



Merchant Taylors' Schools, Crosby

Critical Incident Policy

Policy Owner	Headteacher
Policy Author	Senior Deputy Head/Director of Operations and Estates
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Related Policies:	Disaster Recovery Procedure Safeguarding Policy Health & Safety Policy Risk Assessment Policy First Aid Policy Fire Safety Policy Fire Evacuation Procedures Educational Visits Policy Curriculum Policy Teaching & Learning Policy
Regulatory Body (if applicable)	DfE, ISI,
Relevant legislation/guidelines	<ul style="list-style-type: none"> • DfE, <i>Emergency planning and response for education, childcare, and children's social care settings</i>, updated May 2023 • DfE, <i>Health and safety: responsibilities and duties for schools</i> • DfE, <i>First aid in schools, early years and further education</i>

	<ul style="list-style-type: none">• DfE, <i>Keeping children safe in education</i>• DfE, <i>Working Together to Safeguard Children</i>• DfE, <i>Restrictive interventions, including the use of reasonable force, in schools</i>, effective from 1 April 2026• Education (Independent School Standards) Regulations 2014, including Parts 3, 4 and 8• Health and Safety at Work etc. Act 1974• Management of Health and Safety at Work Regulations 1999• Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013, known as RIDDOR• Health and Safety (First-Aid) Regulations 1981• Regulatory Reform (Fire Safety) Order 2005• UK GDPR and Data Protection Act 2018
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1 Aims

- 1.1 This is the Critical Incident Policy of Merchant Taylors' Schools, Crosby [the School].
- 1.2 The School considers a critical incident to be:

“Any sudden event or emergency involving one of its schools (in or out of hours) where the effectiveness of the school response is likely to have a significant impact on the local community and stakeholders”.
- 1.3 The Critical Incident Plan is designed to help the School staff manage these incidents when they occur. This policy applies to incidents occurring on school premises, during school activities off site, during educational visits, during school events, out of normal school hours, during holiday periods, and where an incident in the wider community has a direct impact on the safe operation of the School.
- 1.4 In the event of a critical incident occurring, the Board of Governors has established the following priorities to be addressed by a School's incident management team, and the aims of this policy are:
 - 1.4.1 To minimise or eliminate any danger or risks to individuals;
 - 1.4.2 To contain the incident and work effectively with emergency services;
 - 1.4.3 To assist in any investigation and ensure the school acts in a lawful manner;
 - 1.4.4 To safeguard and promote the welfare of pupils, staff, visitors and others affected by the incident, including through timely safeguarding action, welfare support, appropriate communication and liaison with relevant external agencies.
 - 1.4.5 To restore normality as soon as possible.
 - 1.4.6 To minimise disruption to pupils' education and care, including through appropriate business continuity, remote education or alternative provision arrangements where required.
 - 1.4.7 To ensure that statutory recording, reporting, notification and review duties are met, including safeguarding, health and safety, RIDDOR, data protection and, where applicable, early years or childcare reporting requirements.
- 1.5 The Board of Governors is aware of the emotional needs, as well as the practical needs, of each individual within the School's community at a time when a critical incident occurs and will ensure that appropriate support is put in place for as long as it is needed.

