SUSI EARNSHAW

School of Academics & Performing Arts

SAFEGUARDING AND CHILD PROTECTION POLICY

Last updated: September 2026	Next review: September 2027
Ratified by: Proprietor – Susi Earnshaw	Reviewer: DSL Katherine Tyler

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Aims of this Policy

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

Designated Safeguarding Lead and School Safeguarding Team

ROLE	**NAME**	***Safeguarding Responsibility***	**Contact: Email/Tel**
Headteacher	Megan Mcnamara	Overall operational responsibility for Safeguarding & Child protection	Tel: 02084415010 headteacher@susiearnshaw.co.uk
Designated Safeguarding Lead (DSL)	Katherine Tyler	Responsible for child protection, including online safety, managing referrals, and ensuring staff training. Responsible for managing risks from misinformation and AI, robust attendance monitoring, and overseeing filtering/monitoring systems.	Tel: 020 8441 5010 Emergency telephone: 07956 420758 katherine.tyler@susiearnshaw.co.uk
Deputy Designated Safeguarding Lead	Melissa Gillespie Sean Kelly	To assist the DSL in creating a safe culture and managing safeguarding concerns, including online safety.	Tel: 020 8441 5010 melissa.gillespie@susiearnshaw.co.uk sean.kelly@susiearnshaw.co.uk
Susi Earnshaw	Nominated Safeguarding Proprietor	To ensure a "whole-school approach" to safeguarding is embedded, making it a priority at all levels, not just a procedural formality. To ensure that the child protection and safeguarding policy is updated annually (to align with the latest KCSIE 2025 changes) and that it is easily available, often published on the school website.	Tel: 0208 441 5010 Emergency telephone: 07973 362351 susi@susiearnshaw.co.uk

Susi Earnshaw **David Earnshaw**	Proprietors	Ultimate responsibility for Safeguarding in the school	Tel: 0208 441 5010 Emergency telephone: 07973 362351 susi@susiearnshaw.co.uk david@susiearnshaw.co.uk
David Earnshaw	Facilities Manager	Responsible for ensuring a safe, secure and compliant environment for students and staff.	role@school.co.uk

All staff are trained that anyone can make a referral to social services, at any time. Hence in the unlikely event of being unable to contact the appropriate person in the school safeguarding team, consideration should be given to direct contact to other agencies below.

Key external agencies, services and professionals' contact details

Organisation	Phone number
NB - If a person is in immediate danger, ring 999 and ask for the Police.	
Police non-emergency	101
Police Child Abuse Investigation Team (8am-6pm) At all other times-contact this number where the controller will take initial details and contact the appropriate out of hour's officer.	Tel: 020 8733 5070 Tel: 020 8200 1212
Barnet Safeguarding Children Partnership (BSCP)	Tel: 020 8359 4540 barnetscb@barnet.gov.uk Independent Chair: Chris Miller: 020 8359 4519
Multi-agency Safeguarding Hub (MASH) Operating Hours: 9am – 5.15pm Monday to Thursday 9am – 5pm Friday Barnet Family Services: Designated Safeguarding Lead Advice Line Operating Hours:	Tel: 020 8359 4066 Secure Fax: 0871 594 876 Email: mash@barnet.gov.uk 0208 359 7335 Mon-Fri 10am-2pm
Rob Wratten Local Authority Designated Officer (LADO)	Tel: 020 8359 4528 Email: Rob.wratten@barnet.gov.uk
Liam Foote Schools Safeguarding lead Barnet Education & Learning Service (BELS)	Email: http://liam.foote@barnet.gov.uk
Barnet Education & Learning Service (BELS) Schools admissions information	Email: http://bels@barnet.gov.uk
CAF Consultation Line (9.30am - 11.30am Tuesday and Wednesday) This number is available for consultation, advice or when you just want to talk over a situation and case names are not required. This number is not for referrals.	Tel: 020 8359 4336
CAF Team	Tel: 020 8359 4405 Email: CAF Coordinator e-caf@Barnet.gov.uk Web: www.barnet.gov.uk/caf-practioner-info
Out of Office Hours Emergency Social Work Service (including out of hours Child Protection Referrals) The Barnet Council Emergency Service	Tel: 020 8359 2000

Controller will take initial details and contact the appropriate out of hours officer.	
Catch22- County Lines (Child Exploitation)	Email: countylinessupport@catch-22.org.uk Email London: Sandra.Baah@catch-22.org.uk Web: https://www.catch-22.org.uk/find-services/county-lines-support/
Mental Health Trusts (Barnet, Enfield and Haringey (BEH) Child and Adolescent Mental Health Service (CAMHS)). Crisis Resolution team	Tel: 0800 151 0023
SOLACE-Women's Aid	Tel: 020 3874 5003 Web: **barnet.advocacy@solacewomensaid.org**
ACT (Action Counters Terrorism)	Web: https://act.campaign.gov.uk/
DfE Counter Extremism Helpline (Prevent)	0207 340 7264 Email: counter-extremism@education.gsi.gov.uk
Disclosure and Barring Service (DBS)	DBS Barring, PO Box 3963, Royal Wootton Bassett, SN4 4HH. Tel: 03000 200 190 Email: http://customerservices@dbs.gov.uk
Childline Kidscape NSPCC	0800 11 11 0845 1295 0808 800 5000
NSPCC Whistleblowing Advice Line	0800 028 0285 Email: help@nspcc.org.uk
PREVENT Non-emergency advice line: Confidential anti-terrorist hotline:	020 7340 7264 counter-extremism@education.gsi.gov.uk 0800 789 321
Child Licencing Authorities:	Barnet Education Welfare Team: Child Licensing direct line Tel: 0208 359 5290 Email: **will.adnams@barnet.gov.uk**External link Or http://ewt@barnet.gov.uk Web: https://www.barnet.gov.uk/schools-and-education/school-support-information/child-employment-and-licensing/child-performance Hertfordshire Tel: 01992 588605 Email: http://child.performance@hertfordshire.gov.uk Web: https://www.hertfordshire.gov.uk/services/schools-and-education/young-people-and-work/apply-for-a-childs-performance-licence/apply-for-a-childs-performance-licence.aspx

NNCEE (National Network for Children in Employment and Entertainment)	Web: http://nncee.org.uk/

Summary Record of Safeguarding Training (Detail held in HR records)

Type of Training	Date completed	Next due date
Whole School Safeguarding Training	3 September 2025	September 2026
Whole School Staff Refresher and updates & reminder of importance of regular e-bulletins (Annual)	3 September 2025	September 2026
DSL / DDSL (every TWO years)	September 2025	September 2027
DSL Prevent Training Update to disseminate to ALL staff (Annual)	DSL January 2026	January 2027
Safer Recruitment Training - recommended at least one member of every interview panel	DSL - May 2026	May 2027
Proprietor Safeguarding Training (Annual)	February 2026	February 2027

Key Definitions

Safeguarding

This is broader than child protection, and includes:

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

KCSIE para 20 reminds us that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

LADO

Local Authority Designated Officer(s) for Child Protection. Each Local Authority designates a particular officer, or team of officers, to be involved with the management and oversight of allegations against people that work with children. The term 'LADO' in this document is used for convenience to designate these local authority designated officer(s) or other appropriate first point of contact for child protection concerns, whatever terminology the local safeguarding partners may use.

