Safeguarding and Child Protection Policy

This policy, which applies to the whole school, inclusive of boarding, is publicly available on the school website and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the school Compliance Officer.

This policy and its efficacy are reviewed and updated annually (or more frequently when national guidance or institutional learning requirements require it).
This policy is approved by the full Board of Governors.

Owner: Deputy Head Pastoral (Designated Safeguarding Lead)
Approving Body: Board of Governors

Date of last formal Review: September 2026
Date of next formal Review: September 2027

Linked Polices:

- Anti-bullying Policy
- Attendance Policy
- Behaviour, Rewards and Sanctions Policy
- Data Protection Policy
- Low-level Concerns Policy
- Mental Health & Wellbeing Policy
- Missing Student Policy
- Online Safety Policy
- Privacy Notice – Students, Parents and Alumnae
- SEND Policy including Reasonable Adjustments
- Suicide Prevention Policy
- Taking, Storing and Using Student Images Policy
- RSE Policy
- Visitor and Visiting Speaker Policy
- Wellbeing (PSHE) Policy
- Whistleblowing Policy

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KEY EXTERNAL CONTACT DETAILS

Local Authority Designated Officer (LADO)	TEL: 03001231650 EMAIL: lado@surreycc.gov.uk
Local Authority Children's Social Services	**C-SPA (Children's Single Point of Access)** TEL: 0300 470 9100 EMAIL: cspa@surreycc.gov.uk EARLY HELP: **OUT OF HOURS EMERGENCY DUTY TEAM** TEL: 01483 517 898 EMAIL: edt.ssd@surreycc.gov.uk
Local Authority Safeguarding Board	**Surrey Safeguarding Children's Partnership** WEBSITE: www.surreyscb.org.uk
Local Authority Designated Officer	**Duty LADO** TEL: 0300 123 1650 EMAIL: LADO@surreycc.gov.uk
Support and Advice about Extremism	**Police** Claire McDonald - SURREY POLICE TEL: 01483 571 212 EMERGENCY: 999 NON-EMERGENCY NUMBER: 101 EMAIL: claire.mcdonald@surrey.police.uk **To Make a Referral** EMAIL: preventreferrals@surrey.pnn.police.uk **Local Authority** Lara Bowden - SURREY COUNTY COUNCIL EMAIL: lara.bowden@surreycc.gov.uk **Department for Education** NON-EMERGENCY NUMBER: 020 7340 7264 EMAIL: counter.extremism@education. gov.uk
NSPCC Whistleblowing Advice Line	ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 (Monday to Friday 8am to 8pm; weekends between 9am and 6pm) EMAIL: help@nspcc.org.uk
NSPCC Report Abuse in Education Advice Line	TEL: 0800 136 663 EMAIL: help@nspcc.org.uk

Disclosure and Barring Service	ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@dbs.gov.uk
Teaching Regulation Agency	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm) EMAIL: CIE@ofsted.gov.uk
Independent Schools Inspectorate	TEL: 0207 6000 100 EMAIL: concerns@isi.net

KEY SCHOOL CONTACT DETAILS

Governors	**CHAIR OF GOVERNORS** **Catharine Berwick** EMAIL: berwickc@woldinghamschool.co.uk **NOMINATED SAFEGUARDING GOVERNORS** **Ifey Summers** EMAIL: summersi@woldinghamschool.co.uk **Nick Waite** EMAIL: waiten@woldinghamschool.co.uk
Designated Safeguarding Lead ("DSL")	**DSL FOR THE SCHOOL** **Miss Joy Ugono – Deputy Head Pastoral (DSL)** TEL school hours: 01883654291 TEL out of school hours: 07786584866 EMAIL: ugonoj@woldinghamschool.co.uk

Deputy Designed Safeguarding Lead ("DDSL") Team	**DEPUTY DSL** **Mrs Abigail Eland** – Safeguarding Manager and Mental Health Lead TEL school hours: 01883654251 TEL out of school hours: 07514 800 042 EMAIL: elanda@woldinghamschool.co.uk **DEPUTY DSL** **Mr Terry Nunes** – Assistant Head Co-curricular TEL school hours: 01883654179 TEL out of school hours: 07979903904 EMAIL: nunest@woldinghamschool.co.uk **DEPUTY DSL** **Mr Alex Sharkey** – Head of Wellbeing TEL school hours: 01883654357 TEL out of school hours: 07768856655 EMAIL: sharkeya@woldinghamschool.co.uk **DEPUTY DSL** **Mrs Pippa Whitby** – Assistant Head Boarding TEL school hours: 01883 654100 TEL out of school hours: 07768 853 414 EMAIL: whitbyp@woldinghamschool.co.uk **DEPUTY DSL – SCHOOL HOLIDAY CONTACTS** **Ms Liz Roche** – Director of Finance and Operations TEL: 01883654202 MOBILE: 07825436718 **Mr Paul Ireland** – Director of IT TEL: 01883654145 MOBILE: 07768776006 **Ms Jacqui Collins** – Head of Human Resources TEL: 01883654014 MOBILE: 07768703212
Designated Teacher for Looked After Children	**Miss Joy Ugono – Deputy Head Pastoral** TEL: 01883 654251 MOB: 07786584866
Head	**Mrs Sue Baillie** TEL: 01883 349431 EMAIL: head@woldinghamschool.co.uk

This policy has regard to the following guidance and advice:

- *Keeping Children Safe in Education* (September 2026) ("*KCSIE*")
    - *KCSIE incorporates the additional statutory guidance Disqualification under the Childcare Act 2006 (September 2018)*
    - *KCSIE also provides links to various toolkits and additional advice and support*
- *Working Together to Safeguard Children* (March 2026) ("*WT*")
    - *WT* refers to the non-statutory advice: *Information sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers* (May 2024)
- *Prevent duty guidance: Guidance for specified authorities in England and Wales December 2023. Prevent* is supplemented by a briefing note:
    - *How social media is used to encourage travel to Syria and Iraq* (July 2015)
- *Relationships Education, Relationships, and Sex Education (RSE) and Health Education* (July 2025).
- *Behaviour in schools (February 2024)*
- *Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (July 2026)*
- *Children Missing Education (September 2025)*
- *Digital and technology standards in schools and colleges (June 2026)*
- *Mobile phones in schools (June 2026)*
- *After school clubs, community activities, and tuition (safeguarding guidance for providers) (February 2026)*
- The Charity Commission guidance *Safeguarding and protecting people for charities and trustees* (June 2022)
- *The National Minimum Standards for boarding schools (May 2026)*
- *What to do if you're worried a child is being abused – Advice for practitioners (March 2015)*
- *Searching Screening and Confiscation Advice for Schools (July 2022)*

TERMINOLOGY

Safeguarding and promoting the welfare of children is defined as:

• Providing help and support to meet the needs of children as soon as problems emerge;

• Protecting children from abuse and maltreatment, whether within or outside the home, including online;

• Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;

• Taking action to enable all children to have the best outcomes.

• Preventing impairment of children's mental or physical health or development.

Abuse - reference to abuse in the policy may also mean or include need, neglect or harm as appropriate.

Child Protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Child(ren) for the School's purposes includes all students in the School, including those who are over 18. On the whole, this will apply to students of our School; however the policy will extend to visiting children and students from other establishments.

Child looked after (CLA) – used internally in Surrey County Council rather than looked after children

C-SPA refers to the Single Point of Access and the Child Protection Consultation Line

Early Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chances of a problem getting worse.

Gillick Competency help people who work with children to balance the need to listen to children's wishes with the responsibility to keep them safe.

The local safeguarding partnership has three partners:

1. Chief Executive of Surrey County Council (Children's Services)
2. Chief Executives of Surrey Heartlands and Frimley Integrated Care Boards, and
3. The Chief Constable of Surrey Police

MAP refers to the Surrey Multi-Agency Partnership

Parents refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

Social Care refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.

SSCP refers to the multi-agency safeguarding arrangements set up by the Surrey Safeguarding Children's Partnership

Staff refers to all those working for or on behalf of the School, full or part time, temporary or permanent, in either a paid or voluntary capacity (including governors, supply staff, agency staff and volunteers)

OUTLINE OF PRINCIPLES

Woldingham School takes a 'whole school approach' to safeguarding and is committed to:

- keeping its community, including students and staff, safe
- listening to children and acting in their best interests
- working with and sharing information with parents, unless to do so may cause greater harm, and taking the wishes of students into account (especially where Gillick competent)
- an anti-discriminatory culture throughout the School, recognising that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination
- *promote an inclusive, anti-discriminatory culture where racism and other discriminatory behaviours are recognised, challenged, and addressed as part of safeguarding responsibilities*

This policy also follows the procedures and practice, including the criteria for action and protocols for assessment, of Surrey's Children's Single Point of access (C-SPA) as part of the SSCP.

