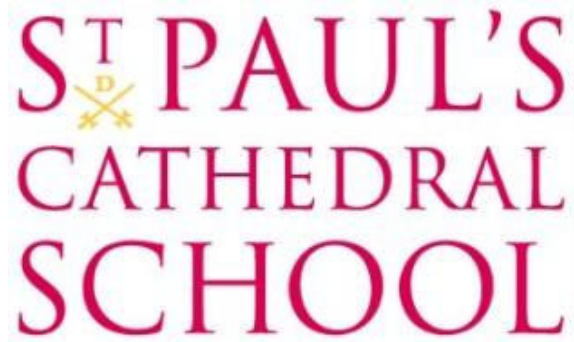




Safeguarding (Child Protection)

Policy and Procedures

Academic Year 2026-2027

Aims and Principles

St Paul's Cathedral School is a Christian, co-educational community which holds to the values of love, justice, tolerance, respect, honesty, service and trust in its life and practice, to promote positive relationships throughout the school community and where the safety, welfare and emotional wellbeing of each child is of the utmost importance.

The school aims to instil a love of learning through a broad curriculum. It aims to give each pupil the opportunity to develop intellectually, socially, personally, physically, culturally and spiritually. All pupils are encouraged to work to the best of their ability and to achieve standards of excellence in all of their endeavours.

Through the corporate life of the school, and through good pastoral care, the school encourages the independence of the individual as well as mutual responsibility. It aims to make its pupils aware of the wider community, espouses the democratic process and encourages a close working relationship with parents and guardians.

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Four categories of abuse

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- Emotional abuse
- Sexual abuse
- Neglect

Indicators of abuse

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Record of Concern form

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Low-Level Concern Form

I. Policy statement and principles

This is the safeguarding (child protection) policy and procedures of St Paul's Cathedral School (school) This policy applies to all sections of the school including boarding and EYFS and applies at all times including where pupils or staff are away from school, whether they are on school-arranged activities or otherwise, and whether or not the school is open. It will therefore apply outside school hours and in the holidays

This policy should be read in conjunction with a series of policies in the school's integrated safeguarding portfolio:

- Anti-bullying policy
- Educational Visits Policy
- Acceptable Use of ICT Policy (Pupils)
- Acceptable Use of ICT Policy (Staff)
- Online Safety Policy
- Staff code of conduct and Whistleblowing Policy
- Recruitment, Selection and Disclosure Policy
- St Paul's Cathedral Safeguarding Policy
- RSE Policy
- Missing Pupil Policy
- EYFS Policy on the use of cameras, mobile phones and electronic devices
- First Aid Policy
- Learning Support Policy
- Health and Safety Policy
- Data Protection and Privacy Policy
- Safe Restraint Policy
- Complaints Policy
- Attendance Policy
- AI Policy
- Behaviour Policy including Use of Reasonable Force, Search and Confiscation Policies, and Mobile Phone and Devices.
- Supervision Policy

This policy is available on the school website and is available in hard copy on request. The policy can be made available in large print or another accessible format if required. All staff are required to read and confirm they have read the updated policy at least annually.

Our core safeguarding principles are:

- Safeguarding is everyone's responsibility
- The school's responsibility to safeguard and promote the welfare of children is of paramount importance
- Safer children make more successful learners
- Policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.

1.1 Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse, neglect and exploitation and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff, volunteers and Governors and are consistent with those established by the City and Hackney Safeguarding Children's Partnership (CHSCP) as set out in the City of London Threshold of Needs Document [The City of London Corporation Thresholds of Need](#)

1.1.1 Policy principles

- The welfare of the child is paramount.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection and should feel safe and protected from any form of abuse, neglect and exploitation.
- All staff have an equal responsibility to understand the indicators of abuse, neglect and exploitation and understand specific safeguarding risks so they can identify them, act on and report any concern, suspicion or disclosure that may suggest a child is at risk of harm.
- All staff will reassure children that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.
- Pupils and staff involved in child protection issues will receive appropriate support, including anyone about whom a concern is raised where the matter will be handled sensitively, and appropriate action will be taken.
- Members of the school community (to include alumni) should feel able to raise 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.
- 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 underpin and are at the heart of all decisions, systems, processes and policies.

1.1.2 Policy aims

- To actively promote the wellbeing of pupils.
- To safeguard and promote the welfare of children, staff and others who come into contact with the school and to protect them from harm.

- To have clear procedures in place for dealing with and referring concerns about the welfare of any individual and / or allegations of abuse, neglect and / or exploitation.
- To raise awareness about how to report concerns and how they will be investigated, whether they are current or historic in nature.
- To provide all staff with the necessary information to enable them to meet their child protection responsibilities.
- To ensure consistent good safeguarding practice throughout the school, to include the promotion of a zero-tolerance approach to child-on-child sexual violence and harassment in which pupils are confident to report it and staff are confident to identify and respond to it.
- To demonstrate the school's commitment regarding child protection to pupils, parents and other partners.
- To promote a whole school culture of safety, equality and protection.

1.2 Terminology

Child includes everyone under the age of 18.

Child protection refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

DSL refers to the designated safeguarding lead at the school. References to the DSL include the Deputy DSL (DDSL) where the DSL is unavailable.

Family Help: The school aims to identify needs early and provide support through Family Help, which encompasses community-based early help and targeted early help, before statutory intervention is required.

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

Proprietor: The Chapter of St Paul's Cathedral, as the legal proprietor of St Paul's Cathedral School. References in statutory guidance to the "proprietor" should be understood accordingly.

Safeguarding and promoting the welfare of children refers to the process of providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care; promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children and taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Staff: All individuals working for or on behalf of the School in any capacity, whether paid or unpaid, permanent or temporary, full-time or part-time, and whether or not they work

directly with children. This includes employees, supply and agency staff, trainee teachers, contractors, volunteers and self-employed persons. References to “staff” in this policy include all such individuals unless the context clearly requires a distinction.

2. Safeguarding legislation and guidance

The School has regard to the following legislation, statutory guidance and non-statutory advice, together with any subsequent amendments or revisions. This list is not exhaustive.

2.1 Statutory guidance and relevant government advice

Listed in reverse chronological order by the latest substantive publication or revision date:

- **Modern slavery: how to identify and support victims** – statutory guidance for England and Wales under section 49 of the Modern Slavery Act 2015 (Home Office, updated 27 August 2026)
- **EYFS statutory framework for group and school-based providers** (DfE, Effective from 1 September 2026)
- **Working together to improve school attendance** (DfE, updated 9 July 2026)
- **Keeping children safe in education 2026** (DfE, Effective from 1 September 2026)
- **Allergy safety in schools** (DfE, published 6 July 2026)
- **National minimum standards for boarding schools** (DfE, updated 18 May 2026)
- **Working together to safeguard children 2026** (DfE, published 18 March 2026)
- **Restrictive interventions, including the use of reasonable force, in schools** (DfE, Effective from 1 April 2026)
- **Channel duty guidance: protecting people susceptible to radicalisation** (Home Office, updated 14 October 2025)
- **Children missing education: statutory guidance for local authorities and schools** (DfE, updated 8 September 2025)
- **Relationships Education, Relationships and Sex Education and Health Education** (DfE, Effective from 1 September 2026)
- **Information sharing: advice for practitioners providing safeguarding services** (DfE, updated 1 May 2024)
- **Sharing nudes and semi-nudes: advice for education settings working with children and young people** (UK Council for Internet Safety, updated 11 March 2024)
- **PACE Code C 2023** (Home Office, Effective from 20 December 2023)
- **Prevent duty guidance: England and Wales** (Home Office, Effective from 31 December 2023)
- **Teachers’ Standards** (DfE, updated 13 December 2021)

- **Multi-agency statutory guidance on female genital mutilation** (HM Government, updated 30 July 2020)
- **Disqualification under the Childcare Act 2006** (DfE, updated 31 August 2018)
- **Supporting pupils at school with medical conditions** (DfE, updated 16 August 2017)

2.2 Local and regional safeguarding arrangements

The School follows the current online versions of:

- **London Safeguarding Children Procedures and Practice Guidance** (London Safeguarding Children Partnership; substantially updated March 2026 and amended as required)
- **City and Hackney Safeguarding Children Partnership safeguarding arrangements**
- **City of London Threshold of Needs document and local referral procedures**

2.3 Principal legislation

Listed in reverse chronological order by enactment:

- Children's Wellbeing and Schools Act 2026
- Crime and Policing Act 2026
- Data (Use and Access) Act 2025, read alongside the Data Protection Act 2018 and the UK General Data Protection Regulation
- Online Safety Act 2023
- Domestic Abuse Act 2021
- Children and Social Work Act 2017
- Modern Slavery Act 2015
- Counter-Terrorism and Security Act 2015
- Education (Independent School Standards) Regulations 2014, as amended
- Children and Families Act 2014
- Equality Act 2010
- Safeguarding Vulnerable Groups Act 2006, as amended
- Childcare Act 2006
- Children Act 2004
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003
- Education Act 2002
- Human Rights Act 1998

