

Safeguarding and Child Protection Policy

September 2026

Contents

Key Contacts	3
(1) Policy Aims	6
(2) Scope and Application	7
(3) Regulatory Framework	7
(4) Publication and Availability	11
(5) Definitions	11
(6) Responsibilities – Safeguarding Leadership	12
(7) Safeguarding Principles	15
(8) Reporting Obligations	17
(9) Procedures for Staff	18
(10) Managing Support for Pupils	20
(11) Early Help	20
(12) Making a Referral	21
(13) Allegations Against Pupils – Child-on-Child Abuse	23
(14) Welfare Concerns	23
(15) Allegations or Concerns about Staff	23
(16) Informing Parents	24
(17) Additional Reporting	24
(18) Safer Recruitment and Supervision of Staff	25
(19) Use of Mobile Technology	25
(20) Secure School Premises	26
(21) Training	26
(22) Risk Assessment	29
(23) Monitoring and Review	29
(24) Recordkeeping	30
(25) Information Sharing and Multi-agency Working	31
(26) Version Control	32
Appendix 1 Forms of Abuse, Neglect and Specific Safeguarding Risks	33
Appendix 2 Concerns About a Child – Guidance for Staff	48
Appendix 3 Procedures for Allegations of Child-on-Child Abuse	50
Appendix 4 Raising Allegations and Low-Level Concerns	54
Appendix 5 Charity Safeguarding Procedures	61

Key School Contacts

Designated Safeguarding Lead ("DSL") – whole school including EYFS and Boarding

Mr J Rist: Deputy Head
Telephone number: 01223 803995 or 01223 365814 ext. 260
Email: safeguarding@kcs.cambs.sch.uk

Deputy Designated Safeguarding Lead ("Deputy DSL")

Mrs Alison Gelling: School Nurse
Telephone number: 01223 365814
Email: agelling@kcs.cambs.sch.uk

Deputy Designated Safeguarding Lead ("Deputy DSL") and Mental Health Lead

Mrs Helen Williams: Year 6 Form Tutor
Telephone number: 01223 365814
Email: hwilliams@kcs.cambs.sch.uk

Head

Mrs Yvette Day: Head and Master over the Choristers
Telephone number: 01223 365814
Email: head@kcs.cambs.sch.uk

Chair of Governors

Rev Dr Stephen Cherry: Emeritus Fellow of King's College, Cambridge
Telephone number: 01223 331419
Email: stephen.cherry@kings.cam.ac.uk

The **Nominated Safeguarding Governor** is Mr Stuart Thackrah who can be contacted by email at: cp-governor@kcs.cambs.sch.uk.

Prevent Lead, Domestic Violence Lead, Online Safety Lead, Attendance Officer

Mr J Rist: Deputy Head
Telephone number: 01223 803995 or 01223 365814 ext. 260
Email: safeguarding@kcs.cambs.sch.uk

Key External Contacts

Education Safeguarding Team ECPS.General@cambridgeshire.gov.uk

Early Help Hub early.help@cambridgeshire.gov.uk
01480 376666

Local Authority Designated Officer 01223 727967 or 01223 727968
LADO@cambridgeshire.gov.uk

Cambridgeshire County Council Children's Social Care Team and Multi Agency Safeguarding Hub (MASH):

Telephone Number: 0345 045 5203
Monday to Thursday 8am – 5:30pm; Friday 8am-4:30pm

Out of Hours Emergency Duty Team: 01733 234724
outside the above hours and at weekends

Referral Forms:

<https://safeguardingcambspeterborough.org.uk/concerned/>

Cambridgeshire & Peterborough Safeguarding Children Partnership Board

<http://www.safeguardingcambspeterborough.org.uk/children-board>

Police

Emergencies	999
Child Abuse Investigation Unit	101
School's police liaison officer	101

Advice and Support about Extremism

Police	999
Non-emergency DfE advice	020 7340 7264 (Mon-Fri 9am to 6pm) Counter-extremism@education.gsi.gov.uk

Reporting Female Genital Mutilation

Police Child Abuse Investigation Unit	101
Cambridgeshire County Council	01733 234724
Out of Hours Emergency Duty Team	

NSPCC Whistleblowing Helpline

National Society for the Prevention of Cruelty to Children (NSPCC)
Weston House
42 Curtain Road
London EC2A 3NH

Tel: 0800 028 0285
help@nspcc.org.uk

NSPCC Support Line for Potential Victims of Sexual Harassment and Abuse in Educational Settings

Tel: 0800 136 663
Further guidance: <https://www.nspcc.org.uk/about-us/news-opinion/2021/sexual-abuse-victims-schools-helpline/>

UK Safer Internet Centre

Tel: 0344 381 4772
Email: helpline@saferinternet.org.uk

Reporting serious wrongdoing to the Charity Commission

For further guidance see: <https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer>

Email: whistleblowing@charitycommission.gsi.gov.uk

Cambridgeshire and Peterborough Mental Health Crisis Support

First Response Service Tel: 111 and press option 2

1 Policy Aims

1.1 This is the *Safeguarding and Child Protection Policy* of King's College School, Cambridge ("the **School**").

1.2 The aims of this policy are as follows:

- 1.2.1 to actively safeguard and promote the welfare of children, staff and others who come into contact with the School and protect them from harm;
- 1.2.2 to actively promote the wellbeing of pupils;
- 1.2.3 to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and allegations of abuse, neglect and / or exploitation;
- 1.2.4 to raise awareness about how to report concerns and how they will be investigated, whether they are current or historic in nature;
- 1.2.5 to raise staff awareness about the School's safeguarding expectations;
- 1.2.6 to raise awareness about how to report concerns and ensure all reported concerns are appropriately investigated;
- 1.2.7 to ensure staff are competent to carry out their safeguarding responsibilities and are supported in this role;
- 1.2.8 to ensure consistent good safeguarding practice throughout the School to include the promotion of a zero tolerance approach to sexism, racism, misogyny / misandry, homophobia, biphobia, child-on-child abuse including sexual violence and sexual harassment, derogatory behaviour including other forms of physical violence and conflict in which pupils are confident to report it and staff are confident to identify and respond to it; and
- 1.2.9 to promote a whole school culture of safety, equality and protection.

1.3 Every pupil should feel safe and protected from any form of abuse, neglect and exploitation.

1.4 All staff should understand the indicators of abuse, neglect, exploitation and modern slavery and understand specific safeguarding risks so that they can identify them and report any concerns about children, including where they are given reason to suspect a child sex offence may have been committed. The indicators and key safeguarding risks for the School community are set out in Appendix 1.

1.5 All staff should be aware that the Crime and Policing Act 2026 imposes a duty in certain circumstances to notify the police and local authority, where in the course of a relevant activity, a person is given reason to suspect that a child sex offence may have been committed.

1.6 Members of the School community (including alumni) should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively, and appropriate action taken.

1.7 Anyone about whom a concern is raised should feel confident that they will be supported, and the matter will be handled sensitively, and that appropriate action will be taken.

- 1.8 This policy forms part of the School's whole school approach to promoting child safeguarding and wellbeing, which seeks to involve everyone at the School to ensure that the best interests of pupils underpins and is at the heart of all decisions, procedures and policies.
- 1.9 The School recognises that safeguarding risks are dynamic and may evolve over time. This includes risks arising from online activity, emerging technologies (including artificial intelligence), misogyny and harmful gender-based attitudes, and the fact that safeguarding issues are often interrelated and may overlap. The School will take a proactive and responsive approach to identifying and addressing such risks.
- 1.10 Although this policy is necessarily detailed, it is important to the School that its safeguarding policies and procedures are transparent, easy to understand for staff, pupils, parents and carers. The School welcomes feedback on how it can improve its policies.

2 Scope and Application

- 2.1 This policy applies to the whole school including the Early Years Foundation Stage (EYFS) and the School's boarding provision.
- 2.2 This policy applies at all times including where pupils or staff are away from the School, whether they are on School organised activities or trips, and whether or not the School is open; it will, therefore, apply out of School hours and outside of term time.
- 2.3 This policy applies to core school activities and to out of hours and commercial activities.
- 2.4 Commercial activities refers to external groups who hire any part of the School site. Prior to any booking confirmation, all external groups are required to produce a copy of their current safeguarding policy and risk assessment, confirm the identity of their Designated Safeguarding Lead and produce evidence of DBS checks for their group leaders.
- 2.5 This policy covers the Choir of King's College, Cambridge choristers for the times they are in School, in Chapel or College, at concerts and on choir tours in the UK and abroad.
- 2.6 This policy is designed to address:
 - 2.6.1 the School's charity law safeguarding duty. Safeguarding responsibilities are a key governance priority for the trustees and for everyone. The trustees are committed to the School being a safe and trusted environment. Everyone must take reasonable steps to protect people who come into contact with the charity from harm. This includes pupils, anyone else who benefits from the School's work, staff, volunteers, parents or anyone else who comes into contact with the School through its work. Even where the School may not strictly have a duty of care, we are still required to think about steps to address the risk of harm.
 - 2.6.2 the specific statutory obligations on the School to safeguard and promote the welfare of children, as defined below.

3 Regulatory Framework

- 3.1 This policy has been prepared to meet the School's responsibilities under:
 - 3.1.1 Education (Independent School Standards) Regulations 2014;
 - 3.1.2 Boarding schools: national minimum standards (Department for Education (DfE), May 2026);

- 3.1.3 Early years foundation stage statutory framework for group and school-based providers (EYFS) (DfE, September 2026);
- 3.1.4 Children Act 1989;
- 3.1.5 Children Act 2004;
- 3.1.6 Safeguarding Vulnerable Groups Act 2006;
- 3.1.7 Education and Skills Act 2008;
- 3.1.8 Childcare Act 2006;
- 3.1.9 Children and Social Work Act 2017;
- 3.1.10 Data Protection Act 2018 and General Data Protection Regulation (**UK GDPR**) and the Data (Use and Access) Act 2025 (together referred to as **data protection laws**);
- 3.1.11 Equality Act 2010;
- 3.1.12 Charities Act 2011;
- 3.1.13 Human Rights Act 1998;
- 3.1.14 Care Act 2014; and
- 3.1.15 Crime and Policing Act 2026.

3.2 This policy has regard to the following guidance and advice:

- 3.2.1 Keeping Children Safe in Education (DfE, September 2026) (KCSIE);
- 3.2.2 After school clubs, community activities and tuition: safeguarding guidance (DfE, February 2026);
- 3.2.3 Working Together to Safeguard Children (HM Government, updated March 2026) (WTSC);
- 3.2.4 Behaviour in schools: advice for headteachers and school staff (DfE, February 2024);
- 3.2.5 Working together to improve school attendance (DfE, July 2026);
- 3.2.6 Mobile phones in schools guidance (DfE, June 2026);
- 3.2.7 Meeting digital and technology standards in education (DfE, June 2026);
- 3.2.8 Disqualification under the Childcare Act 2006 (DfE, 31 August 2018);
- 3.2.9 Prevent Duty Guidance for England and Wales (HM Government, March 2024);
- 3.2.10 Managing the risk of radicalisation in your education setting (DfE, September 2023);
- 3.2.11 The key principles of Prevent (Home Office, February 2026);

- 3.2.12 Channel Duty Guidance: Protecting people susceptible to radicalisation (HM Government, October 2025);
- 3.2.13 Multi-agency statutory guidance on FGM (HM Government, updated July 2020);
- 3.2.14 Virginit testing and hymenoplasty multi-agency guidance (DHCS, August 2025);
- 3.2.15 Forced marriage resource pack (Home Office, May 2023);
- 3.2.16 What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015);
- 3.2.17 Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, May 2024);
- 3.2.18 Sharing information to safeguard children and young people in the education sector in the UK (ICO, maintained);
- 3.2.19 Sharing nudes and semi-nudes: advice for education settings working with children and young people (DSIT and UKCIS, March 2024);
- 3.2.20 Children missing education (DfE, September 2025);
- 3.2.21 Child sexual exploitation: definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (DfE, February 2017);
- 3.2.22 Searching, screening and confiscation: advice for schools (DfE, July 2023);
- 3.2.23 Listening to and involving children and young people (DfE, January 2014);
- 3.2.24 Meeting digital and technology standards in schools and colleges (DfE, March 2023);
- 3.2.25 Safeguarding children ([links to government guidance and resources](#));
- 3.2.26 Teaching online safety in schools (DfE, January 2023);
- 3.2.27 Harmful online challenges and online hoaxes (DfE, February 2021);
- 3.2.28 Safeguarding children and protecting professionals in early years settings: online safety considerations (UK Council for Internet Safety, February 2019);
- 3.2.29 Educate Against Hate (HM Government);
- 3.2.30 Safeguarding for charities and trustees (Charity Commission, November 2021);
- 3.2.31 Guidance on reporting safeguarding concerns in a charity (Department for Digital, Culture, Media and Sport, March 2022);
- 3.2.32 Reporting a serious incident in your charity when it involves a partner (Charity Commission, December 2019);
- 3.2.33 Relationships education, relationships and sex education and health education guidance (DfE, updated September 2026);

- 3.2.34 Cambridgeshire & Peterborough Safeguarding Partnership Board Threshold Document;
- 3.2.35 PACE Code C 2019;
- 3.2.36 Equality Act 2010: advice for Schools (DfE, June 2018);
- 3.2.37 Plan technology for your school (HM Government, November 2025);
- 3.2.38 Generative AI; product safety expectations (DfE, January 2025)

3.3 The following policies, procedures and resource materials are also relevant to the School's safeguarding practices:

- 3.3.1 Acceptable Use of ICT for Pupils Policy
- 3.3.2 Anti-Bullying Policy
- 3.3.3 Attendance and Missing Child Policy and Procedures
- 3.3.4 Data Protection and Retention Policy
- 3.3.5 Drugs and Substance Misuse Policy
- 3.3.6 Equal Opportunities Policy
- 3.3.7 Equality, Diversity and Inclusion Statement
- 3.3.8 Educational Visits Policy
- 3.3.9 First Aid Policy
- 3.3.10 Health and Safety Manual
- 3.3.11 Online Safety Policy
- 3.3.12 Personal, Social, Health and Economic Education (PSHE) Policy
- 3.3.13 Policy for Good Discipline
- 3.3.14 Preventing Extremism and Radicalisation Policy
- 3.3.15 Risk Assessment Policy for Pupil Welfare
- 3.3.16 Safer Recruitment Policy
- 3.3.17 Special Educational Needs and Disabilities (SEND) Policy
- 3.3.18 Staff Code of Conduct
- 3.3.19 Visitors and Site Security Policy
- 3.3.20 Whistleblowing Policy

4 Publication and Availability

- 4.1 This policy has been published on the School's website; it is also accessible to parents and staff on the School Portal.
- 4.2 This policy is available in hard copy upon request.
- 4.3 A copy is available for inspection from the School Office during the school day.
- 4.4 This policy can be made available in large print or other accessible format if required.
- 4.5 This policy and all policies referred to in it are available to staff on SharePoint.