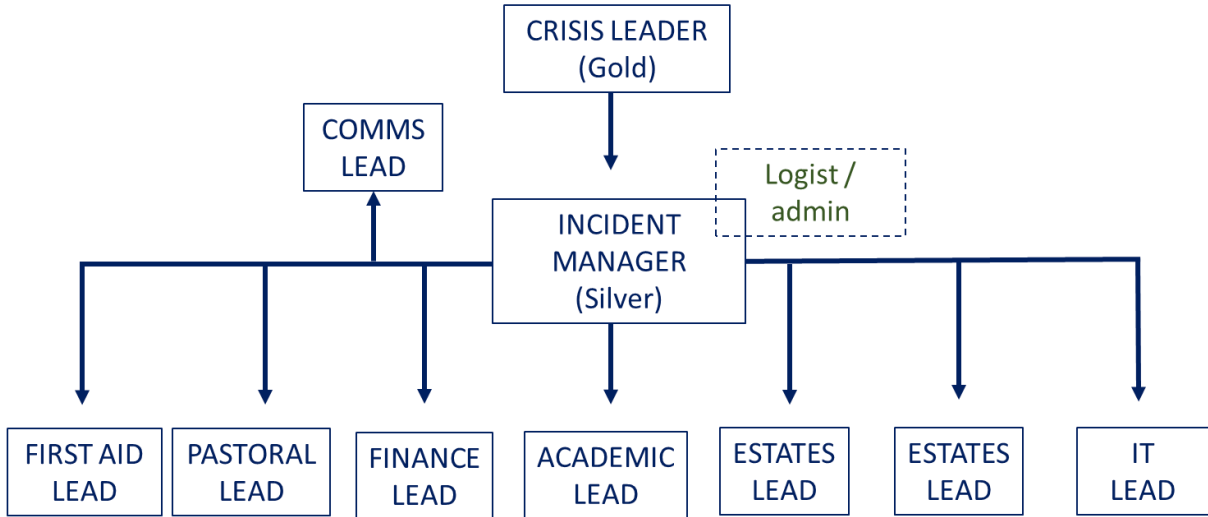
2. Immediate Action

- 2.1 In the event of a suspected critical incident, all staff should immediately inform the Headteacher or nominated emergency contact. If the Headteacher or nominated emergency contact is unavailable, or may be directly involved in the incident, the most senior person present must take immediate action in line with this policy until relieved by the Incident Manager or Crisis Leader.
 - 2.1.1 Assess the situation from a safe position and establish a basic factual overview of the incident.
 - 2.1.2 Take immediate action to safeguard pupils, staff, visitors, contractors and others on site.

- 2.1.3 Account for pupils, staff and visitors as far as reasonably possible, using registers, visitor logs and staff information.
- 2.1.4 Attend to casualties and administer first aid where it is safe and appropriate to do so.
- 2.1.5 Dial 999 immediately where there is danger to life, serious injury, fire, suspected criminal activity, a threat to site security, a missing pupil at risk, or any uncertainty about the need for emergency support. Staff using an internal school telephone should follow the School's internal process for obtaining an outside line before calling 999. Staff using mobile phones should dial 999 directly.
- 2.1.6 Preserve the scene, evidence, CCTV, relevant communications and records where safe to do so, particularly where the incident may involve safeguarding, criminal activity, fire, serious injury, cyber/data breach, or later investigation.
- 2.1.7 Start a contemporaneous incident log as soon as practicable, recording times, decisions, actions, persons involved and instructions received.
- 2.1.8 Notify the DSL immediately where the incident involves, or may involve, safeguarding, child protection, adult conduct, a missing pupil, peer-on-peer harm, online activity, sexual misconduct, violence, restraint, seclusion, or a disclosure by a pupil

3. Decision-Making structure

- 3.1 To ensure a coherent and co-ordinated response to any critical incident, a decision-making structure that is distinct and separate to the normal management structure will be used.
- 3.2 The Incident Management structure set out below, outlines the minimum of roles that are required for ***an initial activation***. Additional roles may be required as the incident progresses.



- 3.3 The incident management structure operates alongside, and does not replace, statutory safeguarding, health and safety, first aid, fire safety, data protection and educational visits procedures. Where a specialist statutory route is triggered, including contact with the DSL, LADO/Designated Officer, children's social care, police, HSE, ICO, local authority, insurers or relevant safeguarding partners, this must be recorded within the incident log.

4. Training & Testing

- 4.1 The Board of Governors will ensure that the School has appropriate arrangements for training, testing and reviewing critical incident procedures. Members of SLT, the Incident Management Team and staff with designated responsibilities will receive appropriate training and will participate in at least one annual critical incident exercise or tabletop scenario.
- 4.2 Testing should include, as appropriate, evacuation, shelter-in, lockdown, emergency communications, accounting for pupils/staff/visitors, out-of-hours escalation, educational visits, cyber/data breach response, serious injury, public health disruption and continuity of education.
- 4.3 Staff will be made aware of the key emergency procedures through induction, annual safeguarding and health and safety updates, and local site briefings.
- 4.4 Visitors, contractors and external providers will receive proportionate emergency information relevant to their time on site.
- 4.5 Following any test, exercise, near miss or actual incident, lessons learned will be recorded and used to update procedures, training and risk assessments.
- 4.6 Governors will receive appropriate assurance information on critical incident preparedness, including training, testing, significant incidents, statutory notifications, lessons learned and any recommended changes to policy or practice.