EQUALITY ACT 2010

The School understands and recognises its obligations under the Equality Act and that the school must not discriminate against students because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the School will consider how to support students with regard to particular protected characteristics in order to meet their specific needs. The School will also consider their duty to make reasonable adjustments for disabled students. The School recognises that effective safeguarding is anti-discriminatory and anti-racist, and understands factors, including economic and social circumstances, ethnicity and disability, which can impact on children and families' lives. Staff are alert to the risk of adultification bias, where children, particularly Black children, may be perceived as older than they are, which can lead to their needs being poorly understood and opportunities to provide help being missed.

The School also complies with its legal duties under the Equality Act 2010, including putting special provision in place to support dialogue with children who may not be able to convey their wishes and feelings as they may want to. This might include, for example, those who have communication difficulties and those who do not speak English or for whom English is not their first language.

CONCERNS ABOUT A CHILD

The School has a duty to consider, at all times, the best interests of the student and take action to enable all students to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility. The School adopts a 'whole school' approach to safeguarding. This means involving everyone in the School, and ensuring that, safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Staff are required to report any concerns about the safety or welfare of a student, about the conduct of an adult working in the school or about safeguarding practices in the school in accordance with this policy.

Parents are encouraged to raise any concerns directly with the School, if necessary using this safeguarding policy, for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

The School has arrangements for listening to children and providing early help. If a student has suffered or is likely to suffer harm, the DSL must report this to C-SPA.

Children in need of additional support from one or more agencies: The DSL would use the Continuum of Support to determine the type of support a child or their family may require. An Early Help Assessment (EHA) Form, will be completed to make a referral directly or through Surrey C-SPA.

DEFINITIONS OF CHILD PROTECTION AND SAFEGUARDING AND TYPES AND SIGNS OF ABUSE

Safeguarding and promoting the welfare of children 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 part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be one or more of the following:

- physical abuse;
- emotional abuse;
- sexual abuse;
- neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* (May 2024) supports staff who have to make decisions about sharing information.

The proprietor recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required.

Fears regarding sharing information under the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) must not be a barrier to safeguarding and keeping children safe, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. When deciding what information to share, staff should consider:

- the relevancy of the information, including to the current safeguarding risk,
- what is necessary for the receiving setting to know, and
- whether it is clearly presented and appropriately contextualised.

Professional judgement should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. Care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead (DSL).

The proprietor will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared

without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and gaining consent would place a child at risk

not providing students' personal data where the serious harm test is met.

The School has appropriate arrangements in place to ensure that safeguarding information is transferred, reviewed and actioned promptly at all transition points, including in-year moves, in line with the statutory guidance. When sharing safeguarding information the School will clearly distinguish current safeguarding concerns and support needs from historic information.

Where the School receives safeguarding information for students this will be reviewed by the DSL who will take steps to clarify any information that is unclear or incomplete. Where there are issues or concerns this may include a conversation between the DSLs at both settings. The DSL will ensure that key staff are aware of any relevant information for new students.

Where the School receives any information that indicates an incoming student may present a risk to others and/or themselves, the School will assess the risk and put in place a safety and support plan for when the child arrives.

All staff should:

- listen attentively, be calm and reassuring and non-judgemental
- avoid asking leading questions
- observe their behaviour
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns
- determine how best to build trusted relationships with children and young people which facilitate communication

All concerns, discussions, and decisions (including the rationale for those decisions) regarding a disclosure should be recorded in writing. Typically, this would be on CPOMS or it could be in another format. Additionally, the DSL or another member of the Safeguarding Team (DDSLs) should be notified of the disclosure. This includes instances where referrals were or were not made to another agency, such as children's social care or the Prevent programme. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how

the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. The record should include:

- the date and time of the conversation
- details of what was said using the student's own language (try to write verbatim, where possible)
- by whom and in whose presence the disclosure was made
- the name of the person recording the disclosure
- any actions taken

The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of *KCSIE*.

Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or a DDSL).

Where there is a safeguarding concern, the School will ensure, as far as possible, that the student's wishes and feelings are taken into account when determining what action to take and what services to provide. In some circumstances, the needs of the victim will need to be balanced carefully with the duty to protect the child, as well as other children. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The School implements a child-centred approach to safeguarding. Whilst the School is committed to working collaboratively, and in partnership, with parents and carers as far as possible, the wishes and feelings of the child and what is in their best interest is always central to the School's decision-making process.

CONTEXTUAL SAFEGUARDING

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside school. All staff, but especially the DSL and DDSLs, should consider the context within which such incidents and/or behaviours occur. The School will, as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

VULNERABE GROUPS

The School recognises that some students are more vulnerable to abuse.

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain medical conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health, and care plan)
- Has a mental health need – this can be an indicator of abuse, neglect or exploitation
- Is a child living away from home eg boarding
- Is a young carer
- Is absent on repeat occasions or for prolonged periods
- Is frequently missing/goes missing from education, home or care
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement as association with organised crime groups or county lines
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, or in Alternative Provision or a Student Referral Unit
- Is misusing drugs and alcohol themselves
- Is at risk of modern slavery, trafficking, and/or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending
- Is a privately fostered child
- Is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage

The School recognises that whilst LGBT and gender questioning are not risk factors in themselves, children could be targeted by others and risks can be compounded when children who are LGBT lack a trusted adult. Woldingham School endeavours to reduce any additional barriers faced and provide a safe space to speak and share any concerns with members of staff.
Gender questioning children may have wider vulnerabilities and/or wider, complex mental health needs. In such cases, the School will encourage families to seek clinical help and advice.

EARLY HELP
Early help is support for children of all ages that improves resilience and outcomes or reduces the chance of a problem getting worse. Early help may be appropriate for children who have several needs, or whose circumstances might make them more vulnerable.

The School has effective measures in place to identify emerging problems and potential unmet needs of individual students. All staff undertake appropriate training to ensure that they know when to share information with other agencies and what action to take to support early identification and assessments.

In the first instance, staff identify a student who may benefit from early help should discuss this with the School's DSL. If appropriate, the DSL will work with C-SPA within the SSCP to

undertake an assessment of the need for early help. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. Further guidance on effective assessment of the need for early help can be found in Working Together to Safeguard Children (December 2023) ("WT").

If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the student's situation does not appear to be improving.

REPORTING AND PROCEDURES – WHAT STAFF SHOULD DO:

1. IF THEY HAVE CONCERNS ABOUT A CHILD

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can also make a direct referral to children's services. Staff should not assume that somebody else will take action and should always share information that might be critical to keep a child safe; they should maintain an attitude of 'it could happen here' and 'what if I'm right?'. In some cases, a concern may require a referral. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's services for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's services as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

2. IF THEY HAVE CONCERNS THAT A CHILD IS IN DANGER OR AT RISK OF HARM

Where a child is in immediate danger or at risk of harm, they should make an immediate referral to children's services (C-SPA) and/or the police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's services; however, unless there is a concern that seeking consent could cause significant harm to the child, the school would endeavour to work with parents when making a referral. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School works with SSCP. A full copy of their local procedures can be found on the SSCP website www.surreyscp.org.uk.

3. IF A CHILD IS SEEN AS AT RISK OF RADICALISATION

Staff should follow the School's normal referral processes when there are concerns about children who may be susceptible to radicalisation into terrorism. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff

have concerns that there is an immediate/significant risk of a child being drawn into terrorism, they must call 999. Advice and support can also be sought, in confidence, from the **National Police Prevent Advice Line – 0800 0113764**, where concerns can be shared with specially trained officers.

The School, in recognition that students may be susceptible to being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the police) which assess how their learners or staff may be at risk of being radicalised into terrorism, including online. Such risk assessments are discussed with the Head, DSL and wider safeguarding committee including DDSLs and governors responsible for safeguarding, to ensure the School's safeguarding arrangements are sufficiently robust in identifying those at risk of radicalisation. Appropriate support is provided and is regularly revised as needed.

4. IF THEY DISCOVER AN ACT OF FEMALE GENITAL MUTILATION ("FGM")

Staff have a mandatory duty to report to the police by calling 101/999, cases where they discover that an act of FGM appears to have been carried out. Staff must give their name, contact details, role and place of work alongside DSL contact information and details of the student such as name, date of birth and address. Staff should take note of the reference number given to them by the police. Unless the member of staff has a good reason not to, they should notify the DSL of any such case who will involve children's services as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a student may be at risk of FGM.

5. IF THEY HAVE CONCERNS THAT CHILDREN ARE AT RISK FROM OR INVOLVED WITH SERIOUS VIOLENT CRIME

All staff should be aware of the indicators which may signal that children are at risk from or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can also make a direct referral to children's social care.

