Radnor House
SEVENOAKS
celebrating every individual

Safeguarding Policy

Applies to:

- All staff (teaching and non-teaching), the directors and volunteers working in the School;
- Pupil, Parents, Guardians and Caregivers and Prospective Parents;
- Visitors and Contractors.

Availability:

This policy is made available in the following ways:

- The School's website www.radnor-sevenoaks.org;
- Via Teams, All Staff Shared Documents, Compliance, Policies;
- On request a copy may be obtained from the School's Office.

Monitoring and Review:

- This policy will be subject to continuous monitoring, refinement and audit by the Head.
- The Board of Directors undertake a formal annual review of this policy.

Signed:





David Paton
Head

Ian Davies
Chairman of the Board of Directors

Reviewed: September 2026
Next Review: September 2027

Introduction

Radnor House Sevenoaks (the 'School') is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all pupils achieve their very best.

Safeguarding and promoting the welfare of children is defined in the DfE's Keeping Children Safe in Education (Sept 2026) as safeguarding and promoting the welfare of children, 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.

Every pupil should feel safe and protected from any form of abuse which, in this policy, means any kind of neglect, non-accidental physical injury, sexual exploitation or emotional ill-treatment. It is important for children to receive the right help at the right time to address safeguarding risks, prevent issues escalating and to promote children's welfare. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action.

This Safeguarding Policy has been authorised by the Governors, applies to the whole school, and is addressed to all members of staff and volunteers. In our school the term 'staff', in the context of safeguarding, is inclusive of all staff and is also inclusive of students on placement, contractors, agency staff, volunteers and proprietor. This policy applies wherever staff or volunteers are working with pupils even where this is away from the School, for example at an activity centre or on an educational visit.

Other school policies and procedures are also directly relevant to Safeguarding and the following in particular may be consulted in conjunction with this policy: Anti-bullying; Behaviour; Online Safety; Acceptable Use of IT Policy/Agreement; Educational Visits and Off-site Activities; First Aid; Health, Safety, Risk Assessment and Welfare; PSHEE; Safer Recruitment; Learning Differences incl. SEND; Sex and Relationship Education; Staff Code of Conduct; Whistleblowing.

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1. Statement of the school's commitment to safeguarding

This policy, which applies to the entire school, including EYFS, is consistent with the requirements of:

- The Local Safeguarding Children Multi-Agency Partnership – Kent Safeguarding Children Multi-agency Partnership (KSCMP), and agreed local interagency procedures as set down by them
- Keeping Children Safe in Education (KCSIE): DfE Sept 2026, and any subsequent amendments: see Keeping children safe in education - GOV.UK
- Working Together to Safeguard Children (WT): DfE March 2026: see Working together to safeguard children - GOV.UK
- The advice to schools in The Prevent Duty: DfE Sept 2023 (effective 1st January 2024) Prevent Duty and any subsequent amendments: Prevent duty guidance: England and Wales (2023) - GOV.UK
- The advice to schools in What to do if you are Worried a Child is Being Abused -Advice for Practitioners DfE March 2015: Child abuse concerns: guide for practitioners - GOV.UK
- The statutory guidance regarding Relationships Education, Relationships and Sex Education (RSE) and Health Education, DfE July 2025: Relationships and sex education (RSE) and health education - GOV.UK
- The advice to schools in Mental Health and Behaviour in Schools: DfE Nov 2018: Mental health and behaviour in schools - GOV.UK
- Restrictive interventions, including use of reasonable force, in schools: DfE April 2026 Use of reasonable force in schools - GOV.UK
- The advice to EYFS settings in the Statutory Framework for the Early Years Foundation Stage 2026: Early years foundation stage (EYFS) statutory framework - GOV.UK

Accordingly, the policy aims to:

1. Safeguard children whether they are at risk of maltreatment or abuse, or in need of specific local authority or inter-agency care and school support.
2. Ensure that the school provides a safe, caring environment which promotes, at all times, the best interests of the children in the school.
3. Encourage a sensitive and open 'listening' environment in which staff and pupils feel free to discuss general matters relating to safeguarding and to raise specific concerns; in particular, all pupils are advised as to the various ways, including through independent listeners and counsellors, in which they may make any general or personal safeguarding concerns known.
4. Promote full cooperation with and contribute to the provision of appropriate coordinated support and/or early help from, external agencies.

Noting that in the matter of any referral to an external agency the foremost consideration is the best interests of the child, parental consent for such referrals is neither necessary nor in some cases appropriate. At Radnor House Sevenoaks, safeguarding is everyone's responsibility. Although referrals are normally to be managed by the DSL, anyone may refer a child if necessary. Members of staff should use the school's Whistleblowing Policy if they have any concerns about the handling of safeguarding matters either in general or in specific cases.

2. Key personnel and contact details

Noting that external responsibilities and therefore details of any external personnel named below may be subject to change without notification to the school.

Head	Mr David Paton dpaton@radnor-sevenoaks.org Ext: 410
DSL	
Designated Safeguarding Lead (DSL) and Prevent Officer and Online Safety Lead (Senior)	Orla Fisher (Wellbeing Hub Co-ordinator) ofisher@radnor-sevenoaks.org DD: 01959 560456 Ext: 422
Designated Safeguarding Lead, Prevent Officer and Online Safety Lead (DSL) (Prep and EYFS)	Ms Shona Bliss Deputy Head (Pastoral and Inclusion) sbliss@radnor-sevenoaks.org DD: 07584567853 Ext: 415
DDSLs	
Deputy Designated Safeguarding Leads and Prevent Officer (DDSLs) (Senior)	Mr David Paton Head Dpaton@radnor-sevenoaks.org Ext: 410 Mrs Alison Robinson Deputy Head of Lower School arobinson@radnor-sevenoaks.org Ext: 451
Deputy Designated Safeguarding Leads and Prevent Officer (DDSLs) (Prep)	Ms Faye Green Deputy Head (Academic) and Head of EYFS fgreen@radnor-sevenoaks.org Ext: 404
Governors	
Director with Responsibility for Safeguarding	Miss Esther Wright ewright@radnor-sevenoaks.org

Key External Key Contacts

Kent Safeguarding Children Multi-Agency Partnership (KSCMP)	The Local Safeguarding Multi-agency Partnership for the School is Kent (KSCMP). kscmp@kent.gov.uk Tel: 03000 421126 Front Door: 03000 41 11 11 Out of Hours: 03000 41 91 91 Home - Kent Safeguarding Children Multi-Agency Partnership
Early Help Team	Tel: 03000 410 044 (Monday – Wednesday) or Tel: 03000 414 239 (Wednesday – Friday) SevenoaksEarlyHelp@kent.gov.uk District Teams can be found on: Early Help contacts - KELSI
Surrounding Safeguarding Partnerships	Surrey: Homepage - Surrey Safeguarding Children Partnership Bromley: Bromley LSCB - Home

	Bexley: Bexley Safeguarding Partnership for Children & Young People | Bexley LSCB
Online Safety in the Education Safeguarding Service	Ashley Assiter, Online Safety Development Officer (Monday/Tuesday/Wednesday) – Tel: Tel: 03000 423 164
LADO Education Safeguarding Advisory Service	Local Authority Designated Officer (LADO) - Kent Safeguarding Children Multi-Agency Partnership If your concern relates to the welfare of a child: Please contact the Front Door Service via the Childrens Portal If you need to make a referral to the LADO regarding an allegation against a member of staff: Please complete a LADO referral via the Childrens Portal If you need clarification on whether to make a LADO referral, need general education safeguarding or online safety advice, or would like to enquiry about training or other safeguarding products: LADO Education Safeguarding Advisory Service (LESAS) Enquiry Form If a call is urgent i.e. a child is in immediate danger and requires safeguarding: Tel: 03000 41 11 11 If a call is urgent and outside of office hours: Tel: 03000 41 91 91
Kent Police	101 (or 999 if there is an immediate risk of harm)
Local Authority Prevent Team	Sally Green, Prevent Education Officer, sally.green2@kent.ac.uk Tel: 03000 41 34 39 If you have immediate concerns about the welfare of any persons, then contact the Police by calling 999. **Radicalisation or Extremism** - all concerns regarding Prevent/Radicalisation should be reported by: - Report via MyConcern. The DSL will discuss/seek guidance from the local Kent and Medway Prevent Team. - Contact the Kent County Council Team directly at prevent@kent.gov.uk - Contact the Kent and Medway Prevent Coordinator, Jess Harman by emailing jess.harman@kent.gov.uk - Contact the police on 101 or 0800 789 321 or complete an Tell us about possible terrorist activity | Metropolitan Police DfE Counter-Extremism Helpline: - Tel: 020 7340 7264. - counter.extremism@education.gov.uk. - Report online material promoting terrorism or extremism - GOV.UK
NSPCC/Home Office Child Abuse Whistleblowing Helpline	**NSPCC Whistleblowing Advice Line** Available 10am–4pm, Monday to Friday.**:**

(An alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by the school)	- Tel: 0800 028 0285 - Email**:** help@nspcc.org.uk - Whistleblowing Advice Line | NSPCC
NSPCC Report Abuse in Schools Helpline	**NSPCC Report Abuse in Schools Helpline** Available - 8am–8pm Monday to Friday, and 9am–6pm Saturday to Sunday. - Tel: 0800 136 663 - Email: help@nspcc.org.uk - NSPCC dedicated helplines | NSPCC
Independent Schools Inspectorate	CAP House, 9-12 Long Lane, London, EC1A 9HA - Tel: 0207 600 0100 - info@isi.net
Disclosure and Barring Service (DBS)	Barring referrals should be made online using the DBS Barring Referral Service. - Email: customerservices@dbs.gov.uk to request a paper referral form. - Referral advice helpline: 01325 953 795.
KCC Adult Social Care (Reporting a Concern about a young person 18+)	KCC Adult Social Care - report abuse Email social.services@kent.gov.uk Phone 03000 41 61 61 Monday to Friday, 9am to 5pm Phone (out of hours) 03000 41 91 91 Resources Section: Kent and Medway Safeguarding Adults Board
Ofsted (Offers impartial advice and guidance on a special 'whistleblowing' helpline)	Tel :08456 404 046.

Although referrals in cases of abuse and/or need to Children's Services are usually made through the DSL, anyone may make a referral using the contact details above.

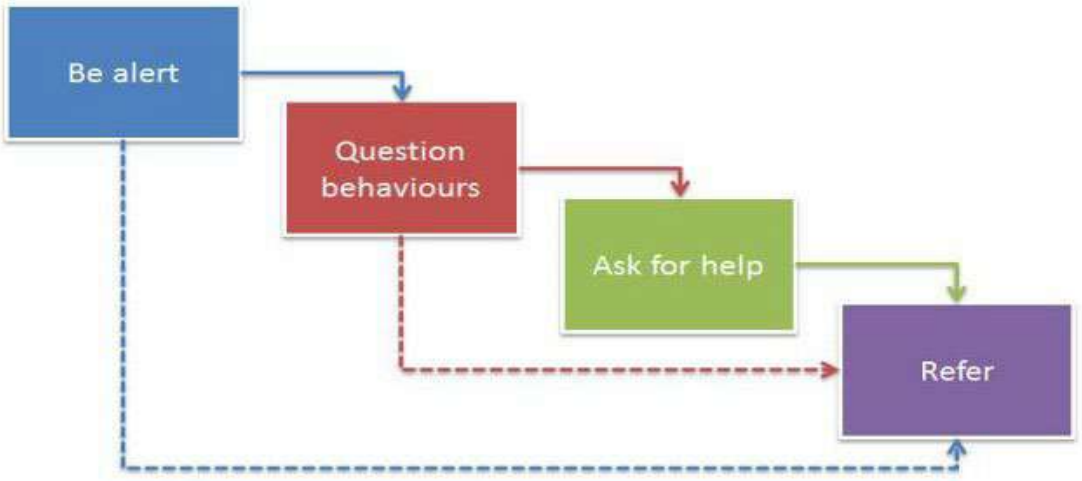
Any member of staff or volunteer who has concerns about poor or unsafe practice either in general or in any specific case should follow the guidance given in the school's Whistleblowing Policy.

3. Safeguarding and Child Protection Procedures

3.1 All staff in the Prep, which includes the EYFS, are provided with a secure locker to store their personal mobile devices whilst in the building. EYFS staff, volunteers and visitors working with children in the EYFS must ensure their mobile phones and/or other personal devices are safely stored, and not on their person when the children are present.

3.2 The School adheres to the KSCMP Safeguarding Children Procedures. The full KSCMP procedures and additional guidance relating to specific safeguarding issues can be found on the KSCMP website Welcome to the Kent and Medway Safeguarding Children...

3.3 All members of staff are expected to be aware of and follow this approach:



3.4 It may not always be appropriate to go through all four stages sequentially and if a child is in immediate danger or is at risk of harm, a request for support should be made immediately to Children's Social Work Services and/or the police.

3.5 The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer.

3.6 The DSL may seek advice or guidance from the LADO Education Safeguarding Advisory Service (LESAS), or from a social worker at the Front Door Service, before deciding the appropriate next steps.

3.7 All members of staff are made aware of the internal and local early help support services. Where a child is being offered or receiving early help support, staff will be supported to understand their role in any early help assessment or intervention. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.

3.8 The DSL will keep all early help cases under constant review and consideration will be given to a request for support to the Front Door service if the situation does not appear to be improving or is getting worse.

3.9 All staff are aware of the process for making request for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.

3.10 In all but the most exceptional circumstances, parents /carers will be made aware of the concerns for their child at the earliest possible stage. In the event of a request for support to the Front Door service being necessary, parents/carers will be informed and consent to this will be sought in line with guidance provided by KSCB, unless there is a valid reason not to do so, for example if to do so would put a child at risk of harm or would undermine a criminal investigation.

3.11 If the DSL is unavailable and there is an immediate or urgent concern, staff should seek advice from a Deputy DSL. Where further advice is required, staff may seek guidance from the LADO Education Safeguarding Advisory Service (LESAS) or consult a Local Authority social worker via the Front Door Service. If anyone other than the DSL makes a referral to external services, they must inform the DSL as soon as possible.