5. Critical Incident Classification and Escalation Criteria

- 5.1 Any incident or suspected incident must be reported to a member of the Incident Management Team as soon as practicable.
- 5.2 The receptionist or member of SLT notified will immediately ascertain and record the following:
 - 5.2.1 Exact location and address of the incident.
 - 5.2.3 Time incident occurred.
 - 5.2.4 Number of pupils and staff directly impacted.
 - 5.2.5 Number and extent of injuries / fatalities.
 - 5.2.6 Presence of Emergency services.
 - 5.2.7 Nature of incident.
 - 5.2.8 Whether any pupil, staff member, visitor or contractor is unaccounted for.
 - 5.2.9 Whether the incident may involve safeguarding, child protection, adult conduct, peer on-peer harm, restraint, seclusion, online harm or criminal behaviour.
 - 5.2.10 Whether the incident may require statutory notification or reporting, including to the DSL, LADO/Designated Officer, children's social care, police, HSE, ICO, local authority, insurers, examination boards or other relevant body.
 - 5.2.11 Immediate actions already taken and by whom.

5.2.12 Whether visitors, contractors, event attendees or pupils from other schools are present or affected.

5.3 An incident should be classified using the following criteria:

Category	Criteria
Critical Incident	Fatality
(Contact any member of the Senior Leadership Team)	Serious injury
	Violent trespass / Threat of
	Loss of building
	Loss of access to campus
	Data breach
	Community Disturbance
	Missing pupil where there is immediate or significant risk
	Safeguarding incident involving serious harm or suspected serious harm
	Allegation or concern involving an adult working with children where the harm threshold may be met
	Serious peer-on-peer abuse or violence
	Significant use of force, restraint or seclusion connected to the incident
	Major cyber incident or data breach involving significant risk to individuals
	Public health incident requiring external agency involvement
	Serious transport incident
	Major incident affecting pupils or staff on an educational visit
	Incident likely to attract significant media, police, local authority, HSE, ICO, DfE, ISI or safeguarding partner involvement
Priority Incident	Loss of utility
(Contact Director of Estates & Operations)	Loss of IT
	Disruption to transportation
	Food poisoning
	Minor injury
	Severe weather
	Bomb threat/Suspicious package
	Localised safeguarding or welfare concern requiring DSL oversight
	Minor data breach requiring DPO assessment
	Temporary closure of part of the site

	Examination disruption
	Significant visitor, contractor or event-related incident
	Utility, catering or site issue affecting pupil safety, welfare or continuity of education
Routine	Minor or temporary disruption not expected to exceed 4 hours

- 5.4 The receptionist or initial point of contact should identify and contact any **immediately available** member of the Senior Leadership Team for a Critical Incident once an incident has been identified / declared. (See Appendix 10).
- 5.5 During school hours, once a member of the Senior Leadership Team has been contacted and briefed on the incident, [s]he in turn **must immediately assume** the role of **Incident Manager (Silver) until otherwise instructed**.
- 5.6 For an out-of-hours incident, post 5.00pm, weekends or during holiday periods incident reporting will switch to the Sports Centre reception at the Senior site. The sports centre staff will immediately contact a senior manager AFTER contacting the emergency services / activating the lock down alert.

6. Roles & Responsibilities: Crisis Leader [Gold]

- 6.1 Unless otherwise necessary, the Headteacher will automatically assume the role of Crisis Leader [Gold] and will be responsible for overseeing the School's response by determining resourcing levels, appointing a person to be the Incident Manager, and undertaking strategic stakeholder engagement.

The Crisis Leader retains strategic oversight of safeguarding, welfare, health and safety, communications, statutory notifications, business continuity, media handling and governor liaison. The Crisis Leader must ensure that appropriate specialist leads are involved, including the DSL, Director of Operations and Estates, First Aid Lead, Communications Lead, Data Protection Officer, EVC, Exams Officer or external advisers where relevant.

