

Safeguarding

and

Child Protection Policy

Including Children Absent From Education

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KEY EXTERNAL CONTACT DETAILS

Local Authority Designated Officer	Sue Darby TEL: 0118 9372684 EMAIL: LADO@reading.gov.uk
Local Authority Children's Social Services	TEL: 0118 937 3641 EMAIL: cspoa@reading.gov.uk DUTY TEAM TEL: 01344 351999 (This includes out of hours contact details)
Reading Safeguarding Children Partnership	Support Team email: BWSCP@reading.gov.uk
Multi-Agency Safeguarding Hub	TEL: 0118 9373641 EMAIL: cspoa@reading.gov.uk
Support and Advice about Extremism/PREVENT	**Police** Thames Valley Police EMERGENCY: 999 NON-EMERGENCY NUMBER: 101 EMAIL: preventreferralsreading@thamesvalley.policy.uk **Department for Education** NON-EMERGENCY NUMBER: 0800 011 3764 EMAIL: counter.extremism@education.gov.uk
FGM reporting - non-emergency policy contact number	101
NSPCC Whistleblowing Advice Line	ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 (Monday to Friday 8am to 8pm; weekends between 9am and 6pm) EMAIL: help@nspcc.org.uk
NSPCC Report Abuse in Education Advice Line	TEL: 0800 136 663 EMAIL: help@nspcc.org.uk
Disclosure and Barring Service	ADDRESS: DBS customer services PO Box 3961

	Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@dbs.gov.uk
School's Police liaison officer	PC 7476 Carly Baldwin PC 0060 Dawn Waterman
Teaching Regulation Agency	ADDRESS: Teacher Regulation Agency Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: TRA.Caseworker@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm) EMAIL: enquiries@ofsted.gov.uk
UK Safer Internet Centre	0345 601 3203 enquiries@saferinternet.org.uk
Reporting serious wrongdoing to the Charity Commission	For further guidance see: https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer whistleblowing@charitycommission.gov.uk
Independent Schools Inspectorate	TEL: 0207 600 0100 EMAIL: info@isi.net

KEY SCHOOL CONTACT DETAILS

Governors	**Chair of Governors** Nick Wood EMAIL: nickwood@leightonpark.com **Nominated Safeguarding Governor** Matt Winkless EMAIL: mattwinkless@leightonpark.com **Nominated Deputy Safeguarding Governor** Gwenan Sykes

	EMAIL: gwenansykes@leightonpark.com
Designated Safeguarding Lead ("DSL") and Deputy Designated Safeguarding Lead ("DDSL"). Together these form the Designated Safeguarding Team (DST)	**Main DSL for the School** Elaine Newall TEL: 0118 9879 508 EMAIL: elainenewall@leightonpark.com **Deputy DSLs (DDSLs)** Eddie Falshaw TEL: 0118 9879604 EMAIL: edwardfalshaw@leightonpark.com Rachel Barnard TEL: 0118 9879578 EMAIL: rachelbarnard@leightonpark.com Tash Coccia TEL: 0118 9879540 EMAIL: natashacoccia@leightonpark.com Sally Saunders TEL : 0118 9879595 EMAIL : sallysaunders@leightonpark.com Alex Leighton TEL: 0118 9879580 EMAIL: alexleighton@leightonpark.com Lee Carter TEL: 0118 9879694 EMAIL: leecarter@leightonpark.com
Designated Teacher for Looked After Children	Eddie Falshaw TEL: 0118 9879604 EMAIL: edwardfalshaw@leightonpark.com
Head	Luke Walters TEL: 0118 9879607 EMAIL: lukewalters@leightonpark.com

POLICY STATEMENT

This policy applies to Leighton Park ("the School"). This policy is reviewed and updated annually (as a minimum) and is available on the School website or hard copies are available from the School office.

REGULATORY FRAMEWORK

This policy has been prepared to meet the School's responsibilities under the following legislation:

- Education (Independent School Standards) Regulations 2014
- The National Minimum Standards for boarding schools (May 2026)
- Children Act 1989
- Children Act 2004
- Crime and Policing Act 2026
- Education and Skills Act 2008
- Safeguarding Vulnerable Groups Act 2006
- Children and Social Work Act 2017
- Children's Wellbeing and School's Act 2026
- Care Act 2014
- Data Protection Act 2018, UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025 (together referred to as 'data protection laws')
- Charities Act 2011
- Human Rights Act 1998
- Equality Act 2010

This policy has regard to the following guidance and advice:

- Keeping Children Safe in Education (September 2026) ("KCSIE")
- Working Together to Safeguard Children (March 2026) ("WT")
- Information sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers (May 2024)
- Prevent Duty Guidance: for England and Wales (March 2024) ("Prevent").
- Key Principles of Prevent (February 2026)
- Channel duty guidance: protecting people susceptible to radicalisation (December 2023)
- Relationships education, relationships, and sex education (RSE) and health education (September 2026)
- Behaviour in schools: advice for headteachers and school staff (February 2024)
- Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (July 2026)
- Children Missing Education (September 2025)
- Meeting Digital and technology standards in schools and colleges (August 2026)
- The Charity Commission Guidance Safeguarding and protecting people for charities and trustees (June 2022) and How to report a serious incident in your charity (January 2026)
- After school clubs, community activities, and tuition (safeguarding guidance for providers) (February 2026)
- Mobile phones in schools (June 2026)
- PACE Code C 2019
- Searching, screening and confiscation: advice for schools (September 2022)

- Teaching online safety in schools (January 2023)
- What to do if you're worried a child is being abused: advice for practitioners (2015);
- Multi-agency statutory guidance on female genital mutilation (July 2020)
- Virginity testing and hymenoplasty multi-agency guidance (updated April 2024)
- Multi-agency practice principles for responding to child exploitation and familial harm (TCE support programme)
- Plan technology for your school (September 2024)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (March 2024)
- Generative AI: product safety expectations (January 2025)
- Using AI in education settings: support materials (June 2025)
- Harmful online challenges and online hoaxes (February 2021)
- Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (February 2017)
- Forced marriage resource pack (May 2023)
- Education Against Hate (maintained)
- Managing the risk of radicalisation in your education setting (September 2023)
- Equality Act: advice for schools (June 2018)
- After-school clubs, community activities and tuition: safeguarding guidance for providers (September 2023)
- Sponsorship Duties (May 2025)

Charities advice:

- Safeguarding for charities and trustees (Charity Commission, November 2021)
- Safeguarding and protecting people for charities and trustees (Charity Commission, June 2022)
- Charities and social media (Charity Commission, April 2026);
- How to report a serious incident in your charity (Charity Commission, 16 January 2026);
- Reporting a serious incident in your charity when it involves a partner (Charity Commission, December 2019);
- Report serious wrongdoing at a charity as a worker or volunteer (Charity Commission, June 2019);
- Guidance on reporting safeguarding concerns in a charity (Department for Digital, Culture, Media and Sport, (**DCMS**) March 2022);
- Guidance on handling safeguarding allegations in a charity (DCMS)
- Safeguarding for trustees by NCVO;

- Charity Governance Code
- Good Governance for Safeguarding by Bond

This policy also considers the procedures and practice of the local children's services, Reading Safeguarding Children Partnership and their designated officers.

The following School policies, procedures and resource materials are relevant to this policy:

- Staff code of conduct (including acceptable use of technologies)
- Whistleblowing policy
- Safer recruitment policy
- Smoking, alcohol and misuse of drugs and substances policy
- Online safety policy
- Behaviour and discipline policy
- Anti-bullying policy
- IT and Digital Services Acceptable Use Policy (AUP)
- Absence, attendance and registration policy
- Access to school premises by people outside the School policy
- Risk assessment policy
- Missing student procedure
- SEND policy
- Health and safety policy
- RSE policy

At Leighton Park School we are committed to safeguarding children and young people, and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.

The School's safeguarding aims and the purpose of this policy are:

- To actively promote the well-being of students.
- 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 support the child's physical and mental development in ways that will foster security, confidence and independence.

- To ensure consistent good safeguarding practice throughout the School, to include the promotion of a zero tolerance approach to sexism, racism, misogyny/misandry, homophobia, biphobia, child-on-child abuse including sexual violence and harassment, derogatory behaviour and other forms of physical violence and conflict in which students are confident to report it and staff are confident to identify and respond to it.

- To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.

- To provide and promote systems for students as well as staff which are easily understood and readily accessible so that anyone may confidently report abuse knowing that concerns will be treated seriously.

- To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse, neglect, exploitation or modern slavery, specifically:
    - to ensure that staff know: how to identify the signs of abuse, neglect, exploitation and modern slavery:
    - how to report and record concerns about a student, including where they are given reason to suspect that a child sex offence may have been committed;
    - that they have an individual responsibility to be alert to the signs and indicators of abuse and for referring child protection concerns to the Designated Safeguarding Lead The indicators and key safeguarding risks for the School community are set out at Appendix 1;
    - that they have a responsibility to provide a safe environment where children can learn.