3.12 On occasion, staff may pass information about a child to the DSL but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL so that they can reassure themselves the child is safe and their welfare is being considered. If following this process, the staff member remains concerned it is the responsibility of that staff member to follow the school's escalation process.

3.13 If a child's situation does not appear to be improving, the DSL, or the person who made the original request for support, will consider whether a re-referral is required. Professional disagreements or escalation will be managed in line with KSCMP procedures, and DSLs may seek advice or support from the LADO Education Safeguarding Advisory Service (LESAS) where appropriate.

3.14 Escalation procedures can be found via this link:
Kent Safeguarding Children Escalation Procedure - Kent Safeguarding Children Multi-Agency Partnership

4. Referrals for pupils who live outside of Kent Borough

4.1 Referrals to Children's Social Services (CSS) should be made via the child's home county Safeguarding Partnership. The School is a (North) Kent school, but we educate pupils who live in surrounding counties and therefore referrals may be made to: Kent, Surrey, Bexley, Bromley etc.

4.2 Surrey: Homepage - Surrey Safeguarding Children Partnership
Bromley: Bromley LSCB - Home
Bexley: Bexley Safeguarding Partnership for Children & Young People | Bexley LSCB
To check a child's home county, look up their home address postcode: Find your local council - GOV.UK

5 Record Keeping

5.1 All safeguarding concerns, discussions and decisions (and justifications for those decisions) will be recorded in writing. If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSLs. Information is held confidentially and stored securely, in a separate file for each child. Records 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, decisions reached and the outcome.

5.2 Staff will record any welfare concern that they have about a child using the My Concern online safeguarding portal, which immediately alerts the DSL team. Records will be completed as soon as possible after the incident/event, using the child's words.

5.3 The My Concern safeguarding software is accessible online, via a link on the school website/intranet.

5.4 If a member of staff is unable to use the online system, then a paper Incident/Welfare Concern Form (with body map if injuries have been observed) should be completed and handed without delay to the DSL. Back - up copies of Incident/Welfare Concern forms and body maps are kept in the Senior and Prep School office, and on the shared area on the U drive: U:\Administration\Safeguarding.

5.5 Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSLs. Safeguarding records are shared with staff on a 'need to know' basis only.

5.6 All safeguarding records will be transferred in accordance with KCSIE and data protection legislation to the child's subsequent school/setting, under confidential and separate cover. These will be given to the DSLs and a receipt of delivery will be obtained. The school will refer to Annex C 'Information sharing and managing the child protection file, regarding the mandated timescales to be followed.

5.7 The Head will be kept informed of any significant issues by the DSLs.

6. Multi-Agency Working

6.1 The school recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance (WTSC) and KCSIE 2026.

6.2 New safeguarding partners and child death review partner arrangements have been in place since September 2020. Locally, the three safeguarding partners (the local authority, the Integrated Care Systems for an area within the local authority; and the chief officer of police for a police area in the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

6.3 The School, especially the senior leadership team and the DSLs/DDSLs will make themselves aware of and follow their new local arrangements. The Local Safeguarding Multi-Agency Partnership for the School is Kent (KSCMP).

6.4 Schools are not the investigating agency when there are child protection concerns. We will however contribute to the investigation and assessment processes as required. The school recognises the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi- agency meetings.

6.5 The School Leadership Team and the DSLs will work to establish strong and co-operative relationships with relevant professionals in other agencies.

7. Confidentiality, Information Sharing and Data Protection

7.1 It is important that governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (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.

7.2 The school recognises that all matters relating to child protection are confidential. The Headteacher or DSL will only disclose information about a pupil to other members of staff on a 'need to know' basis.

7.3 All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children.

7.4 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.

7.5 Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision, whether this is when problems are first emerging, or where a child is already known to local authority children's social care (such as on a child in need or child protection plan).

7.6 DfE Guidance on Information Sharing (May 2024) provides further detail. DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people,parents and carers

7.7 All relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

- 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 practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- For schools, not providing pupils' personal data where the serious harm test under the legislation is

met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt the school would seek independent legal advice.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. Schools and colleges have clear powers to share, hold and use information for these purposes.

8. Children at risk of abuse, neglect and exploitation

8.1 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.

8.2 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.

8.3 All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

8.4 Knowing what to look for is vital to the early identification of abuse, neglect and exploitation. All staff should be aware of indicators of abuse, neglect and exploitation and specific safeguarding issues such as child criminal exploitation and child sexual exploitation so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should **always** speak to the designated safeguarding lead (or deputy).

8.5 **All** staff should be aware that abuse, neglect and exploitation are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

8.6 **All** staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

8.7 **All** staff should also be aware that technology is a significant component in many safeguarding and wellbeing issues.

8.8 Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, threatening harm or by failing to act to prevent harm.

8.9 Children may be abused in a family or in an institution or community setting by those known to them or by others (e.g. via the internet).

8.10 Children may be abused by an adult or adults, or by another child or children.

8.11 If a child is in immediate danger or at risk of harm or of further harm, a referral should be made to children's social care and/or the police immediately.

8.12 Referrals are normally managed by the DSL who will contact the local Kent Safeguarding Children Multi-Agency Partnership immediately when a child has either suffered or is at risk of abuse. It should be noted that no child should be sent back into a place of potential danger or risk without receiving specific

guidance from the Safeguarding Partnership.

8.13 Children's social care assessments consider where children are being harmed in contexts outside the home, so the school provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: Home (contextualsafeguarding.org.uk)

8.14 Anyone may make a referral to children's services: in such cases the DSL or one of the Deputy DSLs should be informed as soon as possible that a referral has been made. The police will always be contacted when a crime is alleged.

8.15 The latest edition of KCSIE 2026 sets out various ways in which children may be abused and provides guidance for the identification of possible abuse.

8.16 Types of abuse include: Neglect, Emotional, Physical, and Sexual. Child on Child (formerly known as peer on peer) abuse and the sexual abuse of children by other children (e.g. sexual violence, sexual harassment, sexting, initiation/hazing and other rituals) is a specific safeguarding issue in education. Details of these and other types of abuse (including radicalisation, child sexual exploitation, child criminal exploitation, so-called 'honour-based' abuse including forced marriage, and female genital mutilation (FGM)) and guidance on identifying them are set down in Appendix A, noting that instances of actual or suspected FGM must be reported to the police by the observer.

8.17 Reports to the relevant local agencies must also be made where children are missing from education, since this may be amongst other possibilities a sign of abuse: see 9.15 below.

8.18 Advice will be sought from, and decisions will be made by, the Safeguarding Partnership regarding if, how and when the parents or carers of the child should be informed of any disclosure relating to abuse. The school will comply with the guidance given.

8.19 It should be noted that the bullying of a child whether by an adult or adults, or by another child or other children, directly or through electronic means, is also potentially abuse. The school's anti-bullying and e-safety policies set out the school's strategies for dealing with all forms of bullying including cyber-bullying.

8.20 Referrals are normally managed by the DSL who will contact KSCMP immediately when a child has either suffered or is at risk of abuse. The police will be contacted when a crime is alleged.

9. Children in need of specific or additional external support, or about whom staff have concerns

9.1 All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and the consensual and non- consensual sharing of nude and semi-nude images and or videos (also known as sexting or youth produced sexual imagery) put children in danger.

9.2 Support and interventions are required not just for children at risk of abuse, but also for those in need of additional support from external agencies, including inter-agency working to provide early help for children in need.

9.3 Children *needing early help* - Any child may benefit from early help, but all school staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health 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.
- is a young carer.
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- is frequently missing/goes missing from care or from home.
- is misusing drugs or alcohol themselves.
- is at risk of modern slavery, trafficking or sexual or criminal exploitation.
- has a family member in prison or is affected by parental offending.
- is in a family circumstance presenting challenges for the child, such as drug and alcohol abuse, adult mental health problems or domestic abuse.
- is at risk of honour-based abuse such as Female Genital Mutilation or Forced Marriage.
- has returned home to their family from care.
- is showing early signs of abuse and/or neglect.
- is at risk of being exploited.
- is a privately fostered child.

- is persistently absent from education.

9.4 *Children affected by domestic abuse* – Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

9.5 *Operation Encompass*. The School works in partnership with Kent Police and Children's Services to identify and provide appropriate support to pupils who have experienced domestic violence in their household; this scheme is called Operation Encompass. The purpose of Operation Encompass is to safeguard and support children and young people who have been involved in or witness to a domestic abuse incident. Domestic abuse impacts on children in a number of ways. Children are at increased risk of physical injury during an incident, either by accident or because they attempt to intervene. Even when not directly injured, children are greatly distressed by witnessing the physical and emotional suffering of a parent.

9.6 Operation Encompass has been created to highlight this situation. It is the implementation of key partnership working between the police and schools. The aim of sharing information with local schools is to allow 'Key Adults' the opportunity of engaging with the child and to provide access to support that allows them to remain in a safe but secure familiar environment. To achieve this, the Multi-Agency Safeguarding Partnership will share police information of all domestic incidents where one of our pupils has been present, with the Designated Safeguarding Lead(s) (DSL). On receipt of any information, the DSL will decide on the appropriate support the child requires, this should be covert dependent on the needs and wishes of the child. All information sharing and resulting actions will be undertaken in accordance with Kent Police and MASH Encompass Protocol Data Sharing Agreement. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

9.7 The purpose and procedures in Operation Encompass have been shared with all parents and governors. Further information can be found by clicking on the following link: Home: Operation Encompass. At Radnor House Sevenoaks our Key Adult are the DSL Leads.

9.8 Children with Special Educational Needs and Disabilities - Particular attention will be given to the needs of children identified as being more vulnerable including those with SEND, as these children can face additional safeguarding challenges.

9.9 Additional barriers can exist when recognising abuse, neglect and exploitation in this group of pupils, including:

- assumptions that of possible abuse such as behavior, mood and injury relate to the child's disability without further exploration;
- these pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- the associated communication barriers and difficulties in overcoming all the above.
- cognitive understanding – being able to understand the difference between fact and fiction in online content and then repeating the content/behaviour in school, or the consequences of doing so.

9.10 To address these additional challenges, the school monitors pupils via Pastoral Radar, and puts in extra pastoral support for children with SEND if required. Any reports of abuse involving children with SEND therefore requires close liaison between DSL/DDSL and the SENDCo.

9.11 The SEND Code of Practice is a useful source of information, and support is available from specialist organisations including The Special Educational Needs and Disabilities Information Advice and Support Services (SENDIASS).

9.12 *Children At Risk From Serious Violence* – All staff should be aware of 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 well-being, or signs of assault or unexplained injuries. 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. All staff should be aware of the associated risks and understand the measures in place to manage these. Advice is provided in the Home Office's *Preventing youth violence and gang involvement* and its' *Criminal exploitation of children and vulnerable adults: county lines*

guidance.
Advice to schools and colleges on gangs and youth violence - GOV.UK (www.gov.uk) Criminal exploitation of children and vulnerable adults: county lines - GOV.UK (www.gov.uk)

9.13 *Children requiring Mental Health Support* - Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The school has an important role to play in supporting the mental health and wellbeing of their pupils. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, however school staff 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. The school accesses a range of advice to help it identify children in need of extra mental health support, including working with external agencies. More information can be found in the mental health and behaviour in schools guidance (see link below), and Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children.

9.14 Self-Harm, Suicidal Ideation and Suicide Risk - All staff should be aware that self-harm, suicidal thoughts, suicidal ideation and suicide attempts may be indicators of abuse, neglect, exploitation, trauma, adverse childhood experiences, mental ill-health or other safeguarding concerns.

- Any expression of suicidal thoughts, suicidal intent, plans to end life, suicide attempts, or significant concerns regarding self-harm must be taken seriously and reported immediately to the DSL or a Deputy DSL. Staff should never assume that such behaviours are attention-seeking or low risk.
- The School will respond to concerns in accordance with safeguarding procedures, undertake appropriate risk assessment, involve parents or carers where appropriate, and seek support from health, mental health and safeguarding services as necessary.
- The welfare and safety of the child will remain the primary consideration in all decision-making.

9.15 Where children have suffered abuse, neglect and exploitation, or other 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 and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken, following the procedures in this policy and speaking to the designated safeguarding lead or a deputy.

9.16 The school can access a range of advice to help identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the Mental Health and Behaviour in Schools (DFE guidance) Mental health and behaviour in schools - GOV.UK (www.gov.uk) and Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people.

9.17 *Children in Need of a Social Worker* (*Child in Need and Child Protection Plans*) – children may need a social worker due to safeguarding and welfare needs, abuse, neglect and/or 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.

9.18 Local authorities should share the fact that a pupil at the school has a social worker. This information will inform decisions the school takes 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). Findings from the Children in Need review (June 2019) contain further information. The conclusion 'Help, protection, education' sets out action the Government is taking to support this See: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/809236/190614_CHILDREN_IN_NEED_PUBLICATION_FINAL.pdf

9.19 The School recognises that safeguarding needs do not automatically end when a young person reaches the age of 18. Older adolescents and young adults may continue to experience, or be at risk of, abuse, neglect, exploitation, coercion, self-neglect, homelessness, domestic abuse, mental health difficulties, suicidal ideation, serious violence, online harm or other forms of significant harm.

9.20 Transitional safeguarding is an approach which recognises that some young people aged 18 and over continue to require safeguarding support as they move from childhood into adulthood. The School acknowledges that this may be particularly relevant for young people with SEND, care experience, mental health needs, experiences of trauma, abuse or exploitation, or those receiving support from external agencies.

9.21 Where a safeguarding or welfare concern relates to a young person aged 18 or over, staff will report the concern to the DSL. The DSL will consider the concern in line with relevant safeguarding procedures, the young person's wishes and views, mental capacity, consent, presenting risks, and the need to share

information to prevent or respond to harm.

9.22 The DSL will consider the most appropriate support pathway. This may include support within the School, adult safeguarding services, health services, mental health services, housing services, the police, Prevent, or other relevant local agencies.

9.23 Where appropriate, referrals will be made to adult social care in line local adult safeguarding referral pathways, with reference to guidance and resources from the Kent and Medway Safeguarding Adults Board.

9.24 Where a young person is already known to Children's Services, is a care leaver, has an Education, Health and Care Plan (EHCP), has care and support needs, or is transitioning between children's and adult services, the School will work with relevant agencies to support continuity of safeguarding, information sharing and welfare planning.