- 6.2 A guide to suggested actions by each lead is contained in Appendix 7.
- 6.3 In the initial stages of an incident, or until notified otherwise, the strategic priorities will be:
- 6.3.1 Preserve Life.
 - 6.3.2 Minimise damage / loss to buildings.
 - 6.3.3 Ensure welfare of staff and pupils.
 - 6.3.4 Resume designated critical activity.
 - 6.3.5 Return academic activity to normal, within allocated resourcing levels.
 - 6.3.6 Protect the local reputation and standing of the Trust.
 - 6.3.7 Ensure statutory and regulatory reporting duties are considered and discharged.
 - 6.3.8 Ensure that the Chair of Governors or nominated governor is briefed as appropriate.
 - 6.3.9 Ensure that decisions are recorded clearly, including the rationale for any decision to close, partially close, evacuate, shelter-in, lockdown, move to remote education, inform parents, notify external agencies or stand down the response.

7. Roles & Responsibilities: Incident Manager [Silver]

- 7.1 The Incident Manager is responsible for developing a plan that will resolve the incident and restore normal activity in accordance with the priorities and resourcing levels set out by the Crisis Leader [Gold].
- 7.2 An individual who is a member of the Senior Leadership Team will assume the role of Incident Manager upon an initial request by a receptionist or at the request of the Crisis Leader.

Once the Incident Manager is satisfied, they are fully aware of the current situation and on-going activity they should:

- 7.2.1 Commence an incident log, using Appendix 5, ensuring that all significant information, decisions, actions, owners, timings and communications are recorded.
- 7.2.2 Convene the Incident Management Team (IMT) and confirm/appoint individuals to be the functional leads specified above.
- 7.2.3 The role of the functional leads in the IMT is to organise the implementation of any tasks allocated to their function, under the plan developed by the Incident Manager. This may require the identification and instruction of others to undertake the task required.
- 7.2.4 Ensure a First Aid Response Team has been deployed for any on-site incident.
- 7.2.5 Identify an Emergency Response Lead [ERL] for any off-site incident.
- 7.2.6 Activate / establish a telephone hotline / web briefing portal.
- 7.2.7 Confirm that pupils, staff, visitors and contractors have been accounted for and that any unaccounted-for person is escalated immediately to the emergency services and Crisis Leader.
- 7.2.8 Ensure that the DSL is involved where there is any safeguarding, child protection, adult conduct, pupil welfare, peer-on-peer harm, missing pupil, online harm, use of force, restraint or seclusion concern.
- 7.2.9 Ensure that the Data Protection Officer is involved where the incident involves data loss, cyber incident, unauthorised disclosure or possible personal data breach.
- 7.2.10 Ensure that the Director of Operations and Estates or competent health and safety adviser considers accident investigation and RIDDOR reporting where relevant.
- 7.2.11 Ensure that the EVC is involved where the incident occurs during an educational visit or off-site activity
- 7.2.12 Ensure that the Exams Officer is involved where the incident may affect public examinations or formal assessments.

8. First Aid Response Lead

- 8.1 The role of the First Aid Response Lead is to attend the immediate vicinity of an incident occurring within the school campus to:
 - 8.1.1 Assess and confirm the nature of the incident
 - 8.1.2 Provide first aid to injured parties
 - 8.1.3 Support the establishment of a safe area or cordon where it is safe to do so, and only in a way that does not place staff or pupils at further risk.
 - 8.1.4 Initiate emergency action to prevent further injury or damage

- 8.2 Where it is not safe to undertake a physical investigation, a remote investigation by CCTV or other means should be considered.
- 8.3 It is essential that an initial assessment of the incident made and passed to the Incident Manager with a recommendation on whether to invoke a pre-determined **“Evacuation”** or **“Shelter-In”** plan is a matter of urgency.
- 8.4 All first aid treatment, accidents, injuries and near misses must be recorded in line with the School’s First Aid and Health and Safety procedures.
- 8.5 The Director of Operations and Estates, or other nominated competent person, will assess whether the incident is reportable under RIDDOR. RIDDOR reporting is only required where the legal reporting criteria are met, including relevant work-related deaths, specified injuries, over-seven-day injuries, certain dangerous occurrences, occupational diseases, or reportable injuries to non-workers arising out of, or in connection with, work activity.
- 8.6 Parents or carers must be informed of pupil injuries, medical treatment or hospital attendance in line with the School’s First Aid, Safeguarding and parent communication procedures.