- To provide a systematic means of monitoring children known or thought to be at risk of harm or in need of early intervention and support, and to ensure that the School contributes to assessments of need and support plans for those children.

- To ensure excellent levels of communication amongst staff on pastoral and safeguarding matters.

- To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.

- To develop and promote effective working relationships with other agencies, especially the Police and other appropriate external children's services.

- To ensure that all staff including supply staff and volunteers working within the school who have substantial access to children have been checked prior to their starting dates as to their suitability, including verification of their identity, qualifications, and a DBS check, and a central record is kept for audit.

- To ensure that all students are provided with the guidance they need to keep themselves safe including when online.

- In order to further promote the welfare and safety of students, to safeguard the protected characteristics of students under the Equality Act 2010, including:

    - disability
    - gender reassignment
    - race
    - religion or belief
    - sex
    - sexual orientation.

- To ensure that the safeguarding policy is up-to-date, incorporating the most recent DfE and local authority guidance, and is suitable for its purposes.

- To recognise the importance of the role of the DSL and ensure they have the time, training and support necessary to undertake their duties which include, providing advice and support to staff, students' online safety, taking part in inter-agency meetings and contributing to the assessment of children in need.

- To maintain confidentiality with regard to safeguarding matters: The Head and DSL will disclose information about a child to other members of staff on a need-to-know basis only.

- To ensure through a whole-School approach including teaching, training and curriculum planning that all students are provided with the guidance they need to keep themselves safe including when online.

SCOPE AND APPLICATION

This policy applies to the whole School. This policy applies to all registered pupils (referred to in this policy as "students") whether they are under or over 18 years of age. This policy applies at all times including where students or staff are away from the School, whether they are on school-arranged activities or otherwise, and whether or not the School is open. It will therefore apply out of School hours and in the holidays. This policy applies to core School activities and to out of hours and commercial activities. The policy is designed to address:

- The specific statutory obligations on the School to safeguard and promote the welfare of children

- The School's charity law safeguarding duty. Safeguarding responsibilities are a key governance priority for the trustees and for everyone. The trustees are committed to the School being a safe and trusted environment. Everyone must take reasonable steps to protect the people who come into contact with the charity through its work, from harm. This includes students, anyone else who benefits from the School's work, staff, volunteers, parents or anyone else who comes into contact with the School through its work. Even where the school may not strictly have a duty of care, you will still need to think about steps to address the risk of harm

DEFINITIONS

References to the **Governing Body** are references to the proprietor of the School.
Child means a child under the age of 18**.**
Safeguarding is the protection of people from harm.

Safeguarding and promoting the welfare of children is defined in KCSIE 2026 as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

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

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

- physical abuse;
- emotional abuse;
- sexual abuse; and/or
- neglect.

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

DSL means the School's Designated Safeguarding Lead. References to the DSL include the Deputy DSL (**DDSL**) where the DSL is unavailable. **DST** means the Designated Safeguarding Team.

Early help means support for children and families as soon as a problem emerges, at any point in a child's life. This includes universal and community-based early help

services and targeted early help provided through **Family Help** arrangements. Family Help may include both non-statutory early intervention and support provided under section 17 of the Children Act 1989 (children in need).

The term '**making or sharing nudes and semi-nudes**' refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term '**images**' includes all visual content, such as photographs, videos and livestreams.
Images may be taken by the child themselves or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

References to **harmful sexual behaviour** in this policy refer to problematic, abusive and violent sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate and may cause developmental damage, may be harmful towards self or others, or abusive towards another child, young person or adult.

References to **children missing education (CME)** mean children of compulsory school age who are not registered students at a School and are not receiving suitable education otherwise than at School.

Senior leadership means The Head, The Director of Finance and Operations, The Senior Deputy Head, The Deputy Head: Academic, The Senior Assistant Head: Partnerships and Co-curricular, The Senior Assistant Head: Community and Wellness, The Deputy Director of Finance and Operations, The Director of Safeguarding/DSL

Reference to **staff** includes all those who work for or on behalf of the School, regardless of their employment status, including contractors, supply staff, trainee teachers, volunteers and Governors unless otherwise indicated

The School's approach to safeguarding leadership

The governing body has overall responsibility for all matters which are the subject of this policy, including:

- legal responsibility to ensure that arrangements are made to safeguard and promote the welfare of students at the school, having regard to relevant guidance issued by the Secretary of State;
- strategic leadership responsibility for the School's safeguarding arrangements; and
- specific responsibilities to facilitate a whole school approach to safeguarding, set out in more detail in Part 2 of KCSIE.

The governing body:

- appoints a board level lead on safeguarding matters, whose contact details are set out in the School contacts list at the front of this policy;
- ensures that all members of the governing body receive appropriate safeguarding and child protection (including online) training, both on induction and thereafter regularly updated. Training should be consistent with KCSIE and Local Safeguarding Partner guidance;
- ensures it discharges its legal responsibilities under the Human Rights Act 1998 and the Equality Act 2010 (see below), having regard for the implications for safeguarding that such responsibilities can have;
- ensures the School has appropriate cyber security systems in place, in line with the Cyber security standards, to strengthen resilience, reduce the risk of disruption, prevent data breaches, and mitigate safeguarding risks[1];
- ensures that appropriate arrangements are in place for the whole board to discharge their function, including appropriate consideration of safeguarding matters at termly Pastoral and Safeguarding Committee meetings and an annual review of safeguarding; and
- establishes appropriate delegation arrangements at School level, led by the Head and DSL, to enable the School to discharge its safeguarding duties effectively.

EQUALITY ACT 2010

The School understands and recognises their obligations under the Equality Act and that the school must not discriminate against students because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the School will consider how to support students with regard to particular protected characteristics in order to meet their specific needs. The School will also consider their duty to make reasonable adjustments for disabled students.

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

The School will be inclusive, anti-discriminatory and responsive to the needs and experiences of children and families of different ethnic, cultural and religious backgrounds.

CONCERNS ABOUT A CHILD

The School has a duty to consider at all times the best interests of the student and take action to enable all students to achieve the best outcomes. Safeguarding and promoting

[1] Guidance on e-security is available from the National Education Network, and broader cyber security advice, including resources for governors and trustees, can be found at National Cyber Security Centre – NCSC.

the welfare of children is everyone's responsibility. The School adopts a 'whole school' approach to safeguarding. This means involving everyone in the School and ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

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

The School has arrangements for listening to children and providing early help, and the pastoral teamwork with key staff to do so, including making referrals for support where necessary. Staff must record all concerns in writing and consistently with the School's system for recording safeguarding concerns.

Students aged 18 or over

It is not uncommon for the School to have some students on roll who reach the age of 18 or 19 in the course of their education. The School's safeguarding responsibilities extend to all members of the School community and its safeguarding policies, procedures, and codes of conduct apply to all students, including those aged 18 or over. The School acknowledges its duty of care to these students and the need to consider their specific needs and rights, as well as the need to manage any risk they may present to others, with reference to differences in legal status, maturity, or life experience, for example. Where a student who is aged 18 or over presents safeguarding concerns, the School will consider whether they are, or may be, an "adult at risk" under the provisions of the Care Act 2014. If so, it will follow appropriate safeguarding procedures, including referrals to the relevant local authority's safeguarding adults board, where relevant.

PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

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

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* (May 2024) supports staff who have to make decisions about sharing information. The governing body recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under data protection laws must not be allowed to stand in the way of safeguarding and promoting the welfare of children, and data protection laws do not prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the DSL.

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

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and gaining consent would place a child at risk
- not providing students' personal data where the serious harm test is met (* see note)

(The "serious harm test" is an exemption to the right of access to personal data. For example, if someone has requested access to their (or their child's) personal data held by the school, the school must consider whether disclosing the data would cause serious harm to anyone's mental or physical health. This exemption only applies to health data (where a health professional has confirmed the exemption applies), social work data and, importantly for schools, education data.)*

All staff should:

- listen carefully
- avoid asking leading questions
- observe their behaviour
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe

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

All concerns, discussions, and decisions (including the rationale for those decisions) made under these procedures should be recorded in writing. This includes instances where referrals were or were not made to another agency, such as children's social care or the Prevent programme. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of *KCSIE*.

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

Where there is a safeguarding concern, the School will ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful sexual behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. The School implements a child-centred approach to safeguarding. Whilst the School is committed to working collaboratively, and in partnership, with parents and carers as far as possible, the wishes and feelings of the child and what is in their best interest is always central to the School's decision-making process.

The information created in connection with this policy may contain personal data. The School's use of this personal data will be in accordance with data protection law. The School has published on its website privacy notices which explain how the School will use personal data.