9.25 Where there is an immediate risk of harm, emergency services will be contacted via 999. All safeguarding decisions, actions taken, referrals made and the rationale for decisions will be appropriately recorded in accordance with the School's safeguarding procedures.

9.26 The School will seek to ensure that vulnerable young adults continue to receive appropriate support during periods of transition and that safeguarding concerns are not overlooked solely because a young person has reached the age of 18.

9.27 *Children Missing (Who Are Absent) From Education* - The School recognises that being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation – particularly county lines or radicalisation. The school will ensure that its immediate response to persistently absent pupils is robust, such that it helps prevent them becoming a child missing education in the future. This is particularly important for children known to social care.

9.28 DfE guidance on school attendance 2024 Working together to improve school attendance - GOV.UK provides statutory guidance on how schools should work with local authority children's services where school absence indicates safeguarding concerns within the family or in the community.

9.29 Where a pupil's absence has not been requested in advance by parents, Reception staff will chase the reason for the absence on the relevant morning. The absence report is forwarded to the relevant member of the Pastoral Team (Seniors) or Head of Key Stage (Prep), who can check for any patterns of absence and follow up with the pupils and parents if necessary. Where a child misses school for 10 consecutive days, or for fewer days but more regularly, without reason or satisfactory explanation, the DSLs will make a referral to children's social services, being alert to the possible reasons for this absence – including the risk of abuse, neglect and exploitation, or child sexual abuse, travelling to conflict zones, FGM and forced marriage and will refer all such concerns to the relevant local agencies. This may help prevent them going missing in future.

9.30 Where early help or other support is appropriate, the case should be kept under constant review and the DSL should support the staff in liaising with other agencies and setting up an inter-agency assessment as appropriate. If the child's situation does not appear to be improving, then consideration should be given to referring the case to children's social care.

9.31 *Child Criminal Exploitation* – some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. CCE does not always involve physical contact; it can also occur through the use of technology. 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. See Appendix A for further details.

9.32 *Child Sexual Exploitation* – CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. See Appendix A for further details.

9.33 *Children who are lesbian, gay, bi, or trans (LGBT)* – these children can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Staff work to reduce additional barriers these children may face and provide a safe space where they can speak out or share their concerns with a member of staff. LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

9.34 The School recognises that some children may question the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society. This is not in itself a safeguarding concern.

9.35 Staff will be alert to potential vulnerabilities experienced by some children who are questioning their gender, including bullying, harassment, online harm, family difficulties, mental health concerns, self-harm, exploitation and other safeguarding risks.

9.36 Where a safeguarding or welfare concern arises, staff must refer the matter to the DSL. The child's welfare and best interests will remain the School's paramount consideration.

9.37 Any requests relating to social transition will be considered by the DSL and relevant senior leaders, with appropriate involvement of parents/carers unless doing so would place the child at risk of harm.

9.38 The School will take a careful approach when considering any request relating to social transition, recognising that such decisions may have significant implications for the child and others affected, and that arrangements may need to remain flexible and open to review.

9.39 Any requests or issues relating to names, pronouns, uniform, toilets, changing rooms, residential accommodation, sport, trips or other school arrangements will be considered individually by the DSL and relevant senior leaders, in line with KCSIE, safeguarding duties, equality and human rights obligations, and relevant School policies.

9.40 The School will ensure that decisions are appropriately recorded, reviewed and shared only with those members of staff who need the information in order to safeguard and support the child.

9.41 The School will hold at least two emergency contact numbers for each pupil, giving additional contact options to make contact with a responsible adult when a child is missing from education or absent, is also identified as a welfare and/or safeguarding concern.

9.42 Where there is a concern about a child (as opposed to a child being in immediate danger), there should be a conversation with the DSL to agree a course of action with due regard to the referral thresholds of the Safeguarding Partnership.

9.43 Where early help or other support is appropriate, the case should be kept under constant review and the DSL should support the staff in liaising with other agencies and setting up an inter-agency assessment as appropriate. If the child's situation does not appear to be improving, then consideration should be given to referring the case to children's social care.

9.44 All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing and in MyConcern. The DSLs will advise on the recording requirements. The record will be kept by the DSL.

9.45 Where a pupil joins or leaves the School at non-standard transition times, the school will report this to the local authority.

10. Designated Safeguarding Lead (DSLs) responsibilities

10.1 The DSLs take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place in the School.

10.2 Normally, safeguarding concerns will be referred to and managed by the DSL, liaising with the nominated Director, the Head, the Deputy DSLs and other members of the senior leadership team, as appropriate.

10.3 A detailed list of responsibilities for the DSL is given in Appendix B, in line with KCSIE 2026 Annex C. In brief, these responsibilities cover the following safeguarding areas:

- Managing referrals – for example, to the local safeguarding partners, other relevant agencies, the Channel programme, the Disclosure and Barring Service, the police (as appropriate);
- Working with others - including liaising with the Deputy DSLs, the Head, the Board of Directors, other school staff, and the LADO and the local safeguarding partners;
- Training – their own, and of others - including with regard to the risks associated with online safety for

all pupils, and the increased risks which children with SEND may face online;

- Raising awareness – ensuring the school's safeguarding policies are known, understood and used appropriately.
- Information sharing - help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school senior leadership team.
- The administration of child protection files - information sharing, including transferring files where children leave the school, and when it may be appropriate to share information in advance of a child leaving school;
- Providing support to the staff in school - supporting and advising staff and help them feel confident on welfare, safeguarding and child protection matters.
- Understanding the views of children – the DSL should encourage a culture of listening to children and taking account of their wishes and feelings, understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.
- Availability – either the DSL or DDSL always being available to hear all concerns The work of the DSLs will be reviewed annually by the Safeguarding Director.

11. Deputy Designated Safeguarding Lead (DDSL) responsibilities

11.1 A Deputy DSL is a member of the school's senior leadership with the status and authority to carry out the duties of the posts of Deputy DSL and Deputy Prevent Officer.

11.2 A Deputy DSL will be trained to the same standards as the DSL.

11.3 A Deputy DSL will act as DSL in their absence, and otherwise will carry out safeguarding tasks and duties as specified by the DSL, in line with the details above and Appendix B.

11.4 The Deputy DSL with specific responsibility for EYFS will have delegated powers to act as DSL for the EYFS, but will ensure that the DSL is kept informed of all safeguarding matters relating to the EYFS.

12. Responsibilities of Directors

12.1 Directors have, together with the proprietor corporate responsibility for all safeguarding matters relating to the pupils of the school. They should ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

12.2 Directors will read and achieve a secure understanding of KCSIE 2026 Part 1.

12.3 Directors will have specific responsibilities for:

- Ensuring that all staff and those working in the school (teaching, support, contractors, agency staff and volunteers) are informed of the content of this policy;
- Checking the staff's understanding and implementation of the policy; and
- Ensuring that all staff are aware of the referral process and how to implement safeguarding protocols.

12.4 Directors will promote a climate in which the best interests of the child are at its' heart, and in which it is understood that safeguarding is the responsibility of all.

12.5 Where there is a safeguarding concern, the governors and school leaders will make certain that systems are in place to ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. These systems are well promoted in school, easily understood and easily accessible for pupils to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

12.6 To these ends:

- They will ensure that this policy is reviewed in detail and approved by them at least annually.
- They will monitor the policy, procedures and the efficiency with which they are implemented.
- They will ensure that child protection files are maintained in line with KCSIE 2026 Annex C.
- They will ensure that safer recruitment policies and practices in line with KCSIE 2026 Part Three are in place.

- They will ensure that there are clear job specifications for the DSL and Deputy DSL.
- They will ensure the designated safeguarding lead has the appropriate status and authority within the school to carry out the duties of the post. As the role carries a significant level of responsibility this equates to the additional time, funding, training, resources, and support needed to carry out the role effectively.
- The Board of Directors of the school will hold online safety as a central theme in their whole setting approach to safeguarding.
- They will ensure that all those working in the school understand their own safeguarding duties and responsibilities.
- They will nominate from amongst their number one director to liaise with senior leadership of the school and with the DSL and Deputy DSLs on matters relating to safeguarding. That person will be authorised to liaise with the Safeguarding Partnership and LADO as and when required by this policy.
- They will receive from the DSL a safeguarding report at each meeting of the directors.
- They will receive an annual safeguarding report prepared by the nominated governor.
- They will receive appropriate and regular training to assist them in the proper fulfilment of their corporate responsibilities for safeguarding.
- They will receive appropriate safeguarding and child protection (including online safety) induction training on appointment as a Director, which will be regularly updated thereafter.

12.7 The directors will ensure that arrangements are in place so that there is always a member of staff with appropriate training and status, on site during the working day, to deal with safeguarding matters: this would normally be the DSL, one of the Deputy DSLs or Head, all of whom should be trained for DSL duties.

12.8 The Governors will ensure that safeguarding training for staff, including online safety training, is integrated, and considered as part of the whole school safeguarding approach. They will also ensure that the children are taught about safeguarding, including online safety (a more personalized/contextualized approach might be needed for more vulnerable children, victims of abuse and some pupils with SEND). See also: DfE advice for schools: Teaching online safety in schools - GOV.UK (www.gov.uk).

12.9 The Governors have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and require teachers to have a clear understanding of the needs of all pupils.

12.10 Additionally, the Directors will give opportunities for any concerns to be voiced and ensure that the Board of Directors has an appropriately thorough understanding of the methodology of the teaching of safeguarding issues within the school.

12.11 The Directors and Proprietors are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements. These are set out in para 80 – 91 KCSIE 2026.

13. Safer Recruitment, the Single Central Register, and Visitors

13.1 The school follows the Government's recommendations for the safer recruitment and employment of staff working with, or nearby, children in accordance with Part 3 of KCSIE 2026: see the school's Safer Recruitment Policy for specific details of our practice and procedures.

13.2 The school operates safer recruitment procedures, including not accepting curriculum vitaes without an accompanying application form, and carrying out the required pre-appointment checks on teaching and non-teaching staff, volunteers, directors, supply staff, staff of contractors and other individuals, in accordance with the school's Safer Recruitment Policy.

13.3 At least one person who is involved in every staff interview has completed Safer Recruitment training. The interview process consists of several meetings with different members of staff, one of whom is trained in Safer Recruitment.

13.4 A Single Central Register (SCR) of appointments is rigorously maintained. All employees, directors, supply staff, volunteers and others working within the school are checked in accordance with the full requirements of the SCR before starting work and the details of these checks are recorded in the SCR.

13.5 As part of its risk assessment process, the school also ensures that appropriate checks have been carried out on

staff from other organisations who work with our pupils on external trips and visits.

13.6 In any case where a new member of staff's DBS check has not been seen by the school prior to the start date, but all other checks have been completed, then a risk assessment can be carried out to determine the appropriate course of action, e.g. allowing appropriately supervised access for a specified period or postponing the starting date.

13.7 Appropriate safeguarding and Prevent duty checks, including appropriate background checks, upon visiting speakers and other visitors, will be made and recorded. The school will not permit to enter the school any visitor with links to extremist organisations, or who has expressed extremist views. All speakers, contractors and other visitors will be required to undergo an identity check on arrival and wear a visitor's badge. A member of staff will be assigned to supervise any visiting speaker. No unsupervised access to pupils will be permitted for any visitor or contractor. Speakers will provide prior to their arrival at the school, an outline of what ground they will be covering in their talk or presentation: this will not conflict with the school's aims and ethos nor undermine British values; if it does, the talk or presentation will not be allowed to go ahead. The assigned member of staff will interrupt and terminate any talk or presentation, if it appears to deviate inappropriately from this outline and/or pose a risk under the Prevent Duty.

13.8 The School will have regard to the statutory guidance, Disqualification under the Childcare Act 2006, alongside KCSIE and the School's safer recruitment procedures. This guidance relates to staff working in the early years and those involved in childcare for children under the age of eight in before- and after-school settings. The School must not knowingly employ people to work in relevant childcare, or allow them to be directly concerned in its management, if they are disqualified from childcare.

14. Responsibilities of staff and volunteers

14.1 Safeguarding is everyone's responsibility. It applies to all who work, or volunteer, or learn, or supply services to our school.

14.2 The School recognises the importance of creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role. It is important that the School and the schools' leaders create the right culture and environment so that staff feel comfortable to discuss concerns regarding matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children.

14.3 All staff and volunteers have an equal responsibility to understand and implement this policy and its procedures, both within and outside of normal school hours, including activities away from school. This includes a duty to act upon any suspicion, concern or disclosure that may suggest that a child is at risk of significant harm or in need of support services. They are required to report instances of actual or suspected child abuse or neglect to the DSL or Deputy DSL. They may refer matters directly to the local children's services or police as appropriate.

14.4 The Crime and Policing Act 2026 introduces a new mandatory reporting duty for child sexual abuse. Although the Act received Royal Assent in April 2026 and the duty exists in law, there is currently no commencement date. Once commenced, the duty will require individuals in regulated activity with children to report child sexual abuse where they are told about it by a child or an adult, or where they witness it directly. A separate criminal offence, carrying a maximum penalty of up to seven years' imprisonment, will apply to anyone who seeks to prevent or deter a person from making such a report. There is no criminal penalty for failing to report; however, failure to report may lead to referral to the Disclosure and Barring Service for barring consideration. Staff should follow the School's safeguarding procedures and speak to the DSL immediately if they are told about, witness, suspect or have any concern about child sexual abuse.

14.5 Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan). Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers supports staff who have to make decisions about sharing information.

14.6 All should have a clear awareness of the different forms of and indicators of abuse; see Section 3 above and the appendices. Knowing what to look for is vital for the early identification of abuse, neglect and exploitation. All should be aware that behaviours such as those linked to drug taking, alcohol abuse, truanting and sexting put children in danger.

14.7 The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the Designated Safeguarding Lead.

14.8 All staff should be aware that safeguarding issues may manifest themselves via child-on-child abuse, including online abuse. This may include, but is not limited to: abuse in intimate personal relationships between children; physical abuse; bullying, including cyber-bullying; gender-based violence; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes, including self-generated intimate images and/or videos (sexting); initiation/hazing-type violence and rituals; and upskirting. See Section 22 below.