9. Emergency Response Lead Off-site

- 9.1 The Emergency Response Lead is the most senior member of staff on a school trip or event away from the school premises.
- 9.2 The role of the Emergency Response Lead is to attend the immediate vicinity of incident to initiate / confirm the attendance of emergency services who can provide first aid to injured parties and to then ensure that all remaining pupils are located and moved to a nearby place of safety as soon as possible.
- 9.3 Once this has been achieved, they must contact the Incident Manager and give the names of pupils who have been injured, the nature of their injury and their current location.
- 9.4 The Emergency Response Lead must maintain an incident log and retain relevant documents, including registers, medical information, consent forms, emergency contacts, provider details, risk assessments, tickets, passports, insurance details and witness information where applicable.
- 9.5 The Emergency Response Lead must liaise with the EVC and Incident Manager before communicating with parents, except where immediate emergency contact is required to protect life or welfare.
- 9.6 For overseas visits, the Incident Manager and EVC will consider whether to contact the insurer, tour provider, British Embassy/Consulate, Foreign, Commonwealth and Development Office, and parents/carers, as appropriate.
- 9.7 The Emergency Response Lead must not admit liability, speculate, or make media comment. All external communications should be coordinated through the Incident Manager and Communications Lead.

10. Incident Management Team

10.1 The Incident Management Team (IMT) will comprise the following roles and on activation should meet in the Head's Office, School House or join a school-initiated video conference.

Function	Name	Alternate
1. Crisis Leader	Head	Senior Deputy Head
2. Incident Manager	Senior Deputy Head	Director of Estates or Finance
3. Welfare Lead	Deputy Head [Pastoral]	As Designated
4. Academic Lead	Deputy Head [Academic]	As Designated
5. Finance Lead	Dir. of Finance & Resource	As Designated
6. Estates	Dir. Of Estates & Operations	As Designated
7. Comms & Media	Head of Adm. & Marketing	As Designated
8. First Aid Response	School Nurse	Healthcare Assistant
9. IT	ICT Services Manager	Assist' ICT Services Manager
10. Admin	Head's PA	Senior Deputy PA
11. Logistics / Procurement	Dir. of Finance & Resource	As Designated
12. Safeguarding Lead	DSL/DDSL	As Designated
13. Data Protection Lead	DPO/IT services manager	As Designated
14. Educational Visits Lead	EVC	As Designated
15. Examinations Lead	Exams Officer	As Designated
16. Attendance and Punctuality Lead	Attendance Lead	School Office Lead
17. Legal/Insurance Liaison	Director of Finance and Resources	Clerk to Governors

By its very nature, a critical incident is dynamic and allocation of staff to roles will reflect the circumstances, availability, relevance, and expertise in any given situation. The DSL must be part of the response where there is any safeguarding, child protection, allegation, adult conduct, peer-on-peer harm, missing pupil, online safety, restrictive intervention, welfare or pupil vulnerability concern. The DPO must be part of the response where there is any cyber incident, data breach or unauthorised disclosure of personal information.

11. Shelter-In & Lockdown Procedure

11.1 Shelter in Signal

The signal for SHELTER IN is an intermittent ringing of the fire alarm. This will be followed by an email to all staff providing an update and identifying the incident as shelter in. A shelter in incident occurs when pupils and staff need to be indoors for safety as a result of a general risk in the locality e.g. a release of a hazardous material into the atmosphere.

11.2 Activation

A member of the estates team will activate the signal if made aware of an environmental hazard in the locality or upon request from an individual acting in the capacity of an Incident Manager under the Critical Incident Plan.

11.3 Action on Instigation: All Staff, Pupils, & Visitors

On hearing the shelter in signal, all staff and pupils must:

- Make your way immediately to the nearest building or designated refuge (whichever is closer)
- Go to the nearest classroom.
- Remain in the classroom until further notice.