- Children Act 1989

3. Roles and responsibilities

Safeguarding Contact Information

Head	James Featherstone Head@spcs.london.sch.uk 020 7248 5156, Mobile: 07394 805361
Designated Safeguarding Lead (DSL)	Catherine Thomas (Senior Deputy Head) cthomas@spcs.london.sch.uk 020 7651 0283, Mobile: 07394 805362
Deputy Designated Safeguarding Lead (DDSL) (Boarding Focus)	Joe Gorman (Head of Boarding) jgorman@spcs.london.sch.uk 020 7651 0291. Mobile: 07394 805364
Deputy Designated Safeguarding Lead (DDSL) (with responsibility for the EYFS)	Kim Thomas (Head of Pre-Prep) Kthomas@spcs.london.sch.uk Mobile: 07394 805365
Deputy Designated Safeguarding Lead (DDSL)	Chloe Shaw (SENCO) cshaw@spcs.london.sch.uk
Governor with Safeguarding Responsibility	Paula Jefferson pjefferson@spcs.london.sch.uk
Chair of Governors	Canon Dr Paula Gooder chair@spcs.london.sch.uk
Local Authority Designated Officer (LADO) and City of London's Local Authority Designated Officer	Laura Demetriades laura.demetriades@cityoflondon.gov.uk 020 7332 1215
Prevent and Channel Officer	Claire Doyle Claire.Doyle@cityoflondon.gov.uk prevent@cityoflondon.gov.uk 020 7601 2442
City and Hackney Safeguarding Children Partnership (CHSCP)	City of London: 020 7332 3621 Hackney: 020 8356 5500 CHSCP Independent Child Safeguarding Commissioner: Jim Gamble
City of London Children and Families Team (Social Care)	children.duty@cityoflondon.gov.uk 0207332 3621/020 8356 2710 (out of hours emergencies)
DfE Counter-extremism hotline	counter.extremism@education.gov.uk 020 7340 7264

NSPCC Whistleblowing Advice Line	help@NSPCC.org.uk 0800 028 0285
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3.1 The Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) is a senior member of the School's leadership team and takes lead responsibility for safeguarding and child protection, including online safety and understanding the School's filtering and monitoring systems. The DSL has the status, authority, time, funding, training, resources and support required to carry out the role effectively.

The full responsibilities of the DSL are set out in the DSL's job description, which reflects Annex B of the current edition of *Keeping Children Safe in Education* (KCSIE). In particular, the DSL will:

- act as a source of safeguarding support, advice and expertise for staff, and promote a culture in which children are listened to and their wishes and feelings are considered;
- manage or support referrals to local authority children's social care, the Police, the Channel programme and the Disclosure and Barring Service, as required, and participate in strategy discussions, inter-agency meetings and assessments;
- act as a point of contact with the safeguarding partners and liaise with the Head about ongoing section 47 enquiries and Police investigations, including the requirement for a child to have an Appropriate Adult where applicable;
- liaise, as required, with the case manager and Local Authority Designated Officer (LADO) in relation to concerns or allegations about adults working with children;
- work with relevant staff, including the SENCO, pastoral and mental-health leads, IT staff, boarding staff and Cathedral staff responsible for Choristers and Probationers, so that children's safeguarding, welfare and educational needs are considered holistically;
- promote constructive engagement with parents and carers, unless doing so would place a child at increased risk, and help promote the educational outcomes of children who have or have had a social worker;
- ensure staff have access to and understand the School's safeguarding policies and local safeguarding arrangements, and are made aware of relevant training and updates;
- ensure child-protection records are clear, accurate, confidential, securely stored and accessible only on a need-to-know basis, and that child-protection files are transferred in accordance with the School's file-transfer procedure; and
- report to the Governing Body at least annually on the effectiveness of the School's safeguarding arrangements, while maintaining appropriate confidentiality.

The DSL and any deputies will undertake appropriate DSL training, updated at least every two years, including Prevent awareness training. Their knowledge and skills will also be refreshed as required and at least annually.

3.2 Deputy Designated Safeguarding Leads

Deputy Designated Safeguarding Leads (DDSLs) are trained to the same standard as the DSL, and their responsibilities are explicit in their job descriptions. Safeguarding activities may be delegated to appropriately trained deputies, but ultimate lead responsibility for safeguarding and child protection remains with the DSL.

During term time, the DSL or a DDSL will always be available during School hours to discuss safeguarding concerns. The School will maintain clear, reliable and known cover arrangements for illness, leave or other absence and appropriate arrangements for boarding, trips, Cathedral commitments and other out-of-hours or out-of-term activities. Where the DSL is absent for an extended period, an interim DSL will be formally appointed.

If, exceptionally, the DSL and DDSLs are unavailable, this must not delay action. Staff should consult the Head or another senior leader and/or contact local authority children's social care or the Police directly. Where a child is in immediate danger, the Police must be contacted without delay.

3.3 The Governing Body

The Governing Body has strategic leadership responsibility for the School's safeguarding arrangements. It will have regard to KCSIE and ensure that the School's policies, procedures and practice comply with applicable legislation, statutory guidance and the arrangements of the City and Hackney Safeguarding Children Partnership.

The Governing Body will:

- appoint a senior board-level safeguarding lead and ensure that an appropriately senior member of the leadership team is appointed as DSL, with sufficient authority, time, funding, training, resources and support;
- ensure that effective and accessible safeguarding policies and reporting systems are in place, operate in the best interests of children, take account of their wishes and feelings, and are reviewed at least annually and whenever guidance or circumstances change;
- ensure the child-protection policy is publicly available and that parents understand the School's safeguarding responsibilities, including that referrals may be made to statutory agencies;
- ensure that all staff receive the child-protection policy, staff code of conduct and details of the DSL and deputies at induction;

- ensure all staff read Part One; leaders and staff working directly with children also read Annex A; DSLs and DDSs must be familiar with Annex B;
- ensure appropriate safeguarding information will be provided to temporary staff, volunteers and contractors on a proportionate, risk-based basis;
- ensure all staff receive safeguarding and child-protection training, including online safety and filtering and monitoring responsibilities, at induction; that this training is regularly updated; and that staff receive safeguarding updates as required and at least annually;
- ensure all governors receive safeguarding and child-protection training, including online safety, at induction and that this is updated regularly;
- ensure appropriate safer-recruitment arrangements are embedded and effective, including the completion and recording of all required checks on staff, volunteers, governors and proprietors, including DBS and section 128 checks where applicable;
- ensure effective procedures are in place for reporting and managing low-level concerns, allegations against adults working with children and whistleblowing. The Chair of Governors will act as case manager where an allegation concerns the Head. A concern about the DSL will ordinarily be reported to the Head; where the DSL is also the Head, it will be reported to the Chair;
- ensure child-protection records are maintained securely and separately from the main pupil file, in accordance with Annex B of KCSIE, and that more than one emergency contact is held for each pupil where reasonably possible;
- ensure the School works effectively with local safeguarding partners, children's social care, the Police, health services and other relevant agencies, and that information is shared lawfully and promptly when necessary to safeguard a child;
- ensure children are taught how to keep themselves and others safe, including online, through an age-appropriate curriculum that considers individual needs and vulnerabilities;
- ensure appropriate filtering and monitoring systems are in place, that responsibilities are clearly assigned and that the effectiveness of the provision is reviewed and recorded at least once every academic year;
- receive a safeguarding report from the DSL at least annually, monitor the effectiveness of the School's arrangements and remedy any deficiencies or weaknesses without delay.

Use of School premises by other organisations

Where an activity is provided directly by the School under the supervision or management of School staff, the School's safeguarding policy and procedures will apply.

Where facilities or premises are hired or rented to another organisation or individual providing activities for children, the Governing Body will seek assurance that the provider

has appropriate safeguarding and child-protection arrangements in place, inspecting these where necessary, and will ensure that arrangements exist for liaison with the School. This applies whether or not the children attending are pupils of the School.

Safeguarding requirements will be included as a condition of any lease, hire or transfer-of-control agreement, and failure to comply will result in termination of the agreement. If the School receives a safeguarding concern or allegation relating to an activity taking place on its premises, it will follow its safeguarding procedures, including informing the LADO where appropriate.

3.4 The Chapter as Proprietor

The Chapter of St Paul's Cathedral is the legal proprietor of St Paul's Cathedral School. Chapter has delegated responsibility for the discharge of the School's safeguarding functions to the Governing Body. The Governing Body exercises strategic leadership and oversight of safeguarding in accordance with this policy, applicable legislation, the Independent School Standards and *Keeping Children Safe in Education*.

The Governing Body includes members of Chapter, supporting effective communication and assurance between the two bodies. The Governor with responsibility for safeguarding provides support and challenge to the Designated Safeguarding Lead and reports to the Governing Body on the effectiveness of the School's safeguarding arrangements. The Governing Body, in turn, provides Chapter with appropriate assurance that its delegated safeguarding responsibilities are being discharged effectively.

Although safeguarding functions are delegated to the Governing Body, Chapter retains its legal accountability as proprietor. Chapter will therefore satisfy itself, through the agreed reporting and assurance arrangements, that effective safeguarding policies, procedures, leadership, training and oversight are in place. Reporting to Chapter will respect confidentiality and safeguarding information will be shared only on a proportionate, need-to-know basis.

4. Good Practice Guideline and Staff Code of Conduct

The Head is responsible for overall management of the School and for the management of concerns and allegations about staff. The Head ensures that the policies and procedures of the School, adopted by the Governing Body (particularly those concerning referrals of cases of suspected abuse and neglect) are understood and followed by all staff.