6. IF THEY BECOME AWARE OF AN INCIDENT OF NUDE AND SEMI-NUDE IMAGES AND/OR VIDEOS (INCLUDING THOSE GENERATED BY AI)

The School is alert to the safeguarding risks arising from AI in this context, including the generation of deepfake intimate images using AI tools and the use of AI to create child sexual abuse material. Taking and sharing AI-generated intimate images of those aged under 18 is a criminal offence. Staff should be aware that incidents involving AI-generated imagery should be treated with the same seriousness as those involving real images and referred to the DSL immediately.

The School recognises that images of students published by the School on its website, social media channels, or in marketing materials may be vulnerable to misuse, including manipulation using AI tools. The School's approach to obtaining consent for, publishing, and managing student images (including the steps taken to mitigate the risk of AI manipulation of published images) is set out in the School's Taking, Storing and Using Student Images Policy. Staff should refer to that policy for guidance on the publication of student images and should report any concerns about the misuse or manipulation of published images to the DSL immediately.

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by persons under the age of 18 online. . Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. hey may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

Many professionals may refer to 'nudes and semi-nudes' as:

- youth produced sexual imagery or 'youth involved' sexual imagery
- indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18.
- 'sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images
- image-based sexual abuse. This term may be used when referring to the nonconsensual sharing of nudes and semi-nudes

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a student or of a student, they should refer the incident to the DSL as soon as possible.

All incidents involving the sharing of nude or semi-nude images will receive a safeguarding response, regardless of whether they are consensual or non-consensual. The School will take a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (March 2024) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the student unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment, if required, to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.

It is important to note that disclosure may not be a single event and the student may share further information at a later stage meaning the situation may need further review.

An immediate referral to police and/or children's services via C-SPA will be made if any of the following points apply:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- The images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The images involves sexual acts and any child or young person in the images or videos is under 13.
- There is reason to believe a child or young person is at immediate risk of harm owing to the sharing of nude and semi-nude images and/or videos including those generated using AI ,, for example, they are presenting as suicidal or self-harming.

If none of the above apply, at the initial review stage the School may decide to respond to the incident without involving the police or children's services. All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. The decision to respond to an incident without involving the police or children's services will only be made in cases where the DSL is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the School's pastoral support and disciplinary framework. Any decision in this regard will be made by the DSL with input from the Head. The decision will be made and recorded in line with this Policy and will be based on consideration of the best interests of any child or young person involved. Any decision will take into account proportionality as well as the welfare and protection of any child or young person. The decision will be reviewed throughout the process of responding to the incident. The School reserves the right to escalate the incident at any time if further information or concerns arise at a later date which change the risk factors.

If doubts remain after following the above procedures, C-SPA will be contacted for a consultation and possible referral.

This guidance does not apply to the sharing of images of persons under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

7. IF A CHILD IS ABSENT FROM EDUCATION

Children who are absent from education particularly on repeat occasions and/or for prolonged periods, and children missing education can act as a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is important that the School's response to persistently absent students and children missing education supports identifying such abuse, and in the case of absent students, helps prevent the risk of them becoming a child missing education in the future.

The School's procedures for unauthorised absence and for dealing with children who are absent, repeatedly and/or for prolonged periods, and children missing from education are outlined in the Attendance Policy.

Where reasonably possible, the School will hold more than one emergency contact number for each student to provide the School with additional options to make contact with a responsible adult particularly when a child who is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safeguarding concern.

The School will report to Surrey County Council a student who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

When working with local authority children's services where school absence indicates safeguarding concerns the School will have regard to the statutory DfE guidance *'Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (August 2024).*

8. IF A CHILD NEEDS A SOCIAL WORKER (CHILDREN IN NEED AND CHILD PROTECTION PLANS)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect, exploitation and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Concerns about a **Child in Need** must be acted on immediately, reported to the DSL who will assess the need for, and arrange for, pastoral, or other in school support, early help or onwards referral to Children's Services in accordance with SSCP.

Concerns about a **Child at Risk** must be reported at once to the DSL for immediate onward referral to Children's Services, and the police where it is deemed a crime has been committed.

All staff should be aware that anyone can make a referral if necessary and that parental consent is not required to statutory agencies, particularly where to do so would place the child at greater risk of harm.

9. IF A CHILD REQUIRES MENTAL HEALTH SUPPORT

The School has an important role to play in supporting the mental health and wellbeing of its students. Specifically, staff can support the fulfilment of 4 key roles:

- promoting good mental wellbeing and preventing the onset of mental illness,
- observing students 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.

All staff should be aware that mental health problems can, in some cases develop into a safeguarding concern. This could include, for example, self-harm, eating disorders, or suicidal ideation. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE *Mental Health and Behaviour in Schools* guidance. Public Health England has produced a range of resources to support staff to promote positive health, wellbeing, and resilience among young people.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL. Where support is needed, the DSL will consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk.

The DSL will call 999 if there is immediate danger and NHS 11 for urgent non-emergency mental health support.

Staff should not wait for a formal diagnosis before raising a concern with the DSL. If staff feel that a child is in immediate danger and the DSL or DDSL is not available, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person.

The School's Mental Health Lead is the Safeguarding Manager who works closely with the Deputy Head Pastoral.

10. IF THEY HAVE SAFEGUARDING CONCERNS ABOUT ANOTHER STAFF MEMBER

The School provides clear and comprehensive guidance about the standards of appropriate behaviour and actions of its staff in the Staff Handbook. All staff are expected to comply with the standards contained within this document at all times.

If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff (including supply staff, trainee teachers, volunteers, and contractors), then:

- this should be referred to the Head via the QR code on the Low-level concerns poster or by emailing the Head directly, who will consider whether an onward referral to the LADO is required
- where there is a concern/allegation about the Head, this should be referred to the Chair of Governors

- where there is a conflict of interest in reporting the matter to the Head, this should be reported directly to the LADO(s). The LADO's details are provided in this policy under Key External Contacts.

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, trainee teachers, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the procedure set out below under 'Dealing with concerns or allegations that do not meet the harm threshold/low level concerns.'

11. IF THEY HAVE CONCERNS ABOUT SAFEGUARDING PRACTICES IN THE SCHOOL

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here' and 'what if I'm right?'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found in the Whistleblowing Policy. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

ARRANGEMENTS FOR DEALING WITH ALLEGATIONS OF CHILD-ON-CHILD ABUSE (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT) (KCSIE - Part Five)

Child-on-child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include:

- bullying (including cyber bullying, prejudice-based and discriminatory bullying),
- abuse in intimate personal relationships between children (also known as teenage relationship abuse),
- physical abuse and harm (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm),
- physical assault and harm, or the threat of harm with a weapon,
- initiation/hazing type violence and rituals,
- upskirting[46],
- consensual and non-consensual making or sharing of nude or semi-nude images and/or videos including those generated using AI e.g. deepfakes,
- harmful sexual behaviours, sexual violence and sexual harassment, which may include misogyny/misandry
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.[48]
- a group of children sexually assaulting or sexually harassing a single child or group of children. [49]

These arrangements apply to all reports and concerns of child-on-child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

The School acknowledges that even if there have been no reported cases of child-on-child abuse in relation to students within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the student is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child-on-child abuse, and can recognise the indicators and signs of child-on-child abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern. All staff will report concerns of peer-on-peer abuse to the DSL, or a deputy DSL.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children. The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

1. PROTECTION OF BOARDERS

The School recognises that children can be particularly vulnerable in the unique nature of residential (boarding) settings and are alert to the potential for child-on-child abuse and risks associated with children sharing overnight accommodation.

Student's fill in request forms every term stating who they would like to share with or, in the case of individual rooms, who they would like to be near in a corridor. This ensures students views are taken into consideration when rooming them.

Staff are present in Boarding Houses whenever the students are 'at home' and whilst their office door is always open for them to come and seek help should they need it, staff also make regular visits around the house to communal spaces and bedrooms to check in with the students.
Overnight, students must stay in their own rooms and if concerned about anything can call the member of staff on duty.
Younger students are supervised during activities as they learn more about socialising with their peers and are given more freedom with how they spend their time as they get older and are more mature.
Students in all houses are reminded about respecting one another's personal space, knocking before entering bedrooms, waiting to be invited in and in shared rooms not inviting other students in without the permission of all of the occupants of the room.
Procedures for responding to issues in boarding follow the same format as those for day students. Where there is a concern regarding child-on-child abuse that is specifically occurring within the boarding environment, additional measures may need to be put in place to safeguard the victim(s) and alleged perpetrator. Decisions will be made with the Fit to Board Policy as guidance by the DSL along with the Director of Boarding.
The School will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times.