A fuller list of important definitions is set out in Appendix 5.

Introduction

1. Susi Earnshaw Theatre School (the school) is fully committed to the safeguarding and welfare of children and expects all members of the school community to share this commitment. The school community forms part of the wider safeguarding system for children. Safeguarding and promoting the welfare of children is everyone's responsibility. To fulfil this responsibility effectively all staff in the school adopt a child-centred approach and consider at all times what is in the best interests of the child.

2. The Department for Education's (DfE) statutory guidance 'Keeping Children Safe in Education (2026). KCSIE defines 'safeguarding and promoting the welfare of children' as 'protecting children from maltreatment; 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.' Children include everyone under the age of 18.

3. Staff are advised always to maintain an attitude of 'It could happen here' where safeguarding is concerned and that just because something is not reported, it does not mean it is not happening. If staff are concerned about the welfare of a child, they are trained always to act in the best interests of the child. If staff are unsure about any aspect of safeguarding they are advised to speak immediately to the Designated Safeguarding Lead (DSL), or the deputy DSL (DDSL), without delay - and not assume that anyone else will raise the matter - and share information which may help to protect a child from harm or promote their welfare. Details of the DSL and DDSLs are set out in the list above of the School Safeguarding Team.

4. This whole-school policy is available on the school website. This policy applies to all teaching and support staff, governors, and volunteers, covering all activities and educational visits, whether on-site or off-site, including evenings, weekends, and school holidays. This helps to ensure safeguarding arrangements are consistently applied and that children are safeguarded whenever they are engaged in school activities or representing the school.

5. The school will review this policy at least annually, or sooner where changes in legislation, statutory guidance or local safeguarding arrangements require it.

6. Safeguarding involves all areas of school life; related policies include:

- Admissions Policy
- AI Policy
- Allergy safety Policy
- Anti-bullying and Cyberbullying Policy
- Attendance Policy
- Behaviour Policy and Procedure
- Careers Policy
- Children Missing in Education Policy
- Child Collection Policy
- Complaints Procedure
- Code of Conduct for Staff
- Critical (Major Incidents) Policy
- Curriculum Policy
- Data Protection and GDPR Policy
- Equal Opportunities Policy
- Health and Safety Policy
- Interventions Policy
- Low Level Concerns Policy
- Marking and Assessment for Learning Policy
- Mental Health and Wellbeing Policy
- Online Safety Policy
- Personal, Social, Health, Citizenship and Economic Education Department Policy
- Relationships and Sex Education Policy
- Rewards and Sanctions Policy
- Safeguarding Policy
- Safer Recruitment Policy
- SEND Policy
- Susi Earnshaw SEND offer
- Staff Code of Conduct Policy
- Teaching and Learning Policy
- Whistleblowing Policy

6. Copies of the above policies are available from the school office and, where appropriate, via the school's website. Printed copies and accessible formats (including large print) are available on request.

7. This Policy is informed by statutory government legislation and is in line with Barnet Safeguarding Children Partnership (BSCP) procedures and local multi-agency safeguarding arrangements.

Human Rights & Equality Statement

8. Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti- discriminatory practice and recognise children's diverse circumstances. The school will have due regard to the Equality Act 2010 and recognises that some children may face additional barriers because of their protected characteristics, needs or personal circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. We give special consideration to children who:

- Have special educational needs (SEN) or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion or belief, sex, sexual orientation, gender reassignment, disability or other protected characteristics.
- Have English as an additional language

Statutory and Regulatory Framework

9. This Policy complies current legislation and statutory guidance in force at the time of publication, including (but not limited to):

- The Education (Independent School Standards) Regulations (2014)
- Keeping Children Safe in Education (2026)
- Early Years Foundation Stage (EYFS) Statutory Framework (January 2024)
- Disqualification under the Childcare Act 2006 (August 2018)
- What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- Working Together to Safeguard Children (2023)
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)
- Revised Prevent Duty Guidance for England and Wales (2023)
- The Prevent Duty: Departmental advice for schools and childminders (2021)
- The use of social media for on-line radicalisation (July 2015)
- Filtering and Monitoring Standards for Schools and Colleges (DfE)
- Meeting Digital and Technology Standards in Schools - Filtering and Monitoring
- Children Missing in Education: Statutory guidance for Local Authorities
- Multi-agency guidance on female genital mutilation (July 2020)
- Relationships and Sex Education (RSE) and Health Education guidance
- Making barring referrals to the DBS guidance guidance on how to make referrals to the Disclosure and Barring Service following safeguarding concerns.
- https://assets.publishing.service.gov.uk/media/6943dad6501cdd438f4cf5aa/Restrictive_interventions_including_use_of_reasonable_force_in_schools.pdf
- Restrictive interventions: Guidance on the Use of Reasonable Force in Schools

Scope and Responsibilities

10. All members of the school community, including but not limited to, the Head, staff, Proprietors, pupils, parents, visitors, volunteers, supply staff, contractors, third party providers, agency staff and all associated companies and subsidiary organisations are expected to comply with this Policy and its procedures. It applies wherever members of the school community are working with pupils even where this is away from the school, for example at an activity centre or on an educational visit.

11. It is the responsibility of the Proprietors to ensure that the school complies with its legislative duties and has regard to KCSIE to ensure that the school's policies, procedures and training are effective and comply with the law. The Head will constantly monitor the effectiveness of the implementation of this Policy and will revise it where necessary. The Head will ensure that all staff are informed of any changes to this policy and receive appropriate safeguarding updates and training where required.

12. The Proprietor Body (SMART Ltd) has nominated one of its members to manage child protection incidents and to liaise with external agencies where required. The nominated Safeguarding Proprietor is Susi Earnshaw.