All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.

Extra-familial harm

Safeguarding incidents and / or behaviours can be associated with factors outside the School and / or can occur between children outside the School, inside and outside of home and online.

All staff, including the DSL, should consider the context within which such incidents and / or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare, and should record these appropriately.

Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.

Extra-familial harm: all staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse, neglect, exploitation and/or modern slavery in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationships abuse, including physical, sexual, emotional abuse and stalking), criminal exploitation (including financial exploitation), serious violence, county lines and radicalisation and harm associated with organised networks or gangs. This may also include exploitation linked to modern slavery. The School will take a contextual safeguarding approach when assessing such risks.

Risk assessment

Where a concern about a student's welfare is identified, the risks to and needs of that student will be assessed and appropriate action will be taken to reduce the risks identified and address the child's wellbeing needs.

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 student welfare or safety plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting student welfare will be systematic and student focused.

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

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.

Universal services and community based Early Help assessment

Universal services and community based Early Help play a crucial role in identifying emerging problems and providing support at an early stage. They are not an individual service, but a system of support delivered by local authorities and their partners working together and taking collective responsibility to provide the right provision in their area. It is distinct from targeted early help delivered through Family Help teams, which are more formal arrangements coordinated by local authorities, where a plan is in place and a lead practitioner appointed.

The School's safeguarding training includes guidance about early help processes and prepares all staff to identify children who may benefit from universal services and community-based Early help, or targeted Early help through Family Help arrangements. Staff are mindful of specific safeguarding issues and those students who may face additional safeguarding challenges and / or varying resilience levels from time to time.

Any child may benefit from community-based early help or targeted early help through Family Help arrangements, but all staff should be particularly alert to the potential need for universal services and community based early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health, and care plan)
- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited signs of abusive, violent and/or harmful behaviours
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, care or from home
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, or in Alternative Provision or a Pupil Referral Unit
- Is misusing drugs or alcohol themselves
- Is at risk of exploitation, modern slavery, trafficking, including sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending

- Is at risk of honour-based or faith-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child
- Is a looked after child
- Is a student from overseas without any adult family members in the UK

In the first instance, staff who consider that a student may benefit from community based early help, or targeted early help through Family Help arrangements should keep a written record of their concerns and in the first instance discuss this with the School's DSL. If appropriate, the DSL will work with the relevant LA Children's Service to their home address, to undertake an assessment of the need for early help. The DSL will support staff in liaising with external agencies and professionals in a community based early help assessment, as appropriate. In some cases School staff may be required to take a lead role. Further guidance on effective assessment of the need for early help can be found in WT.

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

What staff should do if they have concerns about a child

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

As set out above, staff should not assume that somebody else will take action and share information that might be critical to keep a child safe; they should maintain an attitude of "it could happen here". When concerned about the welfare of a student, staff members should always act in the **best** interests of the student. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

Where, in the course of engaging in a relevant activity, a member of staff is given reason to suspect that a child sex offence may have been committed, they must report the matter to the DSL (or DDSL in the DSL's absence) as soon as practicable. Where a notification is required under the Crime and Policing Act 2026, this will ordinarily be made by the DSL on behalf of the member of staff in accordance with the School's safeguarding procedures.

What staff should do if a child is in danger or at risk of harm

If staff (including governors, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School's Local Safeguarding Children Partnership is the Reading Safeguarding Children Partnership..

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.

Use of restrictive interventions, including the use of reasonable force

There are circumstances when it is appropriate for staff to use restrictive interventions, including the use of reasonable force, seclusion and restraint, to safeguard students and others. All members of staff have a legal power to use reasonable force in certain circumstances. In all cases, "Reasonable" means using no more force than is necessary, for the least amount of time required to address the risk.

Staff should refer to School's Behaviour and discipline policy and the Staff code of conduct for more detailed guidance about the use of restrictive interventions.

What staff should do if they discover an act of Female Genital Mutilation ("FGM")

Staff must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a student may be at risk of FGM.

What staff should do if they have concerns that children are at risk from or involved with serious violent crime

All staff should be aware of the indicators which may signal that children are at risk from or are involved with serious violent crime. These may include increased absence from

School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries. For further detail on the definition of serious violence, risk factors, indicators and the School's expectations regarding weapons see Appendix 1.

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

How should staff respond to an incident of nudes and semi-nudes being made or shared by students

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

'Sharing nudes/semi-nudes' means the making or sharing of nude or semi-nude images, videos, or live streams by persons under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The making or sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

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

Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes. Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

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

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

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

An immediate referral to police and/or children's social care through MASH or equivalent will be made if any of the following points apply:

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

If none of the above apply, the School may decide to respond to the incident without involving the police or children's social care. All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. The decision to respond to an incident without involving the police or children's social care will only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the School's pastoral support and disciplinary framework. Any decision in this regard will be made by the DSL with input from the Head. The decision will be made and recorded in line with this policy and will be based on consideration of the best interests of any child or young person involved. Any decision will take into account proportionality as well as the welfare and protection of any child or young person. The decision will be reviewed throughout the process of responding to the incident. If doubts remain, local safeguarding arrangements will be followed.

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

What staff should do if a child is absent from education

The School will take active steps to promote, monitor and analyse school attendance.

Children who are absent from education, particularly persistently, can be a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is therefore important that the School's response to such absence supports identifying such abuse and helps prevent the risk of them being absent from education in the future. The School's procedures for unauthorised absence and for dealing with children who are absent from education are set out in the School's policy on Absence, Attendance and Registration, and involve actively searching for children who are unexpectedly absent, including working with the police where appropriate. Any child subject to a Multi-Agency Child Protection Plan who is absent without satisfactory explanation will be reported to their Key Social Worker as soon as possible and within two days in any case. Staff will monitor students' attendance through their daily register and will inform senior staff who in turn will be in touch with the local children's services for students who are regularly absent from school or have missed 10 school days or more without permission. Further detail can also be found at Appendix 1 of this policy.

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

When working with local authority children's services where school absence indicates safeguarding concerns the School will have regard to the DfE guidance *'Working together to improve school attendance : statutory guidance for maintained schools, academies, independent schools and local authorities (July 2026).*

What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)

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

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the

child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

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

What staff should do if a child requires mental health support

The School has an important role to play in supporting the mental health and wellbeing of its students. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School aims to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our students.

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

Staff should refer to the Mental Health and Well-Being Policy for more detailed guidance on how to support students with their mental health.

What staff should do if they have safeguarding concerns about another staff member

If staff have safeguarding concerns about another staff member then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff and staff refer the matter directly to the local authority designated officers for Reading.

What staff should do if they have concerns about safeguarding practices in the School

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

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

What should staff do if they have concerns about Online Safety, Filtering or Monitoring

The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities so that students learn how to keep themselves safe on-line and when accessing remote learning.

The School will also put in place appropriate security protection measures to safeguard information systems and review the effectiveness of these procedures.

The School ensures appropriate filters and monitoring systems are in place and meet the DfE's filtering and monitoring standards contained in its guidance *Meeting digital and technology standards in schools and colleges* (August 2026)(see the School's Online Safety Policy) and is mindful that this should not lead to unnecessary restrictions on learning. If staff have any concerns relating to online safety, filtering or monitoring they should follow the procedures set out in the Online Safety Policy.

ARRANGEMENTS FOR DEALING WITH CHILD ON CHILD ALLEGATIONS (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)

Child on child abuse is abuse by one or more children of any age against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying and faith-based prejudice or race based discrimination), abuse within intimate personal relationships between peers (teenage relationship abuse), physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, physical assault and harm, or the treat of harm with a weapon, upskirting, consensual and non-consensual making or sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, harmful sexual behaviour including misogyny, child on child sexual violence (such as rape, assault by penetration and sexual assault) and sexual harassment (such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse), causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

The School takes a whole-school public health / preventative approach to harmful sexual behaviour, recognising the escalatory nature of misogyny and other forms of prejudice from low-level sexist language to more serious harmful behaviours, which may

contribute to an unsafe environment or normalisation of abuse, and the benefits of early identification and intervention.

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

Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. The School takes a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

All staff should challenge inappropriate behaviour, including sexism and misogyny, between students and anyone who suffers, witnesses or hears of abuse of any form between students is asked to report it in accordance with this policy and / or the School's behaviour and discipline and anti-bullying policies, so that appropriate action can be taken.

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

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

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

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children and further details of the processes for safeguarding students with SEND are set out in Appendix 1. The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child on child abuse. A designated member of the governing body will take a particular interest in boarding and in the safeguarding needs of students who board and will liaise with the boarding staff to this end. Staff with boarding duties are required to recognise the additional responsibilities arising from boarding education and around the clock care. The School's record of known and alleged bullying incidents specifically specifies which are boarding-related to assist the School in identifying patterns and boarding-related problems. The School will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times. The School will report safeguarding matters to the Boarding Schools Association as required by their Safeguarding Charter.