5 Definitions

- 5.1 Where the following words or phrases are used in this policy:
 - 5.1.1 References to the **Board of Governors** are references to the proprietor of the School.
 - 5.1.2 References to **working days** mean Monday to Friday, when the School is open during term time. The dates of term are published on the School's website. If referrals to an external agency are required outside of term time, references to **working days** are to the days on which the relevant external agency is working.
 - 5.1.3 **Safeguarding** is the protection of people from harm.
 - 5.1.4 **Safeguarding and promoting the welfare of children** means (as set out in KCSIE 2026):
 - 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 or 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.
 - 5.1.5 Reference to **Local Safeguarding Partners** means the three safeguarding partners: local authority, Integrated Care Board (ICS) and the chief officer of police for an area any part of which falls within the local authority area who 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. The local arrangements relevant to the School can be found in Appendix 8.
 - 5.1.6 References to **Children's Social Care** includes, depending on the context, the team based in the local authority where the School is located and, where appropriate, the team based in the local authority where the child is resident.

- 5.1.7 **Early help** means support for children and families as soon as a problem emerges, at any point in a child's life. This includes universal and community-based Early Help services and targeted Early Help provided through Family Help arrangements. Family Help may include non-statutory early intervention and support provided under section 17 of the Children Act 1989 (children in need).
- 5.1.8 The term **making or sharing nudes and semi-nudes** refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term **images** includes all visual content, such as photographs, videos, and livestreams. Images may be taken by the child themselves or created by another person. They may be digitally altered or wholly-generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.
- 5.1.9 References to children missing education (CME) mean children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school.
- 5.1.10 References to **Harmful Sexual Behaviour (HSB)** in this policy refer to the DfE's definition: problematic, abusive and violent sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate and may cause developmental damage, may be harmful towards self or others, or abusive towards another child, young person or adult.
- 5.1.11 **Child** means a child under the age of 18.
- 5.1.12 **DSL** means the School's Designated Safeguarding Lead; references to the DSL include the Deputy DSL (**DDSL**) where the DSL is unavailable.
- 5.1.13 References to **staff** includes reference to all those who work on behalf of the School, regardless of their employment status, including supply staff, contractors, trainee teachers, volunteers, and Governors.
- 5.1.14 **LADO** means designated officer at the local authority. The LADO has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaising with the three safeguarding partners.

6 Responsibilities - Safeguarding Leadership

- 6.1 The School Governors ('Governors') are responsible for safeguarding at the School.
- 6.2 The Governors have overall responsibility for all matters which are the subject of this policy including:
 - 6.2.1 legal responsibility to ensure that arrangements are made to safeguard and promote the welfare of pupils at the School, having regard to relevant guidance issued by the Secretary of State;
 - 6.2.2 strategic leadership responsibility for the School's safeguarding arrangements; and
 - 6.2.3 specific responsibilities to facilitate a whole school approach to safeguarding, set out in more detail in Part 2 of KCSIE.
- 6.3 The Governors:

- 6.3.1 have nominated one of their number (Nominated Safeguarding Governor) to take leadership responsibility for the School's safeguarding arrangements. Contact details for the Nominated Governor are set out in the School contacts list at the front of this policy;
- 6.3.2 ensure that appropriate arrangements are in place for the whole Board to discharge their function including appropriate consideration of safeguarding matters at Governor meetings and a holistic annual review of safeguarding;
- 6.3.3 establish appropriate delegation arrangements at School level, led by the Head and DSL, to enable the School to discharge its safeguarding duties effectively;
- 6.3.4 ensure that all members of the Board of Governors receive appropriate safeguarding and child protection (including online) training, both on induction and thereafter regularly updated. Training should be consistent with KCSIE and Local Safeguarding Partner guidance;
- 6.3.5 ensure they discharge their legal responsibilities under the Human Rights Act 1998 and the Equality Act 2010, having regard for the implications for safeguarding that such responsibilities can have; and
- 6.3.6 ensure the School has appropriate cyber security systems in place, in line with the Cyber security standards, to strengthen resilience, reduce the risk of disruption, prevent data breaches and mitigate safeguarding risks.

6.4 To ensure efficient discharge of its responsibilities under this policy, the Governors have allocated the following tasks:

Task	Allocation	Frequency
Keeping the policy up to date and compliant with the law and best practice.	DSL and School Bursar	As required; annually at a minimum
Monitoring the implementation of the policy, relevant risk assessments, and any action taken in response and evaluating effectiveness.	DSL	As required; termly at a minimum
Maintaining up to date records for all information created in relation to the policy and its implementation as required by the UK GDPR.	DSL and School Bursar	As required; termly at a minimum
Seeking input from interested groups (pupils, staff, parents etc) to consider improvements to safeguarding procedures.	DSL	As required; annually at a minimum
Formal annual review of the School's safeguarding policies and procedures.	Governors, DSL and School Bursar	Annually at a minimum

Assessing the adequacy of the safeguarding arrangements for those who use or hire the School premises.	School Bursar	Prior to commencement of arrangement
--	---------------	--------------------------------------

6.5 Head

- 6.5.1 The Head is responsible for the day-to-day management of safeguarding in the School and for the management of concerns and allegations about staff.
- 6.5.2 The Head ensures the School's policies and procedures, adopted by the Board of Governors (particularly those concerning referrals of cases of suspected abuse and neglect), are understood and followed by all staff.

6.6 Designated Safeguarding Lead

- 6.6.1 The DSL is a member of the School's Senior Leadership Team (SLT) with the necessary status, authority, skills and experience to take lead responsibility and overview for all aspects of safeguarding and child protection for the whole school including EYFS and the boarding provision; this includes online safety and understanding the filtering and monitoring systems and processes in place.
- 6.6.2 The DSL has the appropriate status and authority within the School to carry out the duties of the post, and the time, funding, training, resources and support to enable them to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and / or to support other staff to do so) and to contribute to the assessment of children. The name and contact details of the DSL are set out in the School contact list at the front of this policy. The main responsibilities of the DSL are set out in Annex B of KCSIE.
- 6.6.3 The DSL takes lead responsibility for safeguarding children in the School's early years setting and is responsible for liaising with local statutory children's services agencies and with the Local Safeguarding Partners (LSP). The DSL will also liaise with the Head to inform them of issues relating to any police investigations and the statutory requirements for children to have an appropriate adult. The role of the appropriate adult is to safeguard the rights, entitlements and welfare of juveniles, and to know the provisions of PACE Code C and other applicable codes of practice.
- 6.6.4 The DSL will take lead responsibility for pupils who are looked after children. Direct support will be delegated to the teacher designated for looked after children.
- 6.6.5 The DSL (or DDSL) will, where required, make notifications to the local authority and /or the police in accordance with the School's safeguarding obligations, including the statutory duty to report suspected child sex offences under the Crime and Policing Act 2026.
- 6.6.6 The DSL takes lead responsibility for all aspects of safeguarding throughout the School. The DSL meets at least termly with the Nominated Governor to discuss recent trends and updates.
- 6.6.7 The School maintains formal cover arrangements and shared confidential reporting systems to ensure continuity of safeguarding when the DSL is unavailable. If the DSL is unavailable, the activities of the DSL will be carried out by a nominated Deputy DSL

(DDSL). The Deputy DSLs' details are also set out in the School contact list at the front of this policy.

- 6.6.8 The DSL and DDSs have written job descriptions describing the responsibility and activities related to the role.

7 Safeguarding Principles

- 7.1 Safeguarding and promoting the welfare of children is **everyone's** responsibility.
- 7.2 The School is committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people. The School requires everyone who comes into contact with children and their families to share this commitment.
- 7.3 The School will:
- 7.3.1 understand its role in the safeguarding partner arrangements and operate safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by Cambridgeshire and Peterborough Safeguarding Partnership Board;
 - 7.3.2 be alert to signs of abuse both in the School and from outside, within or outside of the child's family and take immediate steps to protect individuals from any form of abuse, neglect, exploitation or modern slavery whether from an adult or another child;
 - 7.3.3 ensure robust safeguarding systems are in place and are followed in relation to the School's boarding provision including particular vigilance for potential child-on-child abuse as well as implementing strict parameters regarding boarders' activity online and access to potential harmful material;
 - 7.3.4 ensure that concerns, allegations and disclosures relating to child sex abuse are managed in accordance with statutory safeguarding requirements and that, where a person is given reason to suspect that a child sex offence may have been committed, any notification required under the Crime and Policing Act 2026 is made as soon as is practicable;
 - 7.3.5 be inclusive, anti-discriminatory and responsive to the needs and experiences of children and families of different ethnic, cultural and religious backgrounds;
 - 7.3.6 understand the impact of poverty and the distinction between poverty and neglect;
 - 7.3.7 include opportunities within the curriculum for children to develop the skills they need to recognise and stay safe from abuse;
 - 7.3.8 promote the systems in place for children to confidentially report abuse ensuring they know their concerns will be treated seriously and that they can safely express their views and give feedback;
 - 7.3.9 take active steps to promote, monitor and analyse school attendance;
 - 7.3.10 deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with appropriate education, child protection and / or welfare plans;

- 7.3.11 design and operate procedures which, so far as possible, ensure that staff, pupils, and others who are innocent are not prejudiced by malicious, false, unsubstantiated or unfounded allegations;
- 7.3.12 prepare staff to identify children who may be vulnerable and may benefit from universal services and community-based Early Help and encourage them to be particularly alert to the potential need for Early Help for children with the indicators listed in WTSC and KCSIE;
- 7.3.13 be alert to children at potentially greater risk of harm (both online and offline) including children who need a social worker and mental health support;
- 7.3.14 be alert to the medical needs of children with physical or mental health conditions, special educational needs or disabilities, which could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and where additional barriers can exist when detecting abuse, neglect or exploitation;
- 7.3.15 encourage a culture of listening to pupils and victims of abuse and taking account of their wishes and feelings in any measure put in place and actions taken by the School to protect them;
- 7.3.16 operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;
- 7.3.17 assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on the understanding of the potential risk in the local area;
- 7.3.18 identify pupils who may be susceptible to radicalisation, and know what to do when they are identified in accordance with the School's *Preventing Extremism and Radicalisation Policy*;
- 7.3.19 identify pupils who might be vulnerable to being drawn into county lines or other gang activities;
- 7.3.20 consider and develop procedures to deal with any other safeguarding issues which may be specific to individual pupils in the School or in the local area; and
- 7.3.21 allow staff to determine how best to build trusted relationships with pupils which facilitate communication.
- 7.3.22 take a whole-school public health / preventative approach to harmful sexual behaviour, recognising the escalatory nature of misogyny and other forms of prejudice from low-level sexist language to more serious harmful behaviours, which may contribute to an unsafe environment or normalisation of abuse, and the benefits of early identification and intervention;
- 7.3.23 be alert to risks online and take reasonable steps to protect children from online harm, including in its approach to filtering and monitoring;
- 7.3.24 put in place appropriate security protection measures to safeguard information systems and review the effectiveness of these procedures;
- 7.3.25 take appropriate action to meet the Cyber security standards in order to improve resilience against cyber-attacks;

- 7.3.26 comply with its statutory duties and have regard to relevant guidance in relation to safeguarding requirements for school premises, including ensuring that toilets, changing facilities, and showers are provided and used in accordance with legal requirements relating to single-sex provision, and that any alternative arrangements are considered carefully, recorded and reviewed, without compromising safety, privacy, dignity, or wellbeing of pupils;
- 7.3.27 ensure that, in relation to sport and physical education, participation is organised in a way that is safe, fair, and appropriate, including where necessary providing for single-sex participation in accordance with the Equality Act 2010, national sports guidance and safeguarding considerations, and that any requests relating to participation are considered on a case by case basis with regard to the child's welfare, the safety and fairness of the activity, and the impact on other pupils.

7.4 Extra-familial Harm

- 7.4.1 Safeguarding incidents and / or behaviours can be associated with factors outside the School and / or can occur between children outside the School, inside and outside of home and online.
- 7.4.2 All staff, including the DSL, should consider the context within which such incidents and / or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare.
- 7.4.3 Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.
- 7.4.4 All staff, but especially the DSL and deputies, should consider whether children are at risk of abuse, neglect, exploitations or modern slavery in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including, but not limited to, sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse including physical, sexual, emotional abuse and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation and harm associated with organised networks or gangs. This may also include exploitation linked to modern slavery. The School will take a contextual safeguarding approach when assessing such risks.