13. The Designated Safeguarding Lead (DSL) responsibility is outlined fully in Annex C of KCSIE2026. The DSL will, inter alia, maintain an overview of safeguarding within the School, ensure that training for all members of staff is compliant, maintain open channels of communication with local statutory agencies, support staff in carrying out safeguarding duties, encourage a culture of listening to pupils and monitor the effectiveness of policies and procedures in practice. The DSL will also ensure that safeguarding arrangements are reviewed regularly to reflect changes in statutory guidance and local safeguarding arrangements.

Information Sharing

The school recognises that effective information sharing is essential to safeguarding and promoting the welfare of children. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

The school will ensure that relevant information is shared appropriately, proportionately and in a timely manner with those who need to know in order to safeguard children. Information will be shared with parents, carers, other professionals and agencies where appropriate, taking account of the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), the Human Rights Act 1998, the Information Sharing Advice for Practitioners guidance and relevant safeguarding legislation.

Staff should never promise a child that they will keep a safeguarding concern confidential. When a child makes a disclosure, staff should explain that the information will only be shared with those who need to know in order to help keep them safe.

Decisions about information sharing will normally be led by the Designated Safeguarding Lead (DSL) or Deputy DSL. The school will work collaboratively with Children's Social Care, the Police, the Local Authority Designated Officer (LADO), health professionals and other relevant agencies where appropriate and in accordance with local multi-agency safeguarding arrangments.

The school follows the Department for Education guidance information sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and carers and will ensure that staff understand when information should be shared without consent in order to safeguard or promote the welfare of a child, where this is lawful and appropriate.

Community-Based Early Help and Family Help

14. All staff play an important role in safeguarding and promoting the welfare of children and must identify children who may benefit from either community- based early help or family help. Any child may benefit from support before statutory intervention. This may include universal services and community based early help, or where needs are greater, targeted family help co-ordinated by the Local Authority. The aim is to identify concerns early, improve outcomes and prevent problems from escalating. Community-based Early Help is available to any child or family who would benefit from additional support to improve resilience, wellbeing and outcomes, or to reduce the likelihood of difficulties escalating. This support may be provided by the school or through partnership working with other agencies and does not require statutory intervention. Staff should always discuss concerns with the Designated Safeguarding Lead (DSL) or Deputy DSL at the earliest opportunity.

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

- is disabled or has certain health conditions and has specific additional needs
- has a mental health need
- has repeatedly been removed from the classroom
- is a young carer
- children who are on a part-time timetable
- children who are pregnant or are young parents
- Children who display early signs of abusive, harmful or violent behaviours
- is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- Is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- is a privately fostered child

Where a child's needs require a co-ordinated multi-agency response, the DSL may consider a referral for Family Help. Family Help is targeted support coordinated by the Local Authority through a Lead Practitioner and aims to improve outcomes for children and families where additional intervention is required. The school will work closely with the child, parents/carers and partner agencies to support any Family Help plan. The school will also be alert to the needs of children from separated families, looked after children and care leavers, ensuring appropriate pastoral support and liaison with parents/carers and relevant professionals where required.

Young Carers

The school recognises that some children may be young carers. A young carer is a child under the age of 18 who helps to care for a family member who has a disability, illness, mental health condition or substance misuse issue.

Young carers may experience additional barriers to education, attendance, wellbeing and safeguarding. Staff should be alert to signs that a child may have caring responsibilities and understand that these responsibilities may have an impact on their learning, behaviour, attendance, emotional wellbeing and ability to participate fully in school life.

Where a child is identified as a young carer, the school will consider what support may be appropriate and, where necessary, will work with the child, their family and relevant agencies to ensure that their needs are understood and appropriately supported as part of the school's safeguarding arrangements.

Children with Medical Conditions

The school recognises that children with medical conditions may be more vulnerable and may have additional safeguarding needs. Staff should be aware that some medical conditions, including chronic illnesses, disabilities, allergies and mental health conditions, may affect a child's attendance, wellbeing, participation in school life and ability to recognise or communicate abuse or neglect.

The school will make appropriate arrangements to support pupils with medical conditions in accordance with the Department for Education guidance *Supporting Pupils at school with Medical Conditions.* Individual healthcare plans (where appropriate) will be developed in partnership with parents, carers and relevant healthcare professionals.

Staff will receive appropriate training to meet pupil's medical needs where required. Safeguarding concerns relating to a child with a medical condition will be managed in accordance with this Safeguarding and Child Protection Policy and the school's Medical Conditions and Allergy Safety Policies.

The school recognises that safeguarding and medical needs are closely linked and will ensure that information is shared appropriately between relevant staff to promote the child's safety, welfare and educational progress.

Contextual Safeguarding

16. All staff, including the Designated Safeguarding Lead (DSL) and Deputy DSL'S, should consider the context within which safeguarding incidents and behaviours occur. Contextual safeguarding recognises that children and young people may be at risk of abuse, neglect or exploitation outside of their home and that these experiences can significantly impact their safety and wellbeing.

Staff should consider whether wider environmental factors are present in a child's life that may be a threat to their welfare. These may include influences within peer groups, schools, families, neighbourhoods, online environments or the wider community. Any concerns should be shared with the DSL without delay.

Staff should recognise that abuse rarely occurs in isolation. A child may experience multiple forms of abuse, neglect or exploitation simultaneously. All safeguarding concerns should therefore be viewed holistically, considering the child's family, peer relationships, online activity, school attendance, behaviour, health, and wider community influences. Assessments should take account of the interaction between these factors when determining the most appropriate support or intervention.

Contextual safeguarding concerns may include but are not limited to:

- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- County Lines
- Modern slavery and human trafficking
- Serious Violence
- Missing Education
- Online Abuse
- Child-on-Child abuse, including sexual harassment and sexual violence
- Upskirting
- Sharing of nude and semi nude images
- Radicalisation
- Honour-based abuse, including Forced Marriage and Female Genital Mutilation (FGM)
- Domestic Abuse
- Stalking
- Misogyny and other harmful attitudes or behaviours that may place children at risk.

Where contextual safeguarding concerns are identified, the Designated Safeguarding Lead (DSL) will consider whether Community-based Early Help, Family Help or statutory intervention is required. The school will work collaboratively with parents/carers, the Local Authority and any other relevant agencies to reduce risk, improve outcomes and safeguard the child.

Due to the nature of a performing arts environment, Susi Earnshaw Theatre School remains vigilant regarding the safeguarding risks that may arise during dance classes, rehearsals, performances, backstage activities, changing facilities, educational visits, external productions, transport arrangements, online activity connected with performances and contact with visiting professionals. Appropriate safeguarding risk assessments, supervision arrangements and safer working practices will be implemented at all times.