2. PREVENTATIVE MEASURES

The School takes the following steps to minimise the risk of child-on-child abuse:

Culture

- Making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated.
- Following the school values and standards, which underpin the school ethos and approach to pastoral support, including the Behaviour, Rewards and Sanctions Policy
- Never passing any abuse off as "banter", "just having a laugh" or a "part of growing up". We believe that failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- Encouraging a culture of openness and mutual respect where concerns can be raised without fear
- Recognising, acknowledging, and understanding the scale of harassment and abuse
- Recognising that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- Challenging physical behaviour (potentially criminal in nature) such as smacking bottoms, flicking bras
- Believing that dismissing or tolerating such behaviours risks normalising them

Training and Education

- Providing training for staff on recognising the indicators of peer-on-peer abuse

- Delivering age appropriate PSHE and RSE content on healthy relationships, consent, boundaries and respect
- Teaching students how to recognise harmful behaviours and seek help
- Promote 'Student Voice', providing opportunities for concerns to be raised including tutor time, school counsellors, in the Hub or Wellbeing lessons
- Providing multiple ways for students to report concerns, including anonymously such as Whisper and the avenues outlined on the 'Who Can Support Me?' poster

Action

- When a concern has been raised the DSL will review the matter, alongside other key staff as necessary, considering the needs of the victim and the alleged perpetrator.
- A risk assessment may be deemed necessary; this will be conducted on a case-by-case basis
- Victims will be reassured they are being taken seriously and never be given the impression they are making a fuss or creating a problem.
- A range of factors will be considered when taking action including age, developmental stage, power imbalance, previous incidents, if the abuse is of a sexual nature (including sexual violence or harassment) as well as the needs and wishes of the victim.
- In some circumstances the needs of the victim will need to be balanced carefully with the duty to protect the child, as well as other children
- All matters will be dealt with sensitivity
- All matters will be recorded on CPOMS
- A referral to Children's Services will be made if necessary and parental consent sought, where it would not lead to greater harm for the child to inform the parents
- Appropriate disciplinary action against the alleged perpetrator will occur in accordance with school policies, such as the Behaviour, Rewards and Sanctions Policy. Taking disciplinary action and providing support are not mutually exclusive and will likely occur at the same time.
- Whilst there is a clear focus within peer-on-peer abuse around incidents of a sexual nature, other forms of abuse constitute peer-on-peer abuse such as physical abuse. These are equally not tolerated.
- If it is believed that a crime has been committed, the DSL will report the incident to the police.
- If it is believed that the incident falls within the framework of bullying, the Anti-bullying policy will be adhered to. Where an issue of student behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures below rather than the School's Anti-bullying and Behaviour policies

ACTIONS THAT MAY BE TAKEN

A student against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the SSCP or the police as appropriate on the investigation of such allegations. The School will take all appropriate action to ensure the safety and welfare of all students involved including the alleged victim and perpetrator(s). If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice given, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the relevant external agencies. The School will have regard to the procedures set out in *KCSIE* at all times.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL or a member of the Safeguarding Team who should consider:

- parents or carers should normally be informed unless doing so would put the victim at greater risk;
- the basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care;
- whether a crime has been committed.

Ultimately, the DSL and wider Safeguarding Team, if relevant, will balance the victim's wishes against their duty to protect the victim and other children.

POLICE INVOLVEMENT

By law, any cases of FGM must be reported to the police directly and immediately. This is a mandatory reporting duty.

All incidents of child sexual abuse must be reported to either the Local Authority or the police. Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the student and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help and may make the necessary referral in accordance with the SSCP referral process.

The School's recognises sexting as a form of peer-on-peer abuse. The procedure for managing incidents of this nature are outlined earlier in this policy (If they become aware of an incident of nudes and semi-nudes being shared by students).

The School will follow the UKCIS guidance *Sharing nudes and semi-nudes: advice for education settings working with children and young people" (March 2024)* when responding to an allegation that nudes and/or semi-nudes have been shared.

In accordance with the School Behaviour, Rewards and Sanctions Policy, which outlines the School's approach to searching students and their belongings (*Searching Screening and Confiscation Advice for Schools*), students and their devices may be subject to such searches as necessary. Where staff may suspect an incident of sexting, they should never look at any imagery but may need to confiscate a device to prevent the tampering of any potential evidence.

In the event of disclosures about child-on-child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported including by external agencies as appropriate.

THE NEED FOR RISK ASSESSMENTS

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

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or have their experience minimised. The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to students and put adequate measures in place to protect them and keep them safe and to ensure, as far as is possible, that their educational attainment is not adversely affected. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing

school premises (including during any before or after school-based activities), and school transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

The School will consider intra familial harms and whether any support for siblings is necessary following an incident.

The School will keep a written record of all concerns, discussions and decisions made. This will typically be on CPOMS.

PERIODIC REVIEWING OF REPORTS

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic of inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified, the School will decide on an appropriate course of action.

UNSUBSTANTIATED REPORTS

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's Behaviour, Rewards and Sanctions Policy.

REPORTING PROCEDURES FOR ALLEGATIONS AGAINST STAFF, INCLUDING THE HEAD AND THE DSL, SUPPPLY STAFF, VOLUNTEERS AND CONTRACTORS (KCSIE – Part Four)

Where a concern or an allegation meets the 'harm threshold' (as set out in KCSIE 2025, paragraph 359), the following reporting procedure should be followed:

ALLEGATION OR CONCERN AGAINST	**REPORT TO**
Staff including the DSL, volunteers or contractors	The Head, then the LADO
Supply Staff	The Head, then the LADO and the agency should be fully involved

The Head	The Chair of Governors, then LADO without informing the Head at that stage
A Sole Proprietor	Directly to the LADO
A Teacher who is no longer teaching	Directly to the Police and the LADO
Where there is a conflict of interest in reporting to the Head	Directly to the LADO

In all cases, the School would not conduct a full investigation before making the referral to the LADO, but gather only the basic details which will be required by the LADO.

DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF (INCLUDING SUPPLY TEACHERS), VOLUNTEERS AND CONTRACTORS

The School's procedures for managing concerns or allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School, whether in a paid or unpaid capacity, follows DfE statutory guidance and SSCP arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a child, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

In this section reference to 'allegations' also covers concerns. Allegations that do not meet the above harm threshold should be dealt with using the School's procedure for handling low level concerns set out below and in the School's Low-level Concerns Policy.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation(s) without prior

consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations.

When dealing with an allegation about a staff member the School will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

1. Allegations which appear to meet the above reporting criteria are to be reported straight away to the Head. Where the Head is absent or is the subject of the allegation, reports should be made to the Chair of Governors. Where the Head is the subject of the allegation, the Head must not be informed of the allegation prior to contact with the Chair of Governors or school proprietor and LADO. The person leading the investigation will be known as the 'case manager'.

2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. If the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's services and, as appropriate, the police, immediately. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the police and/or children's services. The DSL is responsible for ensuring the child is not at risk.

3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's services.

4. When to inform the individual who is the subject of the allegation will be considered on a case-by-case basis and with guidance from the LADO, and if appropriate, the police and/or children's services. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:

- redeployment within the School so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;
- redeploying to alternative work in the School so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, *WT* and *KCSIE* when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

6. Where a member of boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children should be made

7. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

8. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.

9. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

10. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.

11. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

12. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant

(automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.[110] Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. All records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer. Records should be reviewed at the end of the retention period in case it is necessary to keep it for longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a student who made it in accordance with the School's Behaviour, Rewards and Sanctions Policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a student.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

PROCEDURE FOR MANAGING AND ALLEGATIONS ABOUT SUPPLY TEACHERS AND CONTRACTORS

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's services.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left the School first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT ORGANISATIONS OR INDIVIDUALS USING SCHOOL PREMISES

The School may receive an allegation or concern relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the School will follow their safeguarding policy and procedures, including informing the LADO.

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has

appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. The School will expect, where appropriate, providers to fully comply with the DfE guidance *After school clubs, community activities, and tuition (safeguarding guidance for providers) (September 2023)* and will seek assurance in this regard.

The School has arrangements in place for the use of school premises for non-school activities including the availability of the DSL or DDSL and how they can be contacted.

DEALING WITH CONCERNS OR ALLEGATIONS (THAT DO NOT MEET THE HARM THRESHOLD)

A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a "nagging doubt". Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.

The School has a separate Low-level Concerns Policy which enables all staff to share concerns – no matter how small – about their own or another member of staff's behaviour.

The School's Staff Code of Conduct can be found in the Staff Handbook, available on SharePoint. The aim of Staff Code of Conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place students or staff at risk of harm or of allegation of harm to a student. All staff are expected to comply with the standards contained within this code of conduct at all times.