- 7.5 Staff may follow the School's *Whistleblowing Policy* to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or its staff to properly fulfil its safeguarding responsibilities. Such concerns will always be taken seriously by the School. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally; the contact details for the NSPCC are at the front of this policy. Staff may also report concerns directly to the local authority or to the Charity Commission if they consider the School has failed to deal with concerns appropriately.

8 Reporting Obligations

- 8.1 Staff should maintain an attitude of "it could happen here" where safeguarding is concerned. When concerned about the welfare of a pupil, staff members should always act in the best interests of the pupil.

- 8.2 Staff should be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and / or they might not recognise their experiences as harmful, e.g. a child may feel embarrassed, humiliated, or being threatened due to their vulnerability, disability and / or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.
- 8.3 All staff have a duty to:
- 8.3.1 report any concerns they may have about the safety and / or wellbeing of pupils (this includes where there are concerns about children who may be at risk of being drawn into terrorism);
 - 8.3.2 where, in the course of engaging in a relevant activity, they are given reason to suspect that a child sex offence may have been committed, comply with any statutory duty to report that suspected offence and cooperate with the School and the DSL in relation to any notification required under the Crime and Policing Act 2026, including where the DSL makes the notification on their behalf;
 - 8.3.3 report any concerns they may have about the safety and / or wellbeing of other persons associated with the School;
 - 8.3.4 report any safeguarding concerns about staff or anyone else associated with the School; and
 - 8.3.5 follow up on any such reports about staff to ensure that appropriate action is or has been taken.
- 8.4 The procedures for reporting are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to exercise professional curiosity and seek guidance from the DSL, any member of the School's Senior Leadership Team, or directly to children's social care or the police in their absence.

9 Procedures for Staff

- 9.1 If staff have **any concern about a pupil's welfare**, they should report their concern either via MyConcern or directly to the DSL (or the Deputy DSL or Designated Person in the DSL's absence) **immediately**. The contact details of the DSL and Deputy DSLs are set out in the contacts list at the front of this policy. See Appendix 2 for guidance about what to do when receiving a disclosure and recording a concern.
- 9.2 A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support, to an emerging problem or to a potentially unmet need or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989.
- 9.3 Where, in the course of a relevant activity, a member of staff is given reason to suspect that a child sex offence may have been committed, they must report the matter to the DSL (or DDSL in the DSL's absence) as soon as practicable. Where a notification is required under the Crime and Policing Act 2026, this will ordinarily be made by the DSL on behalf of the member of staff in accordance with the School's safeguarding procedures.
- 9.4 If the concern involves an **allegation or concern raised about a member of staff**, supply staff, trainee teacher, contractor or volunteer, this must be reported in accordance with the procedures set out in Appendix 4 and parts 1 and 4 of KCSIE.

9.5 What if the DSL is unavailable?

- 9.5.1 The DSL or Deputy DSLs should always be available during school hours or for activities taking place out of hours or out of term to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns. However, as staff availability cannot be guaranteed out of school hours or when there is no school activity taking place, urgent safeguarding matters should be referred directly to children's social care (and copied to the DSL). During these times, non-urgent matters may be reported via MyConcern or emailed to the DSL.
- 9.5.2 If in exceptional circumstances the DSL and Deputy DSLs are unavailable, staff must not delay taking action. Staff should speak to their line manager or a member of the Senior Leadership Team and / or advice should be taken from children's social care.
- 9.5.3 Where a child is suffering, or is likely to suffer from harm, a referral to children's social care and / or police should be made immediately. Staff should be aware of the process for making referrals direct to children's social care and / or the police in these circumstances.
- 9.5.4 Any action taken by a member of staff pursuant to this requirement should then be shared with DSL or Deputy DSLs, or a member of the Senior Leadership Team, as soon as is practically possible.

Action by the DSL

- 9.5.5 On receipt of a report of a concern, the DSL (together with the wider safeguarding team) will consider the appropriate course of action in accordance with the Cambridgeshire & Peterborough Safeguarding Children Partnership Board procedures and referral threshold document. Such action may include:
 - (i) managing any support for the pupil internally via the School's own pastoral support processes, including where doing so does not place the child at additional risk, whether they should inform parents or carers to further support the child's wellbeing, and seeking advice from children's social care where required (see 10 below);
 - (ii) undertaking an Early Help assessment (which would require parental consent) (see 11 below); or
 - (iii) making a referral for statutory services (see 12 below).
- 9.5.6 Where a notification is required under the Crime and Policing Act 2026, the DSL will make or arrange for the notification to be made to the relevant local authority and / or police force as soon as practicable and in accordance with applicable legislation and guidance.
- 9.5.7 The views of the child will be taken into account when considering the appropriate course of action but will not be determinative.
- 9.5.8 If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving.

10 Managing Support for Pupils

- 10.1 The School has a framework for the identification, assessment, management and review of risk to pupil welfare, so that appropriate action can be taken to reduce the risks identified. See section 22 below and the School's *Risk Assessment Policy for Pupil Welfare*.
- 10.2 The School will ensure that appropriate advice and consultation is sought about the management of safeguarding issues, including advice from children's social care where necessary.
- 10.3 Form Tutors provide immediate support for pupils. More specialist support is provided by Heads of Year, Deputy Heads, the Housemaster (for boarders), and the School Nurse. Specific concerns are discussed at a variety of staff meetings including those of the Senior Management Team, Senior Pastoral Team, Boarding House staff meeting and the Senior Leadership Team so that everyone is aware and knows how to best to support a pupil.
- 10.4 Boarders have access to an Independent Listener who they may contact via email at any time. The details of the Independent Listener are posted on noticeboards throughout the Boarding House. In addition, boarders are given a contact card with the details of Childline and the Children's Commissioner (Help at Hand) should they wish to speak with them. Boarders are reminded at the beginning of each school term of the resources available to them and the adults they may speak with should they have any worry or concern.
- 10.5 Pupils are able to send a note that details any worry or concern they may have to any member of staff via the Worry Boxes which are located outside the Library and at the top of the Boarding House stairs.
- 10.6 Pupils with complex needs who need specialist support may be referred to the School's Integrative Child Psychotherapist, Nicky Harris MA UKCP, who is an independent counsellor and is able to see pupils at School; appointments are made by private arrangement and contract with parents.

11 Universal services and community-based Early Help assessment

- 11.1 Universal services and community-based Early Help play a crucial role in identifying emerging problems and providing support at an early stage. They are not an individual service. But a system of support delivered by local authorities and their partners working together and taking collective responsibility to provide the right provision in their area. It is distinct from targeted Early Help delivered through Family Help teams, which are more formal arrangements coordinated by local authorities, where a plan is in place and a lead practitioner appointed.
- 11.2 The School's safeguarding training includes guidance about Early Help processes and prepares all staff to identify children who may benefit from universal services and community-based Early Help, or targeted Early Help through targeted Family Help arrangements. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges and /or varying resilience levels from time to time. Staff should be particularly alert to the potential need for Early Help for a child who:
 - 11.2.1 is disabled or has certain health conditions and has specific additional needs;
 - 11.2.2 has special educational needs (whether or not they have a statutory education, health and / or care plan);
 - 11.2.3 has experienced multiple suspensions, is at risk of being permanently excluded from school and in alternate provision or a pupil referral unit;
 - 11.2.4 has a mental health need;

- 11.2.5 is a young carer;
- 11.2.6 is pregnant and / or is a parent themselves;
- 11.2.7 has exhibited early signs of abusive, violent and / or harmful behaviours;
- 11.2.8 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;
- 11.2.9 is frequently missing / goes missing from care or from home;
- 11.2.10 is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- 11.2.11 is at risk of being radicalised or exploited;
- 11.2.12 has a family member in custody, or is affected by parental offending;
- 11.2.13 is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- 11.2.14 is misusing drugs or alcohol themselves;
- 11.2.15 is looked after or has returned home to their family from care;
- 11.2.16 is at risk of 'honour based' abuse such as Female Genital Mutilation or Forced Marriage;
- 11.2.17 is a privately fostered child;
- 11.2.18 is persistently absent from education including persistent absences for part of the school day; and
- 11.2.19 is a pupil from overseas without any adult family member in the UK.

- 11.3 A member of staff who considers that a pupil may benefit from community-based Early Help or targeted Early Help through Family Help arrangements, should keep a written record of their concerns and in the first instance discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the Cambridgeshire & Peterborough Safeguarding Children Partnership Board menu of Early Help services and their referral threshold document and will support staff in liaising with parents other agencies and setting up an inter-agency assessment as appropriate.
- 11.4 If Early Help is appropriate, staff may be required to support other agencies and professionals in a community-based Early Help assessment and will be supported by the DSL in carrying out this role. In some cases, staff may be required to take a lead role.
- 11.5 The matter will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the pupil's situation appears to be getting worse or does not appear to be improving.

12 Making a Referral

- 12.1 **Where a child is suffering, or is likely to suffer from harm, a referral should be made to children's social care (and if appropriate the police) immediately. Where required, a notification must also be made in accordance with the statutory duty to report suspected child sex offences under the Crime and Policing Act 2026.**

- 12.2 The contact details for children's social care, including the link to the online referral form, are set out at the front of this policy.
- 12.3 Anyone can make contact with children's social care to discuss concerns before a referral is made. This includes professionals as well as a child themselves, family members, and members of the public. Parental consent is not required for referrals to statutory agencies.
- 12.4 The child's local safeguarding partnership will have a threshold of need framework and guidance which will provide more information which can support decision making in relation to contacting children's social care.
- 12.5 Normal referral processes are used where there are concerns about children who may be at risk of being drawn into terrorism.
- 12.6 Statutory Assessments

12.6.1 Children's social care may undertake a statutory assessment under the Children Act 1989 into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

- (i) **Children in need:** A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Children in need may be assessed under section 17 of the Children Act 1989.
- (ii) **Children suffering or likely to suffer significant harm:** Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

The threshold document published by Local Safeguarding Partners includes the criteria, including the level of need, for when a case should be referred for assessment and for statutory services under section 17 and 47.

- 12.7 Anybody can make a referral. Staff required to make a direct referral may find helpful the flowchart set out on page 27 of KCSIE and information in Chapter 3 of WTSC about the likely actions and decisions required.
- 12.8 Parental consent is usually expected for referrals to statutory agencies, unless this may expose the child to additional harm or is not to be considered in the child's best interests, as staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:
- 12.8.1 personal details of the child including the child's developmental needs;
 - 12.8.2 detailed information about the concern;
 - 12.8.3 information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.
- 12.9 If a referral is made by telephone, this should be followed up in writing.
- 12.10 If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

12.11 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.

12.12 Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure the concerns are addressed and that the child's situation improves. Further details about local escalation procedures are held with the DSL.

13 Allegations Against Pupils – Child-on-Child Abuse

13.1 Allegations against pupils should be reported in accordance with the procedures set out in this policy (see Appendix 3). If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 KCSIE and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative.

13.2 All those involved in such allegations, both reporting and reported pupils, will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary.

14 Welfare Concerns

14.1 Staff who have concerns about the welfare of others, or any other safeguarding issue not expressly covered by this policy, should report them.

14.2 In the absence of an express procedure about reporting, they should report such concerns to their line manager or the DSL in the first instance.

14.3 If, in exceptional circumstances, the DSL or Deputy DSLs are unavailable, this should not delay appropriate action. Staff should consider speaking to a member of the Senior Leadership Team and / or contacting local authority children's social care directly. Any action taken must be shared with the DSL as soon as possible.

15 Allegations or Concerns About Staff

15.1 The School has procedures for dealing with allegations made and / or concerns raised about staff, or anyone working for or on behalf of the School, whether paid or unpaid, or any Other Adult (as defined in Appendix 4) which may affect the safety and welfare of children:

15.1.1 The procedures in this policy apply to staff who pose a risk of harm to children or may behave in a way that indicates that they may be unsuitable to work with children. They also apply to 'low level concerns' which are concerns that do not meet the harm threshold. The procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff from false, malicious, unsubstantiated or unfounded allegations. These procedures are set out in Appendix 4 and follow the guidance in Parts 1 and 4 of KCSIE.

15.1.2 The School will follow its employment procedures for dealing with any other concern raised about staff, involving external agencies as appropriate.

15.2 Detailed guidance is given to staff to ensure that all staff are clear on the rules of conduct and the expectations of the School in relation to contact with pupils, parents, colleagues and any other person who comes into contact with the School. Specific guidance is given to staff about one-to-one teaching. This guidance is contained in the *Staff Code of Conduct* and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

16 Informing Parents

- 16.1 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Head, the LADO, children's social care, the police, and / or the pupil before discussing details with parents. In all cases, the DSL will be guided by the Cambridgeshire and Peterborough Safeguarding Children Partnership Board threshold document.
- 16.2 Where a pupil has made a disclosure which relates to a family member, the parents should not be informed unless advised by the safeguarding team at children's social care.
- 16.3 See also Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff.

17 Additional Reporting

- 17.1 In addition to the reporting requirements explained above, the School will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

17.1.1 Health and Safety Executive

- (i) The School is legally required under RIDDOR to report certain incidents to the Health and Safety Executive;

17.1.2 Charity Commission

- (i) The School is a registered charity and is required to report all serious incidents to the Charity Commission in accordance with the guidance How to report a serious incident in your charity (Charity Commission, Jan 2026);

17.1.3 Disclosure and Barring Service (DBS)

- (i) A referral to the DBS will be made promptly if the criteria are met. See Appendix 4.