11.4 Designated Refuge

For pupils who are outdoors at break, lunch or during a Games Lesson on site, the designated refuges will be:

- | | | |
|--------|-------|---------------|
| 11.4.1 | MTPS: | Main Hall |
| 11.4.2 | MTSS: | Sports Centre |

11.5 Action of Teachers & Staff

1. Close windows and doors.
2. Make sure all ventilation/air circulation systems are switched off
3. Reassure all pupils. If possible, return to normal classroom activities.
 - a. Access your school email [Outlook]
 - b. Take a roll call and record the names of all persons present in the room.
 - c. Send roll call to the appropriate Head of School/Senior Deputy Head (Silver Lead)
 - d. Follow the guidance/instruction given via email.

11.6 Release

Normal activity and movement from any classroom or office, may only occur when a notification of "ALL CLEAR" has been advised in person by a member of the SLT or has been posted on the school email.

11.7 Lockdown

11.7.1 Signal

The signal for lockdown is an intermittent ringing of the fire alarm. This will be followed by an email to all staff providing an update and identifying the incident as lockdown. A lockdown incident occurs when there is an immediate risk to pupil and staff safety on the school site – for example a hostile intruder or a dangerous animal.

11.7.2 Action of Teachers and Staff

Please follow the **CLOSE** procedure:

- 1 Close *all doors and windows, draw curtains/blinds if present.*
- 2 Lock *classroom doors shut or barricade door.*
- 3 Out of sight minimise movement & move to away from doors / windows.
- 4 Stay *calm and be as quiet as possible / turn phones to vibrate*
- 5 Endure

- b. Access your school email [Outlook]
 - c. Take a roll call and record the names of all persons present in the room.
 - d. Send roll call to the appropriate Head of School/Senior Deputy Head (Silver Lead)
 - e. Follow the guidance/instruction given via email.
- 11.7.3 Action on lockdown: all staff, pupils and visitors
On receiving a lockdown instruction, staff, pupils and visitors should move to the nearest safe, securable space only if it is safe to do so. If movement would increase risk, they should remain where they are, secure the space as far as possible, stay out of sight, remain quiet, silence mobile devices and await further instruction. Staff should keep pupils together, reassure them, take a roll call where practicable, and report attendance or missing persons by the safest available method.
- 11.7.4 Release
Normal activity and movement from any classroom or office, may only occur when a notification of "ALL CLEAR" has been advised in person by a member of the SLT or has been posted on the school email.
- 11.7.5 During lockdown, no person should communicate externally, including with parents, pupils, media or social media, unless authorised by the Incident Manager, Crisis Leader or emergency services. This does not prevent a person from calling 999 if they are in immediate danger and it is safe to do so.
- 11.7.6 Reasonable adjustments and individual support arrangements, including PEEPs and known medical or SEND needs, should be considered when planning and responding to shelter-in or lockdown situations.

12. Evacuation Procedure

12.1 Signal

The signal for Evacuation is the sounding of the Fire Bell.

12.2 Action on instigation – All staff & pupils

On hearing the fire alarm all staff and pupils must:

- 12.2.1 Make their way immediately to the nearest fire exit.
- 12.2.2 Make their way calmly to their designated Muster Point.

12.3 Muster Points

There are currently two designated muster points as follows:

- 12.3.1 Stanfield: MUGA
- 12.3.2 MTBS: Main School Field

12.4 Action of Teacher

Class teachers must:

- 12.4.1 Make a visual check on exiting a classroom that no pupil remains in room.
 - 12.4.2 Take all pupils in their class directly to their designated muster point.
 - 12.4.3 Take a rollcall of pupils present from their class / form.
 - 12.4.4 Provide the names of any pupil un-accounted for to a Fire Marshall.
 - 12.4.5 Remain with the class until released.
- 12.5 Reception or the Attendance and Pupil Accountability Lead must bring visitor, contractor and signing-in information to the muster point where safe and practicable.
- 12.6 Staff responsible for pupils with Personal Emergency Evacuation Plans, medical needs, SEND or mobility needs must follow the pupil's agreed arrangements where it is safe to do so.
- 12.7 The Incident Manager or nominated Fire Marshal must confirm to the emergency services, as soon as possible, whether all pupils, staff, visitors and contractors are accounted for, and must provide details of anyone missing or believed to remain in the building.