Good practice includes:

- treating all pupils with respect

- setting a good example by conducting ourselves appropriately
- involving pupils in decisions that affect them
- encouraging positive, respectful and safe behaviour among pupils
- being a good listener
- being alert to changes in pupils' behaviour and to signs of abuse, neglect and exploitation
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the school's safeguarding (child protection) policy, staff code of conduct and guidance documents on wider safeguarding issues
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse
- referring all concerns about a pupil's safety and welfare to the DSL, or, if necessary, directly to the Police or children's social care

The School's staff code of conduct sets out our expectations of staff in full and is read and signed by all staff annually.

5. Abuse of Position of Trust

All School staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

Staff understand that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence.

6. Children who may be particularly vulnerable

Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that our pupils receive equal protection, we will give special consideration to children who are:

- part of the chorister programme
- living away from home or in temporary accommodation
- living in chaotic and unsupportive home situations
- living transient lifestyles
- affected by parental substance misuse, domestic violence or parental mental health needs
- vulnerable to being bullied, or engaging in bullying

- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- do not have English as a first language
- at risk of sexual exploitation, female genital mutilation, forced marriage or being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive.

6.1 Young carers

The School recognises that caring responsibilities can affect a child's attendance, attainment, behaviour and wellbeing. Staff will remain alert to signs that a child may be a young carer and will share concerns with the DSL or a DDSL.

The School will work with the child, their family where appropriate and relevant external services to ensure that support is provided at the earliest opportunity. Where there is concern that the child has been harmed or is at risk of harm, the School's child-protection procedures will be followed immediately.

6.2 Children living in temporary accommodation

Children living in temporary accommodation may experience increased safeguarding, welfare and educational vulnerability.

Any notification received from a local housing authority that a pupil has been placed in temporary accommodation will be passed securely to the DSL or a DDSL. The DSL will consider the child's safeguarding, attendance, welfare and support needs and liaise with the family and relevant services as appropriate.

A temporary-accommodation notification does not replace the School's safeguarding duties or the need to refer to children's social care where a child has been harmed, may be in need or is at risk of harm.

7. Children with special educational needs and disabilities

Children with special educational needs or disabilities (SEND), or certain medical or physical health conditions, can face additional safeguarding challenges both online and offline.

Additional barriers to recognising or reporting abuse, neglect and exploitation can include:

- assumptions that indicators such as behaviour, mood or injury relate to the child's condition without further exploration;
- increased vulnerability to isolation or bullying, including prejudice-based bullying;
- being disproportionately affected by bullying without outwardly showing signs;
- communication barriers or difficulty managing and reporting concerns;
- not understanding that what is happening to them is abusive;
- the need for intimate care or increased dependence on adults;

- being isolated from other children or trusted adults; and
- cognitive difficulties, including difficulty distinguishing fact from fiction in online content or understanding the consequences of repeating online content or behaviour.

Staff must remain professionally curious and must not allow assumptions about a child's needs, communication or behaviour to prevent them from reporting a concern.

Safeguarding concerns involving a child with SEND must be reported immediately to the DSL or a DDSL. The DSL will liaise closely with the SENCO and consider whether the child requires additional pastoral support, communication support, supervision, an individual safety plan or specialist external help.

The child's wishes and feelings will be sought in a way that is accessible and appropriate to their communication and developmental needs.

7.1 Safeguarding children with medical conditions

An incident relating to the management of a child's medical condition or allergy does not automatically require a safeguarding referral. A safeguarding concern may arise where the incident indicates that the child may be at increased risk of neglect, abuse or exploitation—for example, where important medical information is withheld or the child is repeatedly sent to School without essential medication.

Such concerns must be reported immediately to the DSL or a DDSL. The School will follow its child-protection procedures and its Supporting Pupils with Medical Conditions and Allergy Safety policies as appropriate.

8. Children who are absent from education

Attendance, absence and exclusions are closely monitored. Please see the School's Attendance policy for more information in this regard. A child being absent from education for prolonged periods and/or on repeat occasions, and a child going missing from education is a potential indicator of abuse and neglect, including sexual abuse or exploitation, child criminal exploitation or mental health problems.

The DSL will monitor unauthorised and unexplained absence and take appropriate action including notifying the local authority, particularly where children are absent or go missing on repeated occasions and/or are missing for periods during the school day.

Staff must also be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

9. Mental Health

Mental-health difficulties can develop into safeguarding concerns and may also indicate that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. This can include self-harm, eating disorders, suicidal ideation or risk of suicide.

Only appropriately trained professionals should diagnose mental-health conditions. Staff should nevertheless remain alert to significant changes in a child's behaviour, mood, relationships, attendance, presentation or engagement.

A mental-health concern that is also a safeguarding concern must be reported immediately to the DSL or a DDSL.

If a child is in immediate danger, has seriously harmed themselves or has an immediate intention or plan to end their life, staff must call 999 or arrange for the child to be taken immediately to Accident and Emergency by a parent, carer or other suitable adult. The child must not be left alone. Where urgent mental-health help is required but the situation is not an emergency, advice may be obtained through NHS 111.

Support from the School's Mental Health Lead, Counsellor, School Nurse or Mental Health First Aiders must not delay emergency action, a safeguarding referral or access to appropriate health services.

10. Children who are Lesbian, Gay or Bisexual

Children who are lesbian, gay, or bisexual (LGB), or perceived to be, may be particularly vulnerable to discriminatory bullying. The school takes proactive steps to prevent this, ensuring robust sanctions are in place and providing a safe space for pupils to share concerns.

10.1 Children who are Questioning their Gender

The school takes a proactive, patient, and sensitive approach to children questioning their gender. We do not initiate any action regarding social transition. Our response is guided by the following statutory principles:

- **Parental Involvement:** We will not adopt any changes relating to social transition without the active involvement of parents or carers, treating their views with great importance. If involving parents poses a greater safeguarding risk, the DSL must be involved immediately.
- **A Cautious Approach:** Accommodating social transition is an active intervention. We exercise caution; support for full social transition will be agreed very rarely.
- **Biological Sex Recording:** Staff must always remain aware of a pupil's biological sex and ensure it is accurately noted wherever it is recorded.
- **Living in Stealth:** If a child has transitioned early and is "living in stealth" (where peers or staff are unaware of their biological sex), the DSL must be involved due to the complexities and safeguarding risks.

- **Detransitioning:** The school will provide support for children who wish to fully or partially reverse a request that has previously been agreed, working closely with parents and relevant experts.

10.2 Single-Sex Spaces and Sports

Toilets, changing rooms and showers: The School provides separate toilets for boys and girls aged eight and over, except where an individual toilet is contained in a room that can be locked from the inside and is intended for use by one pupil at a time. A pupil aged 11 or older at the start of the school year must not be required or permitted to undress in front of a pupil of the opposite biological sex. Pupils must not use toilets, changing rooms or showers designated for the opposite biological sex. Where a pupil does not wish to use facilities designated for their biological sex, the School will consider suitable alternative arrangements, such as a self-contained individual facility or access at a different time. Such arrangements must not compromise the safety, comfort, privacy or dignity of that pupil or any other pupil. The arrangements will be recorded and reviewed regularly.

Sport: The School may separate pupils according to biological sex where the physical strength, stamina or physique of the average girl would place her at a disadvantage when competing against the average boy, or vice versa. Where separation is necessary for safety, there must be no exceptions. Where there is no safety concern, any individual request about participation will be considered in the pupil's best interests, taking account of its impact on other pupils and the need to provide safe and fair sporting opportunities.

11. Whistleblowing if you have a concern about a colleague

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The school's whistleblowing procedures enable staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Head. Complaints about the Head should be reported to the Chair of Governors. Staff may also report their concerns directly to children's social care or the Police if they believe direct reporting is necessary to secure action.

12. Safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers

When a safeguarding concern or allegation is made about anyone working in or on behalf of the School, including supply and agency staff, trainee teachers, contractors and volunteers, the procedures set out in this section must be followed without delay.

These procedures also apply where the School receives a safeguarding concern or allegation relating to an incident that occurred while an individual or organisation was using the School's premises to provide an activity for children. The School will follow Part Four of Keeping Children Safe in Education and local safeguarding-partner procedures.

Non-recent allegations will be managed in accordance with Section 12.1.4.

12.1 Procedure for managing concerns or allegations that may meet the harm threshold

This section applies to safeguarding concerns or allegations about anyone working in or on behalf of the School in a paid or unpaid capacity. This includes employees, supply and agency staff, trainee teachers, volunteers, contractors and members of the Cathedral community who work with pupils.

The procedures in this section must be followed where it is alleged that a person has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates that they may pose a risk of harm to children; and/or
- behaved, or may have behaved, in a way that indicates that they may not be suitable to work with children.

The final category includes behaviour that may have occurred outside the School and that might make an individual unsuitable to work with children. This is known as transferable risk. Where appropriate, an assessment of any transferable risk to children with whom the person works will be undertaken. If there is any doubt, advice will be sought from the Local Authority Designated Officer (LADO).

12.1.1 Reporting an allegation

Any safeguarding concern or allegation that may meet the harm threshold must be reported without delay to the Head, who will act as the case manager.

A concern or allegation about the DSL must be reported to the Head.

Where the concern or allegation relates to the Head, it must be reported directly to the Chair of Governors without informing the Head.

Where there is a conflict of interest in reporting the matter to the Head, or where the concern relates to the Chair of Governors, the matter must be reported directly to the LADO in accordance with local procedures.

The person receiving the allegation must not investigate it, interview witnesses or question the person who is the subject of the allegation. They should make an accurate written record of the information provided, including the time, date and place of the alleged incident, the names of those involved and the name of the person reporting the concern.