17.1.4 Teaching Regulation Agency (TRA)

- (i) The School is under a duty to consider whether it is appropriate to make a referral to the TRA where it has ceased to use the services of a teacher because the teacher has been guilty of serious misconduct (or might have ceased to use the services of a teacher had the teacher not ceased to provide those services). The may also, at its discretion, make a referral to the TRA where the duty to consider doing so has not yet arisen. See Appendix 4 for further information.

17.1.5 Insurers

- (i) The School will consider whether it is necessary to report a safeguarding incident to the School's insurers and / or brokers and, if so, the timescale required by the relevant policies. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.
- (ii) Care should be taken to ensure this is done before renewal to ensure the School complies with its duties under the Insurance Act 2015. If the School is in any doubt with regard to the correct insurer and / or policy and / or if it is

unable to locate the relevant insurer and / or the extent of report required, professional advice should be sought.

17.1.6 UK Visas and Immigration

- (i) In order to comply with its duties as a Child Student Sponsor, the School will report to the Home Office if there is any non-compliance with the rules governing a pupil's Student visa.

18 Safer Recruitment and Supervision of Staff

- 18.1 The School is committed to practicing safer recruitment in checking the suitability of staff and volunteers (including staff employed by another organisation) in accordance with Part 3 of KCSIE, including the requirements relating to regulated activity and DBS checks for volunteers introduced by the Crime and Policing Act 2026. See the School's *Safer Recruitment Policy*.
- 18.2 The School maintains a single central register of appointments for all staff.
- 18.3 The School's procedures for checking the suitability of recruitment in its early years provision are set out in the *Safer Recruitment Policy*.
- 18.4 Staff connected to the School's early years and later years provisions are under an ongoing duty to inform the School if their circumstances change which causes them to meet any of the criteria for Disqualification under the Childcare Act 2006. Staff should refer to the School's *Safer Recruitment Policy* for further information about this duty and to their contract of employment in respect of their obligation to update the School.
- 18.5 The School's protocol for ensuring that visiting speakers are suitable and appropriately supervised is set out in the School's *Visiting Speaker Policy*.

19 Use of Mobile Technology

- 19.1 The School's policy on the use of mobile technology in the School, including in the EYFS setting, is as follows:
 - 19.1.1 The School's *Acceptable Use of ICT for Pupils Policy*, sets out the expectations for pupils. Pupils in Pre-Prep are not permitted to bring mobile devices onto the school premises. For all other pupils, mobile devices (including any device with smart technology such as Apple watches) must be switched off and remain in school bags or lockers during school hours. Pupils must not gain access to the school network with personal devices at any time; use of mobile data while on the school premises during school hours is strictly prohibited.
 - 19.1.2 Staff should use follow the guidance regarding mobile devices as set out in the *Staff Code of Conduct*.
 - 19.1.3 Parents may bring mobile phones onto the premises but may only take photographs during events such as plays, concerts, or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.
 - 19.1.4 Visitors may bring mobile phones onto the premises but must not take photographs or video under any circumstances without the express permission of the Head.

19.1.5 The School allows access to the internet onsite for pupils using School devices. The School recognises the evolving risks associated with emerging technologies, including artificial intelligence. This includes the potential for AI to be used to generate or manipulate images or content (for example, deepfakes), which may be used to harm or exploit children. Appropriate internet safety measures are taken to manage associated risks, and staff will remain vigilant to these risks and respond in accordance with this policy.

19.2 The School's approach to online safety is set out in the School's *Online Safety Policy*.

20 Secure School Premises

20.1 The School will take all practicable steps to ensure that School premises are as secure as circumstances permit.

20.2 All visitors to the School site register at the School Reception. All visitors, including parents and guardians, must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff. All visitors will be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the School premises.

20.3 All visitors to the Boarding House (including parents, legal guardians and education guardians of boarders and choristers) must sign in during the normal School day in accordance with clause 20.2 above. Outside of the normal school day, all visitors must report to the duty member of staff immediately on arrival and must observe the necessity to be kept under sufficient staff supervision during their visit. Parents, legal guardians and education guardians of boarders are expected to notify the Housemaster or member of staff on duty that they are visiting; depending on the circumstances, they may not be required to be kept under direct staff supervision during their visit, unless a court order requires such supervision. Parents of boarders and choristers must respect the visiting times as set out by the Housemaster from time to time.

21 Training

21.1 The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.

21.2 The level and frequency of training depends on role of the individual member of staff.

21.3 The School maintains written records of all staff training.

21.4 All training will be carried out in accordance with Cambridgeshire & Peterborough Safeguarding Children Partnership Board procedures.

21.5 Induction

21.5.1 All staff, including temporary staff and volunteers, will be provided with induction training that includes (and where relevant, includes the provision of copies of):

- this policy;
- the *Whistleblowing Policy*;
- the *Acceptable Use of ICT for Pupils Policy* and *Online Safety Policy*;

- the *Staff Code of Conduct* (which gives guidance to staff to enable them to make sure that their behaviour and actions do not place pupils or themselves at risk of harm or allegations of harm;
- the *Policy for Good Discipline*;
- the *Anti-Bullying Policy*;
- the Staff Handbook;
- the role, identity and contact details of the DSL and Deputy DSLs;
- the relevant parts of KCSIE;
- the safeguarding response to children who go missing from education;
- the School's approach to online safety which includes an understanding of the expectations, applicable roles and responsibility of staff in the filtering and monitoring of online activity;
- safeguarding training in accordance with Cambridgeshire & Peterborough Safeguarding Children Partnership Board procedures including guidance on managing a report of child-on-child harmful sexual behaviour; and
- appropriate Prevent duty training.

Staff delivering the induction training ensure that staff understand the material and have the opportunity to discuss topics in more detail where required.

21.6 Safeguarding Training

- 21.6.1 School leaders and all staff will receive a copy of this policy, the relevant parts of KCSIE and will be required to confirm that they have read and understand these.
- 21.6.2 Members of the Senior Leadership Team and the Nominated Governor will receive a copy of this policy and be expected to read all of KCSIE.
- 21.6.3 The Head and all staff members will undertake appropriate safeguarding training which will be updated at least every three years and following consultation with the Cambridgeshire & Peterborough Safeguarding Children Partnership Board. In addition, all staff members will receive safeguarding and child protection updates via email and staff meetings on a regular basis and at least annually.
- 21.6.4 Staff in the School's early years setting will receive training in accordance with Annex C of the EYFS statutory framework for group and school based providers (DfE September 2026) and will be supported and confident to implement the setting's safeguarding policy and procedures on an ongoing basis. Training will be renewed every two years and the School will consider whether any staff need to undertake any annual refresher training during any two year period to help maintain basic skills and keep up to date with any changes to safeguarding procedures or as a result of any safeguarding concerns that occur in the setting.
- 21.6.5 Staff development training will also include training on online safety which should, amongst other things, include an understanding of the filtering and monitoring systems and processes in place in the School, measures in place to combat cybercrime, the School's approach to the use of generative AI by pupils and for

educational purposes, searching pupils for prohibited and banned items, and Prevent duty training assessed as appropriate for them by the School.

- 21.6.6 The School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as child-on-child abuse (including sexual harassment and sexual violence), radicalisation, harmful sexual behaviour, child criminal and child sexual exploitation, female genital mutilation, cyber bullying, prejudice-based and discriminatory bullying, gangs, and mental health, to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.
- 21.6.7 All Governors receive safeguarding training (including online safety) on induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the School's safeguarding policies in place are effective and support a robust whole-school approach to safeguarding. This training will be regularly updated.
- 21.6.8 The nominated safeguarding Governor and the Chair of Governors will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities. All other Governors are expected to read Part 2 of KCSIE.
- 21.6.9 The School has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant skills, knowledge and experience to safeguard children effectively, including staff meetings and professional development reviews. This includes information on how staff can report concerns occurring out of hours / out of term time.

21.7 DSL and Deputy DSL

- 21.7.1 The DSL and Deputy DSLs will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes inter-agency working and Prevent awareness training and attendance on a training course which is consistent with the criteria set out in Annex C of EYFS statutory framework for group and school based providers (DfE, September 2026) and will be updated at least every two years.
- 21.7.2 In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role.
- 21.7.3 Prevent duty training will be consistent with the government's Prevent training for schools. See Educate Against Hate (HM Government) for further details.

21.8 Teaching Pupils about Safeguarding

- (i) The School teaches pupils about safeguarding through PSHE, tutorials, assemblies and throughout the curricular and extra-curricular programme. This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help.
- (ii) The School recognises that a one size fits all approach may not be appropriate for children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

- (iii) Pupils are introduced to wellbeing, emotional, physical, and mental health in an age-appropriate manner in order to develop resilience and self-esteem. Resilience is particularly important in safeguarding to mitigate the risk of being drawn into extremism.
- (iv) Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment through the provision of Relationships Education (Reception – Year 6) and Relationships and Sex Education (Years 7 and 8) which is delivered via PSHE lessons appropriate to pupils' age and stage of development.
- (v) Pupils are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled. The School's complaints procedure for pupils is posted in classrooms and is detailed in the School's *Anti-Bullying Policy*. The procedure sets out what pupils should do if they have a worry or complaint.
- (vi) The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities so that pupils learn how to keep themselves safe online and when accessing remote learning. The Governors have ensured that appropriate filtering and monitoring systems are in place and meet the DfE's filtering and monitoring standards and are mindful that this should not lead to unnecessary restrictions on learning.
- (vii) The School keeps in regular contact with parents and carers to reinforce the importance of pupils being safe online and make them aware of the systems in place to filter and monitor online use and the sites pupils will be expected to access during learning.

22 Risk Assessment

- 22.1 Where a concern about a student's welfare is identified, the risks to that student's welfare will be assessed and appropriate action will be taken to reduce the risks identified and address the child's wellbeing needs.
- 22.2 The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused.
- 22.3 The Head has overall responsibility for ensuring that matters which affect student welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.
- 22.4 Day-to-day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

23 Monitoring and Review

- 23.1 The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the Governors as necessary and seeking contributions from staff. The DSL will update the Senior Leadership Team regularly on the operation of the School's safeguarding arrangements.

- 23.2 Any serious safeguarding incidents at the School will be followed by a review of these procedures by the DSL and a report made to the Governors. Where an incident involves a member of staff, the LADO will be asked to assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses in regards to safeguarding arrangements at any time will be remedied without delay.
- 23.3 This policy will be updated whenever needed to ensure that it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt.
- 23.4 The Governors will commission a report to undertake a review of this policy and the School's safeguarding procedures annually. This will include an update and review of the effectiveness of procedures and their implementation and the effectiveness of multi-agency working. As part of this review, the Governors will also review the School's approach to online safety and the filtering and monitoring provision, including checks that filtering is working appropriately on all internet-connected devices, supported by an annual risk assessment that considers and reflects the risks its pupils face and a record kept.
- 23.5 Appropriate training in the oversight of safeguarding is provided to the Governors. Governors visit the School and undertake site walks to check the implementation of safeguarding procedures. They also talk to staff and pupils to gain an overview of safeguarding matters in the School. The Nominated Governor checks the Single Central Register on a regular basis.
- 23.6 The DSL reports to the Education and Pastoral Committee to raise any topics of interest and summarise the School's safeguarding practices over the year.
- 23.7 The DSL will work with the Nominated Governor, preparing a report commissioned by the Governors. The written report should address how the School ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled; and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters.
- 23.8 The Governors will review the report and should also consider independent corroboration, such as:
- 23.8.1 inspection of records or feedback from external agencies including the LADO;
 - 23.8.2 reports of ISI inspections;
 - 23.8.3 the outcome of any relevant complaints, claims or related proceedings; and
 - 23.8.4 press reports.
- 23.9 The Governors will review the report, this policy and the implementation of its procedures, including good cooperation with local agencies, and consider any proposed amendments to this policy, from both the DSL and its own members, before giving the revised policy its final approval. Detailed minutes recording the review by the Governors will be made.

24 Recordkeeping

- 24.1 All records created in accordance with this policy are managed in accordance with the School's *Data Protection and Retention Policy*.
- 24.2 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. This will also help if / when responding to any complaints about the way a case has been handled by the School. Information should be kept confidential and stored securely. Concerns and referrals will be kept in a separate child protection file for each child. These should include:

- 24.2.1 A clear and comprehensive summary of the concern;
- 24.2.2 Details of how the concern was followed up and resolved;
- 24.2.3 A note of any action taken, decisions reached and the outcome;
- 24.2.4 Open concerns are regularly reviewed by pastoral staff and the DSL/ DDSL team and closed once all actions are complete. Pupils with significant historic concerns will be regularly monitored on MyConcern.

24.3 Insofar as pupil records are concerned:

- 24.3.1 Staff must record all concerns about a pupil through MyConcern. Guidance on recordkeeping is set out in Appendix 2.
- 24.3.2 The DSL will open a child protection file following a report of a child protection concern about a pupil. The DSL will record all discussions with both colleagues and external agencies, decisions made and the reasons for them and detail of the action taken. The DSL is responsible for managing all child protection files in accordance with KCSIE.

24.4 The records created in accordance with this policy may contain personal data. The School has a number of privacy notices which explain how the School will use personal data for the benefit of pupils and parents. The privacy notices are published on the School's website. In addition, staff must ensure that they follow the School's data protection procedures when handling personal data created in connection with this policy. In certain circumstances, the DSL may share personal information with a third party without parent or guardian consent.