13. Off-Site Evacuation Point

13.1 The off-site evacuation points are:

- 13.1.1 Stanfield: MTSS
- 13.1.2 MTSS: Nazareth Hse field or Chapel.

- 13.2 Where the off-site evacuation point is used, the Incident Manager will confirm arrangements for supervision, registers, first aid, shelter, toilets, communication, transport, parent/carer collection and reunification.
- 13.3 Pupils must only be released to parents/carers or other authorised adults following the School's agreed release and safeguarding procedures. A written record must be kept of all pupils released, including time, receiving adult and authorising member of staff.

14. Release

- 14.1 Normal activity and movement back to any classroom or office, may only occur when a member of the Senior Management Team declares "All Clear".

15. Communication

- 15.1 In the event of a critical incident, communication must be accurate, timely, proportionate and coordinated. Information should be shared with relevant internal and external groups as soon

- as practicable, while avoiding speculation and protecting safeguarding, confidentiality, data protection and any emergency services investigation.
- 15.2 Responsibilities for internal communication are detailed in the roles and responsibilities of individual team members, and oversight will be maintained by the Headmaster (Gold Lead)
- 15.3 All external communication will be managed and led by the Communications lead.
- 15.4 Template holding statements are provided as a basis for initial communications in Appendix 2 which are to be used in the event of an incident.
- 15.5 As soon as practicable, external communications consultants will be engaged to support all media relations, but it is imperative that such communications are delivered by a senior member of the Merchant Taylors' Schools' staff.
- 15.6 Parents/carers of directly affected pupils will be contacted as soon as practicable, unless emergency services or safeguarding professionals advise that this should be delayed to protect a pupil, preserve evidence or avoid serious harm.
- 15.7 Wider parent, pupil, staff and governor communications will be coordinated through the Communications Lead and approved by the Crisis Leader or Incident Manager before release.
- 15.8 Staff, pupils, parents and visitors should be reminded not to post about the incident on social media, share images, name individuals, speculate about causes, or respond to media requests. Media enquiries must be referred to the Communications Lead.
- 15.9 Communications must be accessible and considerate of SEND, language needs, age, vulnerability and the likely emotional impact on pupils and families.
- 15.10 Where the incident affects attendance, closure, remote education, examinations, transport, catering, medical needs or safeguarding arrangements, communications must make clear what pupils and parents should do, where to obtain updates and how urgent concerns should be raised.
- 15.11 A record must be kept of significant communications issued, including time, audience, method, content and authorisation.

Data breach and cyber incident response

Where a critical incident involves a cyber incident, loss of personal data, unauthorised disclosure, ransomware, compromised systems, loss of devices or suspected access to confidential information, the Incident Manager must notify the Data Protection Officer and IT Lead immediately.

The DPO, with support from the IT Lead and Crisis Leader, will assess the nature and severity of the breach, the individuals affected, the risk of harm, safeguarding implications, containment steps, communication requirements and whether the incident must be reported to the Information Commissioner's Office.

Where a personal data breach is likely to result in a risk to individuals, the ICO must be notified within 72 hours of the School becoming aware of the breach. Affected individuals must also be informed where required. All data breaches and near misses must be recorded and reviewed, even where ICO notification is not required.

16. Safeguarding, Allegations and Adult Conduct

- 16.1 Safeguarding remains paramount during any critical incident. The School will continue to follow its Safeguarding Policy, KCSIE and local safeguarding partnership procedures.
- 16.2 Any safeguarding concern, disclosure or allegation arising during or after a critical incident must be reported immediately to the DSL or Deputy DSL. Staff must not investigate, ask leading questions, promise confidentiality or delay reporting.
- 16.3 Where a concern involves an adult working with children, including staff, supply staff, volunteers, contractors, visitors, external providers or governors, the Headteacher and DSL must be informed immediately. Where the concern meets, or may meet, the harm threshold, the School will follow allegations procedures, including consultation with the LADO/Designated Officer and other agencies as appropriate.
- 16.4 Low-level concerns about adults must be recorded and managed in line with the School's Low-Level Concerns and Staff Code of Conduct procedures.
- 16.5 If the allegation or concern involves the Headteacher, it must be reported to the Chair of Governors without delay. If it involves the Chair of Governors, the School will follow its safeguarding and governance escalation procedures.
- 16.6 Where a pupil is missing, at risk of harm, or may have been removed from site without authorisation, the School will act immediately to safeguard the pupil, including contacting parents/carers, police, children's social care and other agencies where appropriate
- 16.7 Where a pupil death or serious harm may involve abuse or neglect, the School will cooperate fully with children's social care, police, safeguarding partners and any serious child safeguarding incident or child death review processes.

