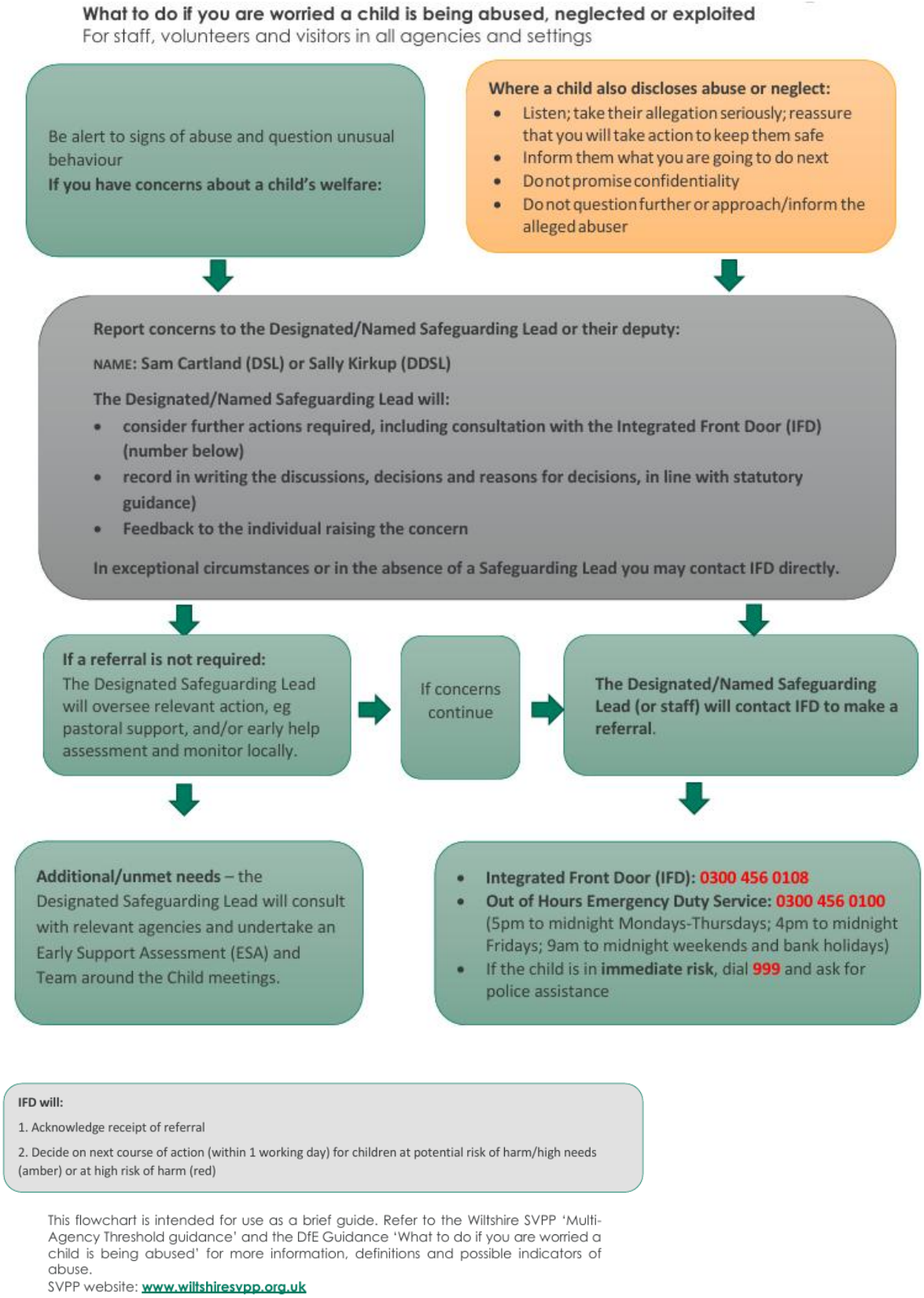
Where a child is in immediate danger, or a weapon is present, staff will contact the police without delay.

Appendix A Key Guidance for safeguarding issues.

- Excalibur Academies Trust Safeguarding Handbook (September 2026)
- Keeping Children Safe in Education 2026

Appendix B – Reporting concerns

- Reporting Concerns Flow Charts for Wiltshire.



- Local Authority Contacts page:

Contact children's services - Wiltshire Council