25 Information Sharing and Multi-Agency Working

- 25.1 The School will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The School will always act in order to safeguard and promote the welfare of children. When a child leaves the School, their child protection file, should one exist, is transferred securely to the new school.
- 25.2 The School understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people, including their education outcomes. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of pupils, which is always the School's paramount concern. Schools have clear powers to share, hold and use information for these purposes and data protection laws provide a framework to ensure that personal information is shared appropriately.
- 25.3 When the School intends, as a result of a professional or legal duty, or otherwise, to share safeguarding information, the school will always seek to inform the pupil, their parent(s) or carer(s), about what information sharing has taken (or will take) place, why and how the information will be used, unless doing so could put a child or others at further risk of harm, or could compromise effective safeguarding arrangements, including police investigations.
- 25.4 When deciding what information to share, the School will consider:
 - 25.4.1 The relevancy of the information, including to the current safeguarding risk;
 - 25.4.2 What is necessary for the receiving setting to know; and
 - 25.4.3 Whether it is clearly presented and appropriately contextualised.

- 25.5 The School will use professional judgement to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes.
- 25.6 When the School receives a request for safeguarding information (e.g. a subject access request from a parent or a request from the police), the School will carefully consider its response to make sure that any disclosure is in accordance with its obligations under data protection laws. Where a request for safeguarding information is received from a parent for an individual under the age of 18, the School may be exempt from providing that data where complying with the request would not be in the best interests of the child. The School will also have regard to its data protection policies. The School's Data Protection Officer (School Bursar) will work with the DSL as appropriate to determine what should be disclosed.
- 25.7 The School will cooperate with children's social care and, where appropriate, the police to ensure that all relevant information is shared for the purposes of Early Help assessments, and assessments and child protection investigations under the Children Act 1989.
- 25.8 Where a pupil leaves the School to attend a new setting, the DSL will consider whether it is appropriate to share information with that setting, particularly where that information would support an assessment of risk to others as well as the individual pupil.
- 25.9 Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.
- 25.10 While the School will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

26 Version Control

Date of last review	September 2026
Date of next review	September 2027
Policy owner	Head / School Bursar / DSL
Authorisation	Rev Dr Stephen Cherry, Chair of Governors on behalf of the Board of Governors

Appendix 1 Forms of Abuse, Neglect and Exploitation

1 Abuse, neglect and exploitation

- 1.1 Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and, in most cases, multiple issues will overlap with one another; therefore, staff should always be vigilant and always raise any concerns with the DSL.
- 1.2 Children can also abuse their peers online. This can take the form of abusive, harassing, and misogynistic messages, the non-consensual making or sharing of indecent images especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

2 Definitions of abuse and neglect

- 2.1 **Abuse:** 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 in relation to the impact on children of all forms of domestic abuse, including physical abuse, sexual abuse, emotional and psychological abuse, coercive and controlling behaviour, and economic or financial abuse, including where they see, hear or experience its affects. Children may be abused in a family or in an institutional or extra-familial context 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. They may be abused by an adult or adults or by another child or children. This includes in teenage relationships, or under the guise of honour-based abuse including forced marriage and female genital mutilation, or abuse related to faith or belief such as allegations of demonic possession. Children may also cause harm to other family members, often referred to as child to parent or carer giver abuse.
- 2.2 **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.
- 2.3 **Emotional Abuse:** the persistent emotional or psychological 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 verbal abuse, such as persistent criticism, belittling, or name calling, as well as 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying, prejudiced-based or discriminatory bullying), 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.
- 2.4 **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 penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place in family settings, in institutional settings, 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. A child of any age or gender can be the victim of sexual abuse. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it. The School's procedures for child-on-child abuse can be found in Appendix 3.

- 2.5 **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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include affluent neglect or neglect of, or unresponsiveness to, a child's basic emotional needs.

3 Signs of Abuse

3.1 Possible signs of abuse include (but are not limited to):

- 3.1.1 the pupil says they have been abused or asks a question or makes a comment which gives rise to that inference;
- 3.1.2 there is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;
- 3.1.3 the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour or there is a sudden or significant change in the pupil's behaviour;
- 3.1.4 the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
- 3.1.5 the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing;
- 3.1.6 the pupil appears neglected, e.g. dirty, hungry, inadequately clothed;
- 3.1.7 the pupil is reluctant to go home, or has been openly rejected by their parents or carers; and
- 3.1.8 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

3.2 Mental health problems can also be a sign of abuse, neglect or exploitation.

3.3 The Cambridgeshire & Peterborough Safeguarding Children Partnership Board can provide advice on the signs of abuse and the DfE Advice "what to do if you're worried a child is being abused (March 2015)" provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

4 Specific Safeguarding Issues

4.1 Statutory guidance acknowledges the following as specific safeguarding issues:

- 4.1.1 child abduction and community safety incidents;
- 4.1.2 children and the court system;
- 4.1.3 children missing from education;
- 4.1.4 children who are questioning their gender;
- 4.1.5 children who are lesbian, gay, or bisexual;
- 4.1.6 children with family members in prison;
- 4.1.7 children with medical conditions;
- 4.1.8 child criminal exploitation and child sexual exploitation;
- 4.1.9 county lines or other gang activities;
- 4.1.10 misinformation / disinformation;
- 4.1.11 modern slavery and the national referral mechanism;
- 4.1.12 cybercrime;
- 4.1.13 domestic abuse;
- 4.1.14 homelessness;
- 4.1.15 honour or faith-based abuse (including female genital mutilation and forced marriage);
- 4.1.16 making or sharing nude or semi-nude images;
- 4.1.17 mental health issues;
- 4.1.18 child on child abuse;
- 4.1.19 preventing radicalisation;
- 4.1.20 serious violence;
- 4.1.21 sexual violence and sexual harassment between children;
- 4.1.22 upskirting;
- 4.1.23 young carers.

4.2 Further advice and links to guidance on these specific safeguarding issues can be found in KCSIE. Staff should be particularly aware of the safeguarding issues set out below.

4.3 Children missing from education (CME)

- 4.3.1 Children being absent from school, particularly repeatedly and for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, honour or faith-based abuse or risk of forced marriage. School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.
- 4.3.2 The School will follow up on all absences in a timely manner. In particular, if a child is absent from the school's early years setting for a prolonged period of time or without notification from the parent or carer, attempts must be made to contact the child's parents or carers and alternative emergency contacts. The School will consider patterns and trends in a child's absences and their personal circumstances and use its professional judgment when deciding if an absence should be considered as prolonged. Consideration will be given to the child's vulnerability, their parents' or carers' vulnerability and their home life. Any concerns will be referred to the local children's social care services and / or a police welfare check requested.
- 4.3.4 Where reasonably possible the School will hold more than one emergency contact for each pupil and for children in the early years setting, the School will hold more than two emergency contacts for each child in order to ascertain whether a child is missing.
- 4.3.4 The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2024.
- 4.3.5 The School shall also inform the child's local authority CME team without delay where enquiries following the absence of a pupil lead the School to reasonably believe that the child will not return, and no alternative provision has been confirmed by the parents.
- 4.3.6 This will assist the local authority to:
- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
 - b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, exploitation or radicalisation or involvement with serious violent crime.
- 4.3.7 Where a child is identified as CME, the School should continue to undertake reasonable enquiries to identify the whereabouts of the child, in collaboration with the local authority (or the child's home local authority) until it is mutually agreed that there are no further actions the School can take.
- 4.3.8 The School shall provide the local authority with the names and addresses of all pupils of compulsory school age who:
- fails to attend school regularly; or
 - have been absent for a continuous period of ten school days where their absence has been recorded with one or more of the codes statistically classified as unauthorised (G, N, O, U). The frequency will be determined by the local authority, but no less frequently than once per calendar month;

- have been recorded with code I (illness) and who the School has reasonable grounds to believe will miss 15 days consecutively or cumulatively because of sickness in a school year.

4.4 Elective Home Education (EHE)

- 4.4.1 Where a parent expresses their intention to remove a pupil from school with a view to educating them at home, the School will work with the local authority and other key professionals to coordinate a meeting with parents where possible, ideally before a final decision has been made. This is to ensure parents have considered what is in the best interests of their child. This will be particularly important where a child has SEND, is vulnerable, and / or has a social worker.

4.5 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

- 4.5.1 Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity:
- a) in exchange for something the victim needs or wants e.g. money, gifts or affection; and / or
 - b) for the financial advantage or increased status of the perpetrator or facilitator; and / or
 - c) through violence or threat of violence to victims (and their families).
- 4.5.2 Children can be exploited by adult males or females, as individuals or in groups, including organised networks or gangs which the victim may identify as being a part of. 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.
- 4.5.3 CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery.
- 4.5.4 Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals and should be treated as victims. It is not possible for a child to give informed consent to engage in criminal or other exploitative activity, and they cannot give consent to be exploited, abused or trafficked.
- 4.5.5 CCE can include children being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.
- 4.5.6 Some of the following can be indicators of both CSE and CCE, including children who:
- a) appear with unexplained gifts, money or new possessions;
 - b) associate with other young people involved in exploitation;
 - c) suffer from changes in emotional wellbeing;
 - d) misuse drugs or alcohol;
 - e) go missing for periods of time or regularly come home late; and
 - f) regularly miss school or education or do not take part in education.
- 4.5.7 Children who have been exploited will need additional support to help maintain them in education.

- 4.5.8 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.
- 4.5.9 CSE does not always involve physical contact; it can occur through the use of technology, including through generative AI and AI-generated nudes or semi-nudes (deepfakes). CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). The CCE indicators above may also be indicators of CSE as children who:
- a) have older boyfriends or girlfriends;
 - b) suffer from sexually transmitted infections or become pregnant.

4.6 County Lines

- 4.6.1 '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 forms of 'deal line.' They are likely to exploit children and vulnerable adults to move, store, and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.
- 4.6.2 Children are increasingly being targeted and recruited online using social media; they can easily become trapped by this type of exploitation as county line gangs can manufacture drug debts which need to be worked off and threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
- 4.6.3 A number of the indicators for CSE and CCE as detailed above may also be applicable to children involved in county lines.
- 4.6.4 Additional reporting duties:
- a) 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 or providers who offer support to victims of county lines exploitation.
 - b) Where a pupil may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism should be considered.

4.7 Serious Violence

- 4.7.1 Indicators which may signal children are at risk from, or are involved with serious violent crime may include:
- a) increased absence from school;
 - b) a change in friendships or relationships with older individuals or groups;
 - c) a significant decline in educational performance;
 - d) signs of self-harm or a significant change in wellbeing;
 - e) signs of assault or unexplained injuries; and
 - f) unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.
- 4.7.2 Staff should be alert to signs that a child may be at risk of or involved in serious violence. There are higher risks for children with disrupted education, including exclusions, permanent

exclusions or time in alternative provision, and for those with a history of offending. Schools should also try to be alert to when children might be at highest risk, recognising that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school and can concentrate in particular places.

4.7.3 Staff should also be aware of a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been excluded, spent time in alternative provision or permanently excluded, having experienced child maltreatment, having been involved in offending, such as theft or robbery, having used drugs or alcohol in early adolescence, and having previously been a victim or previously perpetrated violence.

4.7.4 Early, evidence-based support at critical points when concerns emerge is vital. This includes access to trusted adults, social and emotional skills support and, where available, targeted interventions such as mentoring or therapeutic support.

4.7.5 Further advice is available in the Home Office guidance on criminal exploitation of children and vulnerable adults and county lines. The Youth Endowment Fund also provides practical guidance and a self-assessment tool for schools on evidence-based violence prevention.

4.8 Modern slavery and the national referral mechanism

4.8.1 Modern slavery includes slavery, human trafficking, forced labour, and domestic servitude. Where a child may be a victim of trafficking or exploitation, the School will make appropriate child protection referrals and consider a referral to the National Referral Mechanism in accordance with statutory guidance.

4.9 Cybercrime

4.9.1 Cybercrime is a criminal activity committed using electronic devices and / or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen offline but enabled at scale and speed online e.g. fraud, purchasing of illegal drugs, child sex abuse and exploitation) or 'cyber-dependent' (crimes that can only be committed by using an electronic device).

4.9.2 Cyber-dependent crimes include:

- a) Unauthorised access to computers (illegal hacking) e.g. accessing a school's computer network to look for test papers or change grades awarded;
- b) Denial of Service (DoS or DDos) attacks or 'booting' – attempts to make a computer, network or website unavailable by overwhelming it with internet traffic;
- c) Making, supplying, or obtaining malware e.g. viruses, spyware, ransomware, botnets, and Remote Access Trojans with intent to commit further offence.

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

4.9.4 The School will put in place appropriate measures to meet the Cyber security standards in order to combat cyber attacks and improve cyber resilience.

4.9.5 The DSL should consider referring into the Cyber Choices programme if they have concerns. This is a nationwide preventative programme which intervenes when 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.

4.10 Domestic Violence

- 4.10.1 Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. It can include physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, homophobia or faith-based abuse, forced marriage, female genital mutilation, reproductive coercion, harassment and stalking.
- 4.10.2 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 this can have a detrimental and long-term impact on their health, wellbeing, development and ability to learn.
- 4.10.3 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. Exposure to 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.
- 4.10.4 Further advice on identifying children who are affected by domestic abuse and how they can be helped can be found in Annex A of KCSIE. This includes details about Operation Encompass which operates in all police forces across England, helping schools and police work together to provide emotional and practical help to children.

4.11 Homelessness

- 4.11.1 Homelessness or the risk of homelessness can place a child and family under significant stress and may increase vulnerability to abuse, neglect and exploitation. Staff should report related welfare concerns to the DSL so that appropriate Early Help or statutory support can be considered.

4.12 Mental Health

- 4.12.1 Mental health problems can, in some cases, develop into safeguarding concerns. This could include self harm, suicidal ideation or risk of suicide.

- 4.12.2 Only appropriately trained professionals can diagnose a mental health problem; however, staff are well placed to observe children day to day and identify pupils whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

- 4.12.3 Potential warning signs could include:

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

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

- 4.12.5 If staff have a concern about a child's mental health, they should speak to the DSL. If a child is in danger, staff should call 999 or arrange for a child to be taken to A&E immediately by a parent,

carer or other suitable person. If a child needs urgent mental health help but it is not an emergency, staff can use NHS 111 online or call 111 and select the mental health option.