The school will take all reasonable measures to minimise the risk of child on child abuse, including through PSHE, relationship and sex education programmes, and specific actions promoted through the school's student behaviour and anti-bullying programmes. Relationships and Sex Education and PSHE teach students about respectful, positive, safe and healthy relationships and consent. The School takes particular note of the potential impact of child on child abuse on the mental health of students and the PSHE and wellbeing programmes are designed to minimise the risk of such abuse.

Where an issue of student behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour and Discipline policies:

A student against whom an allegation of abuse has been made may be suspended from the School as a neutral act during the investigation. The School will take advice from Reading Children's Services on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged victim and perpetrator(s). If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the local authority, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the

School and advice will be sought as necessary from the Local Authority where the child resides, and/ or the police as appropriate. The School will have regard to the procedures set out in *KCSIE* at all times.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL who should consider. Parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principle that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL will balance the victim's wishes against their duty to protect the victim and other children.

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

The School will follow the UKCIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (March 2024) when responding to an allegation that nudes and/or semi-nudes have been shared. Further guidance on the processes to be followed in the event of suspected sexting involving students is set out above under "How should staff respond to an incident of nudes and semi-nudes being shared by students".

All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. It is also recognised that such behaviour is preventable, and that early intervention is key.

Appropriate action will involve supporting all members of the School community who may be involved as a priority. This may require investigation by the School or other agencies. Until investigations have been undertaken and findings made, the School will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation.

In the event of disclosures about child on child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the School through the pastoral team. Support may include referral to the School's student

counsellor. The School may also devise a student welfare risk assessment and add them to our internal Pastoral Watch list, so that key staff can offer the correct bespoke support. The child's wishes will be central to the support offered by the School. Support from external agencies will be sought, as appropriate.

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

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

This should be undertaken whether or not the incident is alleged to have occurred at school, or when the student involved was under the school's care and whether or not the student is under 18, as an issue which may impact student welfare. Disciplinary action will follow separately, if appropriate.

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

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

The School will keep a written record of all concerns, discussions and decisions made.

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

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour and discipline policy.

DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF

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

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

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

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

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the LADO on a no-names basis.

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

1. Allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head. Where the Head is absent or is the subject of the allegation, reports should be made to the Chair of Governors. Where the Head is the subject of the allegation, the Head must not be informed of the allegation prior to contact with the Chair of Governors and LADO. However, staff may consider discussing any concerns/allegations with the DSL and may make any referral via them.

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

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

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

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

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

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

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

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

7. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the

School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

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

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

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

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

12. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be

either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.

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

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

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

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

should be asked to consider if action might be appropriate against the person responsible even if they are not a student.

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

DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT SUPPLY TEACHERS AND CONTRACTORS

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

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

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

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

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

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

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

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

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

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

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

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

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

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

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

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

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

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with data protection laws at all times. The information will be retained in accordance with the Data Retention Policy (which is available on the School's website), or until the individual has left employment, whichever is longer.

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

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

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

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

SAFER RECRUITMENT

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School. The School will check the suitability of staff and volunteers (including staff employed by another organisation) in accordance with Part 3 of KCSIE, including the requirements relating to regulated activity and DBS checks for volunteers introduced by the Crime and Policing Act 2026. See the School's separate Safer Recruitment Policy.

The School maintains a single central register of appointments for all staff.

For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

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

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

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

The DST liaising with the HR Department will take a risk-assessed view as to the safeguarding guidance provided for contractors and community users of the school facilities and as to how this is managed in practice.

MANAGEMENT OF SAFEGUARDING

Record Keeping

All concerns, discussions and decisions made, and the rationales for those decisions, should be recorded in writing, either handwritten or recorded electronically. Rationales will be logged on MyConcern.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. The report should be recorded on MyConcern and the DSL notified, either in person or via MyConcern, as soon as possible. Handwritten notes or information should be uploaded to MyConcern.

Records should include:

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

- a rationale for decisions made, including instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program.

If in doubt about recording requirements, staff should discuss with the DSL.

Concerns are followed up as per policy, involving other agencies as required, and the trail recorded on MyConcern.

The Designated Safeguarding Team

The School's DSL is Elaine Newall who is a member of the leadership team.

Eddie Falshaw, Rachel Barnard, Tash Coccia, Alex Leighton, Lee Carter and Sally Saunders are the DDSLs. The DSL and DDSLs make up the DST. In the absence of the DSL, reports should be made to one of the DDSLs. This ensures there is the required cover for the role at all times. The School maintains formal cover arrangements and shared confidential reporting systems to ensure continuity of safeguarding when the DSL is unavailable.

If, in exceptional circumstances, the DSL (or a deputy) is not available, this should not delay appropriate action. Staff should consider speaking to a member of senior leadership and/or contacting local authority children's social care directly. Any action taken must be shared with the DSL as soon as possible.

The contact details for the DST can be found on the Key Contacts page at the start of this policy.

The DSL is a senior member of staff on the School's leadership team with the necessary status, authority, skills and experience to take lead responsibility for all aspects of safeguarding and child protection matters in the School including online safety and understanding the monitoring and filtering systems. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice.

The DSL will also take lead responsibility for online safety and understanding the filtering and monitoring systems and processes the School have in place and as such should receive suitable training to allow them to discharge their responsibilities effectively. The DSL works with the governors to review and update the School's safeguarding policy.

The DSL will liaise with the Head in relation to police investigations and appropriate adults under PACE Code C. The DSL will liaise with the Head and governors as required and at least on a termly basis.

The DSL (or deputy DSL) will, where required, make notifications to the local authority and/or police in accordance with the School's safeguarding obligations, including the statutory duty to report suspected child sex offences under the Crime and Policing Act 2026.

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

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

During term time, the DSL and/or a DDSL will always be available in person (during school hours) for staff in the School to discuss any safeguarding concerns. The DST is sufficiently large to ensure that at least one member of the team will be on site at all times when students are present, providing cover for any illnesses and related absences, e.g. through quarantine and sickness. Should all members of the team be affected, then the Head liaising with the local authority will take extraordinary action to ensure that safeguarding matters are handled effectively.

The DSL should liaise with the safeguarding partners and work with other agencies in line with *WT*. "*NPCC – When to call the police: guidance for schools and colleges*" (npcc.police.uk) can assist the DST to understand when they should consider calling the police and what to expect when they do. If the School has questions about any police investigation, it will ask the police. The DSL will also be responsible for liaising with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health. The DST should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.

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

delegated. The DST will welcome feedback from students and respond to this appropriately.

The School will provide a suitably detailed job description for each member of the DST. Full details of the DSL's role can be found at Annex B of *KCSIE*.

Senior Leadership and Head

The senior leadership will include the designated safeguarding lead. The senior leadership must monitor and challenge the Designated Safeguarding Team (DST) in an appropriate manner to ensure that it discharges its duties effectively.

At least once each term, the Head will meet with the DST as a whole.

The senior leadership shall receive an annual safeguarding audit from the DST.

The senior leadership shall ensure that all members of the DST are effectively trained and that this training is up-to-date.

The senior leadership should ensure that the DST and members of staff generally understand and act appropriately with regard to students with particular vulnerabilities and sensitivities and needs including boarders, and those with SEND and EAL, those who are looked after or who are being supported by local agencies, LGBTQ+ students and these students with mental health concerns.

The senior leadership will ensure that they have a secure understanding of child on child abuse and how the school should deal with allegations of sexual harassment and abuse.

The senior leadership shall ensure that all members of staff understand the need to reassure victims of abuse or alleged abuse, including domestic abuse, that they will be taken seriously, supported and kept safe.

The senior leadership directly or where confidentiality is required through the DSL will scrutinise records relating to safeguarding, bullying and behaviour.

The senior leadership shall ensure that appropriate and effective systems are in place to deal with child on child abuse, bullying in all its forms, sexual violence and sexual harassment.

Ensure that staff are trained to recognise signs of abuse including child-on-child abuse and know how to respond effectively.

All Other Staff

Members of staff should have a suitable understanding of KCSIE and of this safeguarding policy, of the types and signs of abuse, and of the management of disclosures, allegations child on child abuse, sexual harassment and abuse, and other safeguarding concerns.

Members of staff must understand that if there is a risk of immediate harm to a child, they should act immediately. Delay is unacceptable.

The onus is upon the member of staff to report their concerns even if the concern appears to be minor in nature or if they have a 'niggling doubt' and are uncertain about the nature of their concern.

Members of staff should follow the guidelines set down for listening to children, avoiding leading questions or avowals of belief in what is being disclosed by the child.

Members of staff must never promise Rec to a student when this may compromise their safety or well-being: all staff must be aware that the school has a professional as well as legal responsibility to share information with other agencies in order to safeguard children.