If a child has been harmed, may be at immediate risk of harm or the situation is an emergency, the DSL will contact local authority children's social care and, where appropriate, the Police immediately.

The case manager will consider whether the concern or allegation may meet the harm threshold and will contact the LADO without delay and before undertaking any investigation. The case manager and LADO will agree the appropriate course of action, including any involvement of children's social care, the Police, the person's employer or agency, the Teaching Regulation Agency or the Disclosure and Barring Service.

Where the allegation concerns supply staff, trainee teachers or contracted staff, the School will continue to lead on safeguarding, gather the relevant facts and manage the safeguarding process. The School will work closely with the individual's employment agency, employer or training provider, which will normally lead on any employment or disciplinary process.

The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity while an allegation is being considered or investigated. The child, their parents or carers, the person who is the subject of the allegation and the person's employer will be informed only as agreed with the LADO, children's social care and the Police.

Appropriate support will be provided to the child and their family and to the person who is the subject of the allegation.

12.1.2 Suspension

Suspension will not be an automatic response to an allegation. All reasonable alternatives to suspension will be considered before a decision is made.

Suspension will be considered only where there is cause to suspect that a child or other children may be at risk of harm, or where the allegation is so serious that there may be grounds for dismissal.

The case manager will seek advice from the School's HR adviser and the LADO and, where they are involved, children's social care and the Police. Alternatives considered may include:

- redeployment so that the person has no direct contact with the child or children concerned;
- ensuring that another adult is present whenever the person has contact with children;
- redeployment to work that does not involve unsupervised access to children;
- temporarily redeploying the person to another role or location; or
- making alternative arrangements for the child, provided these are in the child's best interests, take account of the child's wishes and are not presented as a punishment.

Where suspension is considered necessary, the case manager will record:

- the rationale and justification for suspension;

- the alternatives that were considered; and
- the reasons why those alternatives were rejected.

Written confirmation of the suspension and as much information as is appropriate about the reasons for it will be provided within one working day. The person will be given the name and contact details of a designated member of staff who will provide appropriate support and keep them informed of progress.

12.1.3 Outcomes and referrals

The outcome of an allegation will be recorded as substantiated, malicious, false, unsubstantiated or unfounded, in accordance with KCSIE.

Where an allegation is substantiated, the School will work with the LADO to consider whether improvements are required to the School's policies, procedures, training or practice.

The School will make a referral to the Disclosure and Barring Service where the legal criteria for referral are met. This duty applies where the School dismisses or removes a person from regulated activity because they have harmed or pose a risk of harm to a child, or would have done so had the person not resigned or otherwise ceased to provide their services.

The School will consider referring a teacher to the Teaching Regulation Agency where the teacher has been dismissed for serious misconduct, or would have been dismissed had they not resigned, and a prohibition order may be appropriate.

12.1.4 Record-keeping and references

Details of allegations that, following investigation, are found to be malicious or false will be removed from the person's personnel record unless the individual gives consent for the information to be retained.

For all other allegations, including those found to be substantiated, unfounded or unsubstantiated, the School will retain:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- a record of the actions taken, decisions reached and outcome;
- a copy provided to the person concerned, where this has been agreed with children's social care or the Police; and
- a statement confirming whether the information will be referred to in any future reference.

These records will be retained until the person has reached normal pension age or for ten years from the date of the allegation, whichever period is longer.

Allegations found to be false, unfounded, unsubstantiated or malicious will not be included in an employment reference, including where concerns have been repeated. A substantiated safeguarding allegation that met the harm threshold will be included where relevant. Any information provided will be factual and will not include opinions.

12.1.5 Non-recent allegations

Abuse can be reported regardless of how long ago it occurred.

Where an adult informs the School that they were abused when they were a child, the School will report the matter to the Police and will support the adult appropriately through that process.

A non-recent allegation made by a child must be reported to the LADO in accordance with local authority procedures. The LADO will coordinate with children's social care and the Police as appropriate.

If any non-recent allegation indicates that a child may currently be at risk of harm, the School will make an immediate referral to children's social care and, where appropriate, the Police.

Where the allegation concerns, or may have implications for, the Cathedral, its personnel, activities or safeguarding arrangements, the School will also share relevant information with the Cathedral safeguarding team. Information will be shared promptly, securely, proportionately and on a need-to-know basis, having regard to any advice from the LADO, children's social care or the Police.

12.2 Low-Level Concerns

The term "low-level concern" does not mean that a concern is insignificant. A low-level concern is any concern—no matter how small, and even if no more than causing a sense of unease or a "nagging doubt"—that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work; and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

A concern that a person may have harmed a child, may pose a risk of harm to children or may not be suitable to work with children must not be treated as a low-level concern. Such concerns must be considered under section 12.1.

Examples of low-level concerns may include, but are not limited to:

- being overfriendly with children;
- having favourites;
- taking photographs of children on a personal mobile telephone contrary to School policy;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door contrary to School policy;
- humiliating a child;

- shouting at a child or using intimidating, sexualised or offensive language, where the behaviour does not meet the harm threshold; or
- other conduct that falls below the professional standards established in the Staff Code of Conduct.

Low-level concerns may arise from a suspicion, complaint, disclosure or observation; information provided by a child, parent, member of staff or other person; a staff self-referral; or information arising from recruitment and vetting checks.

All low-level concerns about staff, supply staff, trainee teachers, volunteers or contractors must be shared promptly with the Head or DSL. Where a concern is reported to the DSL, the DSL will inform the Head in a timely manner according to the nature of the concern. The Head is the ultimate decision-maker in relation to low-level concerns.

A concern about the DSL must be reported to the Head. A concern about the Head must be reported to the Chair of Governors. Where there is doubt about whether a concern meets the harm threshold, the Head or Chair of Governors will consult the LADO.

Staff are not expected to determine whether a concern is low-level or meets the harm threshold before reporting it. The important requirement is that the concern is shared promptly so that the Head, with advice from the DSL and LADO as appropriate, can make that determination.

The School encourages staff to self-refer where they have found themselves in a situation that could be misinterpreted, might appear compromising to others or where, on reflection, they believe that their conduct may have fallen below the expected professional standards.

Where a low-level concern has been raised by a third party, the Head or a nominated senior leader will collect as much relevant information as possible. This may include speaking to the person who raised the concern, the individual concerned and any witnesses, unless there is a safeguarding reason not to do so.

All low-level concerns will be recorded in writing. The record will include:

- details of the concern;
- the context in which the concern arose;
- the name of the person sharing the concern, unless anonymity has been requested and can reasonably be maintained;
- the response of the individual concerned, where appropriate;
- the action taken;
- the rationale for decisions made; and
- the outcome of the concern.

Records will be treated as confidential, held securely and managed in accordance with the School's data-protection policies and applicable data-protection legislation. Records will be retained at least until the individual leaves the School's employment or ceases to provide services to the School.

Low-level concerns about supply staff, trainee teachers and contractors will be shared with their employer, agency or training provider so that any wider pattern of inappropriate or concerning behaviour can be identified.

Records will be reviewed regularly to identify any pattern of inappropriate, problematic or concerning behaviour. Where a pattern is identified, the School will consider whether the matter should be managed through disciplinary procedures or referred to the LADO because it may now meet the harm threshold.

The School will also consider whether any wider cultural or systemic issues contributed to or enabled the behaviour and whether changes are required to policies, procedures, supervision, training or professional expectations.

13. Staff and Governor Training

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation. Training will include Prevent and online safety (including an understanding of the expectations, applicable roles and responsibilities for filtering and monitoring) as well as what to do if they have a concern.

New staff receive a briefing during their induction which includes:

- the School's safeguarding (child protection) policy
- the School's good behaviour policy for pupils and anti-bullying policy
- the staff behaviour policy and code of conduct including the whistleblowing procedure
- the identity of the DSL and DDSs
- the requirements for all staff read Part One; leaders and staff working directly with children also read Annex A; DSLs and DDSs must be familiar with Annex B.
- Prevent Training
- Online Safety Training

All staff including the DSL, Head and Governors will receive training that is regularly updated. All staff will also receive safeguarding and child protection updates via email, e-bulletins, website access and staff meetings throughout the year.

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 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.

Our Governors receive appropriate safeguarding and child protection (including online safety and an understanding of the expectations, applicable roles and responsibilities for filtering and monitoring) training at induction which equips them with the knowledge to provide strategic challenge to test and assure themselves that there is an effective whole school approach to safeguarding. This training is updated at least annually.

Our Governor with responsibility for safeguarding receives additional training to empower them to support and challenge the Designated Safeguarding Lead and support the delivery of high-quality safeguarding throughout the school. As part of that training the Governor with responsibility for safeguarding will be expected to read the entirety of KCSIE. All other governors will be expected to read Part 2 of KCSIE.

All members of Chapter will receive safeguarding and child-protection training appropriate to Chapter's role as the proprietor body and to its oversight of the Governing Body. This will include an understanding of Chapter's legal accountability, the safeguarding functions

delegated to the Governing Body, the reporting and assurance arrangements, and how safeguarding concerns should be reported. Training will be provided at induction and updated regularly.

Members of Chapter who also serve on the Governing Body will receive the safeguarding training required of all Governors. This training will satisfy the Chapter training requirement where it also addresses Chapter's responsibilities as proprietor; unnecessary duplication of training will not be required.