4.13 Honour or Faith-Based Abuse

4.13.1 Honour or faith-based abuse encompasses incidents or crimes committed to protect or defend the honour of a family and/or community, including female genital mutilation, forced marriage and practices such as breast ironing. It often involves wider family or community pressure and may involve multiple perpetrators. These dynamics and additional risk factors must be considered when deciding what safeguarding action to take. All forms of honour or faith-based abuse are abuse, regardless of motivation, and must be handled and escalated as such. Staff must be alert to the possibility that a child is at risk of, or has already suffered, such abuse and should speak to the DSL if they have any doubts.

4.13.2 If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

4.14 Female Genital Mutilation (FGM)

- (a) FGM is a form of honour-based abuse. It 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.
- (b) There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-43 of the [Multi-agency statutory guidance on FGM](#) (HM Government, July 2020) (pages 61-63 focus on the role of schools).
- (c) All staff must be aware of the requirement for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. 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. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.
- (d) If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance [Mandatory Reporting of Female Genital Mutilation - procedural information](#) (January 2020) for further details about the duty.
- (e) Guidance published by the [Department for Health](#) also provides useful information and support for health professionals which will be taken into account by the School's medical staff. The National FGM Centre has also produced FGM guidance to help schools understand their role in safeguarding girls, engaging parents and teaching about FGM.

4.15 Forced Marriage

- (a) Since February 2023 it has been a crime to carry out any conduct with the purpose to cause a child to marry before their 18th birthday, even if violence, threats or another

form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

- (b) Forced marriage is also a form of honour-based abuse. Forcing a person into 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.
- (b) Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found in the following publication: Multi-agency guidelines; handling cases of forced marriage (April 2023).
- (c) Staff should speak to the DSL if they have any concerns. The publication Multi-agency guidelines: handling case of forced marriage highlights the role of schools in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or fmu@fcdo.gov.uk for advice and information.

4.16 Radicalisation and the Prevent Duty

- 4.16.1 The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.
- 4.16.2 The School aims to build pupil's resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and learn how to challenge these ideas.
- 4.16.3 The School has adopted the government's definitions for the purposes of compliance with the Prevent duty:
 - **Extremism:** *the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to destroy the fundamental rights and freedoms of others; undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or intentionally create a permissive environment for others to achieve those results.*
 - **Radicalisation:** *the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups.*
 - **Terrorism:** *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.*
- 4.16.4 There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology; however, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability.

Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

- 4.16.5 It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. 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 the DSL making a Prevent referral.
- 4.16.6 Prevent referrals may be passed to a multi-agency Channel panel, which will determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. While a referral is being assessed, should any further or new information come to light, this should also be passed to the police. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: [Channel duty guidance: protecting vulnerable people from being drawn into terrorism \(HM Government, October 2023\)](#).
- 4.16.7 The DfE and Home Office's briefing note *The use of social media for online radicalisation* (July 2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.
- 4.16.8 Contact details of the School's Prevent Lead and details of sources and advice and support are set out in the Key Contacts section of this policy.

4.17 Child-on-Child Abuse (including sexual harassment and sexual violence)

- 4.17.1 All staff should be aware that children can abuse other children and that it can happen both inside and outside of school as well as online.
- 4.17.2 The School's procedures for dealing with child-on-child abuse can be found in Appendix 3.

4.18 Online Safety

- 4.18.1 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.
- 4.18.2 It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective, whole school approach to online safety empowers a school to protect and educate pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- 4.18.3 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
 - (a) **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news), and conspiracy theories.
 - (b) **contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, 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.

(c) **conduct:** personal online behaviour that increases the 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; and

(d) **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If pupils or staff are at risk, it should be reported to the Anti-Phishing Working Group (<https://apwg.org/>).

4.19 Sharing nude and semi-nude images and videos

4.19.1 Consensual and non-consensual sharing of nudes and semi-nude images and / or videos can be signs that children are at risk.

4.19.2 The School treats all incidences involving, making or sharing nudes and semi-nude images as a breach of discipline and also as safeguarding matters to be actioned in accordance with this policy, regardless of whether they are consensual or non-consensual. All such incidents will require a proportionate approach that considers the age, development and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

4.19.3 Members of staff must not intentionally view any nude or semi-nude images which are reported to them, or copy, print or share the images under any circumstances. In referring any incident of sharing images, members of staff should describe the content of the images as reported to them.

4.19.4 The DSL may, in exceptional circumstances, view images with the prior approval of the Head and only where:

(a) it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;

(b) it is necessary to report the image to a website, app or suitable reporting agency to have it taken down or to support the pupils or parents in making a report; or

(c) a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the school's devices or network.

4.19.5 Where viewing an image is unavoidable:

(a) viewing should take place on School premises wherever possible;

(b) the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);

(c) a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image themselves;

(d) full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;

(e) any member of staff who views an indecent image should be given appropriate support.

- 4.19.6 If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.
- 4.19.7 If an electronic device that is prohibited by the school has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.
- 4.19.8 If external agencies do not need to be involved, the School must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.
- 4.19.9 If images have been shared online and cannot now be deleted by the person who shared them, the School should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).
- 4.19.10 Where a pupil receives unwanted images, the School should advise the pupil and their parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.
- 4.19.11 The UK Council for Child Internet Safety's advice note [Sharing nudes and semi- nudes: advice for education settings working with children and young people \(March 2024\)](#) contains details of support agencies and provides further information for schools on how to responding to incidents of sharing nudes and semi-nudes.

4.19.12 Advice for pupils is available at:

<http://www.thinkuknow.co.uk>

<https://www.childline.org.uk/explore/online-safety/pages/sexting.aspx>

4.19.13 Advice for parents is available at:

<http://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting/>

4.20 Upskirting

- 4.20.1 Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing parts of their genitals or buttocks (with or without underwear), to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.
- 4.20.2 Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.
- 4.20.3 The School will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under the School's child protection procedures.

4.20.4 All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to making or sharing sexual images / sexting.

4.21 Special educational needs and disabilities or physical health issues

4.21.1 The School welcomes pupils with special educational needs and disabilities and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the School's *Special Educational Needs and Disabilities (SEND) Policy*.

4.21.2 Additional barriers can exist when detecting the abuse, neglect or exploitation of pupils with a special educational need or disability creating additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that:

- a) assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's special educational need or disability without further exploration;
- b) pupils with a special educational need or disability or certain health conditions can be more prone to peer group pressure and isolation and can be disproportionately impacted by bullying (including prejudice-based and discriminatory bullying) without outwardly showing any signs;
- c) some pupils may be unable to understand the difference between fact and fiction in online content, including AI-generated content, and can repeat the content or behaviour in school without understanding the consequences; and
- d) there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

4.21.3 The School should provide extra pastoral support and attention for these pupils, along with ensuring any appropriate support for communication is in place.

4.22 Looked after children and previously looked after children

4.22.1 The Governors ensure that staff have the skills, knowledge and understanding to keep looked after children safe and that appropriate staff have the information they need in relation to a child's looked after legal status, for example:

- a) whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;
- b) contact arrangements with birth parents or those with parental responsibility;
- c) information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after them.

4.22.2 The DSL maintains these details, including contact details of the child's social worker.

4.23 Care Leavers

4.23.1 The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

4.24 Privately fostered children

- 4.24.1 Private fostering is when a child under 16 years old, or under 18 if disabled, is provided with care and accommodation in a person's own home for 28 days or more by someone who is not their parent, a person with parental responsibility or a relative.
- 4.24.2 The School will comply with its mandatory duty to inform the local authority of any private fostering arrangement and refer to the Fostering Recruitment and Assessment Team.

4.25 Children who are Lesbian, Gay, Bisexual or Gender Questioning

- 4.25.1 A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm. However, the School recognises that these pupils can be vulnerable to discriminatory bullying. A child perceived by others to be lesbian, gay or bisexual, whether or not they are, can be just as vulnerable as children who are.
- 4.25.2 Inclusion for all is taught as part of the PSHE and RSE curriculum.
- 4.25.3 All staff are aware of these vulnerabilities and the School endeavours to provide a safe space to speak out or share concerns.

4.26 Children who are questioning their gender

- 4.26.1 The School recognises that some children and young people may question their gender, including how they feel about the physical attributes of their sex and how they fit into society. The School also recognises that it is not uncommon for children, particularly at a younger age, to explore interests, behaviours or expressions that may not align with gender stereotypes, and that for many children this may be a temporary phase.
- 4.26.2 The School will take a supportive, child-centered approach, seeking to understand the child's views, wishes, and feelings, and exercising appropriate professional curiosity in relation to their wider circumstances. This includes being alert to any potential safeguarding considerations, such as:
- mental health or emotional wellbeing or needs
 - experiences of bullying (including discriminatory or prejudice-based bullying)
 - family, peer, or social pressures
 - any other vulnerabilities that may impact on the child's welfare
- 4.26.3 The School ensures it will remain a respectful environment in which all pupils feel safe and are able to express themselves. All forms of bullying, including bullying relating to gender, gender expression, or identity, are unacceptable and will be addressed promptly in accordance with the School's *Anti-Bullying Policy* and the *Policy for Good Discipline*.
- 4.26.4 The School will seek to maintain an environment that avoids unnecessary gender stereotyping and supports inclusion, while also ensuring that safeguarding, welfare, safety and fairness considerations are appropriately balanced.

4.27 Young Carers

- 4.27.1 The School recognises that caring responsibilities can impact on their attendance, attainment, behaviour, and wellbeing. Early identification is essential to ensure young carers receive support at the right time by the appropriate services including additional support from external partners or local authority and health services.

Appendix 2 Concerns About a Child - Guidance for Staff

1 Receiving a Disclosure

- 1.1 Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.
- 1.2 Do not ask leading questions, i.e. a question which suggests its own answer. Use 'tell me, explain to me, describe to me' (TED) questioning. It is particularly important not to continue questioning a pupil if they disclose something which suggests that a criminal offence may have been committed – the police will need to take the lead on investigating and continued questioning might compromise possible criminal proceedings.
- 1.3 Reassure the pupil they are being taken seriously and they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.
- 1.4 Do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken. This will involve professional judgement, but where doubts exist, the information must be passed on in accordance with this policy.
- 1.5 Keep a sufficient written record of the conversation completed at the earliest possible time (see 2 below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.
- 1.6 Pass on the record when reporting the concern in accordance with this policy.
- 1.7 Where a pupil makes a disclosure relating to a family member, parents should not be informed unless advised to do so by the safeguarding team at children's social care.

Remember that a victim may not make a direct report; a friend may make a report or a member of staff may overhear a conversation. In all cases, staff should act on concerns immediately rather than wait to be told.

2 Recording a Concern

- 2.1 Staff must record all concerns in writing as soon as possible after the disclosure.
- 2.2 Records should be factual and signed and dated, with the name of the signatory clearly printed in writing. Records should include:
 - 2.2.1 the pupil's details: name; date of birth; address and family details;
 - 2.2.2 date and time of the event / concern / conversation;
 - 2.2.3 a clear and comprehensive summary of the event / concern / conversation;
 - 2.2.4 details of how the concern was followed up and resolved;
 - 2.2.5 the action taken and by whom with reasons for the decision made and the outcome;
 - 2.2.6 the name and position of the person making the record.
- 2.3 The School uses MyConcern software to record concerns digitally, for which staff receive training. Paper copies can also be found in the staff room, from the DSL or downloaded from the School Portal. The record can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.

- 2.4 Where an allegation is made by an adult, the DSL will ask for a written and signed statement from that person and inform them that their evidence may be passed on to a third party. If, after due consideration, the DSL decides to pass the information on to an outside agency in accordance with this policy, the DSL will contact the disclosing party (unless advised otherwise by the agency) to inform them and that they should expect further contact from the agency.

3 Use of restrictive interventions including reasonable force

- 3.1 There are circumstances when it would be appropriate for staff to use restrictive interventions, including the use of reasonable force, seclusion and restraint, to safeguard pupils and others. All members of staff have a legal power to use reasonable force in certain circumstances. In every case, reasonable means using no more force than is necessary and for the least amount of time required to address the risk.
- 3.2 Staff should refer to the *School's Policy for Good Discipline* and the *Staff Code of Conduct* for more detailed guidance about the use of reasonable force.

Appendix 3 Procedures for Allegations of Child-on-Child Abuse

1 Child-on-Child Abuse

1.1 Children of any age can abuse other children and this can happen inside and / or outside school and / or online. This includes, but is not limited to:

1.1.1. bullying (including cyber-bullying and prejudice-based and discriminatory bullying);

1.1.2. abuse within intimate personal relationships between children (teenage relationship abuse);

1.1.3. physical abuse such as hitting, kicking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates and / or encourages physical abuse);

1.1.4. physical assault and harm, or the threat of harm with a weapon;

1.1.5. sexual violence such as rape, assault by penetration and sexual assault (including grabbing bottoms, breasts and genitalia under or over clothes, flicking bras, unwanted kisses or embraces) possibly with an online element which encourages sexual violence;

1.1.6. harmful sexual behaviour including, including misogyny, and sexual violence such as rape, assault by penetration and sexual assault (including grabbing bottoms, breasts and genitalia under or over clothes, flicking bra, unwanted kisses or embraces) possibly with an online element which encourages sexual violence;

1.1.7. sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

1.1.8. 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;

1.1.9. consensual and non-consensual sharing of nude and semi-nudes;

1.1.10. upskirting which typically involves taking a picture under a person's clothing without their permission, 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;

1.1.11. initiation / hazing type violence and rituals that could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may include an online element.