All concerns relating to contextual safeguarding will be recorded promptly using the schools safeguarding recording system and managed in accordance with this Safeguarding and Child Protection Policy. Where appropriate, information will be shared with the relevant agencies in accordance with statutory guidance, local safeguarding procedures and the school's information sharing protocols.

17. The school is unusual in its role as a theatre school and specific issues related to this are outlined in Appendix 6.

18. The DSL, and their deputies where appropriate, are most likely to have a complete safeguarding picture and be the most appropriate people to advise on the response to safeguarding concerns. However, in the unlikely event of both DSLs and deputy DSLs being unavailable, staff must speak to a member of the Safeguarding Team

Confidentiality

19. The HM Government guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* supports staff who have to make decisions about sharing information. Staff should be mindful that sharing information at an early stage is essential for effective safeguarding and promoting the welfare of children. Page 4 of this guidance sets out the seven golden rules to sharing information, whilst page 5 confirms that "The General Data Protection Regulation and the Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe". Page 19 of Working Together to Safeguard Children contains a useful myth-busting guide to information sharing within a safeguarding context.

- If in doubt about information sharing, a member of staff should ask the DSL for advice.
- A member of staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interest.
- If staff need to share 'special category personal data, the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that practitioner gains consent, or if to gain consent would place a child at risk.

Local Authority Strategic Safeguarding Partnership (Barnet)

20. The school recognises its responsibility to put in place effective procedures both for detecting and preventing abuse and for ensuring that parents, staff and all who come to the school are aware of the school's role in this respect, in line with locally agreed inter-agency procedures. The school's three safeguarding partners are the Local Authority (LA), the Local Authority Clinical Commissioning Group and the Police.

Summary of Reporting Procedures

21. If a member of the school community suspects or discovers that a pupil is the victim of abuse, whether physical, emotional, sexual or as a result of neglect, she/he must immediately inform the DSL or DDSL, except in the case of an allegation which itself involves a member of staff, in which case the matter should be reported directly to the Head.

22. If the suspicion relates to a member of staff, including a DSL, volunteer, supply staff, a Proprietor or the Head, the matter must be dealt with in accordance with the procedures set out in Appendices 3 and 4.

23. Contact details for the Local Authority Children Safeguarding Partnership (Barnet SCP), the Local Authority Designated Officer (LADO) for Child Protection and other bodies mentioned in this Policy are located at page 5.

Advice relating to Organisations or Individuals using school premises

Schools and colleges may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO.

Types of Abuse, Neglect and Exploitation

24. All staff should be aware firstly that; abuse, neglect, exploitation and safeguarding issues are rarely stand-alone events that can be covered by one definition and, in most cases, multiple issues will overlap with one another. Secondly, harmful behaviours such as substance abuse, sexting and truanting can put children in danger,

and thirdly; that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. Abuse may also include situations where a child causes harm to another family member (sometimes referred to as child-to-parent or caregiver abuse). Staff should recognise that this may be an indicator that a child requires safeguarding support and should respond in accordance with this policy.

25. All staff, but especially the DSL and deputies should consider whether children are at risk of abuse, neglect or exploitation 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 exploitation, criminal exploitation, and serious youth violence. Children who are exploited through Child Criminal Exploitation (CCE) or Child Sexual Exploitation (CSE) may also be victims of modern slavery. Staff should recognise this possibility and follow the school's safeguarding procedures where concerns arise.

26. KCSIE defines abuse and neglect as follows:

Indicators of Abuse and Neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill=treatment that is not physical as well as the impact of witnessing ill-treatment of others. This can be particularly relevant, 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. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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 from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Emotional abuse may include persistent verbal abuse such as repeated criticism, humiliation, belittling, intimidation or name-calling where this causes significant emotional harm.

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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

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

Safeguarding Issues

Staff should recognise that safeguarding concerns often overlap and children may experience multiple forms of abuse, neglect and exploitation simultaneously. Staff should avoid focusing on a single issue in isolation and should consider the child's circumstances holistically. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos. These can be signs that children are at risk. Below are some safeguarding issues all staff are trained to be aware of.

Specific Forms of Abuse and Safeguarding Issues

27. Keeping Children Safe in Education 2026 –*Keeping Children Safe in Education 2026* identifies a range of specific safeguarding issues that schools should be aware of. The Designated Safeguarding Lead (DSL) will review these issues annually and consider whether any present an increased risk to pupils within the school community. Staff receive regular training to ensure they remain aware of these issues and understand how to recognise, respond to and report concerns appropiately.

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.

Where there are concerns about a specific incident, advice should be sought from the police and/or the Education Safeguarding Service when sharing information with the wider school/setting community. More general information is available at www.actionagainstabduction.org and www.clevernevergoes.org.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE): are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual or criminal activity. In some cases, the abuse will be in exchange for something the victim needs or wants, and/or will be to the financial benefit or increased status of the perpetrator or facilitator. Where children are victims of Child Criminal Exploitation (CCE) or Child Sexual Exploitation (CSE), staff should recognise that this may also constitute modern slavery.

Child Sexual Exploitation and Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Like all forms of abuse, exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex
- can still be abused even if the sexual activity appears consensual
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity

- can take place in person or via technology, or a combination of both
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posting on social media)
- can be perpetrated by individuals or groups, males or females, and children or adults
- can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse
- is typified by some form of power imbalance in favour of those perpetrating the abuse Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of Child Criminal Exploitation:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people 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
- children who regularly miss school or education or do not take part in education.

The above Child Criminal Exploitation indicators can also be indicators of Child Sexual Exploitation, as can:

- children who have older boyfriends or girlfriends
- children who suffer from sexually transmitted infections or become pregnant

County lines: is a term used by the UK Government to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

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 which explain each step of the process and the special measures that are available:
https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds
https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds

Children who are absent from education: a child who is absent from school, particularly repeatedly and/or for prolonged periods is a 'vital warning sign to a range of safeguarding issues'. This may include abuse and neglect such as sexual abuse and can also be a sign of child criminal exploitation including involvement in county lines or radicalisation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of Female Genital Mutilation so called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Staff should follow the School's procedures for unauthorised absence and for dealing with children that are absent from education, particularly on repeat occasions and/or prolonged periods, to help identify the risks of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. The School's procedures are set out in the Missing Pupil Policy. The Designated Safeguarding Leads will monitor unauthorised absence particularly where children are absent on repeated occasions.