Any member of Chapter who visits the School, participates in School activities or otherwise has contact with pupils will receive safeguarding information, induction and, where appropriate, additional training proportionate to the nature and frequency of that contact. They must follow the School's safeguarding, visitor and reporting procedures.

The School maintains records of all staff and governor training.

14. Teaching pupils about safeguarding

The School teaches pupils about safeguarding through the curriculum and PSHE. 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. 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.

15. Safer recruitment

The School follows the safer-recruitment requirements in Part Three of Keeping Children Safe in Education, the Education (Independent School Standards) Regulations 2014 and its Recruitment, Selection and Disclosure Policy.

Those involved in recruiting and appointing people to work with children will receive appropriate safer-recruitment training. The School's recruitment materials will explain its commitment to safeguarding and the checks that will be undertaken. A curriculum vitae will not be accepted without a completed application form.

The School will scrutinise applications, employment history and references; explore gaps, discrepancies or safeguarding concerns; obtain an appropriate self-declaration from shortlisted candidates; and consider carrying out an online search as part of its due diligence. Candidates will be informed that such searches may be undertaken.

All appointments will be conditional on the satisfactory completion of the checks required for the role. These include, as appropriate checks of identity, right to work in the UK, employment history and references, qualifications, mental and physical fitness, overseas history, prohibition from teaching, section 128 directions, childcare disqualification and an

appropriate DBS check. Children's barred-list information will be obtained only where the person will engage in regulated activity.

The School will obtain written confirmation of the required checks for agency and third-party staff and will verify the individual's identity when they arrive. Appropriate checks will also be completed for trainee teachers, volunteers, contractors and members of the proprietor body.

A written risk assessment will determine the checks required for volunteers who are not undertaking regulated activity. Volunteers undertaking regulated activity will be subject to an enhanced DBS check with children's barred-list information. No volunteer or contractor for whom the required checks have not been completed will be permitted to work unsupervised or undertake regulated activity.

The School will maintain an accurate and up-to-date single central record containing the information required by Keeping Children Safe in Education. Detailed recruitment, checking, risk-assessment and record-keeping requirements are contained in the School's Recruitment, Selection and Disclosure Policy.

16. Site Security

Visitors to the School, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the school's safeguarding and health and safety regulations. The Head will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

17. Extended school and off-site arrangements

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the School or its employees, our own safeguarding (child protection) policy and procedures apply. If other organisations provide services or activities on our site on behalf of our School, we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our pupils attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection arrangements are in place.

18. Staff/pupil online relationships

The School provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

Full details of the School's rules for staff can be found in the Staff Code of Conduct and the School's Staff Handbook.

Anyone working in the School either as a paid employee or volunteer must not communicate with children via social networking or accept requests as 'Friends' or other connections. This applies to both current and former pupils until they reach the age of 18.

19. Child protection procedures

19.1 Recognising abuse

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse, neglect and exploitation.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Abuse may be committed by adult men or women and by other children and young people.

Keeping Children Safe in Education (DfE 2026) refers to four categories of abuse. These are set out in Appendix I along with indicators of abuse.

19.2 Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidents of bullying, including cyber-bullying and prejudice-based bullying must be reported and will be managed through our anti-bullying procedures, which can be found in the school's Anti-Bullying Policy (available on the staff shared drive and via the school office).

19.3 Taking Action

Any child, in any family and in any school, could become a victim of abuse, neglect or exploitation. Staff must maintain an attitude of "it could happen here" and must always act in the best interests of the child.

If a member of staff has any concern about a child's welfare, they must act on it immediately.

Staff must:

- take any action necessary to protect the child in an emergency, including calling 999 where a child is in immediate danger;
- report the concern immediately to the DSL or a DDSL;
- make an accurate written record of the concern as soon as possible, using the School's safeguarding-recording system or Record of Concern form;
- record the child's own words wherever possible;
- preserve any relevant evidence;
- share information only with those who need it for safeguarding purposes;
- not investigate the concern or question the child or other people involved; and
- follow up the concern to make sure that appropriate action has been taken.

Completing a written record must never delay an immediate verbal report or any action needed to protect a child.

The DSL or a DDSL should always be available to discuss safeguarding concerns. If, in exceptional circumstances, neither the DSL nor a DDSL is available, staff must not delay taking action. They should speak to a member of the Senior Leadership Team and/or seek advice directly from local authority children's social care. The Police must be contacted where appropriate.

Any action taken while the DSL or DDSL is unavailable must be shared with them as soon as reasonably practicable.

Staff must not assume that a colleague or another professional will take action or share information that may be critical to keeping a child safe. Any member of staff may make a direct referral to children's social care. If a member of staff believes that appropriate action has not been taken after they have reported a concern, they must follow up with the DSL and, if concerns remain, refer directly to children's social care or the Police as appropriate.

19.4 If you are concerned about a pupil's welfare

There will be occasions when staff may suspect that a pupil may be at risk. For example, the pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should use the record of concern form (appendix 2) to record any early concerns immediately. Following an initial conversation with the pupil, if the member of staff has concerns, they should immediately discuss their concerns with the DSL or DDSL if the DSL is unavailable.

Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or threatened, which could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to our DSL if they have concerns about a child.

19.5 If a pupil discloses to you

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, **the staff member will, at the appropriate time, let the pupil know that in order to help them they must pass the information on to the DSL.** The point at which they tell the pupil this is a matter for professional judgement. During the conversation with the pupil, staff will:

- allow them to speak freely
- remain calm and not overreact
- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘this isn’t your fault’, ‘you are doing the right thing in talking to me’
- not be afraid of silences
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the pupil’s mother think about it
- not automatically offer any physical touch as comfort
- avoid admonishing the child for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ may be interpreted by the child to mean that they have done something wrong
- tell the pupil what will happen next
- report verbally to the DSL even if the child has promised to do it by themselves
- complete the **record of concern form** and hand it to the DSL as soon as possible
- seek support if they feel distressed

19.6 Notifying parents

The School will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively, and the DSL will contact the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the pupil. Therefore, if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care and/or the Police before parents are contacted.

19.7 Risk assessment

Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

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 or safety 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.

The Head has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

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.

19.8 Restrictive interventions and reasonable force

There are limited circumstances in which reasonable force or another restrictive intervention may be required to safeguard a child or other people. Any intervention must be lawful, necessary, proportionate, use the least restrictive available option and last for the shortest possible time.

Particular care will be taken where a child has SEND, mental-health needs or a medical condition. Any safeguarding concern arising from the use of a restrictive intervention must be reported immediately to the DSL or a DDSL.

Detailed requirements concerning prevention, de-escalation, the circumstances in which an intervention may be used, recording, parental communication, review and staff training are contained in the School's Behaviour Policy and Safe Restraint Policy.

20. Confidentiality and sharing information

Safeguarding information will be shared in a timely, proportionate and secure manner with those who need it to protect a child or promote their welfare.

The Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 do not prevent the sharing of information for safeguarding purposes. Consent is not required where information needs to be shared to protect a child. Where appropriate and safe, the child and their parents or carers will be informed about information sharing.

Staff must not promise confidentiality to a child and must share safeguarding concerns with the DSL or a DDSL. Information will otherwise be disclosed only on a need-to-know basis.

Safeguarding records will be accurate, confidential, securely stored and kept separately from the pupil's main educational file. Decisions about sharing or withholding information, and the reasons for those decisions, will be recorded.

Requests for access to safeguarding information will be referred to the DSL and the School's Data Protection Officer. Detailed arrangements are contained in the Data Protection and Records Management policies.

20.1 Transfer of child-protection files

When a pupil leaves the School, the DSL or a DDSL will transfer the child-protection file to the DSL at the receiving school or college:

- within five days of an in-year transfer; or
- within the first five days of the new term where the pupil transfers at the beginning of a term.

The file will be transferred securely and separately from the main pupil file, and confirmation of receipt will be obtained.

The transfer will include a clear, structured summary of current safeguarding concerns, relevant context, risks and ongoing support needs. The DSL will consider whether important information should be shared in advance so that appropriate safeguarding and support arrangements are in place when the child arrives.

21. Referral to children's social care

Following consideration of a safeguarding concern, the DSL or DDSL will determine the most appropriate response. This may include:

- managing support for the child through the School's pastoral arrangements;
- undertaking or contributing to a Family Help assessment;
- making a referral for an assessment under section 17 of the Children Act 1989 where a child is or may be in need; or

- making an immediate referral under section 47 of the Children Act 1989 where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

Where a child is suffering or is likely to suffer harm, a referral to local authority children's social care—and, where appropriate, the Police—must be made immediately. The referral will follow the procedures of the local authority in which the child lives.

If a child is in immediate danger, staff must call 999.

Anyone may make a referral to children's social care. A referral does not require the permission of the DSL, the Head, a parent or carer.

Where Family Help is being considered, the School will normally seek the informed consent and involvement of the child's parents or carers, provided it is safe and appropriate to do so.

Parental consent is not required to share safeguarding information or to make a referral where there is concern that a child may be in need, may have been harmed or may be at risk of harm. A necessary referral must not be delayed because consent has not been obtained.

Parents or carers will normally be informed that a referral is being made unless:

- doing so may place the child or another person at increased risk;
- doing so may lead to the loss or destruction of evidence;
- doing so may undermine a Police investigation or statutory assessment; or
- children's social care or the Police advise that parents or carers should not be informed at that stage.

Where there is uncertainty about informing parents or carers, advice will be sought from children's social care or the Police before contact is made.