The procedure for sharing any such concerns is set out in the Low-Level Concerns Policy. The Head is the ultimate decision-maker in respect of all low-level concerns.

Staff must share all concerns with the Head without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the Head, it should be referred to the Chair of Governors.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the Head will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. The information will be retained for 7 years.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic of inappropriate behaviour which may indicate a unacceptable culture, or any weaknesses in the Schools safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will the follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individuals employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a more collaborate decision-making approach.

SAFER RECRUITMENT

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.

Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with "barred list" information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

As part of the shortlisting process, the School will also consider carrying out an online search on shortlisted candidates as part of its due diligence. This may help to identify any incidents or issues that have happened and are publicly available online, which the School may want to explore with an applicant at interview. This forms part of the School's wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the School's Safer Recruitment, Selection and Disclosures Policy.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or students themselves, are suitable and appropriately supervised is set out in the School's Visitor and Visiting Speaker Policy.

The Schools procedures for managing contractors attending the School site can be found in the Safer Recruitment, Selection and Disclosures Policy.

MANAGEMENT OF SAFEGUARDING

The School's DSL is Joy Ugono who is a member of the senior leadership team.

There is a team of DDSL's to whom reports should be made in the absence of the DSL. In addition, a number of business staff are trained to DDSL level. This ensures there is the required cover for the role at all times.

The DSL sand DDSL's contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL will also take lead responsibility for online safety and understanding the filtering and monitoring systems and processes the School have in place. The DSL works with the governors to review and update the School's Safeguarding and child Protection Policy.

Where a student leaves the School, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main student file) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

During term time, the DSL or a DDSL will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. For out of hours/out of term activities, at such time that the DSL is unavailable, a DDSL from the business staff will be the first point of contact as outlined in the key contacts above (school holiday contacts).

The DSL or DDSL should liaise with the SSCP and work with other agencies in line with *WT*. "*NPCC When to call the police: guidance for schools and colleges"* (npcc.police.uk) can assist the DSL or DDSLs understand when they should consider calling the police and what to expect when they do. If the School has questions about any police investigation, it will ask the police. The DSL or DDSLs will also be responsible for liaising with the Mental Health Lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health. The School's Mental Health Lead is the Safeguarding Manager who works closely with the Deputy Head Pastoral.

The DSL and DDSLs should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.

Whilst the Head should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse, exploitation and neglect, are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Full details of the DSL's role can be found at Annex B of *KCSIE*.

TRAINING

Induction and training are in line with advice from SSCP.

1. All Staff

All new staff will be provided with induction training that includes:

- the Safeguarding and Child Protection Policy (including the policy and procedures to deal with child on child abuse);
- the role and identity of the DSL and wider safeguarding team (DDSLs) and safeguarding committee (Head and Governors)
- the Behaviour, Rewards and Sanctions policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the Staff Handbook including the Code of Conduct, the School's Whistleblowing Procedure and the acceptable use agreements, staff/student relationships and communications including the use of social media;
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing education;
- the online safety policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- the requirement to read Part one of *KCSIE*
- School leaders and staff who work directly with children will also be required to read Annex B of *KCSIE (and Part five of KCSIE)*.

All staff are signposted to the staff handbook during the induction process, which includes information on how to access:

- the Behaviour, Rewards and Sanctions policy and Anti-bullying policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the staff code of conduct including the School's whistleblowing policy and the acceptable use policy, staff/student relationships and communications including the use of social media;
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing education (Attendance Policy)

- the online safety policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;

Temporary staff (including supply teachers and those on a fixed term contract) and volunteers are onboarded in the same way as permanent staff.

All staff are also required to:

- Read Part one of *KCSIE* in full and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via normal school communication methods.
- Understand key information contained in Part one of *KCSIE*. The School will ensure staff understanding by periodically testing staff knowledge eg with quizzes
- Receive training in safeguarding and child protection regularly, in line with advice from the SSCP. Training will include:
    - online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring)
    - harmful sexual behaviours (including child on child sexual violence and harassment).
    - the safe and effective use of AI including training on identifying and mitigating the key risks associated with AI, including risks to safeguarding, data protection, ethics, and intellectual property. The School will draw on the DfE's support materials on *Generative artificial intelligence in education*, developed in partnership with the Chiltern Learning Trust and the Chartered College of Teaching, including Module 3 on safe use.
    - Prevent awareness training to equip staff to understand the factors that lead people to support terrorist ideologies or engage in terrorist related activity, be able to recognise susceptibility to terrorism and be aware of what action to take in response, including the School's internal Prevent arrangements.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via, for example, emails, e-bulletins, and staff meetings.
- Whole school training is carried out to the staff body as and when necessary, and at least annually at the start of the new academic year.

All governors receive appropriate safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

The proprietors are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection Act 2018, the UK GDPR, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual

nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention. The Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

In addition, the proprietor complies with the DfE's Data Protection guidance for schools, ensuring school staff and governors know how to comply with data protection law, develop their data policies and processes, what staff and student data to keep and the importance of good practices for preventing personal data breaches.

2. DSL and DDSLs

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children susceptible to radicalisation, record keeping and promoting a culture of listening to children, training in the SSCP approach to *Prevent* duties and harmful sexual behaviours. The DSL also receives more in-depth training, including on extremist and terrorist ideologies, how to make referrals and how to work with Channel panels. This training is updated at least every two years, enabling the DSL to support other staff on Prevent matters and update them on relevant issues. Further details of the required training content for the DSL are set out in Annex B of *KCSIE.*

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the School will support the DSL in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

All DDSLs are trained to the same level as the DSL.

Alternative Provision: In the event of a student facing a 'requirement to leave' following serious behavioural misconduct or a serious breach of the school's code of conduct, the School may be able to provide reasonable assistance to make a fresh start at another school.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

The governing body has designated governors with specific responsibilities for safeguarding and related areas, in order to provide strategic oversight, support and challenge to the School's leadership. These designated roles include:

Safeguarding Governor(s): The Safeguarding Governor(s) takes a lead role at board level in championing safeguarding and child protection across the School. Their responsibilities include liaising regularly with the DSL to maintain oversight of safeguarding activity; reviewing and challenging the effectiveness of safeguarding policies and procedures; ensuring that the

annual review of this policy is carried out and that safeguarding remains a standing agenda item at governing body meetings; monitoring safeguarding training compliance for staff and governors; and reporting to the full governing body on safeguarding matters at least termly. The Safeguarding Governor(s) receives enhanced safeguarding training to enable them to provide informed strategic challenge and is familiar with the local multi-agency safeguarding arrangements.

SEND Governor: Nick Waite is the designated SEND Governor. The SEND Governor provides strategic oversight of the School's provision for students with special educational needs and disabilities, with particular regard to the additional safeguarding challenges that children with SEND can face. The SEND Governor liaises regularly with the SENCO to ensure that safeguarding considerations are fully integrated into the School's SEND provision and that staff are equipped to recognise and respond to safeguarding concerns involving children with SEND.

Online Safety Governor: The Online Safety Governor provides board-level oversight of the School's approach to online safety, including filtering and monitoring systems, cyber security arrangements, the safe use of generative AI, and the School's response to online safeguarding incidents. The Online Safety Governor liaises regularly with the DSL and relevant IT staff to ensure that the School's online safety arrangements are robust, proportionate and regularly updated to reflect the rapidly evolving nature of technology and online risks, including risks arising from generative AI.

All governors with designated safeguarding-related roles receive appropriate induction and ongoing training relevant to their area of responsibility. They work collaboratively to ensure that the governing body maintains effective strategic oversight of safeguarding across the School, and they report to the full governing body on their respective areas at least annually.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, including lessons learnt. This policy is reviewed by the Proprietor and the Full Governing Board meeting in the Autumn Term, annually. The School draws on the expertise of staff, including the DSL(s), in shaping the School's safeguarding arrangements and policies.

The School's safeguarding policies and procedures should be transparent, clear, and easy to understand for staff, students, students, parents, and carers.

If there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

1. TEACHING CHILDREN HOW TO KEEP SAFE

The proprietor ensures that all students are taught about safeguarding, including online safety, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of School, in order to reduce risks and build resilience, including to

radicalisation and extremism. This includes teaching students about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some children with SEND might be needed.
Internet safety (including when children are online at home) is embedded in PSHE and Relationships and Sex Education (RSE).

2. FILTERING AND MONITORING

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system. The School uses Securly as the filtering system which runs alongside the Securly Aware system which provides alerting to the DSL team of any concerning activity.

Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes (contact risk); restrict access to online risks such as online gambling, inappropriate advertising, phishing and/or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying (conduct risk).