17. Restrictive Interventions, Use of Force, Restraint and Seclusion

- 17.1 Any use of force, restraint, seclusion or other restrictive intervention during a critical incident must be lawful, necessary, proportionate and used only where required to prevent harm, maintain safety or respond to an immediate risk.
- 17.2 Staff must seek to use prevention, de-escalation and non-restrictive approaches wherever safe and practicable.
- 17.3 Any significant use of force must be recorded in writing as soon as practicable and, wherever possible, no later than the same day.
- 17.4 Any incident involving seclusion or restraint must be recorded in writing as soon as practicable and, wherever possible, no later than the same day.
- 17.5 The written record should include, as a minimum: the pupil and staff involved; time, date, location and approximate duration; relevant pupil needs or vulnerabilities, including SEND where applicable; the reason the intervention was assessed as necessary; the type and degree of

intervention used; any injuries or adverse impact; first aid or medical treatment provided; post-incident support; pupil and staff debrief; and any follow-up action.

- 17.6 Parents/carers must be informed in writing as soon as practicable, and the School should endeavour to do this no later than the same day, unless reporting to a parent would be likely to result in serious harm to the pupil. Where this exception applies, the School will follow the statutory guidance and safeguarding procedures.
- 17.7 Any restrictive intervention must be reviewed by an appropriate senior leader and, where relevant, the DSL/SENDCo, to identify triggers, patterns, support needs, reasonable adjustments, staff training needs and whether any behaviour support plan or risk assessment requires amendment.
- 17.8 Governors will receive proportionate anonymised information about restrictive intervention data and trends, including any disproportionate use relating to pupils with SEND, protected characteristics or other vulnerabilities.

18. Resolution and De-brief

- 18.1 The response required to return the school to normal activity, in the aftermath of a critical incident, may require activity to extend over a considerable time.
- 18.2 Once the Crisis Leader is satisfied that any on-going action required can best be accomplished through the School's day-to-day managerial structure, the critical incident should be declared finished, and the Incident Management Team stood down.
- 18.3 If appropriate and prior to formal notification of being stood down, the Crisis Team should attend a "hot" de-brief session and should be held no later than 3 days after the initial incident.
- 18.4 The Crisis Leader will ensure that proportionate post-incident support is made available to pupils, staff and others affected. This may include pastoral support, safeguarding support, counselling, occupational health, educational psychology advice, signposting to external support, or further contact with families..
- 18.5 A written report of the lessons learnt from the response to the Critical Incident should be made and any recommendations incorporated into changes to the Critical Incident Plan.
- 18.6 The written post-incident report should include: chronology of the incident; immediate actions taken; decisions and rationale; communications issued; safeguarding, welfare, health and safety, data protection and statutory reporting considerations; impact on pupils' education and wellbeing; support provided; lessons learned; recommendations; responsible owners; and timescales for completion.
- 18.7 A summary of significant incidents, lessons learned and actions completed will be reported to governors through the appropriate committee. Safeguarding, health and safety, restrictive intervention, data breach and RIDDOR matters will also be reported through the relevant governance route.

17.8 Where appropriate, pupil, parent and staff voice will be considered as part of the review, particularly where the incident affected pupils' safety, wellbeing, education, access arrangements, SEND support or confidence in school procedures.

17.9 The policy, risk assessments, training and emergency procedures will be reviewed after any significant incident, near miss, test exercise or change in statutory guidance.

Confidential operational appendices — not for publication

This appendix contains personal contact details and sensitive operational information. It must be kept securely, shared only with those who need it for emergency planning and response, and removed or redacted from any public-facing version of this policy.