14.9 As well as having a clear awareness of the different forms and signs of abuse, all staff and volunteers should demonstrate an awareness of the risks arising from extremism and radicalisation, child sexual exploitation, child criminal exploitation, and so-called honour-based abuse, including female genital mutilation and forced marriage. If staff are unsure, they should always speak to the Designated Safeguarding Lead, or deputy.

14.10 Any member of staff or volunteer should immediately report instances of actual or suspected child abuse, child sexual abuse or neglect to the DSL, even where they make a referral themselves, unless the DSL is implicated in any disclosure or allegation, in which case they should follow the guidance given in Section 19 below.

14.11 Allegations against any member of staff, including the DSL or DDSL, supply staff or volunteer, should be reported immediately to the Head or, in their absence, or where the Head is the subject of the allegation or concern, to the Chair of the Board of Directors, without informing the person concerned or any other person. Where appropriate, the Head will consult with the DSL. In all cases, the matter must not be discussed with the person concerned or with others in or beyond the School. The allegation will be discussed immediately with the LADO before further action is taken. Specific allegations should be dealt with in accordance with Section 19 below, noting in particular paragraph 19.3.

14.12 All staff and volunteers should feel able to raise concerns about poor or unsafe practice, and potential failures in the school's safeguarding regime. They should also have confidence that all such concerns will be taken seriously by the governance and senior leadership of the school. The school's Whistleblowing Policy provides guidance as to how such concerns may be raised.

14.13 Where that confidence is lacking, or staff and volunteers feel unable to raise an issue with the School directly, they should follow the guidance given under whistleblowing: see Section 1.

14.14 Additionally, staff are expected to make themselves available for appropriate training, if necessary, outside normal school hours, and to read both this policy and Part one of the latest statutory edition of KCSIE. Staff who work directly with children must also read Annex B. Special arrangements will be put in place for anyone working in the School whose command of English is insufficient to enable them to read and understand this policy, Part one of KCSIE and, where applicable, Annex B.

14.15 Appropriate formal training will be provided for all members of staff and school volunteers in regulated activity at least every two years. Updates will be provided throughout the academic year as appropriate and not less than annually.

15. What to do in the event of a child making a disclosure – guidance to those within the school community

15.1 If a child makes a disclosure relating to a safeguarding matter then the following strict guidance should be followed:

- Listen sensitively to what the child has to say and take them seriously.
- If there is a need for medical attention seek assistance without delay.
- Do not promise confidentiality.
- Record, as much as possible in the actual words of the child, what is said relating to the disclosure, the date and time.
- Do not ask leading questions.
- Do not ask questions other than to clarify what is being said.
- Do not ask the child to repeat all or part of their disclosure other than to clarify what is being said, understanding that being asked to restate their disclosure repeatedly will put the child under undue stress.
- Do not attempt to investigate the disclosure or to contact in any way any person mentioned in the

disclosure.

- Acknowledge how difficult it must have been for the child to speak and reassure them that you will ensure that the matter is now dealt with.
- When the child has finished speaking, do not leave the child alone. Call for immediate assistance from the DSL or Deputy DSL or follow the procedures for allegations against staff, volunteers, and directors. The DSL (or other responsible person within the scope of this policy) will then deal with the matter.
- Sign (with time and date) all notes made and give them to the DSL (or other responsible person).
- Do not speak to anyone about the fact or content of the disclosure without the full written authority and on the written direction of the DSL and/or Head.

15.2 The above strict guidance relates to any disclosures involving events within or outside the school or concerning adults or other children.

15.3 Refer to Section 5, "Record-Keeping", for details of how to record welfare concerns.

15.4 Although referrals are normally managed by the DSL, as pointed out above in the preamble to this policy, anyone may make a referral if necessary, using the external contact details.

15.5 As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

15.6 Wherever possible, staff should avoid behaviour including that involving the use of social media, texts and other forms of electronic communications which might be misinterpreted by others, and report either to a DSL or to a member of the senior leadership and record any incident with this potential. Staff should refer the school's Staff Handbook.

16. Restrictive interventions, including the use of reasonable force, in school

16.1 There are circumstances in which it may be lawful and necessary for staff at the school to use restrictive interventions, including reasonable force, to safeguard pupils, staff and others. Restrictive interventions are actions which prevent, restrict or subdue a pupil's movement and may include reasonable force, restraint, non-force-related restraint and seclusion. Any such intervention must be used only where necessary, reasonable and proportionate, and for the shortest time necessary to reduce risk.

16.2 The school follows the DfE guidance Restrictive interventions, including use of reasonable force, in schools (April 2026). This guidance replaced the previous DfE Use of Reasonable Force in Schools guidance from 1 April 2026.

16.3 The school does not operate a "no contact" policy. There are occasions when appropriate physical contact may be necessary or beneficial, including to comfort a pupil, provide first aid, support teaching or activities, prevent harm, prevent disorder, prevent damage to property, or prevent a pupil from committing an offence. Any physical contact must be appropriate to the circumstances and the pupil's needs.

16.4 Restrictive interventions must never be used as a punishment. Staff should seek to prevent and minimise the need for restrictive interventions through early support, planning, positive behaviour support, risk assessment and de-escalation strategies. Where an intervention is required, staff should use the least restrictive approach available and should act in a way that protects the pupil's dignity and welfare.

16.5 When considering or using restrictive interventions in relation to pupils with SEND, disabilities, medical conditions or other vulnerabilities, staff must take particular care to consider the pupil's individual needs and any increased risk of harm. The School will have regard to its duties under the Equality Act 2010, including the duty to make reasonable adjustments, and will use individual plans or risk assessments where appropriate.

16.6 Seclusion must only be used as a safety measure where necessary to protect a pupil or others from harm. It must never be used as a punishment or for staff convenience. Any pupil placed in seclusion must be supervised appropriately and supported throughout.

16.7 Any significant incident involving the use of force, seclusion or non-force-related restraint must be recorded and reported in accordance with the DfE statutory guidance and the School's behaviour and safeguarding procedures. Records should include the circumstances of the incident, the pupil and staff involved, the reasons the intervention was considered necessary, the nature and duration of the intervention, any injuries or medical attention required, post-incident support provided, and communication with parents or carers where appropriate.

16.8 Following any restrictive intervention, the School will consider the welfare of the pupil and staff involved, provide appropriate support, review the incident, and consider whether any adjustments to risk assessments, behaviour

plans, pastoral support, staff training or safeguarding arrangements are required.

17. Prevent Duty (preventing radicalisation)

17.1 Since 1 July 2015, all schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty, and comprises:

- The School's procedures are set out in this Safeguarding Policy, the Preventing Radicalisation Policy, and reflect the policies and procedures of KSCMP.
- Staff training – the DSL will complete Prevent training in accordance with Annex C of KCSIE to enable them to train/equip staff via Prevent, Channel and other appropriate training to identify and assess children at risk of being drawn into terrorism and to challenge extremist ideas. Staff in regular contact with students receive training in how to identify signs of radicalism in students through observing changes in behaviour etc. Staff are advised on actions to take should they identify such (reporting to DSL immediately).
- Advice and support – the DSL will provide advice and support to other members of staff on protecting children from radicalisation, with particular attention to the needs of children identified as more vulnerable, including those with SEND, who may be more susceptible. The DSL and senior managers ensure the school PSHEE and SMSC policies and programmes, assembly and other appropriate curricular programmes incorporate specific sections that actively promote British values and assist the students to understand the dangers of radicalisation and extremist arguments.
- IT considerations – the school will ensure that the students are safe from terrorist and extremist material when accessing the internet through suitable filtering. Students will also be taught about online safety more generally.
- The DSL and senior managers ensure the school IT and online policies have safety procedures in place to block any possible route for students to be targeted online or through the internet where they may be susceptible to terrorist or extremist material.
- The School Network Manager is responsible for checking that no terrorist or 'grooming' organisations contact or are able to access students.
- The school ensures parents are continually warned of the dangers of their children being targeted through the internet on home computers.
- If the DSL suspects a student is being radicalised, they may discuss the matter with parents. If the DSL considers the child to be at risk of significant harm they may contact the LADO immediately without informing the parents, and then act accordingly.

17.2 Further guidance regarding the Prevent Duty may be found in Appendices A and D.

17.3 This subject is dealt with in further detail in the Prevent and Anti-Radicalisation Policy.

17.4 Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

18. Training and Induction: DSL, Deputy DSLs, staff, volunteers and Directors

18.1 All those new to working in the school either as a member of staff, third party contractors or supply worker, or volunteer will receive induction training which, in line with KCSIE 2026, will include familiarisation with at least**:**

- This Safeguarding Policy
- The Behaviour Policy
- The school's safeguarding response to children who go missing from education (CME)
- The identity and role/duties of the DSL/DDSL
- The Staff Code of Conduct: see in particular 18.6 below.
- The school's Whistleblowing Policy
- Part One of the latest edition of KCSIE, and for those who work directly with children, Annex B. Part One must be re-read every time it is updated by the DfE. Annex A is a condensed version of Part One of KCSIE which could be provided instead of Part One to those staff who do not work directly with children.
- The School's Anti-bullying and Online Safety Policies
- The School's Prevent strategies including guidance as to how children at risk of radicalisation may be identified
- The local safeguarding procedures as laid down by the Safeguarding Partnership.

18.2 In addition, each new member of staff will receive a copy of Part 1 of the latest edition of KCSIE and a sheet which includes the names and/or contact details for both school and external safeguarding contacts including the DSL.

18.3 All those working in the school either as a member of staff or volunteer will receive further training annually to ensure that safeguarding issues, including online safety, remain uppermost in their thinking and to highlight any specific changes which impact upon the safeguarding policies and practices of the school.

18.4 In addition to any formal certificated training, all those working in the school in any capacity will receive throughout each academic year regular safeguarding and child protection updates, for example by email bulletins and through staff meetings to provide them with the relevant skills and knowledge to safeguard children effectively.

18.5 All those working within the school on a temporary basis will receive appropriate safeguarding guidance.

18.6 The Staff Code of Conduct contains guidance for staff about their behaviour and actions so as not to place pupils and staff at risk of harm or of allegations of harm to a pupil. This includes guidance on social media, one-to-one teaching and trips and visits away from the school itself.

19 Referrals to LADO: allegations against staff (including supply staff), volunteers, third party contractors, DSL, Deputy DSLs, proprietor and Directors – Procedures, and Learning Lessons

19.1 This **'harms threshold'** section applies where an adult within the school community has behaved in a way that:

- has harmed a child, or may have harmed a child;
- indicates they may pose a risk of harm to a child;
- has possibly committed a criminal offence against or related to a child; or
- indicates they may not be suitable to work with children. This is termed 'transferable risk' in KCSIE and refers to an incident outside school which did not involve children but could have an impact on their suitability to work with children. For example, a member of staff is involved in domestic violence at home. No children were involved, but schools/colleges need to consider what triggered these actions and could a child in the school trigger the same reaction, therefore being put at risk.

19.2 Where it is a child who makes the allegation, then the protocols given in Section 15 above, guiding members of staff in how they should respond to a disclosure from a child, should be followed, with the variations set down below.

19.3 When allegations arise, the following protocols should be followed:

- Allegations against any member of staff, including the DSL, DDSL or a volunteer, should be reported immediately to the Head or, in their absence, to the Chair of the Board of Directors, without informing the person concerned or any other person. Where appropriate, the Head will consult with the DSL. The allegation will be discussed immediately with the LADO before further action is taken.
- Allegations concerning the Head or a Director, or where there is a conflict of interest in reporting the matter to the Head, are to be reported immediately to the Chair of the Board of Directors without informing the Head, the Director concerned or any other person. The Chair of the Board of Directors will immediately contact the LADO to discuss the allegation before further action is taken.
- Allegations concerning the Chair of the Board of Directors are to be reported immediately to the Head without informing the Chair of the Board of Directors or any other person. The Head will immediately contact the LADO to discuss the allegation before further action is taken.
- In all cases, allegations may be referred directly to the LADO by anyone, informing the DSL or, if the DSL is directly involved, either the Head or the Chair of the Board of Directors as soon as possible thereafter.

19.4 Allegations against a supply teacher – the school might have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an agency.

19.5 Whilst the school is not the employer of supply teachers, it will ensure that allegations are dealt with properly, finding out the relevant facts and liaising with the agency and the local authority designated officer (LADO) to determine a suitable outcome. There will be a discussion with the agency about whether it is appropriate to suspend the supply teacher or redeploy them to another part of the school, whilst they carry out their investigation.

19.6 In each case above, the LADO will be given sufficient detail to allow them to consider the nature, content and context of the allegation and to agree a course of action, including any involvement of the police. The police will be informed if a criminal offence is alleged.

19.7 Guidance will be sought from the LADO and/or police to enable the school to make a decision about whether or not the person against whom an allegation has been made should be allowed to remain on school premises, and if so, what, if any, conditions should apply.

19.8 Appropriate support will be offered to the person against whom an allegation has been made.

19.9 No internal investigation should take place unless authorised by the LADO.

19.10 Low-level concerns and allegations – The term "low-level" concern does not mean that it is insignificant; it means that the behaviour towards a child does not meet the threshold set out at paragraph 19.1. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a "nagging doubt", 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.

19.11 Examples of such behaviour could include, but are not limited to: being over friendly with children; having favourites; taking photographs of children on their mobile phone; engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or, using inappropriate sexualised, intimidating or offensive language. Such concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

19.12 It is very important that low-level concerns are shared by staff as they arise, as the school wishes to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour (which are set out in the Staff Code of Conduct) are constantly lived, monitored and reinforced by all staff.

19.13 Low-level concerns will also be dealt with promptly, clearly and appropriately, in line with the procedures set out in Part Four of KCSIE 2026 and paragraph 19.3 above. It is vital that staff share their concerns about other members of staff, including supply staff, volunteers and contractors, with the Head. Where there are concerns about the Head, or where there is a conflict of interest in reporting the matter to the Head, these should be referred to the Chair of the Board of Directors. Where there is any doubt whatsoever about the classification of a reported concern, the Chair of the Board of Directors, Head, or DSL, as appropriate, will seek advice from the Local Authority Designated Officer (LADO) on a no-names basis. In all cases allegations may be referred directly to the LADO by anyone. For full details of the clear processes that the School has in place, see the School's Low-Level Safeguarding Concerns Policy.