The School ensures compliance with the DfE's 'Cyber security/filtering and monitoring standards for schools' by;

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing and documenting the effectiveness of the filtering and monitoring provision at least annually.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

The School utilises the DfE's 'plan technology for your school' service to self-assess compliance against the filtering and monitoring standards and ensures that any recommendations are incorporated as appropriate.

The School has regard to the DfE's guidance 'Generative AI: product safety expectations' when considering how the filtering and monitoring arrangements in place apply to the use of generative AI within education. The School ensures that any Generative AI products effectively and reliably prevent access to harmful and inappropriate content by students by:

- integrating the highest standards of filtering possible within the product, and
- using additional filtering solutions that work on top of an AI product.

The School has in place a separate AI Policy which sets out further detail in this regard.

Further detail of the Schools policy and procedures in relation to online safety can be found in the School's Online Safety Policy which also includes detail on the use of mobile and smart technology in School, including the School's management of the associated risks, and the School's filtering and monitoring arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems.

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will asked to access and who from the School their child is going to be interacting with online.

Use of artificial intelligence (AI)

The School recognises that artificial intelligence, including generative AI, presents both significant opportunities and safeguarding risks in education. The School is committed to ensuring that the use of AI is safe, ethical, transparent and aligned with the School's safeguarding obligations. The School's approach to AI safeguarding is embedded within the existing provisions of this policy, including in relation to filtering and monitoring, online safety, training and responding to specific safeguarding issues

The School will only use AI products that meet the DfE's *Generative AI: product safety expectations* and any use of generative AI by staff or students will be carefully considered and assessed, evaluating the benefits and risks within the School's context.

The School is alert to the safeguarding risks arising from AI, including but not limited to:

- the generation of deepfake images and AI-generated intimate imagery;
- the potential for AI chatbots to produce harmful, inaccurate, or age-inappropriate content;
- the risk of 'cognitive offloading' where students defer their critical thinking to AI tools; and
- the use of AI to facilitate grooming, exploitation, or the creation of child sexual abuse material.

Any safeguarding or wellbeing concern arising from the use of AI tools should be reported to the DSL immediately, using the procedures set out in this policy.

This includes, but is not limited to, concerns about:

- a student creating, sharing, or being the subject of AI-generated intimate imagery (deepfakes)
- a student being exposed to harmful, inaccurate, or age-inappropriate content through an AI tool
- a student's personal data being compromised through the use of an AI tool
- a student interacting with an AI chatbot in a way that causes concern for their welfare or mental health
- a member of staff using AI in a way that may compromise student safety or data security.

The DSL will investigate any AI-related safeguarding concern and determine whether it should be referred to external agencies such as children's social care and/or the police, in accordance with the procedures set out in this policy.

The School's AI Policy sets out further detail on the School's approach to AI, including approved tools, acceptable use guidelines, academic integrity expectations and data protection arrangements. Staff should refer to that policy alongside the safeguarding procedures set out in this policy.

Use of mobile phones

The School operates as a mobile phone-free environment by default, in accordance with the DfE's statutory guidance on Mobile phones in schools. Students do not have access to their mobile phones throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime unless a clearly defined exception has been agreed by the Head, Senior Deputy Head or Deputy Head Pastoral.

The School's Mobile Phone and BYOD policy can be found on the school website.

The School recognises that notwithstanding the mobile phone ban, children may still have access to the internet via mobile phone networks (i.e. 3G, 4G and 5G), through other personal devices such as smart watches or, where permitted, personal laptops or tablets. The School's filtering and monitoring systems may not apply to content accessed via students' personal devices. Where those devices are not connected to the School's network. To mitigate this risk, the School has a Mobile Phone and BYOD Policy which addresses the acceptable use expectations of all students. Any safeguarding concerns arising from a student's use of a personal device should be reported to the DSL immediately.

Cyber security

The School recognises that cyber security is a safeguarding concern. If a child's sensitive data is compromised by a cyber-attack, it puts their safety and wellbeing at risk. The School takes measures to safeguard children by protecting personal information and ensuring appropriate cyber security systems are in place, in line with the DfE's *Cyber security standards for schools and colleges* and the *Digital and technology standards in schools and colleges (April 2026)*.

The School's arrangements include maintaining an information asset register, keeping hardware and systems registers up to date, and having a disaster recovery and business continuity plan that addresses digital technology. The School is working towards meeting the six core digital and technology standards by 2030.

RELATIONSHIPS EDUCATION AND/OR RELATIONSHIPS AND SEX EDUCATION ("RSE")

The School understands that children and young people need knowledge and skills that will enable them to make informed and ethical decisions about their wellbeing, health and relationships.

The School's Relationships Education/RSE curriculum is delivered as part of a 'whole school' approach to wellbeing and positive relationships that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic, and sexual violence/harassment. The School focusses on building positive attitudes and skills, promoting healthy norms about relationships, including sexual relationships where relevant, and about health, including mental health. The School recognises that discussions about sensitive topics in Relationships Education/RSE can lead to increased safeguarding reports. All staff know what to do if they have concerns that a student is being neglected or abused, including those who have seen, heard or experienced the effects of domestic abuse.

The School has regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching RSE.

The School's RSE Policy sets out the curriculum content, how and when it will be taught, and who is responsible for teaching it, including any external providers the School will use. The School proactively engages and consults parents in the development and review of this policy. Parents will be informed of their right to request that their child is withdrawn from sex education.

SPORT

The School recognises that sport and physical activities can present unique safeguarding risks. Staff involved in the delivery of sport and physical education should be alert to safeguarding concerns that may arise in these settings, including risks associated with physical contact, changing facilities, one-to-one coaching, and away fixtures or tours. The School will have regard to the relevant provisions in KCSIE and any guidance issued by relevant national governing bodies of sport or professional associations. Where the School engages external sports coaches or providers, it will satisfy itself that appropriate safeguarding checks have been carried out and that providers have adequate safeguarding policies in place.

LOOKED AFTER CHILDREN

The proprietor ensures, where necessary, that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

The DSL is the designated member of staff who has responsibility for their welfare and progress. The School would ensures that the designated member of staff receives appropriate training in order to carry out their role where necessary.

ARRANGEMENTS FOR VISITING SPEAKERS

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable as outlined in the Visitor and Visiting Speaker Policy. The School's responsibility to students is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School along with Fundamental British Values such as democracy.

The School will undertake a risk assessment (Visiting Speaker Form within the Visitor and Visiting Speaker Policy) before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the Fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a School employee. On attending the School, visiting speakers will be required to show original current government issued identification documents including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

ARRANGEMENTS FOR USE OF SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

The School will ensure that the DSL or a DDSL can be contacted and/or is available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll.

All external hire groups are provided with a copy of the school Safeguarding Policy which includes details for DSL contacts during the holidays in the key contacts above. Hiring parties are also required to provide the School with a copy of their own Safeguarding Policy with details of their DSL. The School follows safeguarding checklists for all groups using the facilities, specific to their activities and participants, as advised by Jane Bee Safeguarding Ltd and the Schools' Enterprise Association. The School will ensure that safeguarding requirements are included in any agreement for use of the school premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement.

A Safeguarding Agreement for Hirers is required in addition to the safeguarding terms included in the contract of hire. A copy of this agreement can be requested from the school's external relations team. When considering the safeguarding arrangements any providers have in place the School will have regard to the DfE's non statutory guidance *'After school clubs, community activities, and tuition (safeguarding guidance for providers)' (September 2023)*.

Performances and sporting fixtures away from school will be covered under the Educational Visits Policy.

Any one-to-one (including online or off-site) activities, such as driving lessons or tutoring, are the responsibility of the parent arranging the activity. The School has produced guidance for parents with regards to safeguarding students in these circumstances. Parents are expected to complete a form acknowledging their responsibility and potential safeguarding risk and provide details of the adult delivering the session.

OPERATION ENCOMPASS

The School is part of Operation Encompass, a national police and early intervention safeguarding partnership which supports children who experience domestic abuse.

Through Operation Encompass the police are required to share information with the School about **all** police attended domestic abuse incidents which involve any of our children who are related to either of the adults involved in the incident. This sharing of information should occur prior to the start of the next school day. The notification should be sent to the DSL (known as the Key Adult) and inform us about the context of the incident and will include the child's perspective.

The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information.

The School is part of Operation Encompass, which is an information sharing scheme placed on a statutory footing by Section 49A of the Domestic Abuse Act 2021 (as inserted by Section 20 of the Victims and Prisoners Act 2024). Operation Encompass supports children who experience domestic abuse.