The child's wishes and feelings will be taken into account, having regard to their age and understanding. The child will be told what is likely to happen next unless doing so would place them or another person at risk or prejudice an investigation.

Children's social care should acknowledge a referral and decide the next steps within one working day. The referrer must follow up the referral if this information is not received.

If the child's situation does not appear to be improving, or if the School is not satisfied with the response from children's social care, the DSL or original referrer will follow the local escalation procedures and make further referrals where necessary.

All referrals, discussions, decisions, actions and outcomes, including the reasons for decisions, will be recorded in writing.

22. Reporting directly to child protection agencies

Any member of staff may contact local authority children's social care or the Police directly about a child's welfare.

A member of staff must make or consider making a direct referral where:

- the child is in immediate danger or requires urgent protection;
- the DSL and DDSLs are unavailable and waiting for them would delay appropriate action;
- the member of staff believes that a referral is required but one has not been made;
- the child's situation does not appear to be improving following an earlier referral or intervention; or
- the member of staff believes that direct contact is necessary in the child's best interests.

Staff do not require permission from the DSL, Head or any other member of staff before making a direct safeguarding referral.

Where a member of staff makes a direct referral, they must:

- provide children's social care or the Police with accurate and relevant information;
- record the referral and any advice or action agreed;
- inform the DSL or a DDSL as soon as practically possible, unless doing so would create a conflict of interest or place a child or another person at risk; and
- follow up the referral if they do not receive information about the action being taken.

If a child is in immediate danger, staff must call 999.

23. Additional Reporting

In addition to the reporting requirements outlined 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:

- i) **Health and Safety Executive**
- the School is legally required under RIDDOR to report certain incidents to the Health and Safety Executive.
- ii) **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 registered with Ofsted (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. The School will notify Ofsted of such allegations as soon as is reasonably practicable, but in any event within 14 days of the allegations being made. The School will also notify Ofsted of any significant event which is likely to affect its suitability to look after children or the suitability of any person who cares for / 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.

- iii) **Insurers** - the School will consider whether it is necessary to report a safeguarding incident to the relevant insurers and / or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies. Care should be taken to ensure this is done before renewal to ensure that 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, professional advice should be sought.

24. Child-on-child abuse

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, all staff recognise that children can abuse other children and young people and should be clear about the school's policy and procedures regarding child-on-child abuse. Staff will maintain an attitude of 'it could happen here'. All child-on-child abuse is unacceptable and will be taken seriously.

Child-on-child abuse can take many forms, including:

- **physical abuse** such as shaking, biting, hitting, kicking or hair pulling
- **bullying**, including cyberbullying, prejudice-based and discriminatory bullying
- **sexual violence and sexual harassment** such as inappropriate sexual language, touching, sexual assault or rape
- **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
- the **making or sharing of nudes or semi-nudes**
- **abuse in intimate personal relationships between peers (also known as teenage relationship abuse)** – such as a pattern of actual or threatened acts of physical, sexual or emotional abuse
- **upskirting** – taking a picture under a person's clothing without their permission for the purposes of sexual gratification or to cause humiliation, distress or alarm
- **initiation/hazing** – used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusive trials which promote a bond between them
- **prejudiced behaviour** – a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. Tolerance of such behaviours can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. Staff understand that whilst it is more likely that girls will be victims and boys perpetrators of child-on-child abuse, all forms of child-on-child abuse are unacceptable and will be taken seriously.

Staff recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but simply not reported.

24.1 Minimising risk

The school provides preventative education to develop a zero-tolerance culture around sexism, misogyny, misandry, homophobia, biphobia, racism, derogatory behaviour, and other forms of physical violence and conflict. This is a whole school approach which ensures that the curriculum, school policies, pastoral support and whole school ethos complement each other to create an environment that helps to prevent negative behaviour. We take the following steps to minimise the risk of child-on-child abuse.

- an open and honest environment where young people feel safe to share information about anything that is upsetting them
- access for pupils to wide-ranging pastoral support including, Form Teacher, Head of Year, Deputy Head, Learning Support Team, Nurse, Mental Health First Aider, Counsellor, Residential Duty Team, Chaplain and Wish and Worry box
- assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying
- Form Time, TPR and PSHE are used to reinforce the message through stories, role play, current affairs and other suitable activities
- staff will endeavour always to create surroundings where everyone feels confident and at ease in school
- we will ensure that the school is well supervised, especially in areas where children might be vulnerable
- staff receive regular training on child-on-child abuse during safeguarding updates and via online training.

24.2 Managing allegations of child-on-child abuse and supporting those involved

All reports of child-on-child abuse, including harmful sexual behaviour, sexual harassment and sexual violence, must be taken seriously and acted upon immediately.

The School will respond in a way that:

- safeguards and supports the child who has experienced the alleged abuse;
- safeguards and supports the alleged perpetrator;
- protects any other children who may be at risk;
- takes account of the wishes and feelings of the child who has made the report;
- avoids causing further trauma or victimisation;
- reflects the age, developmental stage and needs of all the children involved; and
- recognises that children who display harmful behaviour may themselves have unmet needs or have experienced abuse.

Staff must reassure a child making a report that they are being taken seriously and will be supported and kept safe. A child must never be made to feel that they are creating a problem, be blamed or be made to feel ashamed for making a report.

Abuse that takes place online or outside School will be treated as seriously as abuse taking place within School.

24.2.1 Immediate response

The member of staff receiving the report must:

- listen carefully and calmly;
- avoid asking leading or investigative questions;
- not promise confidentiality;
- explain that the information must be shared with the DSL so that help and protection can be provided;
- make an accurate record using the child's own words wherever possible;
- preserve any relevant evidence; and
- report the matter immediately to the DSL or a DDSL.

Staff must not investigate the allegation or ask the children involved to provide written statements before the DSL has considered the appropriate response.

The DSL or DDSL will take immediate steps to safeguard and support the child who has made the report, the alleged perpetrator and any other affected children. These steps must not be delayed while referrals, assessments or investigations are awaited.

24.2.2 Risk and needs assessment

Following a report of sexual violence, the DSL or DDSL will complete an immediate risk and needs assessment.

Following a report of sexual harassment or other harmful sexual behaviour, the need for a risk and needs assessment will be considered on a case-by-case basis.

The assessment will consider:

- the safety, wishes and support needs of the child who has experienced the alleged abuse;
- the safety and support needs of the alleged perpetrator;
- the needs of any other children who may have been involved or affected;
- the nature and seriousness of the alleged behaviour;
- whether the alleged behaviour may have occurred previously;
- the ages and developmental stages of the children involved;
- any power imbalance between the children;

- risks within classrooms, boarding, communal areas, journeys, extracurricular activities and online spaces;
- any relevant SEND, disability or other vulnerability;
- whether the incident is linked to child sexual exploitation, child criminal exploitation or another form of abuse; and
- the views of children's social care, the Police or specialist services where they are involved.

The assessment will be recorded, kept under review and updated whenever circumstances change. Individual safety and support plans will be established where required.

24.2.3 Separation and immediate protection

Where a report of rape or assault by penetration is made, the alleged perpetrator will be removed from any classes shared with the child who has made the report while the School establishes the facts and liaises with children's social care and the Police.

The School will also consider how to maintain reasonable physical separation on School premises, during boarding, before and after School, during activities and on transport. These arrangements are in the best interests of all children involved and do not represent a judgement about the alleged perpetrator's guilt.

For other reports of sexual violence, sexual harassment or harmful sexual behaviour, decisions about shared classes and contact will be made on a case-by-case basis through the risk and needs assessment.

The child who has made the report will not ordinarily be moved from a class or activity solely because they have reported abuse unless this is requested by the child and is assessed to be in their best interests.

24.2.4 Deciding how to manage the report

The DSL or DDSL will consider each report individually and may:

- manage the matter internally under the School's safeguarding and behaviour procedures where this is appropriate and safe;
- arrange Family Help or specialist support;
- make an immediate referral to children's social care; and/or
- report the matter to the Police.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, harm, a referral to children's social care must be made immediately.

The starting point is that a report of rape, assault by penetration or sexual assault will be passed to the Police. This starting point applies even where the alleged perpetrator is under the age of ten; in such circumstances, the Police will take a welfare rather than a criminal-justice approach.

Where a referral to children's social care or the Police is being made, the DSL will normally consult the relevant agency about how and when the alleged perpetrator and their parents or carers should be informed. This will not prevent the School from taking immediate action to safeguard children.

The School will not wait for the outcome or commencement of a children's social care or Police investigation before taking steps to safeguard and support the children involved. Any School action will be coordinated with the relevant agencies so that it does not prejudice a statutory or criminal investigation.

24.2.5 Informing and involving parents and carers

Parents or carers of the children involved will normally be informed at an early stage and involved in decisions about support, unless doing so may place a child or another person at increased risk, prejudice an investigation or be contrary to advice from children's social care or the Police.

The wishes and feelings of the child who has made the report will be considered when deciding how and when parents or carers are informed.

24.2.6 Support and ongoing action

Support will be tailored to the needs and wishes of each child and may include:

- support from a trusted member of staff;
- pastoral, counselling or mental-health support;
- specialist harmful-sexual-behaviour or sexual-violence services;
- adjustments to the timetable, boarding arrangements, activities or transport;
- measures to prevent unwanted contact;
- support to maintain access to education;
- protection from bullying, harassment, retaliation or online abuse; and
- support for parents and carers.