The School will fulfil its statutory duty in notifying Barnet Local Authority when adding or removing a pupil's name from the admission register outside of the usual transition points i.e., where a compulsory school-aged child leaves a school before completing the school's final year or joins a school after the beginning of the school's first year. The school will make reasonable enquiries to establish the whereabouts of the child jointly with the Local Authority before deleting their name from the register and will also notify the Local Authority within five days of adding a pupil's name at a non- standard transition point.

Children Missing from Education: Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Children with family members in prison: These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides an information service for all professionals who come into contact with the children and families of offenders. Further information can be found here: https://www.nicco.org.uk/

Cybercrime: "Cybercrime is a 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 scare and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer)" (KCSIE, Sept 2023)

Staff should be aware of the appropriateness of the content pupils are accessing. The School has robust filtering and monitoring systems in place to ensure that the opportunity for cybercrime is minimised.

Domestic abuse: is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological, physical, sexual, financial and emotional. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
The school recognises the role of Operation Encompass in supporting children who have experienced domestic abuse. Where appropriate, the DSL will have regard to Operation Encompass guidance and will work with relevant agencies to ensure children receive timely safeguarding support.

Gender-Questioning Children: The school recognises that a child who is questioning their gender may, in some cases, have additional or complex needs requiring a safeguarding response. The fact that a child is gender-questioning does not, in itself, constitute a safeguarding concern.

Where appropriate, the school will consider the individual circumstances of the child on a case-by-case basis. Decisions will be made in the best interests of the child, with their safety, welfare and educational needs as the primary consideration.

The Designated Safeguarding Lead (DSL) will work with the Headteacher, parents or carers (where appropriate) and relevant professionals to ensure that appropriate support is provided. The school ill have regard to current statutory guidance issued by the Department of Education and will manage any safeguarding concerns in accordance with this policy.

Homelessness: Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The school recognises the statutory duty on local housing authorities to notify schools when a child of compulsory school age is placed in temporary accommodation. Where such a notification is received, the DSL will consider any safeguarding implications and work with the relevant agencies to ensure appropriate support is provided. The school will consider the potential impact on the child's attendance, educational progress, emotional wellbeing and access to support when planning appropriate interventions.

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. The school has a separate policy for mental health and wellbeing, which can be found on the website. Mental health concerns may also arise alongside safeguarding concerns and should not be viewed in isolation. Staff should consider whether a child's presentation may indicate abuse, neglect, exploitation, trauma or other adverse childhood experiences and respond in

accordance with this policy.
Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe pupils 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. Education staff play an important role in identifying emerging mental health concerns, providing early support, creating a safe and supportive environment and signposting children and families to appropriate services where required.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Children that are repeatedly absent and/or for prolonged periods, and children missing education may indicate mental health problems. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, they must immediately speak to the DSL or a deputy.
The Department of Education has published advice on Mental Health and Behaviour in Schools and Preventing and Tackling Bullying to support schools in promoting positive mental health and wellbeing. Staff should also have regard to local early help, health and mental health services when considering appropriate support for children and young people.

Where a pupil's mental health gives rise to safeguarding concerns, or where safeguarding concerns may be affecting a pupil's mental health, the Designated Safeguarding lead (DSL) will ensure appropriate action is taken, including referrals to Community-based Early help, Family Help, Children's Social Care or other specialist services where appropriate.

Modern Slavery and the National Referral Mechanism: The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support.

Modern slavery is a complex crime and may involve multiple forms of exploitation. It encompasses:

- human trafficking
- slavery, servitude, and forced or compulsory labour

An individual could have been a victim of human trafficking and/or slavery, servitude and forced or compulsory labour. Victims may not be aware that they are being trafficked or exploited, and may have consented to elements of their exploitation, or accepted their situation. If you think that modern slavery has taken place, the case should be referred to the NRM so that the relevant competent authority can fully consider the case. You do not need to be certain that someone is a victim.

Online Safety
It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Online safety and the school's approach to safeguarding is reflected in our online safety policy. The school recognises that online safeguarding concerns can occur both within and outside school and that technology is a significant factor in many safeguarding and child protection concerns. To ensure pupils are safe, the school uses appropriate filtering and monitoring (securus) on school devices and school networks. The proprietors, Designated safeguarding Lead (DSL) and senior leaders receive appropriate assurance that filtering and monitoring systems are effective, proportionate and reviewed regularly. Any concerns identified through filtering and monitoring systems will be managed in accordance with the school's safeguarding procedures.

Use of Mobile Phones and Personal Devices

Pupils are required to hand mobile phones and other personal devices to staff at the beginning of the school day. Devices are securely stored in locked storage throughout the school day and returned to pupils at the end of the school day. This arrangement helps reduce safeguarding risks associated with online abuse, child-on-child abuse, cyberbulling, inappropriate image sharing and the unauthorised use of personal devices during the school day. The use of personal devices is managed in accordance with the school's Behaviour Policy, Online Safety Policy and Acceptable Use Agreements.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.

Commerce: Risks such as online gambling, inappropriate advertising, phishing and financial scams. Staff should remain alert to these risks and report any safeguarding concerns immediately to the Designated Safeguarding Lead (DSL) in accordance with the schools safeguarding procedures. Where appropriate, incidents may also be reported to the relevant external organisations or authorities.

AI: The school recognises that generative artificial intelligence (AI) presents both opportunities and safeguarding risks. AI-generated content may be inaccurate, misleading or inappropriate and may be used to facilitate bullying, grooming, exploitation, impersonation, deepfakes, or the creation and sharing of indecent images. Staff will remain alert to these risks. Any safeguarding concerns arising from the use of AI or AI-generated content including deepfakes or manipulated images, audio or video involving a child, must be reported immediately to the Designated Safeguarding Lead (DSL) and managed in accordance with the schools safeguarding procedures. The school has regard to the Department for Education guidance, *Generative Artificial Intelligence (AI) in education,* and will review this guidance as it is updated.

Anti-Bullying Policy: any instances of **cyber bullying** will be dealt with according to the procedures set out in our Anti-Bullying and Cyber-bullying Policy. The school follows the guidelines in the DfE document 'Cyberbullying: Advice for headteachers and school staff' in dealing with instances of cyberbullying: Cyberbullying: Advice for headteachers and school staff - GOV.UK

Online Safety Policy: the pupil device and technology section of the online safety policy contains guidelines on mobile phone usage and safety / security, and on photos and videos on the internet. These sections are of the policy reviewed and updated regularly in line with the constant developments in the use of technology and social media.

Rewards and Sanctions policy:appropriate school sanctions will be used for infringements of school rules on the safe use of the internet. For serious breaches of on-line safety which have safeguarding implications, specific guidance will be sought, and followed, from the DfE document 'Keeping Children Safe in Education (KCSIE)'

PSHCE policy: sets out how PSHCE is covered across the whole curriculum, through individual subjects, assemblies, form time, visiting speakers and trips and visits.