19.14 Staff may also self-report in any situation where they feel their behaviour towards a pupil or another young person could be misinterpreted or misconstrued or leave them vulnerable.

19.15 All low-level concerns will be recorded in writing, including details of the concern, the context, and any action taken; and these records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour is identified and dealt with appropriately, either through the school's disciplinary procedures or (if a pattern of behaviour moves from a concern to meeting the harms threshold) in which case it will be referred to the LADO as above.

20. Use of School Premises for non-school activities

20.1 When school facilities/premises are hired out to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities), the School must ensure that these organisations have appropriate arrangements in place to keep children safe. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

20.2 The School therefore seeks assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensures that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This requirement is included in every lease or hire agreement as a condition of use and occupation of the premises, and failure to comply with this would lead to termination of the agreement.

20.3 The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that the Foundation expects these providers to have in place.

20.4 When the School receives an allegation relating to an incident that (may have) happened when an individual was using their school premises for the purposes of running activities for children (community groups, sports associations, extra-curricular activities), the School will follow the school's regular safeguarding policies and procedures, including informing the LADO.

21. Referrals to DBS and Teaching Regulation Agency (TRA)

19.16 The School will report promptly, and ordinarily within five working days, to the Disclosure and Barring Service (DBS) any person, whether employed, contracted, a volunteer or student, who has harmed, or poses a risk of harm to, a child and who has been removed from working in regulated activity with children, or would have been removed had they not left earlier. This is a legal duty and failure to refer when the criteria are met is a criminal offence under the Safeguarding Vulnerable Groups Act 2006.

19.17 The School will consider the duty to refer to the DBS in light of the definition of regulated activity, including amendments made by the Crime and Policing Act 2026 which remove the supervision exemption from the definition of regulated activity. Where the referral criteria are met, the School will not delay making a DBS referral pending the outcome of any internal process.

19.18 Where a teacher has been dismissed for misconduct, or would have been dismissed had they not resigned first, the School will, taking full account of statutory guidance, give due consideration to making a referral to the Teaching Regulation Agency (TRA).

19. Child-on-child abuse – Allegations of abuse by one or more pupils against another pupil, including sexual violence and sexual harassment

19.19 Child-on-child abuse can take various different forms, including but not limited to:

- Abuse in intimate personal relationships between children (also known as teenage relationship abuse);
- Bullying, including cyber-bullying, prejudice-based or discriminatory bullying;
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be stand- alone or part of a broader pattern of abuse;
- 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 person;
- Consensual and non-consensual sharing of nudes and semi-nudes, including self-generated intimate images and/or videos, whether real, digitally altered or generated using artificial intelligence (AI) (sometimes referred to as sexting or youth-produced sexual imagery);
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks, to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- Physical abuse such as hitting, kicking, shaking, hair pulling, biting, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

21.2 Incidents involving self-generated intimate images and/or videos, including AI-generated or AI-manipulated imagery, may also constitute child-on-child abuse, sexual harassment, online abuse, coercion, exploitation, blackmail or grooming. Staff must report such concerns to the DSL immediately and follow the guidance in the section titled "Self-generated intimate images and/or videos, including those generated using artificial intelligence."

21.3 All staff should be aware that children can abuse other children, that this can happen both inside and outside school, including online, and that the absence of reports does not mean such abuse is not happening. Staff must speak to the DSL, or deputy, immediately if they have any concern about child-on-child abuse, and must record the concern on MyConcern with as much relevant information as possible.

21.4 In circumstances where there is an allegation of abuse by one or more pupils against another pupil, all children involved, whether victim/survivor, alleged perpetrator(s), or any other child affected, will be treated as being "at risk" and the safeguarding procedures set out in this policy will be followed. All staff must be clear as to the School's procedures with regard to child-on-child abuse, and the important role they have to play in preventing it and responding where they believe a child may be at risk from it

21.5 Where there is 'reasonable cause to suspect that a child is suffering or likely to suffer, significant harm' the allegation or disclosure must be reported to the DSL immediately. The DSL will then report this to KSCMP and will seek their advice on whether a formal referral should be made along with referring the pupil(s) to an external agency.

21.6 Additionally, if appropriate and so guided by the Safeguarding Partnership, the DSL will also refer child-on-child abuse to an external safeguarding agency.

21.7 Reference should be made to the school's Anti-bullying Policy, noting that instances of bullying are potentially a child protection concern given, for example, the fact that emotional and physical abuse may arise from bullying.

21.8 All staff will challenge inappropriate behaviours between children that are actually sexually abusive in nature (see list above). Staff should always be clear that abuse is abuse, and should never be passed off as "banter", "just having a laugh", "part of growing up" or "boys just being boys". Downplaying such behaviours can lead to a culture of unacceptable behaviours, an unsafe environment for children, and a culture that might normalise abuse leading to it being accepted as normal and left unreported. The school recognises the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and boys perpetrator(s). All child on child abuse is unacceptable and will be taken seriously.

21.9 The School will provide appropriate support to all children involved, whether victim/survivor, alleged perpetrator(s), or any other child affected, and this support will continue if required even after the immediate cause for concern has been dealt with. Particular attention will be paid to the needs of children identified as being more vulnerable, including those with SEND.

21.10 Child-on-child abuse can be standalone or form part of wider abuse and can occur both inside and outside school, including online. It must always be taken seriously and responded to in line with this policy and KCSIE.

21.11 Part 5 of KCSIE is about how schools should respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school premises, and/or online. This part of the guidance states that all staff working with children are advised to maintain an attitude of "it could happen here".

21.12 Sexual violence and sexual abuse can happen anywhere, and all school staff working with children are advised to maintain an attitude of 'it could happen here'. The school will respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school. The DSL/DDSL (who should have a complete safeguarding picture) will be the most appropriate person to advise on the initial response by the school.

21.13 What the school will consider following a report of sexual violence and/or sexual harassment:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- the importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or school or college staff, and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

21.14 As always when concerned about the welfare of a child, all staff will act in the best interests of the child. In all cases, the School will follow the general safeguarding principles set out throughout this policy. Immediate consideration should be given to how best to support and protect the victim/survivor, alleged perpetrator(s), and any other children involved or affected.

22. Contextual Safeguarding

22.1 Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL (or deputy) will consider the context within which such incidents and/or behaviours occur and assess whether children are at risk of abuse or exploitation from wider environmental factors outside their families.

22.2 Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence factors – potentially

serious threats to their safety and/or welfare.

22.3 Concerns about a child's welfare should be referred to local authority children's social care. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process. The online tool 'Report Child Abuse to Your Local Council' directs to the relevant local children's social care contact number, at https://www.gov.uk/report-child-abuse-to-local-council

22.4 Children's social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context.

Additional information is available here: Home (contextualsafeguarding.org.uk)

23. Online Safety

23.1 It is essential that pupils are safeguarded from potentially harmful and inappropriate online material. The School's approach to online safety empowers us to protect and educate pupils and staff in their use of technology, with mechanisms in place to identify, intervene in, and escalate any concerns where appropriate.

23.2 The School recognises that the use of technology presents particular safeguarding challenges and risks to pupils and adults both inside and outside school, including online, remote or blended learning where applicable. The School will have regard to relevant DfE online safety guidance, including Teaching online safety in schools and the DfE filtering and monitoring standards, and will ensure that staff are aware of the expectations set out in this policy, the Online Safety Policy and the Acceptable Use Policies.

23.3 All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

23.4 Members of staff with appropriate skills, interest and expertise regarding online safety are encouraged to help support the DSLs, and any deputy DSLs as appropriate, for example when developing curriculum approaches or making technical decisions. However, the DSL is acknowledged as having overall responsibility for online safeguarding within the school.

23.5 For some time now, Keeping Children Safe in Education has had a section on online safety and the need to protect children from potentially harmful material. The guidance categorises online safety into four areas of risk – content, contact, conduct and commerce. On page 38, this version of KCSiE sees the content section updated so that as well as the existing examples of inappropriate or harmful content, including pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, it now also specifically mentions misinformation, disinformation (including fake news) and conspiracy theories.

23.6 The School has systems that 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).

23.7 The School recognises, however, that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G), which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.

23.8 Filtering and monitoring are both important parts of safeguarding pupils and staff from potentially harmful and inappropriate online material, but must do so without unreasonably impacting teaching and learning, in line with the DfE filtering and monitoring standards, June 2026. The School will ensure that appropriate filtering and monitoring systems are in place when pupils and staff access school systems and internet provision, so that exposure to any risks can be reasonably limited. The UK Safer Internet Centre has published guidance as to what "appropriate" filtering and monitoring might be: Appropriate Filtering and Monitoring - UK Safer Internet Centre.

23.9 The school acknowledges that whilst filtering and monitoring is an important part of the Schools online safety responsibilities, it is only one part of our approach to online safety. Pupils and adults may have access to systems external to the school control such as mobile phones and other internet enabled devices and technology and

where concerns are identified appropriate action will be taken.

23.10 The school is directly responsible for ensuring it has the appropriate level of information security protection procedures in place to safeguard our systems, staff and pupils. The effectiveness of these procedures is reviewed periodically to keep up to date with evolving cyber-crime technologies. We review our approach to online safety and information security annually, or more often if circumstances dictate.

23.11 Detailed information about the school's response to online safety, both in school and remotely, can be found in the school's Online Safety Policy, and Acceptable Use Policies which can be found on the school website.

23.12 The School recognises that personal mobile phones and other internet-enabled devices provide pupils with unrestricted access to online content, social media, messaging applications and image-sharing platforms.

23.13 While technology offers significant educational and social benefits, it may also expose children to safeguarding risks including cyberbullying, grooming, sexual harassment, child-on-child abuse, exploitation, harmful content, misinformation, disinformation, image-based abuse and the sharing of self-generated intimate images.

23.14 The School's arrangements regarding pupil use of mobile phones and personal devices are set out in the Mobile Phone Policy relating to a pupil's use of personal technology, both inside and outside school, will be managed in accordance with this Safeguarding Policy and other relevant safeguarding procedures.

24. Self-generated intimate images and/or videos, including those generated using artificial intelligence

24.1 The School is alert to the safeguarding risks arising from self-generated intimate images and/or videos, including those generated, altered or manipulated using artificial intelligence (AI). This includes the creation or sharing of digitally manipulated or AI-generated intimate images, sometimes referred to as deepfakes or deep nudes, and the use of AI tools to create child sexual abuse material. Incidents involving AI-generated imagery will be treated with the same seriousness as incidents involving real images and must be referred to the Designated Safeguarding Lead (DSL) immediately.

24.2 All members of staff have a duty to recognise and refer any incident involving self-generated intimate images and/or videos, including those generated or manipulated using AI. Staff will receive appropriate safeguarding training and support to enable them to identify concerns, respond sensitively, and understand that such incidents may involve criminal offences, safeguarding risks, child-on-child abuse, sexual harassment, exploitation, coercion, blackmail, grooming or wider online safety concerns.

24.3 For the purposes of this Policy, sharing self-generated intimate images means the sending, posting or sharing of nude or semi-nude images, videos or live streams by or of a person under the age of 18. This may take place through social media, gaming platforms, messaging apps, forums, group chats, closed social media accounts, cloud storage, file-sharing services, or device-to-device sharing such as AirDrop. The images, videos or live streams may involve one or more children and may be shared publicly, privately, in one-to-one messaging, or within a group.

24.4 The School recognises that children and young people may use a range of terms to describe such incidents, including nudes, semi-nudes, pics, sexting, youth-produced sexual imagery, youth-involved sexual imagery, indecent imagery, image-based sexual abuse, revenge porn, upskirting, deepfakes and deep nudes. Staff should be aware that terminology may vary and should focus on the safeguarding concern disclosed or identified rather than the terminology used.

24.5 The School recognises that images of pupils 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 pupil images is set out in the School's Privacy Policy and any relevant image-use, photography or acceptable-use policy. Staff should refer to those policies for guidance and must report any concern about the misuse, manipulation or inappropriate sharing of published images to the DSL immediately.

24.6 Any direct disclosure by a child will be taken seriously. Staff should respond in accordance with the disclosure guidance in this Policy: they should listen carefully, reassure the child that they are being taken seriously, avoid asking leading questions, avoid asking the child to repeat the disclosure unnecessarily, and ask only appropriate and sensitive questions required to clarify what has been said and to reduce further distress or trauma.

24.7 If staff are notified of, become aware of, or suspect an incident involving self-generated intimate images and/or videos, including AI-generated or AI-manipulated imagery, being shared by a pupil or of a pupil, they must refer the matter to the DSL as soon as possible and record the concern in line with this Policy. Staff must not view, copy, print, forward, share, save, download or ask a pupil to share the image or video unless specifically directed

by the DSL and only where this is lawful, necessary and appropriate.

24.8 The DSL will respond in line with the UK Council for Internet Safety guidance, Sharing nudes and semi-nudes: advice for education settings working with children and young people, and any updated local safeguarding partnership guidance. The DSL's response will include an initial review with appropriate staff, consideration of the children involved, the context and any immediate risks, appropriate interviews with children where required, consideration of whether parents or carers should be informed, and a risk assessment to determine whether any child has been harmed or is at risk of harm.

24.9 An immediate referral to police and/or children's social care through the MASH or equivalent will be made where any of the following apply: the incident involves an adult; there is reason to believe that a child has been coerced, blackmailed, groomed or exploited; there are concerns about a child's capacity to consent, including because of age, special educational needs or disability; the imagery appears to depict sexual acts which are violent, coercive, exploitative or unusual for the child's developmental stage; the imagery involves sexual acts and any child in the image or video is under 13; or there is reason to believe that a child is at immediate risk of harm, including where they are presenting as suicidal, self-harming or otherwise at significant risk.

24.10 If none of the above apply, the School may decide to respond to the incident without immediate referral to police or children's social care, but only where the DSL is confident that there is sufficient information to assess and manage the risks within the School's pastoral, safeguarding and disciplinary framework. Any such decision will be made by the DSL, with input from the Head where appropriate, recorded with reasons, kept under review, and made in the best interests of any child involved. If there is any doubt, local safeguarding arrangements will be followed.