Under this statutory duty, the police are required to notify the School if they have reasonable grounds to believe that a child may be a victim of domestic abuse. This duty applies in respect of all children connected to a household where police attended a domestic abuse incident,

including children who were not physically present at the time of the incident. This sharing of information should occur prior to the start of the next school day. The notification should be sent to the DSL (known as the Key Adult) and include the child's details, their relationship to the perpetrator and the voice of the child, such as what they are saying and how they are behaving.
The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information.
The Safeguarding Governor reports on Operation Encompass in the termly report to Governors. All information is anonymised for these reports.

Temporary accommodation notification
Where the School receives a notification from the local housing authority, under the Children's Wellbeing and Schools Act 2026, that a child has been placed in temporary accommodation, the Designated Safeguarding Lead (or a deputy) will:

- assess whether the child's welfare needs have changed and whether additional pastoral, academic or safeguarding support is required;
- liaise with relevant agencies, including the local housing authority and, where appropriate, local authority children's social care, to ensure coordinated support is provided; and
- make a referral to local authority children's social care where there are concerns that the child has been harmed or is at risk of harm.

This notification does not replace existing safeguarding and welfare duties. Staff who become aware of concerns about a child's welfare arising from homelessness or temporary accommodation should report these to the DSL in the usual way.

APPENDIX 1 – SIGNS AND TYPES OF ABUSE

All School staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. Therefore, staff should always be vigilant and always raise any concerns with the DSL (or DDSLs).

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL (or DDSLs) should consider whether children are at risk of abuse or exploitation in situations outside the home. This is often referred to as "extra-familial harm.' Extra-familial harm can occur in a range of extra-familial contexts, including in school, peer groups, or within community/public spaces, and/or online. Children may experience this type of harm from other children and/or from adults. Forms of extra-familial harm include exploitation by criminal and organised crime groups and individuals (such as county lines and financial exploitation), serious violence, modern slavery and trafficking, online harm, sexual exploitation, teenage relationship abuse, and the influences of extremism which could lead to radicalisation. Children of all ages can experience extra-familial harm.

While any child can experience harm outside the home, children with special educational needs or disabilities, those missing from home, care or education, looked after children, and those with previous experience of abuse or neglect, may be at greater risk of harms such as sexual or criminal exploitation. Perpetrators, including those acting in organised groups, may purposefully target children who are already vulnerable.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL (or DDSLs).

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child (including through corporal punishment). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may

feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.[228] Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child on child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. [229] Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

The Centre of Expertise on Child Sexual Abuse has resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours. There are also the below resources available:

Tackling Child Sexual Abuse Strategy – Home Office policy paper
Together we can stop child sexual abuse – HM Government campaign

Sexual harassment: is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to

as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Sexual violence: refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

Child-on-child sexual violence and/or harassment: Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.[232]

Harmful sexual behaviour: problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

The Lucy Faithfull Foundation has developed a harmful sexual behaviour toolkit, which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about harmful sexual behaviour by children, internet safety, sexual development and preventing child sexual abuse.

The NSPCC provides free and independent advice about harmful sexual behaviour: NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework.
Beyond Referrals | The Contextual Safeguarding programme based at the University of Durham provides a school self-assessment toolkit and guidance for addressing harmful sexual behaviour in schools.

StopItNow – Preventing harmful sexual behaviour in children: provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline 0808 1000 900.

Sharing of nude or semi-nude images and/or videos including those generated using AI: the sending or posting of nude or semi-nude images, videos, or live streams including those generated using AI (also known as 'nudes' or 'semi-nudes'), online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes including those generated using AI can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'. Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer

- children and young people digitally manipulate an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new nude or semi-nude image of a young person

- images created or shared are used to abuse or blackmail peers. Situations could include:

    - children and young people selling nudes or semi-nudes of others online

- children and young people coercing a peer into sharing a nude or semi-nude to blackmail them for money, further images, or force them into illegal activity

- children and young people hacking a peer's account to share images more widely without consent to publicly shame

- children and young people create and share a nude or semi-nude with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (March 2024) sets out the classification of incidents, and how each should be handled.

Upskirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Serious violence: indicators which may signal that children are at risk from, or are involved with serious violent crime include disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of committing violence, increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

All staff should also be aware of the associated risks which increase the likelihood of involvement in serious violence which include

- frequent absence from school,
- having been suspended or permanently excluded from school,
- having experienced child maltreatment,
- having previously been involved in committing violence or other offences (such as theft or robbery)

- having used drugs or alcohol in early adolescence
- having previously been a victim of violence

Staff should be aware that children who are involved in committing violence may themselves be victims in need of support. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff must report any concern about a child carrying or using a weapon, or expressing intent to do so, to the DSL immediately. The DSL should assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict. Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support. Practical guidance on evidenced support is available from the Youth Endowment Fund (YEF) (the "what works" centre for preventing violence.

Specific safeguarding issues: safeguarding issues often overlap and can put children at risk of harm. Behaviours linked to drug taking, alcohol abuse, unexplainable and/or persistent absences from education,serious violence, criminal exploitation (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude or semi-nude images including those generated using AI e.g. deepfakes and/or videos put children in danger. Safeguarding issues can also manifest themselves via child on child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children being absent, repeatedly and/or for prolonged periods, children missing from education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse and trafficking.

Child sexual exploitation (CSE): CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology.

CSE can affect any persons (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion.

Group-based child sexual exploitation: Group-based is defined as two or more individuals (whether identified or not) who are known to (or associated with) one another and are known to be involved in or to facilitate the sexual exploitation of children. Being involved in the sexual exploitation of children includes, for example, introducing them to other individuals for the purpose of exploitation, trafficking a child for the purpose of sexual exploitation, taking payment for sexual activities with a child, or allowing their property to be used for sexual activities with a child. This can be perpetrated within or beyond the family, by both children and adults, and groups can be organised or loosely linked.

The below CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners"*. The Children's Society and Home Office has also published guidance on Preventing Child Sexual Exploitation.

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Child criminal exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into taking part in any criminal activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (for the financial or other advantage (such as

increased status) of the perpetrator or facilitator and/or through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim. It is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions
- children who associate with other children involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late, and
- children who regularly miss school or education or do not take part in education.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

County lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of “deal line”.

This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, student referral units, children's homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home;
- that have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit For Professionals..

Modern Slavery: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (June 2025)*".

Cybercrime: is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale

and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DdoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or DDSLs), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre – NCSC.gov.uk.

Mental health: all staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. These could include:

- significant changes in behaviour
- ongoing difficulty sleeping
- withdrawing from social situations
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention.

Where children have suffered abuse, exploitation and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance and progress at school.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL (or DDSLs).

More information can be found in the *Mental* health *and* behaviour *in* schools guidance. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. The NHS Every Mind Matters website also contains helpful information and advice about Looking after a child or young person's mental health.

Honour or faith based abuse: encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A student may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A student may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the student's return.
- A student is reluctant to undergo medical examination.

If staff have a concern that a student may be at risk of FGM, they should speak to the DSL who will, where appropriate, activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Services.

There is a statutory duty on teachers to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a student is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a student over 18, teachers should follow the School's local safeguarding procedures.
Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack, particularly section 13*.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in the *Multi-agency guidelines: Handling cases of forced marriage (last updated April 2023)*Further information on forced marriage is available in guidance published on gov.uk and by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

Radicalisation: is the process of a person legitimising support for, or use of, terrorist violence.

Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those different faiths and beliefs..

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use

or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. However, it is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be susceptible and act proportionately, which may include making a Prevent referral.

Designated safeguarding leads and other senior leaders in colleges should familiarise themselves with the revised Prevent duty guidance: for England and Wales which are specifically concerned with education. Staff should contact the DSL (or DDSLs) who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

Special educational needs and/or disabilities (SEND), or students with certain health conditions: Students with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- the need for intimate care or that these children are isolated from others
- that these children are more likely to be dependent on adults for care, and

these children may have issues over cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

Staff will support such students in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Safeguarding children with medical conditions: The fact that there has been an incident relating to the management of a child's medical condition or allergy would not in itself warrant a referral to local safeguarding partners. . The DSL will consider a safeguarding referral where an incident highlights concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to the School, or where they are repeatedly sent without essential medication, thereby putting the child at risk. The School will work collaboratively with healthcare professionals to ensure that any safeguarding concerns arising from a child's medical condition are identified and addressed promptly.

Further information can be found in the DfE statutory guidance on supporting Pupils at School with Medical Conditions. and Allergy safety in schools.

Young carers: A young carer is a person under 18 who provides or intends to provide care for another person. Young carers may face additional safeguarding challenges and may be more vulnerable due to the responsibilities they carry. Staff should be alert to signs that a child is taking on caring responsibilities that are inappropriate for their age and which may be impacting on their attendance, attainment, or wellbeing. Concerns about young carers should be discussed with the DSL.