2 The School's approach to child-on-child abuse

2.1 Staff understand that, even if there are no reports of child-on-child abuse at the School, it does not mean it is not happening; it may be the case that it is just not being reported. Staff understand the importance of reporting any concerns (whether these concerns are thought to have taken place on or offsite) regarding child-on-child abuse to the DSL (or the DDSL in the DSL's absence).

2.2 Such behaviour is never accepted and should be considered as both a safeguarding issue and potentially a disciplinary one. The School will adopt a zero tolerance approach to abuse. Downplaying certain behaviours by, for example, dismissing sexual harassment as "banter", "having a laugh" or "part of growing up" can lead to a culture of unacceptable behaviours, misogyny, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward.

- 2.3 All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and the perpetrator. It is also recognised that such behaviour is preventable, and that early intervention is the key.
- 2.4 All staff should challenge inappropriate behaviour, including sexism and misogyny, between pupils and anyone who suffers, witnesses or hears of abuse of any form between pupils is asked to report it in accordance with this policy and / or the school's *Policy for Good Discipline* and the *Anti-Bullying Policy*, so that appropriate action can be taken.
- 2.5 Appropriate action will involve supporting all members of the School community who may be involved as a priority. This may require investigation by the School or other agencies. Until investigations have been undertaken and findings made, the School will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation. This should be undertaken whether or not the incident is alleged to have occurred at school, or when the pupil involved was under the School's care, as an issue which may impact pupil welfare. Disciplinary action will follow separately, if appropriate.
- 2.6 The School will ensure pupils impacted by child-on-child abuse are made aware of appropriate resources available to them.

3 Harmful Sexual Behaviour (HSB) and Sexual Violence and Sexual Harassment (SVSH)

- 3.1 Childrens' sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive, or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage. The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection and applies to behaviour occurring online, face to face, or both. HSB should always be considered within a child protection context.
- 3.2 The School adopts a whole-school approach to preventing harmful sexual behaviour, sexual violence and sexual harassment, underpinned by its safeguarding, behaviour, and pastoral systems. This includes:
 - 3.2.1 promoting a culture of kindness, respect and equality;
 - 3.2.2 identifying and addressing sexism, misogyny, homophobia and harmful stereotypes;
 - 3.2.3 ensuring staff model positive behaviour and challenge harmful attitudes appropriately, including challenging ideas without stigmatising individuals.
- 3.3 Where the misconduct may constitute HSB, sexual violence (rape, assault by penetration, sexual assault or causing someone to engage in sexual activity without consent) or sexual harassment (unwanted conduct of a sexual nature), it should be reported to the DSL and will be managed in accordance with this policy. SVSH is never acceptable.
- 3.4 Whilst any report of HSB, sexual violence or sexual harassment should be taken seriously, staff are aware that it is more likely that girls will be the victims of SVSH and more likely it will be perpetrated by boys.
- 3.5 The School recognises that LGBTQ+ and SEND pupils may be at greater risk of sexual violence or sexual harassment.
- 3.6 SVSH can occur between two or more children of any age or sex from primary to secondary stage both inside and outside of school. It can also occur online. It can also occur through a group of

children towards a single child or towards another group of children. HSB exists on a continuum and may escalate into sexual harassment or sexual violence. Addressing inappropriate behaviour, including sexism and misogyny, (even where it seems to be relatively innocuous) can be an important intervention which helps to prevent problematic or abusive behaviour in the future by setting and enforcing clear expectations of behaviour, supporting victims and encouraging them and others to speak out and facilitating targeted support for those demonstrating HSB. The School also recognises the escalatory nature of misogyny and the benefits of early intervention to support its approach to minimising the risk of HSB, sexual harassment and sexual violence.

- 3.7 The 2021 Ofsted report concluded that whether or not schools are aware of reported instances of SVSH in their community, it is likely to be occurring. The School acknowledges this and that children are likely to report such matters, if at all, to people they trust. All staff are therefore trained to identify signs of abuse and on how to respond to a report.

4 Management of allegations of child-on-child SVSH

4.1 The initial report

- 4.1.1 The School recognises that it is not easy for children to tell staff about abuse and that instead, they may show signs or behave in ways that signal distress. Staff are trained in signs of abuse and required to look out for them and act upon them, and to respond to all reports of abuse however they are reported and whether they are made by victims directly or by third parties.
- 4.1.2 The School acknowledges that the initial response is incredibly important and may impact not just the management of that issue, but others of HSB and SVSH. Staff are also trained in how to receive a report. Where possible they should be accompanied by the DSL or other member of staff.
- 4.1.3 They should:
- a) listen carefully and respectfully, reassuring the person making the report that they are being taken seriously and offer support without promising confidentiality or making a judgement about its veracity;
 - b) where possible they should ask open questions about whether pupil(s) have been harmed, the nature of the harm or if they may be at risk of harm;
 - c) where there is an online element, consider the searching, screening and / or confiscation of devices and the UKCIS *Sharing nudes and semi-nudes: advice for education settings working with children and young people*. The key consideration is for staff not to view or forward illegal images of a child;
 - d) explain the next steps and how the report will be progressed;
 - e) make a written record of the report (recording the facts as the child has presented them);
 - f) inform the DSL (or deputy) as soon as practically possible if they are not involved in the initial report and then only share the report with those necessary in order to progress it.

4.2 DSL's considerations

- 4.2.1 Reports of HSB and SVSH are often complex and require difficult professional decisions to be made. Further disclosures may follow and the facts may be difficult to establish. These decisions are made on a case by case basis taking all of the circumstances into account, in the best interest of the pupils involved. The School's response is led by the DSL who will always have regard to Part 5 of KCSIE in the management of the issue.

4.3 School's considerations

4.3.1 The School will consider:

- a) the victim's wishes in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions made about investigation and support, but their wishes will not always be determinative as the School may have to take action to protect other children;
- b) the nature of the alleged incident (including whether it was a one-off or sustained pattern), whether a crime may have been committed and whether harmful sexual behaviour has been displayed;
- c) the ages and developmental stages of the children involved and any imbalance between them such as differences in age, maturity or social status;
- d) whether the alleged incident was isolated or part of a sustained pattern of abuse;
- e) any intrafamilial harm and support for siblings if needed;
- f) if there is an intimate personal relationship between the children;
- g) whether there are any ongoing risks to those involved;
- h) the time and location of the incident and any action required to make the location safer; and
- i) the wider context including any links to CSE or CCE.

4.3.2 Before deciding how best to support and protect those involved, this will involve:

- a) carrying out immediate risk and needs assessments; these will be undertaken in cases of sexual violence and considered otherwise. Where appropriate, they will be discussed with those involved and their parents. This may involve exclusion pending investigation. Risk and needs assessments will be recorded, used to inform ongoing safeguarding decisions, and kept under review in the knowledge that police investigation and criminal proceedings can take several months to conclude.
- b) Considering what, if any, further action is appropriate such as involvement of police and / or other agencies. The School will make a proportionate response to these matters in light of the circumstances and the factors identified above.

4.3.3 The School will do all it reasonably can to protect the anonymity of children involved in sexual violence or sexual harassment. Amongst other things this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

5 Investigations and findings

- 5.1 The School will record the findings of investigations undertaken by the police and / or the CPS, and if the police decide not to take any further action, will consider whether investigation should be undertaken or commissioned by the School to enable it to determine whether or not it is likely that the allegations are substantiated, unsubstantiated, unfounded, false or malicious. There may be circumstances when this is not appropriate, as it may prejudice a possible future investigation, for example if a victim does not currently wish to make a victim statement. In those circumstances the School should consider whether a limited investigation is appropriate. The concerns, discussions, decisions and reasons for these should be recorded.
- 5.2 The School should continue to support those involved with reference to the range of support options set out in Part 5 of KCSIE and should also consider whether further referral and / or disciplinary action may be appropriate against either the perpetrator where concerns are substantiated and / or harmful sexual behaviours identified, or the victim where concerns were found to be deliberately invented or malicious.

Appendix 4 Raising allegations and low level concerns

1 Key contact information

- 1.1 Below is the key contact information you may need to raise an allegation or low level concern under this policy.

DSL	Mr J Rist Tel: 01223 803995 or 01223 365814 ext. 260 Email: safeguarding@kcs.cambs.sch.uk
Head	Mrs Yvette Day Tel: 01223 365814 Email: head@kcs.cambs.sch.uk
Chair of Governors	Rev Dr Stephen Cherry Tel: 01223 331419 Email: Stephen.cherry@kings.cam.ac.uk
Nominated Safeguarding Governor	Mr Stuart Thackrah Email: cp-governor@kcs.cambs.sch.uk
LADO	01223 727 967 LADO@cambridgeshire.gov.uk

2 Purpose and application

- 2.1 The School takes safeguarding extremely seriously. It is of paramount importance that we maintain an open and transparent culture in which all concerns about adults are shared promptly, responsibly, and with the right person. We recognise the importance of ensuring adults who work with, or otherwise come into contact with children, do so in a way that is consistent with our values, culture and expected standards of behaviour. We also recognise that concerns may arise in several ways and from a number of sources. The purpose of this policy is to provide a framework for all concerns to be raised, recorded and dealt with effectively by the School.
- 2.2 **Application:** this policy applies to all adults working in or on behalf of the School (whether on a paid or unpaid basis), including governors, supply staff, trainee teachers, volunteers and contractors (Staff).
- 2.3 **Other adults:** although this policy directly relates to those who work for the School, the School recognises that its safeguarding role extends to the protection of everyone associated with it, including adults who do not work for the School. Should concerns be raised about people who are not Staff or pupils, then they should be reported to the Head or DSL who will take appropriate action and co-operate with the relevant agencies as appropriate.
- 2.4 **Statutory guidance:** this policy has regard to the following statutory guidance:
- 2.4.1 *Keeping children safe in education* (September 2026) (**KCSIE**). Part Four of KCSIE deals with allegations made and concerns raised about staff, supply staff, trainee teachers, volunteers

and contractors (**Staff**), who are all adults working for, or on behalf of, the School. It distinguishes between two categories of concerns / allegations that can be raised about Staff. These are:

- (a) concerns that do not meet the harm threshold, otherwise known as 'low level concerns'; and
- (b) allegations that may meet the harm threshold

2.4.2 *Working together to safeguard children* (2026) (**WTSC**), which requires policies to be put in place setting out the process, including timescales for investigation and what support and advice will be available to individuals against whom allegations have been made. WTSC requires schools to have regard to KCSIE in order to fulfil their duties in respect of safeguarding and promoting the welfare of children.

3 Key Staff duties

- 3.1 **Staff behaviour:** all Staff must comply with the School's *Staff Code of Conduct* which sets out appropriate and expected standards of behaviour.
- 3.2 **Duty to report:** as a member of Staff, you must immediately follow this policy to report any concerns you have about the conduct of a member of Staff or any other adult (which could include adults not employed by the School). This includes any concern however it arises, for example behaviour you have witnessed, a concern raised with you by a colleague, pupil, parent or other adult, or as result of checks or information brought to your attention.
- 3.3 **Duty to self-refer:** you must refer yourself to the Head where, for example, you have found yourself in a situation which could be misinterpreted, which might appear compromising to others, and / or on reflection if you believe you have behaved in such a way that may fall below the standards expected of you.
- 3.4 **A culture of sharing:** all Staff have a positive obligation to support the School's culture of openness and sharing without fear of reprisal.

4 What needs to be reported?

- 4.1 **Reporting all concerns:** all concerns must be raised whether they are considered to be 'low level' concerns or conduct which may meet the harm threshold.
- 4.2 **Low level concerns:** a low level concern is any concern, no matter how small, and even if no more than a sense of unease or a 'nagging doubt', that a member of Staff may have acted in a way that is inconsistent with expected professional standards and / or the *Staff Code of Conduct*, whether inside or outside work. No concern is too small or minor to raise under this policy.
- 4.3 **Concerns that meet the harm threshold:** allegations that may meet the harm threshold are those that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children for example where the individual has:
 - 4.3.1 behaved in a way that has harmed a child, or may have harmed a child; and / or
 - 4.3.2 possibly committed a criminal offence against or related to a child; and / or
 - 4.3.3 behaved towards a child or children in a way that indicated he or she would pose a risk of harm to children; and / or
 - 4.3.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside the School which creates a transferable risk.

4.4 Definition of Harm: it is important to understand the types of conduct that may be harmful to children, and to recognise that harm may not be limited to the most obvious types of physical abuse. There is no single definition of harm but to assist your understanding of what may amount to 'harm' you should consider the following:

4.4.1 the Safeguarding Vulnerable Groups Act 2006 which does not give a definition of harm, encouraging people to apply a 'normal, everyday meaning';

4.4.2 the Children Act 1989 defines:

- (a) 'harm' as 'ill-treatment of the impairment of health or development (including, for example, impairment suffered from seeing or hearing the ill-treatment of another)';
- (b) 'ill-treatment' as including 'sexual abuse and forms of ill-treatment which are not physical';
- (c) 'health' as 'physical or mental health'

5 How to raise concerns and allegations

5.1 **Raising low level concerns and allegations:** where you have a low level concern in respect of any member of Staff, you must report the matter immediately. You can raise this with the DSL.

5.2 **Duty of the DSL to refer concerns to the Head:** the Head remains the ultimate decision-maker in respect of all low level concerns. Save for in cases involving the Head, the DSL must therefore promptly report any concern raised with them to the Head. Wherever possible, the DSL must speak to the Head in person about the concern as soon as possible after the concern is raised, and always on the same day the concern is raised. If it is not possible to speak to the Head in person about the concern, the DSL must email the Head with a summary of the concern on the same day the concern is raised.