24.11 All incidents involving self-generated intimate images and/or videos, including AI-generated or AI-manipulated imagery, must be recorded, whether or not they are referred externally. Records should include the concern, relevant context, actions taken, decisions made, reasons for decisions, advice sought, referrals made, communication with parents or carers where appropriate, support provided, and any ongoing risk management or review arrangements.

24.12 This guidance does not apply to the sharing of intimate images of a person under 18 by an adult aged 18 or over, which constitutes child sexual abuse. If staff become aware of such an incident, they must notify the DSL immediately. The DSL will inform the police as a matter of urgency and follow local safeguarding procedures.

25. Educating pupils about safeguarding

25.1 Schools play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. The school has a clear set of values and standards which are upheld and demonstrated throughout all aspects of school life.

25.2 The school's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils, as well as by a planned programme of evidence-based Relationships and Sex Education delivered in regularly timetabled lessons and reinforced throughout the whole curriculum (Relationships Education [for all primary pupils] and Relationships and Sex Education [for all secondary pupils]). All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the school. In teaching RSE, schools must have regard for the statutory guidance: Relationships and sex education (RSE) and health education - GOV.UK

25.3 We expect all the teaching and pastoral staff to lead by example, and to play a full part in promoting an awareness that is age and stage of development appropriate (especially when considering the needs of children with SEND and other vulnerabilities, including those who are victims of abuse) amongst all our pupils on issues relating to health, safety and well-being. The programme will tackle issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship, including coercive and controlling behaviour
- The concepts of, and laws relating to – sexual consent, sexual exploitation, abuse, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage or female genital mutilation (FGM), and how to access support, and
- What constitutes sexual harassment and sexual violence and why these are always unacceptable. Full details

are given in the PSHEE Policy and RSE Policy.

25.4 All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our Behaviour Policy, and in enforcing our Anti-bullying and Online Safety policies.

25.5 The following programmes will be used to ensure that pupils develop a clear understanding of safeguarding issues including those involving online safety, of the dangers of radicalisation and of the safeguarding dangers associated with alcohol, bullying, drug-taking, sexual assaults and sexting, and what they may do to play their part in ensuring their welfare and safety and in building resilience against the dangers of radicalisation:

- PSHEE and RSE
- Assemblies
- SMSC
- ICT/Computing

25.6 Additionally whenever appropriate, subjects in the curriculum and extra-curricular activities will be used to reinforce the messages given.

25.7 We recognise that pupils themselves have much to contribute to the discussion of the issues which face them and the school, so we welcome their views and provide opportunities for them to discuss these, for example through the school council, in lessons or in small group or individual sessions.

25.8 All pupils know that there are adults to whom they can turn to if they are worried, including the School Counsellor, Wellbeing Hub Co-ordinator and the School Nurses. If the school has concerns about a child there is always a recognised requirement for sensitive communication, and designated staff members are aware of the need to avoid asking leading questions.

26. Visiting Speakers

26.1 In accordance with the Prevent statutory guidance, the School has a protocol to ensure that visiting speakers are suitable and appropriately supervised. A visiting speaker will be invited only with the permission of a senior leader. Formal or informal background information about a visiting speaker will be obtained to decide whether to invite and/or permit a speaker to attend the School. For further information, please refer to the Visiting Speaker Policy (a copy of which can be obtained from the School).

27. Early Years Foundation Stage

27.1 Although the policy as a whole applies to the EYFS, a number of additional points apply specifically to the EYFS.

27.2 All within the setting, whether staff or visitors are subject to strict requirements relating to the use of mobile phones and any other electronic device with imaging and sharing capabilities. These requirements are detailed within the school's Mobile Technology and Photography Policy set down in Appendix E of this policy.

27.3 The DfE guidance relating to the application of safeguarding within any EYFS is given in section 3 of the Statutory Framework for the Early Years Foundation Stage (2026): see

Early years foundation stage (EYFS) statutory framework – GOV.UK (www.gov.uk)

27.4 The safeguarding training of EYFS staff will pay particular attention to the identification of signs of possible abuse, neglect and exploitation outside the setting (for example in the child's home) in children in these pre-school years, in line with EYFS 2026.

27.5 These include: significant changes in children's behaviour; deterioration in children's general well-being; unexplained bruising, marks or signs of possible abuse or neglect, or signs that a girl may have been subjected to (or is at risk of) female genital mutilation; children's comments which give cause for concern; inappropriate behaviour displayed by other members of staff or any other person working with the children such as inappropriate sexual comments, excessive one-to-one attention beyond the requirements of their usual role and responsibilities, or the inappropriate sharing of images.

27.6 As always, particular attention will be paid to those children in the EYFS identified as being more vulnerable, including those with SEND.

27.7 The school will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2026.

28. Policy review

28.1 This policy is subject to continuous monitoring, refinement and audit by the Head and Designated Safeguarding Lead (DSL) taking into account the need to ensure that all members of the school community are made aware of and implement as required any amendments.

28.2 The Board of Directors (which includes the proprietor) will undertake a full annual review of this policy and procedures, inclusive of its implementation and the efficiency with which the related duties have been discharged. This discussion will be formally documented in writing.

28.3 This policy will be reviewed and amended more frequently if changes in legislation, regulatory requirements or best practice guidelines so require. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay.

29. Complaints

29.1 Any complaint arising from the application of this policy should be directed in the first instance to the DSL. Should the complainant be dissatisfied with the response given then they should follow the school's complaints procedures.

29.2 Attention is also drawn to the contact details for ISI, NSPCC and Ofsted in Section 2 which might prove helpful to those with concerns about the conduct of the school.

Appendix A – Types and signs of abuse, potential safeguarding issues, and a guide to identifying pupils at risk.

Working Together to Safeguard Children defines abuse as 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. A child may be abused by an adult or adults, or another child or children (child on child abuse). Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. **Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children**.

KCSIE 2026 (Part 1; and Annex B) further states that the types of abuse, neglect and exploitation, and other potential safeguarding issues, include:

Abuse; Neglect; Physical abuse; Emotional abuse; Sexual abuse; Sexual violence and sexual harassment; Child on child abuse, Sexting; Initiation/hazing-type violence and rituals; Self-harm; Child sexual exploitation; Child exploitation and e- safety; Bullying; Domestic violence; So-called 'honour-based' abuse – Female genital mutilation, Forced marriages; Extremism /Radicalisation; Children missing from education; Children in the court system; Children with family members in prison; Child criminal exploitation – i.e., the exploitation of children to carry drugs and money across county lines; Homelessness; Drug/alcohol abuse; Abuse of Trust; Disability and Vulnerability; Vulnerable Groups; Vulnerable Pupils; Children in Need; Children who run away or go missing.

It is important that school staff recognise that abuse may take part in a number of ways and that abusers can be of any age and either male or female. In the majority of cases the adult is somebody known and trusted by the child, for example, a relative or close friend of the family. Some individuals seek to use voluntary and community organisations to gain access to children. It is necessary to have an open mind when the possibility arises that a member of the school is suspected of abuse or inappropriate activity.

Child abuse can take many forms, all of which can cause long term damage to a child: physical abuse, emotional abuse, neglect, child sexual abuse and bullying. Domestic abuse can also be a form of child abuse, probably falling under emotional abuse. Such abuse can translate itself into many forms – for example, the student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the student's behaviour.

Bullying is a form of child abuse. It can be defined as using deliberately hurtful behaviour, usually over a period of time, where it is difficult for those being bullied to defend themselves. The three main types of bullying are:

- Physical
- Verbal
- Emotional

All incidents of bullying must be reported to the Head or Deputy Heads and will be recorded in the bullying incident log held by the Deputy Heads. A more detailed guide can be found in the School's Anti-Bullying policy.

Self-Harm- Whilst self-harm is not classed as child abuse it can be a sign that a child is being abused. If it comes to the attention of member of staff that a child is self-harming they should alert the DSL for child protection. Actions by the DSL might include:

- Contacting parents
- Contacting Child and Adolescent Mental Health Service (CAMHS)
- Contacting Social Care if the child meets the referral criteria

- **Neglect**

Definition of 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, guardian 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. Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors. Far

more children are registered to the category of neglect on child protection plans than to the other categories.

Neglect can be very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group. Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need. Neglect is often linked to other forms of abuse, so any concerns school staff have should at least be discussed with the DSL/DDSL.

- **Emotional Abuse**

Definition of 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.

Most harm from emotional abuse is produced in *low warmth, high criticism* homes, not from single incidents. Emotional abuse is difficult to define, identify/recognise and/or prove. Emotional abuse is chronic and cumulative and has a long- term impact. Children can be harmed by witnessing someone harming another person – as in domestic violence. It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards, children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

- **Physical abuse**

The nature of 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. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* e.g. shins. Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

In the social context of the school or college, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when: the explanation given does not match the injury; the explanation uses words or phrases that do not match the vocabulary of the child (adults words); no explanation is forthcoming; the child (or the parent/carer) is secretive or evasive or the injury is accompanied by allegations of abuse or assault.

- **Sexual Abuse**

The nature of sexual abuse: sexual abuse is often perpetrated by people who are known and trusted by the child, e.g. relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Children may be 'groomed' as a prelude to, or as part of, sexual abuse.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of 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 of outside 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

of abuse (including via the internet).

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (child on child abuse).

Characteristics of the sexual abuse of children: it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic; grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent; grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Grooming is a subtle, gradual, and escalating process of building trust with a young person. It is deliberate and purposeful. It may take place over weeks, months, or even years before any sexual abuse actually takes place. It may happen via the internet or social media, or in person. It usually begins with behaviours that may not even seem to be inappropriate. Grooming is often involved in Child Sexual Exploitation, but it may occur for reasons other than sexual, e.g. radicalisation

- **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 sometime 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, that 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. This may be useful for some parents and carers.

- **Children Missing (who are Absent) from education**

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse, neglect and exploitation, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of the school's unauthorised absence and children missing from education procedures.

- **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. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

- **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

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, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources. Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- are persistently absent from education, including persistent absences for part of the school day..

Children who have been exploited will need additional support to help maintain them in education.

Child Sexual Exploitation (CSE) is a form of child sexual abuse. The victim may have been sexually exploited even if the sexual activity appears consensual. It is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of abuse. Child Sexual Exploitation does not always involve physical contact; it can also occur through the use of technology.

Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- 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);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. 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.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who:

- are persistently absent from education, including persistent absences for part of the school day;

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

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: Child sexual exploitation: definition and guide for practitioners - GOV.UK

Child Criminal Exploitation (CCE): can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. 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. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals 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 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, or to threaten other young people. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

County Lines Criminal Activity : County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. . This can happen locally as well as across the UK – no specified distance of travel is required.

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, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
Key to identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines

exploitation.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Signs of Involvement in County Lines–- A young person's involvement in county lines activity often leaves signs. A young person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a young person's lifestyle should be discussed with them. Some indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

- Persistently going missing from school or home and / or being found out-of- area;
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

- **Children At Risk From Serious Violence**

All staff should be aware of 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 well-being, or signs of assault or unexplained injuries.

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. All staff should be aware of the associated risks and understand the measures in place to manage these.

Advice is provided in the Home Office's *Preventing youth violence and gang involvement* and its' *Criminal exploitation of children and vulnerable adults : county lines* guidance. See https://www.gov.uk/government/publications/advice-to- schools-and-colleges-on-gangs-and-youth-violence

- **Cybercrime**

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 designated safeguarding lead (or a deputy), 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.

Note that 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 and National Cyber Security Centre– - NCSC.GOV.UK

- **Domestic Abuse**

The Domestic Abuse Act 2021 introduces the first ever 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 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, socioeconomic 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. The Act's provisions, including the new definition, will be commenced over the coming months.

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. 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 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.

National Domestic Abuse Helpline- Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at: Advice to parents and carers on keeping children safe from abuse and harm - GOV.UK(includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child-to-parent violence/abuse)

- **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 pupil may be at risk of homelessness they should talk to one of the DSLs 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.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. Statutory guidance regarding the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation can be found Provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation - GOV.UK.

- **Honour-Based Abuse (HBA), Female Genital Mutilation (FGM) and Forced Marriage**

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed supposedly to protect or defend the honour of the family and/or community, including 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. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM, or indeed any form of HBA.

Actions: If staff have a concern that a child might be at risk of HBA, or who has suffered HBA, they should speak to the DSL (or deputy), who will activate appropriate safeguarding procedures.

FGM – comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM Mandatory reporting duty for teachers–- Whilst all staff should speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal** duty on **teachers.** If a **teacher**, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation: procedural information–- GOV.UK (www.gov.uk)

Examples of warning signs that FGM may be about to take place, or may have already taken place, can be found in the summary in Appendix C.

Our school activates local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

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. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published statutory guidance Forced marriage–- GOV.UK (www.gov.uk) which focus on the role of schools and colleges). School staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fco.gov.uk.

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 eighteenth 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.

- **Modern Slavery and the National Referral Mechanism**

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, and how to refer to the NRM can be seen at National referral mechanism guidance: adult (England and Wales) - GOV.UK.

- **Preventing Radicalisation**

Children can be vulnerable, and therefore may be susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. It is a social process but also a deeply personal experience.
- 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 an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. 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 at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel programme.

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

Appendix D provides further guidance. Information can also be found in the School's Preventing Radicalisation Policy.

- **Child-on-Child abuse**

Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. It can happen both inside and outside of school, and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports. This can include (but is not limited to) bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; 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; upskirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

- **Sexual violence and sexual harassment between children in schools (Child on Child Abuse)**

Sexual violence and sexual harassment can occur between two or more children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. All staff working with children are advised to maintain an attitude of 'it **could** happen here'.

It can happen both inside and outside of school/college and online. Staff must recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. This can include (but is not limited to):

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse within intimate partner relationships;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos;
- 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;
- upskirting; and
- initiation/hazing type violence and rituals.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff are aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts, and upskirting. Dismissing or tolerating such behaviours risks normalising them.

Upskirting - The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a persons 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. It is a criminal offence. Anyone of any gender, can be a victim.

Sexual violence - It is important that school and staff are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Further information about consent can be found here: Rape Crisis England & Wales - Sexual consent

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

Sexual harassment - When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. 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.