Children who are lesbian, gay, bisexual or gender questioning: A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a student who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are. The School should consider how to address vulnerabilities such as the risk of bullying and take steps to prevent it, including putting appropriate sanctions in place.

Staff should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying. In making decisions about supporting social transitions, staff will comply with their distinct but interacting obligations under safeguarding legislation and equality and human rights law. The DSL will be involved in all cases where a child is questioning their gender. Staff will not adopt any changes relating to social transition unless a decision has been made by the School and the student's parents or carers have been involved. Parents will be involved in the vast majority of cases. In the rare circumstances where involving parents or carers would constitute a greater risk to the child than not

involving them, the DSL will determine what action is needed to safeguard the child, before the parents or carers are contacted or any decisions are taken.

The School complies with its obligations under the Education (Independent School Standards) Regulations 2014 regarding the provision of toilets and washing facilities. The School does not permit children to use toilets designated for the opposite biological sex. The School has regard to the provisions set out in Part two of KCSIE regarding single-sex spaces, changing rooms, and (where applicable) boarding and residential accommodation.

Further guidance on single-sex spaces, sport, and boarding accommodation is set out in Part two of *KCSIE* (September 2026).
The School will also refer to the School's Gender Identity Policy.

Risks can be compounded where children lack trusted adults with whom they can be open. The School endeavours to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Domestic abuse: Domestic abuse is one of the most prevalent forms of abuse, with Women's Aid estimating that 160,000 children are currently living in households where domestic abuse is taking place. This is likely to be an underestimate, however, with much abuse remaining hidden and not coming to the attention of services. The Domestic Abuse Act 2021 introduces a statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on

children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Domestic abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

Operation Encompass: Section 20 of the Victims and Prisoners Act 2024 introduced a new provision into Part 3 of the Domestic Abuse Act 2021 under Section 49A, placing a statutory duty on police forces across England and Wales to notify a child's educational setting if they have reasonable grounds to believe a child may be a victim of domestic abuse. This duty applies to all children connected to the household where police attended a domestic abuse incident, including children not physically present. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare.

More information about the scheme and how schools can become involved is available on the Operation Encompass website. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8:00 to 13:00, Monday to Friday on 0204 513 9990 (charged at local rate).

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a student may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

Children who are absent from school: A child being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education is a potential indicator of a range of safeguarding issues such as abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who are absent, particularly persistently or for prolonged periods. The School's procedure for dealing with children who are absent and/or missing can be found in the Attendance Policy. All unexplained absences will be followed up in accordance with this policy.

The School shall inform the local authority of any student who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of The School Attendance (Student Registration) (England) Regulations 2024. This will assist the local authority to:

a) fulfil its duty to identify children of compulsory school age who are missing from education; and
b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, exploitation or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority Surrey (and the local authority where the child is normally resident) of any student 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 thereafter.

Action should be taken in accordance with this policy if any absence of a student from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child being absent and/or becoming a child missing education in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

Child abduction and community safety incidents: Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system: Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

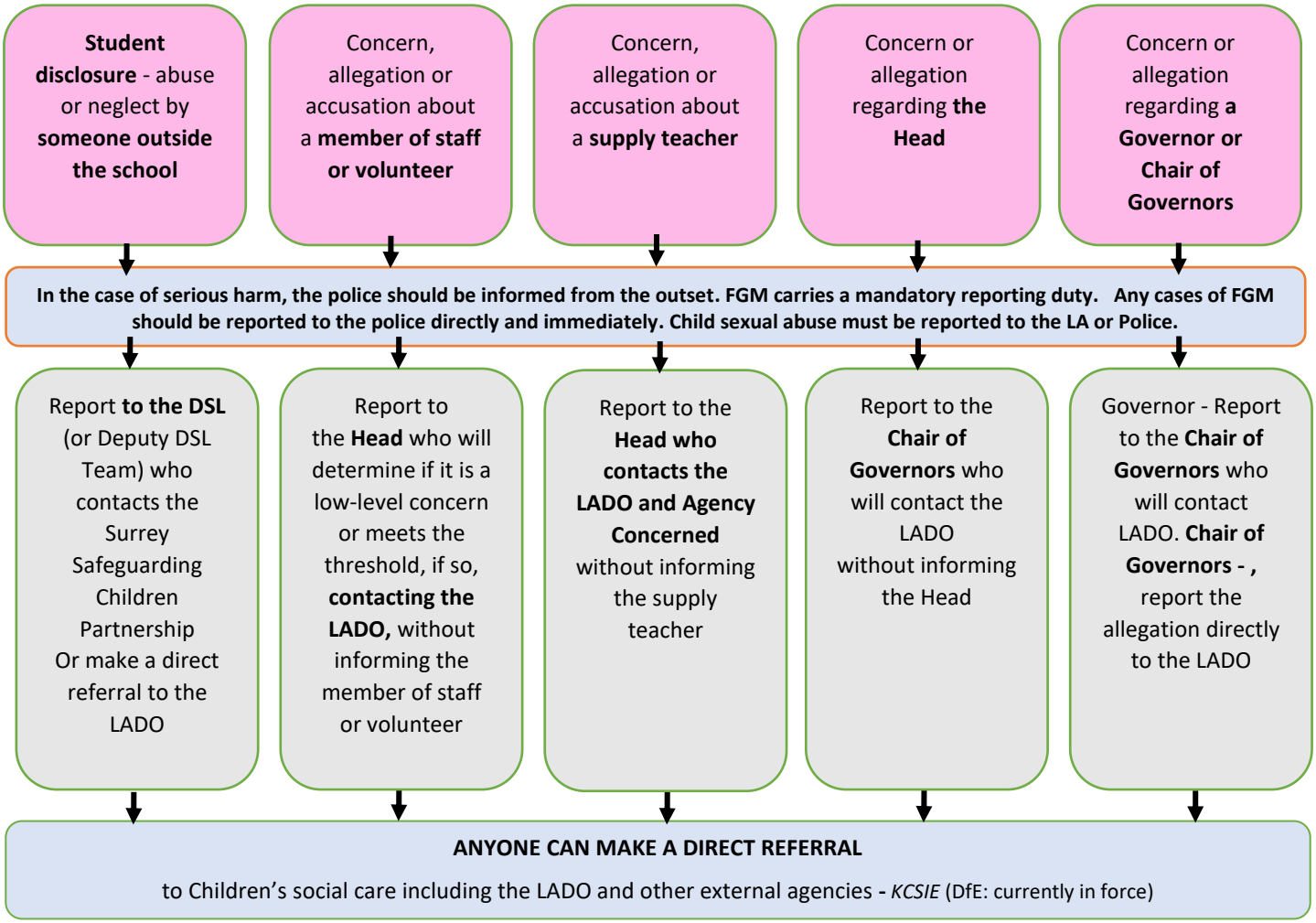
Children with family members in prison: Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health.

The Prison Service will undertake a child safeguarding enquiry with children's social care for all sentenced prisoners to identify any who present an ongoing risk to children from within custody. Prisons will also decide on the level of contact, if any, they will allow between a prisoner and a child based on a child contact risk assessment.

The Prisoners' Families Helpline provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. Further support for families can be found at the Prisoners' Families Helpline website.

Further suggestions of signs of abuse can be found in: *What to do if you're worried a child is being abused – Advice for practitioners (March 2015)*

APPENDIX 2 – SAFEGUARDING FLOWCHART ON MANAGING CONCERNS OR ALLEGATIONS



WHEN A YOUNG PERSON DISCLOSES ABUSE OR NEGLECT

DO

- **Create a safe environment**
- **Offer a private and safe place to talk.**
- **Stay calm and non-judgemental**
- **Reassure the student and stress that they are not to blame**
- **Seek medical attention immediately if needed**
- **Listen – take their disclosure seriously, keep questions to a minimum**
- **Observe their behaviour**
- **Let the student know your course of action**
- **Make a signed (with time and date) record in writing – Detail circumstances, timings of the disclosure, the information given by the student (use student's own words), if anyone else was present. Where possible use CPOMs**
- **Immediately inform the DSL or a member of the Safeguarding Team**
- **Make a direct referral to children's services or the LADO if necessary and inform the DSL ASAP**

DO NOT

- **Promise confidentiality**
- **Ask leading questions**
- **Interrupt their dialogue**
- **View any imagery that may contain nude/semi-nude children**
- **Repeat the disclosure or ask the student to repeat it other than to clarify what's been said.**
- **Display shock or disbelief**
- **Leave the student alone – arrange for someone to stay with them if necessary**
- **Take responsibility for investigating the allegation yourself.**
- **Approach the alleged abuser.**
- **Take photographs of injuries or examine injuries solely to prove or disprove possible abuse.**
- **Assume someone else will take the necessary action.**
- **Speculate, accuse or confront anyone allegedly involved**