The alleged perpetrator will be offered appropriate support and intervention alongside any disciplinary action. Any sanction will be applied in accordance with the Behaviour Policy and will not replace the School's safeguarding response.

Children who witnessed the alleged abuse, or who have otherwise been affected by it, will also be considered for support.

The School will take reasonable steps to protect the anonymity of children involved in reports of sexual violence or sexual harassment, including managing information shared with Safeguarding (Child Protection) Policy 2026–2027 Version 1 | Next review: August 2027

staff, pupils, parents and online. Staff and pupils will be reminded not to share information or make comments that could identify those involved.

All concerns, discussions, referrals, assessments, decisions, actions and outcomes—and the reasons for them—will be recorded in writing. The effectiveness of support and safety arrangements will be reviewed regularly.

An allegation that is withdrawn, not progressed by the Police or children's social care, or does not result in a conviction must not automatically be treated as false. The School will continue to assess risk and provide support for as long as it is needed.

25. Serious Violence

Serious violence may include physical assault and carrying, threatening with or using a weapon. It may occur in the context of peer conflict, bullying, gang involvement or criminal exploitation.

Staff should remain alert to indicators including increased absence, significant changes in friendships or wellbeing, unexplained injuries, declining engagement, unexplained money or possessions, offending, threats involving weapons or indications that a child is carrying or intends to use a weapon.

Concerns must be reported immediately to the DSL or a DDSL. The DSL will assess the risk to the child and others and, where required, establish a safety and support plan, consider action to de-escalate peer conflict and refer to children's social care, the Police or specialist services.

Possession or use of a weapon will not be treated solely as a disciplinary matter. The School will also consider whether the child is experiencing exploitation, coercion or abuse.

26. Child criminal exploitation (CCE) and child sexual exploitation (CSE)

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This power imbalance can be due to a range of factors, including age, gender, sexual orientation, cognitive ability, physical strength, status and access to economic or other resources.

The school includes the risks of criminal exploitation and sexual exploitation in the PSHE and SRE curriculum. A common feature of such exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

26.1 Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse which may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

All staff are made aware of the indicators of sexual exploitation which, as well as including the indicators set out under CCE below, can also include having older boyfriends and suffering sexually transmitted infections or becoming pregnant. All concerns are reported immediately to the DSL.

26.2 Child Criminal Exploitation (CCE)

CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, being forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.

Children involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

All staff are made aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicators can include children who:

- appear with unexplained gifts or new possessions
- associate with other young people involved in exploitation
- suffer from changes in emotional wellbeing
- misuse drugs or alcohol
- go missing for periods of time or regularly return home late
- regularly miss school or education or do not take part in education.

26.3 County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store and sell drugs and money, with offenders often using coercion, intimidation, violence and weapons to ensure compliance of victims.

County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child. This power imbalance can be due to the same range of factors set out under CCE, above.

Children can be targeted and recruited into county lines in a number of locations, including schools and colleges. Indicators of county lines include those indicators set out under CCE, above, with the main indicator being missing episodes from home and/or school. Additional specific indicators that may be present where a child is criminally exploited include children who:

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

If a child is suspected to be at risk of, or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services / third sector providers who offer support to victims of county lines exploitation. Where a pupil may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism should be considered.

26.4 Modern slavery, trafficking and the National Referral Mechanism

Modern slavery is child abuse and includes sexual, criminal and financial exploitation, human trafficking, forced labour, servitude and forced criminality.

A child may have been exploited even where the activity appears consensual or the child does not recognise themselves as a victim. Indicators can include unexplained money or possessions, debt, missing episodes, use of the child's bank account, controlling relationships, unexplained travel or involvement in criminal activity.

Concerns must be reported immediately to the DSL or a DDSL. The DSL will make an appropriate child-protection referral and contact the Police where required. The DSL will also liaise with an authorised First Responder, normally children's social care or the Police, so that a National Referral Mechanism referral can be considered.

A National Referral Mechanism referral does not replace a child-protection referral or immediate action to protect the child.

27. Online Safety

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate material. The use of technology including AI and Generative AI has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation and sexual predation. Generative AI products utilised by the school must meet strict product safety expectations, including maintaining robust activity logs, reliably preventing access to harmful content, and being secured against malicious use.

The school ensures that appropriate and effective filters and monitoring systems are in place to block harmful and inappropriate content by managing the content available to pupils, who can contact our pupils and the personal conduct of our pupils online. We take care to ensure that these systems do not unreasonably impact on teaching and learning, and staff have been identified and assigned suitable roles and responsibilities to manage these systems. We also have effective monitoring strategies in place to meet the safeguarding needs of our pupils. The Governing Body will formally review the effectiveness of filtering and monitoring arrangements at least once a year. The school will keep a log demonstrating that filtering works on all devices in all relevant locations.

The school refers to the DfE guidance 'plan technology for your school service' to self-assess against the filtering and monitoring standards.

We tell parents and carers what filtering and monitoring systems we use, so they can understand how we work to keep children safe. We will also inform parents and carers of what we are asking children to do online, including sites they need to access, and with whom they will be interacting online. We run online safety workshops for parents and online safety for pupils is regularly addressed in assemblies, PSHE and ICT lessons.

Our online safety curriculum teaches pupils about online harms, including the prevalence of deepfakes, pornography, and misogynistic influencers. Safeguarding against online risks now explicitly covers simulated harmful online AI interactions and the making, sending, or receiving of self-generated intimate images using AI.

The school also ensures that appropriate levels of security protection procedures are in place to safeguard our systems, staff and learners. We review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Online safety risks can be categorised into four areas of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact** – being subjected to harmful online interaction with other users such as peer-to-peer pressure and adults posing as children or young adults to groom or exploit children
- **Conduct** - personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images and online bullying
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing or financial scams. If pupils, students or staff are at risk, it should be reported to the [Anti-Phishing Working Group](#).

All staff are aware of these risk areas and should report any concerns to the DSL or DDSs.

The School is alert to the need to proactively prepare specifically for recognising and responding to incidents related to generative AI in Education and refers to the DfE guidance 'Generative artificial intelligence (AI) in Education'

<https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education> when managing these

issues. Any safeguarding related issues related to AI must be referred to the DSL or a DDSL.

28. Making or sharing of nudes or semi-nudes

Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or done offline between devices via services like Apple's AirDrop.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics'.

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

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

All incidents involving youth produced sexual imagery will be responded to as follows:

- the incident will be referred to the DSL immediately and the DSL will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the young people involved
- parents will be informed at any early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- at any point in the process, if there is concern a young person has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately in accordance with this policy.

Staff and parents or carers must not intentionally view any nude or semi-nude imagery unless there is a good and clear reason to do so. Wherever possible, the School's response will be based on what the DSL has been told about the content of the imagery.

Any decision to view imagery must be made by the DSL, using their professional judgement and in accordance with the School's child-protection procedures and current UKCIS guidance. Imagery must never be viewed where doing so is likely to cause significant distress or harm to a child.

Before viewing imagery, the DSL must be satisfied that viewing:

- is the only practicable way to decide whether other agencies should be involved because the facts cannot be established from the children concerned;
- is necessary to report the imagery to a website, application or reporting agency so that it can be removed, or to support a child, parent or carer in making such a report; or
- is unavoidable because the imagery has been presented directly to a member of staff or has been discovered on a School device or network.

The imagery must not be copied, printed, forwarded, shared or saved. The decision whether or not to view it, together with the reasons for that decision and any subsequent action, will be recorded.

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. In some instances, it may be necessary to refer the matter to the Police. Once a report is made to the Police, the report must be recorded, and the Police will investigate. This may include seizure of devices and interviews with the young people involved. 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 this is done. Members of staff should not search devices to delete images.

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).

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.

The UK Council for Internet Safety updated its advice for managing incidents of sharing nudes and semi-nudes in March 2024 – <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>. The school will have regard to this advice when managing these issues.

29. Domestic Abuse

Domestic abuse can include physical, sexual, psychological, emotional, controlling, coercive or economic abuse. It may occur between current or former partners or family members and includes teenage relationship abuse and child-to-parent or child-to-caregiver abuse.

Children are victims of domestic abuse in their own right where they see, hear or experience its effects. Any concern that a child may be affected by domestic abuse must be reported immediately to the DSL or a DDSL.

Under Operation Encompass, the Police notify a child's education setting where there are reasonable grounds to believe that the child may be a victim of domestic abuse. This includes children connected to the household who were not physically present during the incident.

The DSL, or a trained DDSL in their absence, will receive and manage notifications securely and ensure that appropriate support is considered promptly. An Operation Encompass notification does not replace the School's safeguarding procedures or a referral to children's social care where a child has been harmed or is at risk of harm.

Detailed arrangements for receiving, recording and acting on Operation Encompass notifications are contained in the School's internal safeguarding procedures.

30. Honour-based abuse

So called 'honour-based' abuse (HBA) is abuse (regardless of motivation) and should be handled and escalated as such. It encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. Staff and the DSL are aware of this dynamic and will consider it when deciding what safeguarding action to take.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

All staff must report any concern that a girl may be at risk of, or may have undergone, female genital mutilation to the DSL or a DDSL without delay so that normal safeguarding procedures can be followed.

A teacher who, in the course of their professional work, discovers through a disclosure by the girl or through visual evidence that FGM appears to have been carried out on a girl

under the age of 18 has a statutory duty to report the matter personally and directly to the Police. The teacher should also inform the DSL or a DDSL unless there is a good reason not to do so.