Although they should understand that the DST is there to provide guidance and act on behalf of the child and the school, members of staff should be aware that anyone may make a referral to children's services or the police. However, members of staff should never contact parents themselves: this is a matter for the DST or for local agencies.

Members of staff should not assume that another colleague or professional will take action on a safeguarding matter and should contact the DSL or appropriate external agency.

Members of staff may use the school's whistleblowing policy to draw attention in good faith to any perceived failing with regard to safeguarding practice either in individual cases or concerning more general circumstances.

Every member of staff should play their part in providing a safe environment for students.

The school's code of conduct sets out our expectations of staff and is read and agreed by all staff members, with particular regard to safeguarding matters including staff/student relationships and the use of social media, but also taking note of the following requirements:

- treating all students with respect
- setting a good example by conducting ourselves appropriately
- involving students in decisions that affect them
- encouraging positive, respectful and safe behaviour among students
- being a good listener
- being alert to changes in students' behaviour and to signs of abuse, neglect, exploitation or modern slavery
- recognising that challenging behaviour may be an indicator of abuse
- reading, understanding and putting into practice, this safeguarding and child protection policy, behaviour and discipline policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact, sexual exploitation, extremism, e-safety and information-sharing
- asking the student's permission before initiating physical contact, such as assisting with physical support during PE, Music or Drama or administering first aid

- maintaining appropriate standards of conversation and interaction with and between students and avoiding the use of sexualised or derogatory language
- being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse, (extra familial harm)
- applying the use of reasonable force only as a last resort and in compliance with the School's behaviour and discipline policy
- referring all concerns about a student's safety and welfare to the DSL, or, if necessary, directly to police or children's social care

All members of staff should understand the need to reassure victims of abuse or alleged abuse that they will be taken seriously, supported and kept safe.

All members of staff will be aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

In addition, staff should 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 or a vulnerable adult aged 18 and over, 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 student under 18 may be a criminal offence, even if that student is over the age of consent. It is also viewed as an abuse of trust if there is a relationship between a member of staff and student over the age of 18.

Any member of staff leading a trip or visit outside of school should liaise with the person responsible for educational visits and the DST to ensure that all appropriate safeguards are in place.

Boarding Staff

Taking note of all the above responsibilities for members of staff, those with boarding duties should recognise the additional responsibilities arising from boarding education and around the clock care.

In particular boarding staff should not put themselves at risk by failing scrupulously to adhere to the guidance provided on staff/student relationships.

Students

Students should work with the school to ensure that all may enjoy a safe and productive environment.

Students should have the confidence to report any concerns, either about themselves or others, including those relating to child on child abuse and sexual harassment, to a member of staff.

Students should not put themselves at risk online, using smart or mobile technology, or in the public arena, following the guidance provided through personal, health and social education and through other elements of the educational process in the school.

Parents

Parents must understand that, whilst the school will endeavour to involve them in matters relating to their children, the school may not, without proper authority to do so, relate the details or even fact of a disclosure to them: this will be the case when to do so may undermine the safety or well-being of a child: guidance is always sought from local children's services and/or the police on such occasions.

Parents are expected to support the safeguarding work of the school including regarding keeping children safe online including when using smart and mobile technology and when remote learning is necessary.

TRAINING

Induction and training are in line with advice from Reading Safeguarding Children Partnership and Reading Children's Services.

All Staff

All staff including temporary staff and volunteers will be provided with induction training that includes:

- the child protection and safeguarding policy (including the policy and procedures to deal with child on child abuse);
- the role and identity of the DSL and DDSLs;
- meeting with at least one member of the DST;
- the behaviour and discipline policy and the anti-bullying policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying and faith-based prejudice or race based discrimination);
- the staff code of conduct including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/student relationships and communications including the use of social media
- the safeguarding response to children who are absent from education;
- a copy of Part one and, where appropriate, Annex A of KCSIE for school leaders and those who work directly with children. Prevent duty training consistent with the Government's Prevent training for schools; and
- the School's approach to online safety which includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- safeguarding training in accordance with Reading Safeguarding Children Partnership and Reading Children's Services procedures including guidance on managing a report of child-on-child abuse (including sexual harassment and sexual violence.

Copies of the above documents are provided to all staff during induction.

In addition:

- All staff and School leaders School leaders will receive a copy of this policy and Part 1 and where appropriate, Annex A of KCSIE, and will be required to confirm that they have read and understand these.
- Members of senior leadership (including the Head) and the Nominated Safeguarding Governor will receive a copy of this policy and be expected to read all of KCSIE.
- All members of staff (including the Head) will receive an update on safeguarding at least annually, with this including any changes to KCSIE or other statutory and non-statutory guidance for Schools and local authority guidance as well as reinforcement of key points from previous training.
- All members of staff will receive regular safeguarding updates through staff meetings, all-staff emails, and other appropriate mechanisms.
- Staff development training will also include training on online safety and the acceptable use of IT which should, amongst other things, include an understanding of the filtering and monitoring systems and processes in place in the school, measures in place to combat cybercrime, the School's approach to the use of generative AI by students and for educational purposes, searching students for prohibited and banned items, and Prevent duty training assessed as appropriate for them by the School.
- Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child-on-child abuse (including sexual harassment and sexual violence), harmful sexual behaviour, child criminal and child sexual exploitation, female genital mutilation, cyberbullying, prejudiced-based and discriminatory bullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.
- The school recognises that the role of boarding staff is physically, emotionally and mentally difficult and appropriate training support will be provided for all such staff. All boarding staff will receive enhanced safeguarding training relevant to the boarding context
- All members of staff will receive guidance on early help and interventions and will support the pastoral team and DST in this area.
- All members of staff will receive guidance relating to child-on-child abuse including how to deal with allegations of sexual harassment, sexual violence, or abuse.
- Staff will understand the need to reassure victims of abuse or alleged abuse that they will be taken seriously, supported and kept safe.

Governors

The governing body will ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. This training will be regularly updated.

The governing body are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection Act 2018, data protection laws, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention. Data protection laws place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

In order to ensure effective delivery of the training to governors, the following arrangements have been put in place:

- the designated members of the governing body for safeguarding receive suitable and regularly updated training for their roles.

- all members of the governing body receive suitable safeguarding training at least annually to include all relevant parts of KCSIE and other guidance from the DfE and local authority.

- the governing body review the safeguarding policy and its implementation at least annually.

- Governors must take part in mandatory safeguarding training to allow them to make a considered judgement that the leadership and management of the school have sufficient skills, training and experience to fulfil their safeguarding responsibilities effectively.

- Governors must ensure their safeguarding training is regularly updated.

- The Nominated Safeguarding Governor should be sufficiently well trained to be able to monitor and challenge the DST effectively and to act appropriately in the event of an allegation of abuse made against the Head.

- The Nominated Safeguarding Governor and the Chair of Governors will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities. As part of that training the Nominated Safeguarding Governor will be expected to read the entirety of KCSIE. All other Governors will be expected to read Part 2 of KCSIE.

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

DST

Each member of the DST will receive updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, record keeping, Prevent duty training consistent with government guidance, the DSL's role regarding care leavers and promoting a culture of listening to children. Further details of the required training content for the DSL are set out in Annex B of *KCSIE*.

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

At least one member of the DST will be responsible for ensuring that the school takes appropriate measures to deal with its Prevent duties in accordance with the most recent anti-extremist guidance.

At least one member of the DST will be responsible for ensuring that the school takes appropriate measure to deal with looked after children in accordance with the most recent guidance from the local children's services.

The DST will be responsible for ensuring that suitable safeguarding training is provided for all members of the school community, updated at least annually. This training will include guidance on include guidance on child-on-child abuse including sexual violence and sexual harassment and on universal services and community based Early Help through Family Help arrangements. Training for the school community will include informal as well as formal updates and briefings orally or by email.
The DST will be responsible for ensuring that suitable records are maintained for safeguarding training both formal and informal for the DST, staff, governors, and others within the school community.

The DST will ensure that at least one person trained in safer recruitment is a member of each appointments panel for new members of staff.

HR personnel

Members of the HR staff are suitably trained to ensure that pre-appointment and other safeguarding checks are carried out and that records are maintained effectively.

HR staff will be trained in procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS and consider a referral to the Teachers Regulation Agency (TRA) if a person has been dismissed or removed due to safeguarding concerns or would have been had they not resigned or otherwise left the school.

The HR team will receive sufficient training to ensure effective liaison with the senior leadership prior to the starting dates of new staff.

Reading, understanding and implementing the relevant sections of the current inspectorate's (ISI) commentary on pre-appointment checks.

Students

All day and boarding students receive suitable age-related guidance with regard to safeguarding matters including the action to take should they receive a disclosure or be concerned about another student.