- Personal Education includes helping students to stay safe and recognise dangers;
- Social, (Moral and Cultural) Education includes learning how to recognise and avoid exploitation, bullying and abuse.

Safety on-line is frequently addressed in assemblies & form time with information & discussion in relation to issues arising either in school or nationally. Assemblies on the benefits and dangers of social media and on anti-bullying have been presented by form groups.

Preventing radicalisation: Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. It can happen in many different ways and settings. The School and its staff have a duty to have due regard to the need to prevent people from being drawn into terrorism (the Prevent duty). 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 Government's Counter Extremism Strategy defines 'Extremism' as: "the vocal or active opposition to our fundamental values, including, democracy, the rule of law, individual liberty and the mutual respect and tolerance for those of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist."

The school seeks to promote an understanding of and commitment to fundamental British values such as democracy, the rule of law, individual liberty, tolerance and respect for other people. Pupils are able to discuss sensitive topics, including terrorism and extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. The Prevent duty is not intended to limit discussion of these issues and the School and its staff should be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately. Staff are encouraged to discuss their concerns with the Designated Safeguarding Leads who can advise on assessing the level of risk to identify the most appropriate referral, which could include making a referral to the Channel programme or the Local Authority Safeguarding Hub.

Channel: is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be susceptible to radicalisation. When referring an individual to Channel that person will need to give their consent before any support through the programme is provided. It is a voluntary process which allows the individual to withdraw from the programme at any time.

All staff are encouraged to familiarise themselves with the Government's *Educate Against Hate* website. The website provides school leaders, teachers and parents with information, tools and resources to help recognise and address extremism and radicalisation in young people. Educate Against Hate - Prevent Radicalisation & Extremism

Sexual violence and sexual harassment between children in schools: Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.
Sexual harassment, sexual violence and harmful sexual behaviour exist on a continuum of behaviours. Staff should respond promptly to all concerns, however minor they may initially appear, to prevent escalation and ensure children receive appropriate support and protection.

It is essential that all victims are reassured that they are being taken seriously, will be supported and kept safe. No child should never be given the impression that they are creating a problem by reporting abuse. The wishes of the victim should be carefully considered when determining the appropriate safeguarding response, while recognising that the school has a duty to protect all children.

Staff should be aware that girls, children with Special Educational Needs and Disabilities, children who are lesbian, gay or bisexual (LGB), and children who are questioning their gender may face additional vulnerabilities and should receive appropriate safeguarding support.

Serious violence: All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

The school recognises that serious violence is a safeguarding concern in its own right. This includes, but is not limited to, physical assault, carrying a weapon, threatening another person with a weapon, knife-enabled violence, and other weapon related harm where relevant as well as violence associated with criminal exploitation. Children involved in serious violence may also be victims themselves and should be treated as children who may require safeguarding and protection.

Any concerns regarding serious violence must be reported immediately to the Designated Safeguarding Lead (DSL). The DSL will assess the risk posed to the child and others, consider whether an immediate safeguarding referral is required, and where appropriate develop a safety and support plan, involve relevant partner agencies and take action to de-escalate peer conflict. The school is committed to identifying concerns at the earliest opportunity, making timely referrals where appropriate, working with safeguarding partners, and implementing evidence-informed interventions to reduce the risk of serious violence and protect children.

So-called 'Honour-based' abuse: So-called 'honour-based' abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation, forced marriage, and practices such as breast ironing. Staff should recognise that so-called honour-based abuse may affect both girls and boys and may involve multiple perpetrators acting together within families or communities.

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

Female Genital Mutilation (FGM)- mandatory reporting duty for teachers: Teachers have a mandatory reporting duty to personally report to the police where, in the course of their professional duties, they either discover that an act of Female Gential Mutilation (FGM) appears to have been carried out on a girl under the age of 18, or a girl under the age of 18 discloses that she has undergone FGM. All other concerns or suspicions relating to FGM must be reported immediately to the Designated Safeguarding Lead (DSL), who will take appropriate safeguarding action in accordance with this policy and statutory guidance.

It is also School Policy that any member of staff, other than a teacher, should follow the above procedure where they discover that an act of Female Gential Mutilation (FGM) appears to have been carried out, as this represents best practice.

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 Services as appropriate. The duty does not apply in relation to at risk or suspected cases i.e., where the teacher does not discover that an act of Female Genital Mutilation (FGM) appears to have been carried out, or where the woman is over 18. In these cases, teachers should follow local safeguarding procedures.

Forced marriage: A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, coercion or any other form of abuse is used to cause a person to enter into marriage. Forced marriage is a form of child abuse and may involve physical, emotional, psychological, financial or sexual abuse.

It is a criminal offence in England and Wales to use violence, threats, coercion or any other form of abuse to cause a person to enter into a marriage. It is also a criminal offence to carry out any conduct intended to cause a child under the age of 18 to marry, whether or not violence, threats or coercion are used. This applies to both legally recognised marriages and non-binding or unofficial ceremonies.

There is a clear distinction between a forced marriage and an arranged marriage. In an arranged marriage, families may take a leading role in introducing or arranging the marriage, but the decision to marry remains entirely with the individuals concerned. In a forced marriage, one or both individuals do not or cannot give their free and full consent.

The school recognises that children at risk of forced marriage may also be at risk of other forms of abuse, including domestic abuse, honour-based abuse, coercive control and other forms of child abuse. Any concerns or disclosures relating to forced marriage will be treated as safeguarding concerns and reported immediately to the Designated Safeguarding Lead (DSL).

Staff must not attempt to mediate with family members, negotiate with those involved, or send a child or young person back to their family if they believe the child may be at risk. Children should be given the opportunity to speak to staff alone where it is safe to do so, and interpreters should not be provided by family members. The DSL will work with Children's Social Care, the Police and any other relevant agencies to ensure appropriate safeguarding action is taken.

Where there is an immediate risk of harm, staff will contact the Police without delay and inform the DSL as soon as possible, in accordance with the school's safeguarding procedures.