Whilst not intended to be an exhaustive list, 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 (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
    - consensual and non-consensual sharing of nudes and semi-nude images and/or videos; As set out in UKCIS Sharing nudes and semi-nudes:advice for education settings working with children and young people (which provides detailed advice for schools and colleges re taking and sharing nude photographs of U18s being a criminal offence;
    - sexualised online bullying;
    - sharing of unwanted explicit content;
    - upskirting (which is a criminal offence);
    - unwanted sexual comments and messages, including, on social media; and
    - sexual exploitation; coercion and threats

The response to a report of sexual violence or sexual harassment - The initial response to a report from a child is important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out in the diagram in Appendix F. As is always the case, if staff are in any doubt as to what to do they should speak to the DSL (or a deputy).

- **How should staff respond to an incident of nudes and semi-nudes being shared by pupils33**

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. 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.

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. 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 pupil or of a pupil, they should refer the incident to the DSL as soon as possible.

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 pupil 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 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.

An immediate referral to police and/or children's social care through the MASH or equivalent 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 nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.

If none of the above apply, the School may decide to respond to the incident without involving the police or children's social care. 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 social care will only be made in cases where the DSL (or equivalent) 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 (or equivalent) 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. If doubts remain, local safeguarding arrangements will be followed.

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.

Toolkits

- KSCMP Guidance Harmful Sexual Behaviour | The Education People
- Childnet - STAR SEND Toolkit equips, enables and empowers educators with the knowledge they need to support young people with special educational needs and disabilities.
- Childnet - Just a joke? provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.
- Childnet - Step Up, Speak Up a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.
- Preventing Harmful Sexual Behaviour toolkit by the Lucy Faithfull Foundation, the toolkit contains links to useful information, resources and support, including practical tips to prevent HSB.
- NSPCC - Harmful sexual behaviour framework An evidence-informed framework for children and young people displaying HSB.
- Contextual Safeguarding Network – Beyond Referrals - Schools levers for addressing HSB in schools.
- ask AVA – Safeguarding women and girls from violence (ask-ava.org.uk) The Ask AVA prevention platform has been created to support education practitioners across the UK to develop and deliver a comprehensive programme to stop Violence Against Women and Girls.
- Safeguarding and child protection self-assessment tool | NSPCC Learning Online Self-assessment tool to ensure organisations are doing everything they can to safeguard children.
- Let children know you're listening | NSPCC Learning Resources which help adults respond to children disclosing abuse.
- Stop It Now - Preventing child sexual abuse resource from The Lucy Faithfull Foundation - Preventing child sexual abuse – Can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online).

Additional advice and support

Safeguarding Priorities | The Education People

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Abuse	Supporting practice in tackling child sexual abuse - CSA Centre	Centre of Expertise on CSA
	What to do if you're worried a child is being abused	DfE advice
	Domestic abuse: Various Information/Guidance	Home Office
	Faith based abuse: National Action Plan	DfE advice
	Relationship abuse: disrespect nobody	Home Office
	Tackling Child Sexual Abuse Strategy	Home Office
	Together we can stop child sexual abuse	HM Govt campaign

Bullying	Preventing bullying - GOV.UK (www.gov.uk)	DfE advice
	Cyber bullying: advice for headteachers and school staff	DfE advice
Children missing from education, home or care	https://www.gov.uk/government/publications/children-missing-education Children missing education	DfE statutory guidance
	Child missing from home or care	DfE statutory guidance
	Children and adults missing strategy	Home Office strategy
Children with family members in prison	National Information Centre on Children of Offenders	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice
Child Exploitation	Care of unaccompanied and trafficked children	DfE statutory guidance
	Modern slavery: how to identify and support victims	Home Office

	Trafficking: safeguarding children	DfE and HO guidance
	Child exploitation disruption toolkit (publishing.service.gov.uk)	Home Office
	County Lines Toolkit For Professionals | The Children's Society	The Childrens Society
Children and the Courts	Advice for 5-11-year olds witnesses in criminal courts	MoJ advice
	Advice for 12-17 year old witnesses in criminal courts	MoJ advice
Confidentiality	Gillick competence and Fraser guidelines | NSPCC Learning	NSPCC
Drugs	From harm to hope: A 10-year drugs plan to cut crime and save lives - GOV.UK (www.gov.uk)	Home Office strategy 2022
	Information and advice on drugs	Talk to Frank website
	Drug and Alcohol education — teacher guidance & evidence review	PSHE Assocn website
"Honour Based Abuse" (so called)	Female genital mutilation: information and resources	Home Office
	Female genital mutilation: multi agency statutory guidance	DfE, DH, and HO statutory guidance
	Forced marriage - GOV.UK (www.gov.uk)	HM Govt guidance

	Female genital mutilation: resource pack - GOV.UK (www.gov.uk)	HM Govt guidance
Health and Wellbeing	Fabricated or induced illness: safeguarding children	DfE, Department for Health and Home Office
	Rise Above: Free PSHE resources on health, wellbeing and resilience	Public Health England resources
	Medical-conditions: supporting pupils at school	DfE statutory guidance
	Mental health and behaviour	DfE advice
Homelessness	Homelessness code of guidance for local authorities - Guidance - GOV.UK (www.gov.uk)	HM Govt guidance
Information sharing	Information sharing advice for safeguarding practitioners - GOV.UK (www.gov.uk)	HM Govt guidance
Online Safety	Sexting: responding to incidents and safeguarding children	UK Council for Child Internet Safety
	Cyberbullying Guidance | Childnet	Childnet guidance

	Educate Against Hate - Prevent Radicalisation & Extremism	
	The National Grid for Learning - Safeguarding (lgfl.net)	
	E-safety for schools | NSPCC Learning	NSPCC
	Searching, screening and confiscation at school - GOV.UK (www.gov.uk)	
	SWGfL - Safety & Security Online	
	The use of social media for online radicalisation - GOV.UK (www.gov.uk)	
	UKCIS Online Safety Audit Tool - GOV.UK (www.gov.uk)	
	A business guide for protecting children on your online platform - GOV.UK (www.gov.uk)	
	Parents and Carers - UK Safer Internet Centre	
Radicalisation	Prevent duty guidance: England and Wales (2023) - GOV.UK (www.gov.uk)	Home Office guidance
	Prevent duty advice for schools	DfE advice
	Educate Against Hate Website	DfE and Home Office
	Prevent for FE and Training	Education and Training Foundation

	Online Safety Resource Centre - London Grid for Learning (lgfl.net)	London Grid for Learning
Serious Violence	Serious Violence Strategy - GOV.UK (www.gov.uk)	Home Office
	An analysis of indicators of serious violence: Findings from the Millennium Cohort Study and the Environmental Risk (E-Risk) Longitudinal Twin Study (publishing.service.gov.uk)	Home Office
	Our approach to evidence - Youth Endowment Fund	Home Office
	Advice to schools and colleges on gangs and youth violence - GOV.UK (www.gov.uk)	Home Office advice
	Tackling violence against women and girls strategy - GOV.UK (www.gov.uk)	Home Office strategy
	Violence against women and girls: national statement of expectations - GOV.UK (www.gov.uk)	Home Office guidance

Sexual Violence and Sexual Harassment – Specialist Organisations	
Believe in children | Children's charity | Barnardo's (barnardos.org.uk)	UK charity caring for and supporting some of the most vulnerable children and young people through their range of services.
The Lucy Faithfull Foundation |	UK-wide child protection charity dedicated to preventing child sexual abuse. They work with families affected by sexual abuse and also run
Preventing Child Sex Abuse	the confidential Stop it Now! Helpline.
Meeting the needs of children abused online | Marie Collins Foundation	Charity that, amongst other things, works directly with children, young people, and families to enable their recovery following sexual abuse.
NSPCC | The UK children's charity | NSPCC	Children's charity specialising in child protection with statutory powers enabling them to take action and safeguard children at risk of abuse.
Rape Crisis England & Wales	National charity and the umbrella body for their network of independent member Rape Crisis Centres
Homepage - UK Safer Internet Centre	Provides advice and support to children, young people, parents, carers and schools about staying safe online.

Harmful Sexual Behaviour – Specialist Organisations	
Harmful Sexual Behaviour Support Service | SWGfL	Provides expert-led advice and guidance in tackling harmful sexual behaviours to professionals working with children and young people
Rape Crisis England & Wales	For information, advice, and details of local specialist sexual violence organisations
The Survivors Trust	For information, advice, and details of local specialist sexual violence organisations
Overview | Harmful sexual behaviour among children and young people | Guidance | NICE	For information on, amongst other things: developing interventions; working with families and carers; and multi-agency working.
Protecting children from harmful sexual behaviour | NSPCC Learning Harmful sexual behaviour framework | NSPCC Learning	Free and independent advice about HSB.
Beyond Referrals - Schools (csnetwork.org.uk)	Provides a school self assessment toolkit and guidance for addressing HSB in schools.

Support for Victims – Specialist Organisations	
Anti-Bullying Alliance	Detailed information for anyone being bullied, along with advice for parents and schools. Signposts to various helplines and websites for further support.

Rape Crisis England & Wales	Provide and signpost to a range of services to support people who have experienced rape, child abuse or any kind of sexual violence.
The Survivors Trust	UK-wide national umbrella agency with resources and support dedicated to survivors of rape, sexual violence and child sex abuse
Home - Victim Support	Supporting children and young people who have been affected by crime. Also provides support to parents and professionals who work with children and young people — regardless of whether a crime has been reported or how long ago it was.
Childline | Childline	Provides free and confidential advice for children and young people

Sharing Nudes and Semi-Nudes	
Nudes (thinkuknow.co.uk)	London Grid for Learning-collection of advice - Various information and resources dealing with the sharing of nudes and semi-nudes.
Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)	Advice for schools and colleges on responding to incidents of non-consensual sharing of nudes and semi-nudes.

Support for Parents and Carers	
Parents and carers | CEOP Education (thinkuknow.co.uk)	Advice/resources on how to deal with concerns about what children may be doing online, including advice on how to help challenge harmful sexual attitudes and start positive conversations.

Appendix B: Detailed Responsibilities of the Designated Safeguarding Lead (DSL), and Deputy DSL

The Designated Safeguarding Lead (DSL) is a member of the senior leadership team of the school, and has the appropriate status and authority within the school to carry out the duties of the post. The DSL also acts as the school lead on Prevent and Online safety and understanding the filtering and monitoring systems and processes in place. Although responsibilities may be delegated to appropriately trained deputies, the DSL will take ultimate lead responsibility for safeguarding at the school. The Deputy DSL is trained to the same standard as the DSL.

The DSL role carries a significant level of responsibility, and he/she is given the additional time, funding, training, resources and support needed to carry out the role effectively. The additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and interagency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

The DSL and deputies have undertaken child protection training and training in inter-agency working, and will attend refresher training at two-yearly intervals. In addition to this formal training, the DSL and deputies will also update their skills and knowledge continually, and at least annually, through studying appropriate guidance from ISI, the local authority, the DfE and others with an interest in maintaining the highest possible standards of safeguarding, and though meeting with other DSLs and members of the local safeguarding community.

Deputy designated safeguarding leads -

The Deputy DSLs (DDSLs) are trained to the same standard as the DSLs and the role is explicit in their job description. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL, this lead responsibility should not be delegated.

Availability

During term time the DSL (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. In very exceptional circumstances this DSL availability may be via phone and or Teams or other such media. It is a matter for individual schools and colleges and the DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Manage referrals *- The DSL is expected to refer cases:*

- of suspected abuse, neglect and exploitation to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

Working with others *- The DSL is expected to:*

- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the safeguarding partners;
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult with them in particular circumstances. Further information can be found in the statutory guidance - PACE Code C 2019 - GOV.UK (www.gov.uk)
- as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- ensure that all new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety), including information to ensure they are aware of the school/college internal safeguarding processes, as part of their induction;
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;

- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school . This includes:
    - ensuring that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
    - support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing and managing the child protection file - *The DSL is responsible for ensuring that child protection files are kept up to date.*

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of this guidance.

Where children leave the school (including in year transfers) the DSL should ensure their child protection file is transferred to the new school 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. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as DSLs and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. 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 . For example, information that would allow the new school to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising Awareness *- The DSL should:*

- ensure each member of staff has access to, and understands, the school's 's child protection policy and procedures, especially new and part-time staff;
- ensure the school's 's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

Training, knowledge and skills - *The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role.*

This training should be updated at least every two years. The DSL should undertake Prevent awareness training. Training should provide DSLs with a good understanding of their own role, how to identify, understand and

respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the DSL has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school ;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e- bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff - *Training should support the DSL in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:*

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children - *It is important that children feel heard and understood. Therefore, DSLs should be supported in developing knowledge and skills to:*

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them; and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information - *The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this document, and therefore the DSL should be equipped to:*

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Appendix C : FGM: Multi-Agency Practice Guidelines

The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is newborn, during childhood or adolescence, at marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the age of 5 and puberty (typically 8 upwards but sometimes younger) and therefore girls within that age bracket are at a higher risk.

It is believed that FGM happens to British girls in the UK as well as overseas (often in the family's country of origin). Girls of school age who are subjected to FGM overseas are thought to be taken abroad at the start of the school holidays, particularly in the summer holidays, in order for there to be sufficient time for her to recover before returning to her studies.

For further information, please refer to the guidance in 'Multi-agency statutory guidance on female genital mutilation'; see:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/512906/Multi_Agency_Statutory_Guidance_on_FGM_-_FINAL.pdf

There can also be clearer signs when FGM is imminent:

- It may be possible that families will practise FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin.
- A professional may hear reference to FGM in conversation, for example a girl may tell other children about it.
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'.
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk.
- Parents state that they or a relative will take the child out of the country for a prolonged period.
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent (see Section 2.2 of the guidance (above) for the nationalities that traditionally practise FGM).
- Parents seeking to withdraw their children from learning about FGM.

It is important that professionals look out for signs that FGM has already taken place so that:

- The girl affected can be supported to deal with the consequences of FGM (see Sections 2.10 and 2.11 of the guidance).
- Enquiries can be made about other female family members who may need to be safeguarded from harm.
- Criminal investigations into the perpetrators, including those who carry out the procedure, can be considered to prosecute those breaking the law and to protect others from harm.