All students will receive suitable age-related guidance on safeguarding matters including what to do if they feel unsafe.

Students receive suitable age-related guidance with regard to staying safe online, the safe use of social media, PSHE and safeguarding, and relationship and sex education.

Students with responsibilities including within boarding houses have a particular responsibility to be vigilant and to report their concerns: all such students will receive appropriate safeguarding training.

Students will be guided through PSHE lessons, Collects, and other means so that they feel entirely confident in reporting their concerns about themselves or others to a member of staff or to a member of the DST team.

Students will receive appropriate guidance through PSHE and other appropriate avenues in line with DfE recommendations in https://www.gov.uk/guidance/teaching-about-relationships-sex-and-health and the School's approach to relationships, sex, and health education.

Parents

The DST will ensure that parents are provided with suitable guidance regarding the school's approach to safeguarding.

The DST will provide from time-to-time suitable presentations for parents on safeguarding matters such as online safety.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Matt Winkless is the Safeguarding Governor designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. Gwenan Sykes is the Deputy Safeguarding Governor. They are members of the governing body. At least once each term a designated member of the governing body will meet with the DST as a whole.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's child protection policies takes place at least

annually, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working, including lessons learnt.

The governing body will also undertake an annual review of its approach to online safety and filtering and monitoring provision, including checks that filtering is working appropriately on all internet-connected devices in all relevant locations, supported by an annual risk assessment that considers and reflects the risks its students face and a record kept.

The DSL will work with the Nominated Safeguarding Governor to prepare a written report commissioned by the governing body. The written report should address how the School ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled, including lessons learned; and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters. The Proprietor should also consider independent corroboration, such as:

- inspection of records or feedback from external agencies including the Designated Officer(s)
- reports of ISI inspections
- the outcome of any relevant complaints, claims or related proceedings
- press reports.

The governing body will review the report, monitor and challenge appropriately the DST and the senior leadership of the school to ensure that the safeguarding policy is effectively implemented, using as appropriate: visits to the school; discussions with staff and with students; staff, student and parental questionnaires and surveys; scrutiny of records relating to safeguarding, bullying and behaviour, and early help and interventions.

A designated member of the governing body (currently the Safeguarding Governor) will take a particular interest in boarding and in the safeguarding needs of students who board and will liaise with the boarding staff to this end.

The School draws on the expertise of staff, including the DST, in shaping the School's safeguarding arrangements and policies.

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

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

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Teaching children how to keep safe

The governing body ensures that all students are taught about safeguarding, including online safety, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of School, in order to reduce risks and build resilience, including to radicalisation and extremism. This includes teaching students about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some children with SEND might be needed.

Students are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through RSE and PSHE education appropriate to their age and stage of development. The content will be relevant, include scenario-based learning[2] and tackle issues such as: healthy and respectful relationships, boundaries and consent, stereotyping, prejudice and equality, body confidence and self-esteem, promoting healthy and positive masculinities[3], how to recognise abusive relationships, including coercive and controlling behaviour[4], concepts and laws relating to sexual consent, sexual exploitation, abuse, grooming, harassment, rape, domestic abuse, honour or faith-based violence and how to access support, what constitutes sexual harassment and sexual violence and why these are always unacceptable and online harms such as making or sharing nudes and semi-nudes, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help.

Internet safety (including when children are online at home) is an integral part of the School's curriculum and also embedded in PSHE and Relationships and Sex Education ("RSE"). 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 safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of Collects and tutorial / pastoral activities so that students learn how to keep themselves safe on-line and when accessing remote learning. The governing body as proprietor of the School has ensured appropriate filters and monitoring systems are in place and meet the DfE's filtering and monitoring

[2] Recommended in Everyone's Safer
[3] Recommended in Everyone's Safer
[4] The Home Office publish guidance on Controlling or coercive behaviour which provides clear information on what constitutes controlling or coercive behaviour and how to identify the offence.

standards (see the Online safety policy) and is mindful that this should not lead to unnecessary restrictions on learning.

The School keeps in regular contact with parents and carers to reinforce the importance of students being safe online and make them aware of the systems in place to filter and monitor online use and the sites students will be expected to access during learning.

Where lessons are delivered by external agencies, schools should agree in advance of the session how a safeguarding concern would be dealt with by the external visitor.

Filtering and monitoring

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system. Further details on these measures for ensuring students safety are set out in detail in the School's IT and Digital Services Acceptable Use Policy, which is available on the School's website. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, extreme sexual or physical harm, misinformation, disinformation (including fake news) and conspiracy theories (**content risk**); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and adults posing as children or young adults (or generative AI applications that simulate this) with intention to groom or exploit them for sexual, criminal, financial or other purposes (**contact risk**); restrict access to online risks such as online gambling, inappropriate advertising, phishing and/or financial scams (**commerce risk**); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images e.g. consensual and non-consensual making or sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying (**conduct risk**). The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.

The School ensures compliance with KCSIE and the DfE's '*Meeting digital and technology standards in schools and colleges (August 2026)* by;

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

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

Staff will remain vigilant to these risks and respond in accordance with this policy. The School has regard to the DfE's guidance '*Generative AI: product safety expectations*' when considering how the filtering and monitoring arrangements in place apply to the use of generative AI within education. The School ensures that any generative AI products effectively and reliably prevent access to harmful and inappropriate content by students by:

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

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

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

Use of mobile electronic devices and smart technology

In accordance with DfE guidance, the School maintains a mobile electronic device-free environment by default. For detailed information on the use of mobile electronic devices and smart technology, please refer to the Mobile Phone Policy and IT and Digital Services Acceptable Use Policy (AUP) for students.

All staff should use mobile devices and cameras and other electronic devices with imaging and sharing capabilities in accordance with the guidance set out in the Staff code of conduct and Mobile Phone Policy.

Parents of all students may bring mobile devices onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

The School recognises the evolving risks associated with emerging technologies, including artificial intelligence. This includes the potential for AI to be used to generate or manipulate images or content (for example, deepfakes), which may be used to harm or exploit children. Staff will remain vigilant to these risks and respond in accordance with this policy.

The School's approach to online safety is set out in the School's Online safety policy.

Relationships and Sex Education ("RSE")

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

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

The School has regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education (September 2026)* when making arrangements for and teaching RSE.

Further information on the School's RSE programme, curriculum content, how and when it will be taught, and who is responsible for teaching it, including any external providers the School will use, is set out in the School's Relationships and Sex Education Policy, which is available on the School's website. The School proactively engages and consults with parents in the development and review of this policy.

Arrangements for visiting speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to students is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and the British values of democracy.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. A copy of the "Risk Assessment for Visiting Speaker/Event" is attached to the Visiting Speaker Policy. This will take into account any

vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

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

Visiting Speakers, whilst on the School site, will at all times be supervised by a School employee.

A copy of the full protocols that must be adhered to when arranging for a visiting speaker to attend the School are set out in the Visiting Speaker Policy which is available on the School's website.

Arrangements for students with special educational needs and/or disabilities (SEND)

The school has students with emotional and behavioural difficulties and/or challenging behaviours. The school will support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self–esteem as part of an overall behaviour support plan agreed with parents/carers.

As part of the PSHE curriculum staff will teach young people personal safety skills in an age-appropriate manner. Students will be taught on how to keep themselves safe, peer pressure and appropriate relationships.

The school is aware that students with SEND may be vulnerable to abuse because they may be finding it more difficult to express themselves to others. Instead such students may exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the child.

Where necessary, the school will provide additional training to staff in the use of alternate communication systems. Supervision by senior managers will be vigilant to create a protective ethos around the student.

We promote high standards of practice, including ensuring that children with disabilities know how to raise concerns, and have access to a range of adults with whom they can communicate.

Further details on the support given to students with SEND is set out in the School's Special Educational Needs and Disability (SEND) Policy available on the School website.

Arrangements for where school premises are used for non-school activities

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

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services, activities, or commercial use of the premises are not under the direct supervision or management of the School, the School will ensure that appropriate arrangements are in place to safeguard children and vulnerable adults, and to ensure compliance with relevant safeguarding requirements. In particular, we will:

- Assure ourselves that the hirer has appropriate safeguarding and child protection policies in place;
- Ensure we put in place arrangements for the hirer to liaise with the school on these matters;
- Ensure safeguarding requirements are included in any transfer of control agreement;
- Ensure that safeguarding arrangements are also in place for any commercial activities conducted on school premises, regardless of whether children or vulnerable adults are directly involved;
- Ensure hirers understand our expectation that they will comply with the guidance in 'After School Clubs, Community Activities, and Tuition (Safeguarding Guidance for Providers)';
- Include a condition in any lease or hire agreement stating that failure to comply with safeguarding requirements will result in termination of the agreement.