28. Signs of Possible Abuse

Possible signs and behaviours which may indicate that a child is being abused include, but are not limited to:

- significant changes in children's behaviour,
- deterioration in children's general well-being
- unexplained bruising, marks or signs of possible abuse or neglect
- children's comments which give cause for concern
- any reasons to suspect neglect or abuse outside the setting, for example in the child's home
- inappropriate behaviour displayed by other members of staff for example excessive one to one attention beyond usual role or responsibilities
- repeated minor injuries
- children who are dirty, smelly, poorly clothed or who appear underfed
- children who have lingering illness which are not attended to, deterioration in School work, or significant changes in behaviour, aggressive behaviour, severe tantrums
- an air of "detachment" or "don't care" attitude
- overly compliant behaviour
- a "watchful attitude"
- sexually explicit behaviour (e.g. playing games/showing awareness which is inappropriate for the child's age)
- a child who is reluctant to go home, or is kept away from School for no apparent reason
- does not trust adults, particularly those who are close,
- "tummy pains" with no medical reason
- eating problems, including over-eating, loss of appetite
- disturbed sleep, nightmares, bed wetting
- running away from home, suicide attempts
- self-inflicted wounds
- reverting to younger behaviour,
- depression, withdrawal
- relationships between child and adults which are secretive and exclude others
- pregnancy

29. These signs are not evidence themselves; but may be a warning, particularly if a child exhibits several of them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs. Abuse is not easy to diagnose, even for experts.

30. Staff should bear in mind that additional difficulties may exist when recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND). This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration, being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children, that children with SEND can be disproportionately impacted by, for example, bullying without outwardly showing any signs, and there can be communication barriers in overcoming these difficulties.

Child Sexual Violence and Sexual Harassment

31. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment can occur online and offline (including technology-facilitated abuse), both inside and outside school and are never acceptable. The school recognises that these behaviours are a safeguarding concern, exist on a continuum, are never acceptable and, where identified early, can often be prevented from escalating through timely and appropriate intervention.

32. Sexual offences under the Sexual Offences Act 2003 are defined as follows:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or with any part of their body or an object, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

The school recognises that children may not immediately understand that they have experienced sexual abuse, exploitation or harmful sexual behaviour and may not disclose concerns and may not disclose concerns straight away. Staff should remain professionally curious, listen carefully, avoid asking leading questions and respond in accordance with this policy.

33. Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs.

34. Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment should never be dismissed as banter, part of growing up or simply "boys will be boys". All concerns will be taken seriously and responded to appropriately.

35. 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 but is not limited to:

- 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 and displaying pictures, photos or drawings of a sexual nature
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or

sexual violence. It may include:

- non-consensual & consensual sharing of sexual images and videos;
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats
- upskirting

36. It is important that all victims are taken seriously and offered appropriate support. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. The victim should never be made to feel that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report. The school recognises that children displaying harmful sexual behaviour may themselves have experienced abuse, trauma or exploitation and will ensure appropriate safeguarding and support is provided for all children involved. The wishes of the victim will be carefully considered when determining the appropriate safeguarding response, while recognising that the school has a duty to protect all children and comply with statutory safeguarding responsibilities.

37. If a pupil makes a disclosure directly to a member of staff or volunteer they must follow the process as set out under 'What to do if a pupil makes a disclosure' on page 28 and Appendix 2 of this Policy. Staff are reminded not to view or forward illegal images of a child. Where a report involves an online incident, staff will follow the guidance set out in KCSIE and the UKCIS guidance Sharing nudes and semi nudes: advice for education settings working with children and young people.

38. When there has been a report of sexual violence, the DSL or DDSL should 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. Risk assessments will be reviewed whenever circumstances change and at regular intervals to reflect any change in circumstances, emerging risks or protective factors.

39. Victims may not disclose the whole picture immediately and may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged and the school will ask the victim if they would find it helpful to have a designated trusted adult to talk to about their needs. The choice of any such adult should be the victims and the school will respect and support this choice.

40. Staff should be aware that some groups are potentially more at risk. Evidence shows that girls, children with Special Educational Needs and Disabilities (SEND), children who are lesbian, gay or bisexual (LGB), and children who are questioning their gender may be at greater risk or experiencing child-on-child abuse, sexual violence or sexual harrassment. Staff should remain alert to individual vulnerabilities and ensure that all children receive appropriate safeguarding support.

Relationships and Sex Education (RSE)

Through Relationships and Sex Education, pupils are taught about healthy and respectful relationships, consent, online safety, recognising abusive and coercive behaviours, appropriate behaviours, and how to seek help if they have concerns. The school will always consider the needs of both the alleged victim and the alleged perpetrator when responding to reports of child-on-child abuse, including sexual violence and sexual harassment. Appropriate safeguarding support will be provided to all children involved, where necessary, whilst ensuring that the safety, welfare and best interests of the alleged victim remain paramount. Decisions regarding risk management, support and any sanctions will be made on a case-by-case basis by the Designated Safeguarding Lead (DSL), working with other agencies where appropriate.

41. The Relationships Education, Relationships and Sex Education and Health Education (England) Regulations 2021 requires pupils receiving primary education to be taught Relationships Education and pupils receiving secondary education to be taught Relationships and Sex Education. The school delivers Relationship and Sex Education in accordance with the statutory requirements and current Department for Education guidance.

42. Personal, Social, Health and Economic Education (PSHE Education) is compulsory in independent schools; the school provides PSHCE lessons throughout the school.

43. DfE guidance gives schools freedom to deliver the content set out in the guidance in the context of a broad and balanced curriculum. The school delivers RSE as set out in the curriculum plan.

44. The school seeks to work in partnership with parents to enable parents to feel confident about the Relationships and Sex Education programme, and that it will be delivered sensitively and inclusively respecting backgrounds and beliefs. The draft RSE Policy, including the curriculum plan and draft PSHE programme, was circulated to parents, with parents being invited to make suggestions for development as part of the school's consultation process. Following consultation, the school published its Relationships and Sex Education Policy on the School website. The school's Relationship and Sex Education Policy is published on the school website and is available to parents on request.

The use of reasonable force, physical restraint and seclusion

45. Physical restraint: All forms of corporal punishment are unlawful; the School does not use or threaten corporal punishment. The use of unwarranted physical force is likely to constitute a criminal offence. The use of physical intervention should be avoided if possible. There are circumstances when it is appropriate for staff to use force to safeguard children. Any reasonable force will always be proportionate, necessary, lawful and recorded in accordance with the school's behaviour and safeguarding procedures. Parents will be informed as appropriate. This is enshrined in law and applies to any member of staff at the school. It can also apply to people whom the Head has temporarily put in charge of pupils, such as unpaid volunteers or parents accompanying pupils on a school organised visit.