Staff must not examine a pupil to determine whether FGM has occurred. The personal mandatory reporting duty does not apply to suspected or at-risk cases where FGM has not been disclosed or visually identified; these cases must be managed through the School's usual safeguarding procedures.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is illegal. It is also illegal to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Children may be married at a very young age, and well below the age of consent in England. School staff receive awareness training and should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not allowed to return to England.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

31. Radicalisation and extremism

The Government defines extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Children are vulnerable to extremist ideology and radicalisation. As part of the Counter Terrorism and Security Act (2015), schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

There is no single way of identifying if a child is susceptible to extremist ideologies and radicalisation can occur through several different methods, which may include family, social media and the internet. Islamic extremism is the most widely publicised form of radicalisation but the school remains alert to the risk of radicalisation into white supremacy extremism.

As with other safeguarding risks, staff should remain alert to changes in a pupil's behaviour and speech which could indicate they are in need of protection.

Staff receive training to help identify signs of extremism. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture. Where staff are concerned that pupils are developing extremist views or show signs of becoming radicalised, they must discuss this with the DSL/DDSL. The DSL will follow the Channel guidelines for reporting concerns around radicalisation.

The City of London provides advice for managing concerns around radicalisation <https://democracy.cityoflondon.gov.uk/documents/s159450/Item%201%20-%20Prevent%20Policy%20and%20Channel%20Guidance.pdf> and the school will have regard to this advice.

Given the school's location staff receive training from City Police in awareness around possible terrorist threats and the school has an Emergency Management Plan to deal with emergency situations other than fire.

32. Private Fostering Arrangements

A private fostering arrangement occurs when a child under the age of 16—or under the age of 18 if the child is disabled—is cared for and accommodated for 28 days or more by someone who is not:

- the child's parent;
- a person with parental responsibility for the child; or
- a close relative of the child.

A close relative means a grandparent, brother, sister, uncle, aunt or step-parent, whether by full-blood, half-blood or marriage or civil partnership.

Private fostering is a private arrangement agreed between the child's parent and the person who will care for the child. It is not the same as a child being placed with a foster carer by a local authority.

Parents, private foster carers and any other person involved in arranging for a child to be privately fostered have a legal duty to notify the relevant local authority.

Where a member of staff becomes aware that a pupil may be living in a private fostering arrangement, or that such an arrangement is being planned, they must report this immediately to the DSL or a DDSL.

The DSL will notify the relevant local authority as soon as possible and will record the notification and any action agreed. The School will continue to monitor the child's welfare and will make a separate safeguarding referral where there are concerns that the child has been harmed or is at risk of harm.

33. Special Circumstances

33.1 Children who have a social worker

Children may need a social worker due to safeguarding or welfare needs. Local Authorities will share this information with us, and the DSL will hold and use this information to inform decisions about safeguarding and promoting the child's welfare.

33.2 Boarding Schools

Research has shown that children can be particularly vulnerable in residential settings. All boarding schools and residential special schools comply with the National Minimum Standards (NMS) for their particular setting and are appropriately inspected.

In line with KCSIE and the NMS for Boarding Schools, we will ensure that boarding accommodation is safe, secure, and subject to 24-hour supervision, with clear boundaries that respect pupils' privacy while enabling staff to fulfil their safeguarding responsibilities. Boarding pupils are expected to comply with reasonable instructions of the boarding staff. Their welfare is closely monitored, and they will have regular opportunities to meet privately with Boarding and other pastoral staff and information is shared appropriately with the DSL who retains overall responsibility for the welfare of these pupils while they are in our care. The DSL will manage any concerns with reference to the pupil's home local authority safeguarding arrangements and will liaise with parents and /or a named guardian, where appropriate.

In addition to the National Minimum Standards, the school adheres to strict overnight accommodation regulations.

- Children of different biological sexes must not share overnight accommodation.
- If a gender-questioning child does not want to share accommodation with children of the same biological sex, alternative arrangements (such as a separate room) will be sought where possible.

- Where an accommodation concern reflects a request for social transition, the school will evaluate it against our transition principles and safeguarding obligations before any decision is made.

We recognise that these pupils may face additional safeguarding challenges due to their separation from their parents and carers and as a result of living away from home. For these children, the risk of bullying (both in person and online), child-on-child abuse, inappropriate relationships and emotional isolation is greater and strong allegiances or blind spots can develop which risk creating a dynamic of power and control that can be abused. We have clear rules of acceptable conduct for staff and pupils which relate to the boarding context and include reference to local risks outside the school grounds. We provide additional training on maintaining effective relationships and on how to recognise and report behaviour of concern to boarding staff and pupils. Boarders are empowered to raise concerns and make suggestions for changes and improvements, which are taken seriously, and we offer a range of ways for concerns to be reported, which include access to an independent listener, separate from the school, if preferred. During exeat weekends, half-terms and holidays, responsibility for a boarding pupil's day-to-day care transfers to their parent, a person with parental responsibility or another adult formally authorised by them and accepted by the School once the pupil has been formally handed over.

Before a pupil leaves, the School will confirm the identity and authority of the responsible adult and satisfy itself that appropriate travel, accommodation, supervision and emergency-contact arrangements are in place. Any uncertainty or safeguarding concern must be referred to the DSL or a DDSL before the pupil is released.

The School remains responsible for acting on any safeguarding concern or information that comes to its attention before, during or after a period of leave. Where the School continues to provide or supervise an activity during an exeat or holiday, this policy and the School's safeguarding procedures continue to apply in full.

All residential staff will receive enhanced safeguarding training relevant to the boarding context and should be aware of the following:

- staff should maintain professional standards of behaviour and appropriate boundaries at all times in relationships between themselves and the pupils
- positive relationships between residential boarding staff and pupils are key to a happy and successful boarding experience for pupils, but staff must be aware of and comply with the guidelines set out in the Code of Conduct at all times
- residential staff should be aware of the potential for abuse of children by their peers in the boarding environment
- the procedure for reporting concerns is the same as for the non-boarding pupils.

The School will report safeguarding matters to the BSA as required by their safeguarding charter.

33.3 Looked After Children and previously looked after children

The most common reason for children becoming looked after is as a result of abuse or neglect. The School ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The Designated Teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Local Authority's virtual head for children in care.

Appendix One

Four categories of abuse

Physical abuse

Physical abuse is 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 (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include **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), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example **rape or 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 (including via the internet). **Sexual abuse can take place online, and technology can be used to facilitate offline abuse.** Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. **The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.**

Neglect

Neglect is 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);
- 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.

Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons, it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with their own or others' safety
- self-harm
- frequently miss school, arrive late or leave the school for part of the day

- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their schoolwork
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new ‘friends’.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

Appendix Two

Record of Concern

Child's Name:			
Child's DOB:			
Male/Female	Ethnic Origin	Disability Y/N	Religion
Date and time of concern:			
Additional information: (context of concern/disclosure)			
Your name:		Your signature:	
Position in school:		Date and Time of this record:	
Action and response of DSL:			
Feedback given to member of staff reporting concern:		Information shared with any other staff?	

	If so, what information and rationale for doing so?
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Return completed form to Designated Safeguarding Lead: Catherine Thomas or
Deputy Designated Safeguarding Lead: Joe Gorman, Chloe Shaw, Kim Thomas

Appendix Three



Low-Level Concern Form

This form must be used to record any concern that an adult working in or on behalf of the School may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work, but that does not meet the harm threshold.

Staff are not expected to determine whether a concern is low-level or meets the harm threshold. All concerns must be reported promptly to the Head or DSL, who will make that assessment. A concern that may meet the harm threshold must be managed immediately under Section 12.1 of this policy.

Part A: Details of the concern

Name of person about whom the concern has been raised:

Role and department:

Employer or agency, if applicable:

Name of person reporting the concern:

Role:

Is this a self-referral? Yes / No

Date and time the concern was reported:

Date, time and location of the incident or behaviour:

Name and role of any child or children involved:

Details of the concern:

Please provide a factual account of what was seen, heard or reported. Include relevant context, circumstances and, where possible, the exact words used.

Names and roles of any witnesses or other people present:

Any immediate action taken to safeguard a child or preserve evidence:

Signature of person reporting:

Date:

Part B: Assessment and action

Date and time received:

Received by:

Initial assessment against the harm threshold:

- Does not appear to meet the harm threshold and will be managed as a low-level concern.
- May meet the harm threshold and will be managed under Section 12.1.
- Further information or advice is required before a determination can be made.

Was advice sought from the LADO? Yes / No

If yes, record the date, time, person consulted and advice received:

Relevant Staff Code of Conduct or professional standard:

Response of the person who is the subject of the concern:

If they have not been informed, record the reason for that decision.

Enquiries or investigation undertaken:

Action taken:

Include any safeguarding action, management advice, training, support, disciplinary action, referral, notification to an employer or agency, or involvement of external agencies.

Decision and outcome:

Rationale for the decision and action taken:

Does this concern form part of a pattern or indicate a wider cultural or organisational issue?

Further action or review required:

Name and role of decision-maker:

Signature:

Date:

Review date, where applicable:

Signed:

Dated:

This record and any supporting documentation will be stored securely and confidentially in accordance with the School's safeguarding, low-level-concern and data-retention arrangements.

Policy Area	Staff
Author	Senior Deputy Head/DSL
Senior Team Lead	Senior Deputy Head/DSL
Governing Body Committee	Curriculum and Standards
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