The School has arrangements in place for the use of school premises for non-school activities including the availability of the DST and how they can be contacted. This includes clear procedures for reporting safeguarding concerns and ensuring that hirers and users of the premises are aware of their responsibilities in relation to safeguarding.

Operation Encompass

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

Through Operation Encompass the police are required to share information with the School about all police attended domestic abuse incidents which involve any of our children who are related to either of the adults involved in the incident. This sharing of information should occur prior to the start of the next school day. The notification should

be sent to the DSL (known as the Key Adult) and inform us about the context of the incident and will include the child's perspective.

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

APPENDIX 1 – SIGNS AND TYPES OF ABUSE

All School staff should be aware that abuse, neglect, exploitation or modern slavery and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL or a member of the DST.

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

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

In all cases, if staff are unsure, they should always speak to the DSL or a member of the DST.

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

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

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

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

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

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

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

exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

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

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

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

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

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

The NSPCC provides free and independent advice about harmful sexual behaviour: NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework.

Beyond Referrals | The Contextual Safeguarding programme based at the University of Durham provides a school self-assessment toolkit and guidance for addressing harmful sexual behaviour in schools.

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

Making or sharing of nudes and/or semi-nudes:

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

The School treats all incidences of making or sharing nudes and semi-nudes as a breach of discipline and also as safeguarding matters to be actioned in accordance with this policy, regardless of whether they are consensual or non-consensual. All such incidents will require a proportionate approach that considers the age[5], development and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

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

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

- it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;
- it is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the student or parent in making a report; or
- a student has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the school's devices or network.

Where viewing an image is unavoidable:

- viewing should take place on School premises wherever possible;

[5] Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive, but children still need to know it is illegal, whilst non-consensual is illegal and abusive.

- the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);
- a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;
- full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;
- any member of staff who views an indecent image should be given appropriate support.

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.

If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

If external agencies do not need to be involved, the School must consider the deletion of any images. Students should be asked to delete images themselves and to confirm that 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 student receives unwanted images, the School should advise the student and their parents of options that may be available to block the sender or to change the student's mobile phone number or email address.

The UK Council for Internet Safety's advice note Sharing nudes and semi-nudes: advice for education settings working with children and young people (DCMS and UKCIS, March 2024) contains details of support agencies and provides further information for schools on how to respond to incidents of sharing nudes and semi-nudes.

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

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include affluent neglect or neglect of, or unresponsiveness to, a child's basic emotional needs. The School understand the impact of poverty and the distinction between poverty and neglect. Poverty in itself does not amount to neglect, although it may increase a child's vulnerability and be a relevant factor when assessing a child's needs and welfare.

Serious violence:

Serious violence may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation.

Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL who will assess the risk to both the individual student and others in the School, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant consider action to de-escalate peer conflict.

Indicators which may signal children are at risk from, or are involved in serious violence may include:

- increased absence from school;
- a change in friendships or relationships with older individuals or groups;
- a significant decline in educational performance;
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries; and
- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. Schools should also try to be alert to when children might be at highest risk, recognising that violence can often peak in the hours just before or just after school, when students are travelling to and from school and can concentrate in particular places.

Staff should also be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been suspended, spent time in alternative provision or permanently excluded, having experienced child maltreatment, having been involved in offending, such as theft or robbery, having used

drugs or alcohol in early adolescence and having previously been a victim or previously perpetrated violence.

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

Further advice for schools is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance. The Youth Endowment Fund (YEF) (the "what works centre for preventing violence") has produced practical guidance for schools and an accompanying self-assessment tool to help introduce evidenced practice for preventing children becoming involved in violence

Specific safeguarding issues: Safeguarding issues can also be linked to, for example, children being absent from education repeatedly and/or for prolonged periods; sponsored students; boarding students; child abduction and community safety incidents; children and the court systems; children with family members in prison; elective home education; child on child abuse; child criminal exploitation and child sexual exploitation; county lines; serious violence; modern slavery and the national referral scheme; cybercrime; domestic violence; homelessness; honour or faith-based abuse (including female genital mutilation and forced marriage); preventing radicalisation; sexual violence and sexual harassment between children in schools and colleges; mental health; preventing radicalisation;making or sharing of nudes or semi-nudes; upskirting, children who are lesbian, gay or bisexual, children questioning their gender, misinformation/disinformation; young carers; children with medical conditions.

Further advice and links to guidance on these specific safeguarding issues can be found in Annex A of KCSIE.

Sponsored students

Some of the School's students hold visas (typically Child Student visas) which are sponsored by the School under a licence granted by UKVI.

These students may be living far away from their families, having to adapt to what may be a very different culture, and may also encounter difficulties in communicating in English or reaching their parents due to time zone differences. The School recognises the additional safeguarding risks associated with these students and the additional duties imposed by virtue of its status as a licensed sponsor.

In addition to the requirements set out in KCSIE and the NMS for Boarding Schools, the School will ensure that appropriate and safe care arrangements are in place, in line with Immigration Rules and UKVI's Student Sponsor Guidance. The School will comply with

its duties as a licensed sponsor and will take appropriate steps to monitor and support sponsored students in accordance with its safeguarding responsibilities.

There is respect for diversity and sensitivity to race, culture and religion, alongside the other protected characteristics.

In the event that a student holding a Student or Child Student visa sponsored by the School under the Points Based System goes missing, the School will report to UKVI in line with prevailing Student Sponsor Guidance.

Each time the School's attendance register is completed it is treated as a contact point for these purposes.

The School will also ensure that any changes to the care or living arrangements which are in place for a student holding a Child Student visa sponsored by the School meet the requirements of the Immigration Rules and UKVI's Student Sponsor Guidance. Where a change to a student's living or care arrangements do not comply with those requirements then this must be reported to UKVI including the details of the steps that are being taken to rectify the situation.

Where a student holding a Child Student visa sponsored by the School will be cared for in a private foster care setting, the School will notify the local authority in the area where the student will be living as soon as the School becomes aware that the child has arrived in the UK or, if the private foster care arrangement begins after the student arrived in the UK, as soon as it becomes aware of the change.

Reports to UKVI will be made by the School's Level 1 user via the Sponsor Management and in accordance with prevailing UKVI guidance.]

Boarding students

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 students' privacy while enabling staff to fulfil their safeguarding responsibilities. Boarding students are expected to sign in and out, to abide by an age-appropriate curfew and have daily welfare checks and regular opportunities to meet privately with House and other pastoral staff and information is shared appropriately with the DSL who retains overall responsibility for the welfare of these students while they are in our care. The DSL will manage any concerns with reference to the student's home local authority safeguarding arrangements and will liaise with parents and /or a named guardian, where appropriate.

We recognise that these students 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

(including sexual harassment and sexual violence), 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 students 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 students. 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. Unless specifically agreed in advance, the school is not responsible for exeat weekends, half-term and holiday arrangements, particularly accommodation.

The school ensures that arrangements for international boarders who may have additional language or cultural needs are specifically considered, whether or not their place is sponsored by the school.

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

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

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

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

- children who have older boyfriends or girlfriends, and

- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

International students may be particularly vulnerable to trafficking, particularly those who are or will be in the UK without their parent(s) or legal guardian, and schools which hold a Child Student sponsor licence may be targeted by traffickers as a means of facilitating a child's entry to the UK for the purposes of CSE or CCE

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

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

Child criminal exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into taking part in any criminal activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

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

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

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions
- children who associate with other children involved in exploitation

- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late, and
- children who regularly miss school or education or do not take part in education.

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

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

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

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

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

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

- go missing (from school or home) and are subsequently found in areas away from their home;
- that have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;

- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing;

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

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

Cybercrime: is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

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

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

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

If there are concerns about a child in this area, the DSL, should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime

such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

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

Mental health: all staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to a member of the DST.

More information can be found in the *Mental Health and Behaviour in Schools* guidance. Public Health England has produced a range of resources to support secondary and senior schoolteachers to promote positive health, wellbeing and resilience among children.

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

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

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

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

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

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

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. Nobody under the age of 18 may legally get married. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in the *Multi-agency guidelines: Handling cases of forced marriage* (last updated April 2023). Further information on forced marriage is available in guidance published on gov.uk and by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

Radicalisation and the Prevent duty

The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

The School aims to build students' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. The School also conducts regular risk assessments, in consultation with local partners such as the police, to identify and mitigate risks of radicalisation among students and staff. These assessments ensure the School's safeguarding arrangements remain robust and are reviewed periodically to adapt to emerging risks. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

The School has adopted the government's definitions for the purposes of compliance with the Prevent duty:

Extremism: " *the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:*

- *negate or destroy the fundamental rights and freedoms of others; or*
- *undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or*
- *intentionally create a permissive environment for others to achieve the results in (1) or (2)."*

Radicalisation: "*the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups.*"

Terrorism: "*an action that endangers or causes serious violence to a person / people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and made for the purpose of advancing a political, religious or ideological cause*."