5.3 **Concerns about Staff:** where you have a concern about the conduct of a member of Staff (other than the Head) that may meet the harm threshold you must raise this immediately with the Head.

5.4 **Concerns involving the Head:** where you identify a concern about the Head, you must report the matter immediately to the Chair of Governors without first notifying the Head.

5.5 **Conflicts of interest:** where there is a conflict of interest in raising the concern with the Head (e.g. concerns raised in connection with an individual who is related to or personally connected with the Head) you must report the concern directly to the Local Authority Designated Officer (LADO) without first notifying the Head. Details of the LADO can be found in the key contacts section of this policy.

5.6 **Concerns involving Governors:** where you identify a concern about a Governor, you must report the matter immediately to the Chair of Governors or the Nominated Safeguarding Governor. If either the Chair of Governors or the Nominated Safeguarding Governor is the subject of an allegation, you must report the matter to the other.

5.7 **Concerns involving individuals / organisations using School premises:** the School will follow its own safeguarding policies and procedures, including informing the LADO, where it receives an allegation relating to an incident that happened when an individual or third-party organisation was using the premises for the purposes of running activities for children (e.g. community groups, sports associations, or service providers that run extra-curricular activities).

5.8 **Reports to the DSL:** If it is not possible for you to make a report to the Head or Chair of Governors or Nominated Safeguarding Governor, you must instead immediately make a report to the DSL. The

DSL will take action in accordance with these procedures and will as soon as possible inform the Head or, where appropriate, the Chair of Governors and the Nominated Safeguarding Governor.

6 The School's response to concerns and allegations

- 6.1 Appropriate action:** the School will ensure that appropriate action is taken to address concerns that are raised under this policy.
- 6.2 Assessing concerns:** the Head (or, if the concern relates to the Head, the Chair of Governors or Nominated Safeguarding Governor) will determine whether the concerns raised are low level or potentially meet the harm threshold. The DSL, the Head, the Chair of Governors and the Nominated Safeguarding Governor have all been trained to assess concerns, and to record and address them appropriately.
- 6.3 Low level concerns:** if the School determines the concern is a low level concern, then the School will address the concern as appropriate. This will usually involve making the individual aware of the concern against them, undertaking any investigation that may be required and may include giving management guidance and advice or invoking the School's capability or disciplinary procedures.
- 6.4 Borderline cases:** the Head (or, if the concern relates to the Head, the Chair of Governors or the Nominated Safeguarding Governor) may take advice from the LADO in borderline cases in order to establish whether the concern is a low level concern or an allegation that potentially meets the harm threshold. This may include conducting an initial 'no names' conversation with the LADO about whether the harm threshold is met.
- 6.5 Referral:** where the Head (or, if the concern relates to the Head, the Chair of Governors) considers the concerns raised to potentially meet the harm threshold, the Head (or, if the concern relates to the Head, the Chair of Governors) will make a report to the LADO before further action is taken. The Head (or, if the concern relates to the Head, the Chair of Governors) may also seek advice from the LADO as appropriate. Where a LADO referral is appropriate, this will be made within one working day of the allegation being reported in accordance with this policy.
- 6.6 Responding to an allegation that may meet the harm threshold:** where an allegation is made that may meet the harm threshold, the School will take advice from and cooperate with the LADO, the police, and any other external body that may be involved in the response to the allegation. The School will follow its internal procedures in order to investigate and respond to the allegation when it is appropriate to do so and will keep the LADO informed of the action it is taking.
- 6.7 Case Manager:** where an investigation is deemed necessary into an allegation of conduct that may meet the harm threshold, a 'case manager' will be appointed by the School to lead the investigation. The Case Manager will be either the Head or a person with appropriate authority appointed by the Head. Where the Head is the subject of an allegation, the Case Manager will usually be either the Chair of Governors or the Nominated Safeguarding Governor.

7 Disclosure of information about concerns and allegations

- 7.1 Informing the individual of a concern:** the School will in most cases inform the individual concerned about any low level concern that is raised about them.
- 7.2 Informing the individual of an allegation where appropriate:** the Case Manager will consult with the LADO in order to agree if and when it is appropriate to inform the individual of the allegation.

- 7.3 **Communication and support for the individual subject to an allegation:** if and when it is appropriate to inform the individual of the allegation against them, the Case Manager will also offer appropriate pastoral support and will keep the individual informed of the timescales for the investigation under this procedure and the factors which may affect it. In all cases, the investigation will be concluded as soon as reasonably practicable.
- 7.4 **Informing the child's parents / carers where appropriate:** the Case Manager will agree with the LADO when and how the parents or carers of the child / children involved will be informed of the allegation if they do not already know of it. The Case Manager will also agree with the LADO what information shall be shared with the parents / carer of the child / children as the case progresses. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.
- 7.5 **Reporting restrictions:** the School is mindful of and will comply with the reporting restrictions under section 141 Education Act 2002 which prevent the identification of a teacher who is the subject of such an allegation in certain circumstances.
- 7.6 **Involvement of external agencies:** where the LADO advises that a strategy discussion is needed, or the police or children's social care need to be involved, the Case Manager will not inform the individual subject to the allegation, or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.
- 7.7 **Concerns about supply staff, trainee teachers and contractors:** where a concern / allegation has been made in respect of a member of supply staff, a trainee teacher placed within the School or a contractor, the School recognises that it shares safeguarding responsibility with the relevant employing agency, teacher training provider or contracting organisation. The concern / allegation will be notified to an individual's employer or the teacher training provider, and the School will work with them to ensure that any investigation and safeguarding response is appropriately coordinated. Where a Case Manager has been appointed to investigate an allegation, the Case Manager will consult with the LADO before sharing any information with the individual's employer.

8 Early Years Foundation Stage (EYFS)

- 8.1 **Report to Ofsted:** the School will inform Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children on the premises of the EYFS provision (whether that allegation relates to harm or abuse committed on the premises or elsewhere), and will provide details of the action taken in respect of those allegations.
- 8.2 **Timescale for Ofsted report:** these notifications will be made as soon as reasonably practicable, but in any event within 14 days of the allegations being made. A registered provider who, without reasonable excuse, fails to comply with this requirement, commits an offence.
- 8.3 The School will also notify Ofsted if any significant event which is likely to affect its suitability to look after children or the suitability of any person who case for or is in regular contact with children on the premises. The School will notify Ofsted of such events as soon as is reasonably practicable, but in any event within 14 days of the event.

9 Referrals to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency

- 9.1 **Report to the DBS:** the School is under a legal duty to make a referral to the DBS where:
- 9.1.1 an individual has applied for a position at the School despite being barred from working with children; and / or

9.1.2 an individual (including a volunteer) has been removed by the School from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, or in the case of a volunteer has ceased to volunteer at the School in circumstances where they would otherwise have been removed, because they have:

- (a) satisfied the harm test (as defined in section 35 of the Safeguarding Vulnerable Groups Act 2006);
- (b) committed relevant conduct (as defined in Schedule 3 to the Safeguarding Vulnerable Groups Act 2006); or
- (c) been cautioned for, or convicted of, a relevant offence (as defined in paragraphs 1 and 2 of Schedule 1 to the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Relevant Offences) Regulations 2009).

9.2 **Report to the Teaching Regulation Agency (TRA):** the School is under a duty to consider whether it is appropriate to make a referral to the TRA where it has ceased to use the services of a teacher because the teacher has been guilty of serious misconduct (or might have ceased to use the services of a teacher had the teacher not ceased to provide those services). The School may also, at its discretion, make a referral to the TRA where the duty to consider doing so has not yet arisen. The TRA will consider whether to impose a prohibition order on that person which prevents them from undertaking teaching work in the future.

10 Recordkeeping

- 10.1 **Records of low level concerns:** low level concerns will be recorded in writing. The record of the concern will be retained so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed. Records of low level concerns that have been addressed with an individual will usually be kept on the individual's personnel file. In addition, all low level concerns, including those that have not been addressed formally under the School's procedures, will also be stored securely in a central file.
- 10.2 **Recording low level concerns:** the Concerns and Allegations Record will set out the name of the individual involved (if an individual is named), a brief description of the concern and the context in which it arose, any investigation that has been carried out, and the outcome / result of the investigation into the concern. The name of the individual who has raised the concern should also be noted. Where that individual wishes to remain anonymous, the School will try to accommodate this as far as reasonably practicable but cannot guarantee anonymity in all circumstances.
- 10.3 **Records of allegations that may meet the harm threshold:** details of allegations that may meet the harm threshold will be recorded both on the individual's personnel file and the Concern and Allegation Record. The individual's personnel file and the Concerns and Allegations Record will include a summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken in response to the allegation.
- 10.4 **Storage and security of Concerns and Allegations Record:** the Concerns and Allegations Record will be stored in the Head's Office and will be accessible by the Head, the Chair of Governors, the DSL, and the Nominated Safeguarding Governor only.
- 10.5 **Malicious or false low level concerns and allegations:** details of low level concerns and allegations found to be malicious or false will be removed from personnel records and the Concerns and Allegations Record.
- 10.6 **Retention of records:** Information stored on staff personnel files about low level concerns and allegations that may meet the harm threshold, and the Concerns and Allegations Record, will be retained by the School indefinitely. The School may in future be required to produce the information

if it is notified of an allegation of historic abuse relating to a current or former member of staff, if a former member of staff is accused of committing safeguarding offences elsewhere or if a former member of staff is the subject of safeguarding allegations arising elsewhere.

11 References

- 11.1 **Low level concerns:** low level concerns will not be disclosed in a reference unless they were address formally and resulted in a sanction under the School's disciplinary or capability policies and procedures and it is otherwise appropriate to disclose them.
- 11.2 **Allegations that meet the harm threshold:** allegations that meet the harm threshold will be disclosed in a reference if the allegation was found to be substantiated (including any cases in which any disciplinary sanction has expired). The School will not disclose information about allegations that were found to be false, unfounded, unsubstantiated, or malicious.

12 Questions

- 12.1 Please contact the DSL if you have any questions about this policy.

Appendix 5 – Charity Safeguarding Procedures

1 Charity Safeguarding Duties

1.1. As trustees of a charity, the trustees as the Board of Governors, acknowledge in addition to their statutory duties to safeguard and protect children and adults at risk, they have a duty to take reasonable steps to protect everyone involved with or who come into contact with the charity through its work from harm, abuse or mistreatment whether working online or in person.

1.2. This protection of the people involved in the charity is central to its culture. The full extent of these additional safeguarding duties is set out in the Charity Commission guidance: *Safeguarding and Protecting People for Charities and Trustees*. This guidance lists risks to be aware of, including discrimination, health and safety, cyber abuse and data breaches.

1.3. The contents of the School's safeguarding and data protection policies, the Staff Handbook and the School's health and safety procedures set out how many concerns about these issues will be handled. If anyone has any safeguarding concerns which have caused or may cause harm to anyone associated with the charity which are not expressly covered by those or other School policies, they should contact the DSL without delay.

1.4. The trustees fulfil these duties by:

1.4.1 leading by example and promoting a fair, inclusive and positive culture, ensuring that everyone involved with the charity feels able to report any concerns they may have, confident that they will be heard and responded to;

1.4.2 setting and regularly (at least annually) reviewing the suitability of policies and procedures as a Board to ensure they remain fit for purpose and that they are followed in practice;

1.4.3 establishing appropriate delegation arrangements for the effective governance and management of safeguarding matters within the charity;

1.4.4 exercising proper oversight of the management of individual safeguarding matters and a review of the performance of the charity's safeguarding function, including consultation with stakeholders and appropriate trend analysis;

1.4.5 being quick to respond to concerns, to carry out appropriate investigations and take necessary action;

1.4.6 being open and transparent and not ignoring harm or downplaying failures;

1.4.7 managing conflicts of interest and / or loyalty;

1.4.8 ensuring that staff receive training in safeguarding at a level which is commensurate with their role;

1.4.9 ensuring that clear processes are in place relating to checks required where there are changes to the School structure or individual roles;

1.4.10 having clear recruitment and contracting processes and ensuring that proper due diligence is undertaken on the suitability of:

(a) staff (there may be differing processes for international staff)

(b) partner organisations

(c) contractors

(d) beneficiaries

1.4.11. entering into appropriate agreements with other third parties (whether those who provide services to the Charity or directly to its beneficiaries (including pupils)) covering the relationship, their respective roles and monitoring and reporting requirements;

1.4.12. review its premises and security arrangements and arrangements for third party use to ensure appropriate measures are in place to keep people safe;

1.4.13. reviewing any grant-making undertaken to ensure appropriate policies and procedures are in place;

1.4.14. implementing suitable reporting and monitoring processes are in place for any work overseas;

1.4.15. exercising proper oversight of the Charity's online operations, adequately managing risk and ensuring that online services are suitable for users;

1.4.16. set out risks and how it will manage them in a risk register;

1.4.17. allocating sufficient resources (whether financial, staff, training or other resources) for the effective management of safeguarding and arranging appropriate insurance cover;

1.4.18. Ensuring a sufficient level of oversight of the charity's operations to manage risk and reporting any incidents which materially affect the charity's operations, finances, people or reputation to the Charity Commission in line with How to report a serious incident in your charity (Charity Commission, January 2026);

1.4.19 having procedures for handling concerns in a full and open manner;

1.4.20 having a clear system for referring or reporting to relevant agencies as soon as concerns are suspected or identified;

1.4.21 following safeguarding statutory guidance, good practice guidance and legislation applicable to independent schools and EYFS / any other relevant regime, which this policy is designed to secure;

1.4.22 having a balanced trustee board which works together in accordance with the School's trustee Code of Conduct without any one or more trustees dominating its work.