There are a number of indications that a girl or woman has already been subjected to FGM:

- The girl may have difficulty walking, sitting or standing and may even look uncomfortable.
- The girl may spend longer than normal in the bathroom or toilet due to difficulties urinating. A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems.
- The girl may have frequent urinary, menstrual or stomach problems.
- There may be prolonged or repeated absences from school or college.
- A prolonged absence from school or college with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.
- The girl may be particularly reluctant to undergo normal medical examinations.
- The girl may confide in a professional.
- The girl may ask for help, but may not be explicit about the problem due to embarrassment or fear.
- The girl may talk about pain or discomfort between her legs.

Note that the lists above are not inclusive of all possible factors.

Appendix D : Prevent Duty Guidance

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing 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. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

Staff Training – new staff will receive training as part of the induction process, which includes Safeguarding & Prevent awareness. All staff are required to complete The College of Policing Online Channel General Awareness (Prevent) Module and sign to confirm that they have read, understood and agreed to comply with the requirements outlined in this Safeguarding Policy, including Prevent Duty awareness. In addition, supplementary training will be provided to all staff, at least annually. Such training may take the form of e-bulletins, briefings, staff training sessions, etc.

- Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them.

- The Prevent Duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of Local Safeguarding Partnership.

- The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the Designated Safeguarding Lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

- Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering is in place. It is also important that schools teach pupils about online safety more generally.

- School staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

The School's Preventing Extremism and Radicalisation Policy is directly relevant to this Safeguarding Policy and Prevent Duty Guidance, and should therefore be read in conjunction with it.

Possible indicators of radicalisation may include:

- discomfort about their place in society
- personal crisis: the pupil may be experiencing family tensions; chaotic family background; a sense of isolation; and low self-esteem; bereavement; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; demonstrating controlling behaviour; they may be searching for answers to questions about identity, faith and belonging

- personal circumstances: migration; local community tensions; and events affecting the pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of government policy
- unmet aspirations: the pupil may have perceptions of injustice; a feeling of failure; rejection of civic life
- experiences of criminality: which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration
- expressing hatred to others or a group
- lack of trust in authorities
- family/associates linked to extremism
- express support for extremist ideology of extremist groups
- being in contact with extremist recruiters
- attended extremist protests or gatherings
- accessing violent extremist websites, especially those with a social networking element
- possessing or accessing violent extremist literature
- using extremist narratives and/or a global ideology to explain personal disadvantage
- justifying the use of violence to solve societal issues
- joining or seeking to join extremist organisations
- significant changes to appearance and/or behaviour
- expressing desire to travel to theatres of war/conflict zones:
- associate to travellers to war/conflict zones, via school/friend/family networks
- contact with others in vulnerable countries

Note that the list above is not inclusive of all possible factors.

Even very young children may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour. The Prevent duty does not require teachers or child care (EYFS) providers to carry out unnecessary intrusion into family life but they must take action when they observe behaviour of concern.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

Guidance on Channel is available at: Channel guidance.

The school's Designated Safeguarding Lead (and any deputies) should be aware of local procedures for making a Channel referral. As a Channel partner, a representative from the school may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

Appendix E: Mobile phones, cameras and other electronic devices with Imaging and sharing capabilities (EYFS)

All staff (including temporary, agency, contractors and visitors) with a mobile phone, camera and other electronic devices with imaging and sharing capabilities must sign in their device in the box located in the Head of EYFS office and are signed ouat the end of the day.

Other electronic devices also include wearable devices such as a smartwatch and any other electronic devices with imaging and sharing capabilities.

All individuals who bring mobile phones or other personal devices into the school including the EYFS must ensure that they hold no inappropriate or illegal content.

No one is allowed to use their personal mobile and other electronic device except in areas where the children are not present. Use of personal devices must be restricted to staff breaks unless agreed by the DSL. All staff must ensure, when using a mobile phone or other personal device, that no children are present in the room or outside whilst the phone or personal device is being used.

Staff must not use their own personal mobile phones for contacting parents or carers. All phone calls/text messages /parent mails must go via the Prep School Office.

Photographs are only taken with school cameras and equipment and not with private cameras or devices.

Parents/carers or other visitors to the school may not take photographs of children in any part of the school building or grounds school using personal cameras or mobile phones except when specific written permission is given for example for school productions and sports days. Photographs taken on these occasions must not be shared or posted on the internet e.g. on social networking sites etc.

Members of staff, parent helpers in school, or parents/carers or other members of the family assisting on outings or visits must not use their personal cameras or mobile phones to take photographs and must only use their mobiles on a school visit in an emergency.

A mobile phone should be taken by one member of staff, for emergency use, however the school radio is the primary device to use in an emergency when walking with the children in the school grounds. Should a child in the EYFS have a medical need which may possibly require immediate assistance then their 'key person' may carry a mobile phone with them, with the written authorisation of the DSL.

Wearable devices such as smartwatches are permitted and can be worn in school following approval of

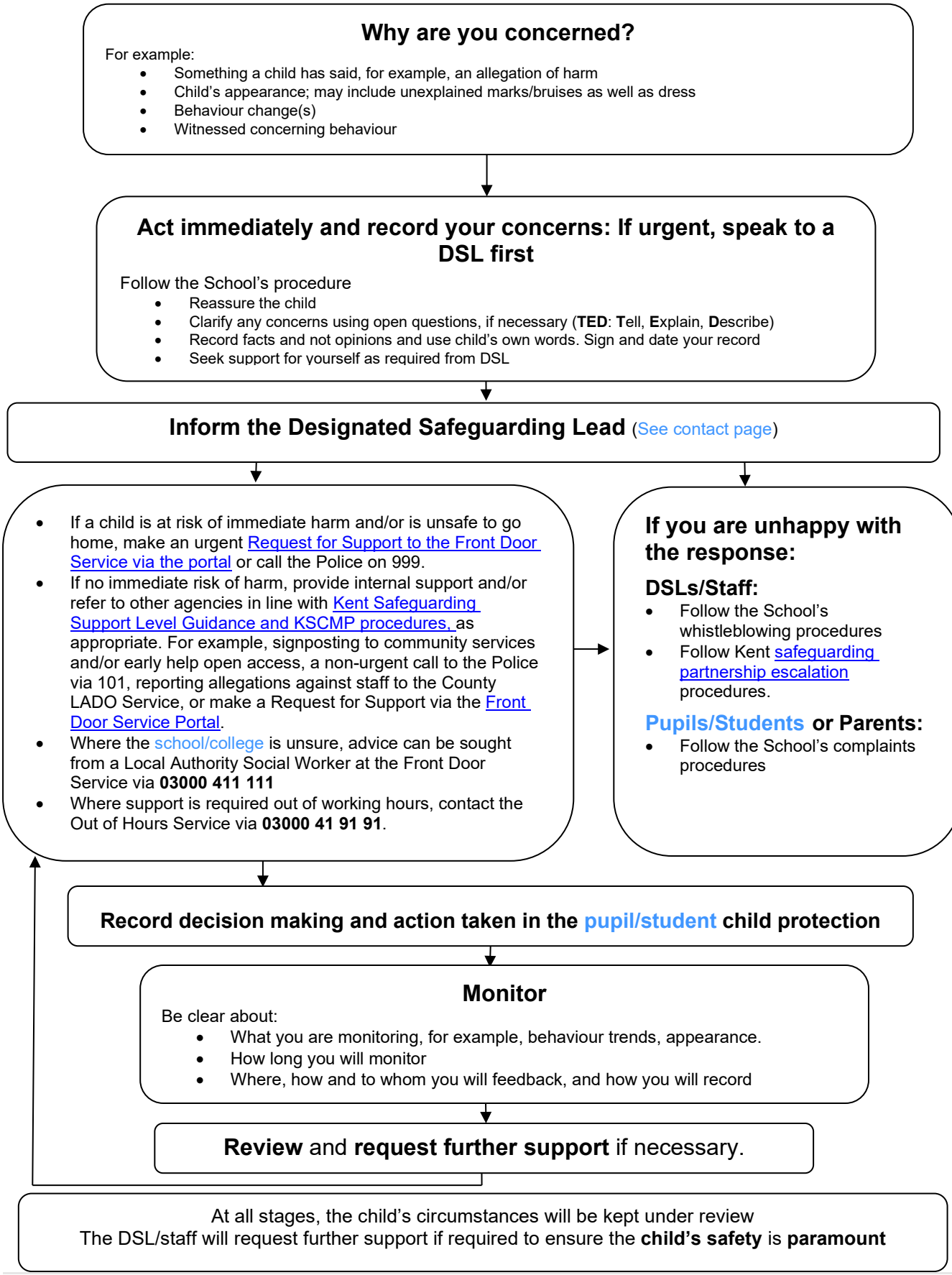
the DSL. Staff must adhere to the following:

- All smartwatches must have Bluetooth disabled or switched to airplane mode or do not disturb, functions depend on the type and make of device.
- All notifications must be turned off and not accessed during working hours or in presence of children.
- All smartwatches and other electronic devices can only be used on a designated break and this must be away from the children.
- No imaging or sharing functions on the device are to be used during school hours and outings.

An Acceptable Use of IT Policy and Agreement (AUP) is reviewed annually, and all staff and Directors will be asked to sign it upon entry to the school and at the beginning of each academic year thereafter. If changes are made during the academic year, staff and Directors will be notified as to the nature and impact of these.

All mobile phones or other personal devices must be open to scrutiny, should this be deemed necessary. The DSL or Head may withdraw or restrict authorisation for use if at any time it is deemed desirable to do so.

Appendix F: What to do if you have a welfare concern in school



Appendix G - Keeping yourself safe when responding to disclosures (the 6 R's – what to do if…)

1. Receive

- Keep calm
- Listen to what is being said without displaying shock or disbelief
- Take what is being said to you seriously
- Note down what has been said

2. Respond

- Reassure the pupil that they have done the right thing in talking to you
- Be honest and do not make promises you cannot keep, e.g. "It will be all right now"
- **Do not promise confidentiality;** you have a duty to refer
- Reassure and alleviate guilt, if the pupil refers to it, e.g. "you're not to blame"
- Reassure the child that information will only be shared with those who need to know

3. React

- React to the pupil only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- **Do not** ask leading questions; "Did he/she….?" Such questions can invalidate evidence.
- **Do** ask open "TED" questions; tell, explain, describe
- Do not criticise the perpetrator(s); the pupil may have affection for him/her/them
- Do not ask the pupil to repeat it all for another member of staff
- Explain what you have to do next and who you have to talk to

4. Record

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible
- Do not destroy your original notes
- Record the date, time, place, any non-verbal behaviour and the words used by the child. Always ensure that as far as possible you have recorded the actual words used by the child.
- Record statements and observable things rather than your interpretations or assumptions

5. Remember

- Contact the Designated Safeguarding Lead (DSL)
- The DSL may be required to make appropriate records available to other agencies
- KSCMP: Home - Kent Safeguarding Children Multi-Agency Partnership (kscmp.org.uk)

6. Relax

- Get some support for yourself, because dealing with disclosures can be traumatic for professionals

Appendix H - National Support Organisations

Support for staff

- Education Support Partnership: Education Support, supporting teachers and education staff
- Professional Online Safety Helpline: Professionals Online Safety Helpline - UK Safer Internet Centre

Support for Pupils

- Kent Resilience Hub: Kent Resilience Hub - Kent Resilience Hub
- NSPCC: Our services | NSPCC
- ChildLine: Childline | Free counselling service for kids and young people | Childline
- Papyrus: Papyrus UK Suicide Prevention | Prevention of Young Suicide
- Young Minds: YoungMinds | Mental Health Charity For Children And Young People | YoungMinds
- Shout: Shout: Free, 24/7 mental health text support in the UK | Shout 85258 (giveusashout.org)
- The Mix: The Mix
- Fearless: Home - Fearless
- National Domestic Abuse Helpline: National Domestic Abuse Helpline - Refuge

Support for adults

- Young Mind: Young Minds: Parents Mental Health Support | Advice for Your Child | YoungMinds
- Spurgeons: Spurgeons Charity | Home
- Family Lives: Parenting and Family Support | Family Lives
- Crime Stoppers: Independent UK charity taking crime information anonymously | Crimestoppers
- Victim Support: Home - Victim Support
- Kidscape: Help With Bullying | Bullying Advice | Kidscape
- The Samaritans: Contact Us | Samaritans
- Mind: We're Mind, the mental health charity | Mind
- We Stand: Our services — We Stand

Support for Learning Disabilities

- We are Beams: We Are Beams | Supporting Disabled Children and Their Families
- Respond: Supporting the lives of people with learning disabilities and autism / Respond
- Mencap: Learning Disability - Down syndrome - Williams syndrome | Mencap

Domestic Abuse

- Refuge: Refuge, the largest UK domestic abuse organisation for women
- Women's Aid: Home - Women's Aid
- Men's Advice Line: Domestic Abuse Helpline for Men | Men's Advice Line UK
- Mankind: Home - Mankind
- National Domestic Abuse Helpline:Domestic Abuse Help · National Centre for Domestic Violence

Honour based Abuse

- Forced Marriage: Forced marriage - GOV.UK

Sexual Abuse and CSE

- Lucy Faithfull Foundation: Lucy Faithfull Foundation - Preventing child sexual abuse
- Stop it Now!: Stop It Now - Preventing child sexual abuse
- CEOP: CEOP Safety Centre
- Marie Collins Foundation: Welcome to Marie Collins Foundation
- Internet Watch Foundation (IWF): About Us & Our Work – Internet Watch Foundation

Online Safety

- CEOP: CEOP Education
- Childnet International: Childnet — Online safety for young people
- UK Safer Internet Centre: Homepage - UK Safer Internet Centre

- Internet Matters: Keep Children Safe Online: Information, advice, support - Internet Matters
- Net Aware: Keeping children safe online | NSPCC
- Get safe Online: Get Safe Online | The UK's leading Online Safety Advice Resource

Radicalisation and hate

- Educate against Hate: Educate Against Hate - Prevent Radicalisation & Extremism
- Counter Terrorism Internet Referral Unit: Report online material promoting terrorism or extremism - GOV.UK
- True Vision: Report a hate crime - True Vision
- London Grid for Learning – Prevent resources