Although there is no single way of identifying an individual who is likely to be susceptible an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a Prevent referral. To support this, all staff complete general awareness training on the Prevent duty, including guidance on recognising indicators of radicalisation and making referrals. Those with designated safeguarding responsibilities receive more in-depth training to ensure they are equipped to provide appropriate support and intervention for students at risk.

Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. Whilst the referral is being assessed, should any further or new information come to light, this should also be passed to police. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: *Channel duty guidance: protecting people susceptible to radicalisation (HM Government, October 2023)*. The DfE and Home Office's briefing note *The use of social media for online radicalisation (DfE, July 2015*) includes information on how social media is used to radicalise young people and guidance on protecting students at risk.

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

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionally impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

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

Lesbian, gay or bisexual children: A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm. However, the School recognises that they can sometimes be vulnerable to discriminatory bullying. In some cases, a student who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are. All staff are aware of these vulnerabilities and the School endeavours to provide a safe space to speak out or share concerns.

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

LGBT inclusion is taught as part of the statutory relationships education/RSE/PSHE curriculum.

Children who are questioning their gender

The School recognises that some children and young people may question their gender, including how they feel about the physical attributes of their sex and how they fit into society. The School also recognises that it is not uncommon for children, particularly at a younger age, to explore interests, behaviours or expressions that may not align with gender stereotypes, and that for many children this may be a temporary phase.

The School will take a supportive, child-centred approach, seeking to understand the child's views, wishes and feelings, and exercising appropriate professional curiosity in relation to their wider circumstances. This includes being alert to any potential safeguarding considerations, such as:

- mental health or emotional wellbeing needs;
- experiences of bullying (including discriminatory or prejudice-based bullying);
- family, peer or social pressures; and
- any other vulnerabilities that may impact on the child's welfare.

The School will ensure that it remains a respectful environment in which all students feel safe and are able to express themselves. All forms of bullying, including bullying related to gender, gender expression or identity, are unacceptable and will be addressed promptly in accordance with the School's Behaviour and anti-bullying policies.

The School will seek to maintain an environment that avoids unnecessary gender stereotyping and supports inclusion, while also ensuring that safeguarding, welfare, safety and fairness considerations are appropriately balanced.

The School will comply with its statutory duties and have regard to relevant guidance in relation to safeguarding requirements for school premises, including ensuring that toilets, changing facilities and showers are provided and used in accordance with legal requirements relating to single-sex provision, and that any alternative arrangements are considered carefully, recorded and reviewed, without compromising the safety, privacy, dignity or wellbeing of students.

The School will ensure that, in relation to sport and physical education, participation is organised in a way that is safe, fair and appropriate, including where necessary providing for single-sex participation in accordance with the Equality Act 2010 and safeguarding considerations , and that any requests relating to participation are considered on a case-by-case basis with regard to the child's welfare, the safety and fairness of the activity, and the impact on other students.

Where a request is made in relation to social transition, the School will consider this in accordance with its Gender Questioning Children and Social Transition Policy which sets out the School's approach to decision-making, including the factors to be taken into account and the processes to be followed. The School will not initiate action in relation to a child questioning their gender. This policy applies where a child or their parent raises a request in relation to social transition, and the School is responding to that request.

Domestic abuse: The Domestic Abuse Act 2021 introduces a statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

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

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

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

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

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

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

Operation Encompass: operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or a deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

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

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

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

Children who are absent from school: A child being absent from School, particularly repeatedly and/or for prolonged periods, and children missing education is a potential

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

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

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

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident) of any student who fails to attend school regularly or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.

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

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

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

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to

keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

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

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

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

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

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

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

The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Looked after children and previously looked after children

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority and the information they need in relation to a child's looked after legal status, for example:

- whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;
- contact arrangements with birth parents or those with parental responsibility;

- information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after him or her.

Looked after children in the School are supported by a designated teacher, who has responsibility for their welfare and progress. The School ensures that the designated teacher receives appropriate training in order to carry out their role. The DSL maintains these details, including contact details of the child's social worker.

A previously looked after child remains potentially vulnerable and, where relevant, all staff will be supported to develop the skills, knowledge and understanding to keep him/her safe. In such a case the DSL and pastoral team would work closely with all agencies.

Misinformation/disinformation

The School recognises that misinformation, disinformation and conspiracy theories may present safeguarding risks, particularly where they contribute to harm, radicalisation or exploitation. Staff will be alert to these risks and respond appropriately.

Young carers

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

Children with medical conditions

A child having a medical condition (including allergies and conditions requiring delegated healthcare tasks) is not in itself an indicator that a child is at greater safeguarding risk. In the event of a clinical incident taking place, the responsible healthcare professional, in conjunction with the DSL should consider whether any safeguarding duty has been triggered and whether any further action is required based on the nature of the incident.

Elective home education

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

APPENDIX 2 – CHARITY SAFEGUARDING PROCEDURES

Charity Safeguarding duties

As trustees of a charity, the trustees as proprietor of the School, acknowledge in addition to their statutory duties to safeguard and protect children and adults at risk, they have a duty to take reasonable steps to protect everyone associated involved with or who come into contact with the charity through its work from harm, abuse or mistreatment whether working online or in person. This protection of the people involved in the charity is central to its culture. The full extent of these additional Safeguarding duties is set out in the Charity Commission guidance: Safeguarding and Protecting People for Charities and Trustees. This guidance lists risks to be aware of, including discrimination, health and safety, cyber abuse and data breaches. We recommend that you also consider the Charity Commission guidance: Charities and social media. This covers moderation of comments on the School's social media.

The contents of the School's Safeguarding and data protection suites of policies, the staff handbook and the Health and safety policy set out how many concerns about these issues will be handled. If anyone has any Safeguarding concerns which have caused or may cause harm to anyone associated with the charity which are not expressly covered by those or other School policies, they should contact The Clerk to the Governing Body without delay.

The trustees fulfil these duties by:

- leading by example and promoting a fair, inclusive and positive culture to which protecting people from harm is central, ensuring that everyone involved with the charity feels able to report any concerns they may have, confident that they will be heard and responded to;
- having procedures for identifying and handling concerns in a full and open manner;
- ensuring that where responsibility for safeguarding is delegated to individuals or sub groups, robust policies and procedures for reporting appropriate information to the wider trustee boards are in place and followed;
- setting and regularly (at least annually) reviewing the suitability of policies and procedures as a Board to ensure they remain fit for purpose and that they are followed in practice;
- establishing appropriate delegation arrangements for the effective governance and management of safeguarding matters within the charity;
- exercising proper oversight of the management of individual Safeguarding matters and a review of the performance of the charity's Safeguarding function, including consultation with stakeholders and appropriate trend analysis;
- being quick to respond to concerns, to carry out appropriate investigations and take necessary action;
- being open and transparent and not ignoring harm or downplaying failures;

- managing conflicts of interest and / or loyalty;
- ensuring that staff receive training in Safeguarding at a level which is commensurate with their role;
- having clear recruitment and contracting processes and ensuring that proper due diligence is undertaken on the suitability of:
    - staff (with regard to differing processes for international staff);
    - partner organisations;
    - contractors;
    - beneficiaries.
- ensuring that clear processes are in place relating to checks required where there are changes to the School structure or individual roles;
- entering into appropriate agreements with other third parties (whether those who provide services to the Charity or directly to its beneficiaries (including students)) covering the relationship, their respective roles and monitoring and reporting requirements;
- having a clear system of referring or reporting to relevant agencies as soon as concerns are suspected or identified;
- following safeguarding statutory guidance, good practice guidance and legislation applicable to independent schools, which this policy is designed to secure];
- having a balanced trustee board which works together in accordance with [• the School's trustee Code of Conduct and Scheme of Governance] without any one or more trustees dominating its work;
- exercising proper oversight of the Charity's online operations, adequately managing risk and ensuring that online services are suitable for users;
- review its premises and security arrangements and arrangements for third party use to ensure appropriate measures are in place to keep people safe;
- reviewing any grant-making undertaken to ensure appropriate policies and procedures are in place;
- implementing suitable reporting and monitoring processes in place for any work overseas;
- set out risks and how it will manage them in a risk register;
- allocating sufficient resources (whether financial, staff, training or other resources) for the effective management of Safeguarding and arranging appropriate insurance cover;
- ensuring a sufficient level of oversight of the charity's operations to manage risk and report any incidents which materially affect the charity's operations, finances, people or reputation can be reported to the Charity Commission in line with How to report a serious incident in your charity (Charity Commission, January 2026).

Reviewed:	Elaine Newall, Designated Safeguarding Lead Matt Winkless, Safeguarding Governor
Signed off:	Luke Walters, Head
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