46. Application of code of restraint: This only applies where no other form of control is available and where it is necessary to intervene. The use of force or physical contact may be reasonable and proportionate in the circumstances to prevent a pupil doing, or continuing to do any of the following:

- Committing a criminal offence
- Injuring themselves or others
- Causing damage to property, including their own
- Engaging in any behaviour prejudicial to good order and discipline at the School or among any of its pupils, whether that behaviour occurs in a classroom or elsewhere

47. Before intervening: Before intervening physically staff should, wherever practicable, tell the pupil to stop and what will happen if she does not. Staff should continue attempting to communicate with the pupil throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary. Any intervention should be the latest restrictive option necessary, proportionate to the risk presented and for the shortest time necessary to ensure safety. Staff should always avoid touching or holding a pupil in a way that might be considered indecent. Staff should also avoid any form of aggressive contact such as holding, pushing, pulling or hitting which could amount to a criminal assault, nor act in a way that might reasonably be expected to cause injury.

48. Inform senior staff: Staff should inform the Head immediately following an incident, except the most minor or trivial, where force has been used. This is to help prevent any misunderstanding or misrepresentation of the incident, and it will be helpful in the event of a complaint. Staff should provide a written report as soon as possible afterwards. The incident should also be recorded in accordance with the school's safeguarding, behaviour and recording procedures, and any safeguarding concerns arising from the incident should be reported to the Designated Safeguarding Lead (DSL) This should include the following details as a minimum:

- names of pupil and staff directly involved
- any relevant needs or circumstances of the pupil, including whether the pupil involved has an identified special educational need or disability and their SEN status code
- time, date, location and approximate duration of the intervention
- brief account of the incident, including what led up to the incident, identified or potential triggers if known, any preventative or de-escalation strategies used, and (where relevant) what type of reasonable

force was applied, the degree of force, and details of any physical injuries sustained
- brief account of why the use of force was assessed as necessary in that instance
- any post-incident support, such as details of any medical treatment for injuries or other adverse impacts

49. The Head will advise as to how parents should be contacted. Statutory guidance is that a procedure is in place for reporting each significant use of force to the parents of the pupil involved as soon as practicable after the incident, and schools should endeavour to do this no later than the same day. Parents/carers will normally be informed as soon as practicable following any significant use of reasonable force unless doing so would place the child at increased risk of harm.

50. Action taken in self-defence or in an emergency: The law allows anyone to defend themselves against an attack provided they do not use more force than is necessary. Similarly, where a pupil is at risk of immediate injury or on the point of inflicting injury on someone else, any member of staff (whether authorised or not) would be entitled to intervene.

51. Using reasonable force: There is no legal definition of "reasonable force". It will always depend on the circumstances. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.
Note that:
- any use of force should be proportionate to the behaviour of the pupil involved and the seriousness of the harm prevented
- staff should recognise the additional vulnerability of children with SEN, disabilities and certain medical conditions before using reasonable force
- physical force could not be justified to prevent a pupil from committing a trivial misdemeanour
- any force should always be the minimum needed to achieve the desired result
- whether it is reasonable to use force and the degree of force that could be reasonably employed might also depend on the age, understanding and sex of the pupil

52. Seclusion: this is a non-disciplinary intervention involving keeping a pupil confined to a place away from others and prevented from leaving and should only be used as a safety measure to protect others from harm when a pupil is experiencing high levels of emotional or behavioural dysregulation. In such circumstances, the pupil is not acting with intent. Seclusion is not to be used as punishment. The place to which the pupil is confined should be safe and not feel threatening or intimidating to the pupil. The pupil must be supervised at all times during the period of seclusion and as soon as the immediate risk of harm has reduced, the pupil should be allowed to leave. An incident involving the use of seclusion must be recorded and reported as per paragraph 52 of this policy. The use of seclusion will be monitored by the school to ensure it remains lawful, proportionate, necessary and in the best interests of the child. Any safeguarding concerns arising from the use of seclusion will be referred to the Designated Safeguarding Lead (DSL).

Designated Safeguarding Lead

53. The DSL is a member of the Senior Leadership Team and takes day to day lead responsibility for safeguarding and child protection. The school will ensure that the DSL is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children. The DSL will ensure that safeguarding information is shared appropriately, proportionately and in a timely manner with relevant agencies where this is necessary to protect and promote the welfare of children. The DSL will ensure that appropriate safeguarding records are maintained securely, reviewed regularly and transferred promptly when a child moves school, in accordance with statutory guidance and data protection requirements.

54. Parents and carers are encouraged to approach the Designated Safeguarding Lead (DSL) directly if they have any concerns about the welfare of any child at the school, whether those concerns relate to their own child or another child. If this is not possible, concerns may be shared with any member of staff, who will then ensure that the information is passed to the DSL without delay in accordance with this policy.

55. In accordance with Annex C of Keeping Children Safe in Education, the main responsibilities of the DSL are:

Managing referrals

- To take lead responsibility for promptly referring all cases of suspected abuse of any pupil at the School to Local Authority Safeguarding Hub
- To support staff who make direct referrals to the Local Authority Safeguarding Hub
- To refer cases to the Channel programme where there is a radicalisation related concern
- To support staff who make direct referrals to the Channel programme
- To take lead responsibility for promptly referring to the Local Authority Designated Officer all child protection concerns which involve a member of staff
- To ensure appropriate, proportionate and timely information sharing with Children's Social Care, the police, healthcare professionals and other safeguarding partners where required to safeguard and promote the welfare of children.
- To take lead responsibility for promptly making referrals to the Disclosure and Barring Service (DBS) (PO Box 3961, Wootton Bassett, SN4 4HF, Tel: 03000 200 190) where a member of staff is dismissed or resigns in circumstances where there has been actual harm, or risk of harm, to a child
- To take lead responsibility for making prompt referrals to the police where a crime may have been committed which involves a child. The National Police Chiefs' Council advice 'When to call the police' should assist Designated Safeguarding Leads in understanding when they should consider calling the police and what to expect when they do.

Working with others

To act as a point of contact with the three safeguarding partners

- To take lead responsibility in early help cases and liaise with other agencies
- To liaise with the Head in respect of police investigations or investigations under section 47 of the Children Act 1989 which involve the school
- To liaise with the 'Case Manager' and Local Authority Designated Officer regarding all child protection concerns which involve a member of staff
- To liaise with all staff on matters relating to safeguarding (including online and digital safety) and to provide advice and support when deciding whether concerns should be referred to relevant safeguarding agencies.
- To act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- To ensure appropriate, proportionate, timely and lawful information sharing with Children's Social Care, the police, health professionals and other safeguarding partners where necessary to safeguard and promote the welfare of children.

Raising awareness

- To ensure this Policy is known, understood and used appropriately
- To ensure this Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Proprietors regarding this
- To ensure this Policy is available publicly
- To ensure that parents are aware that referrals about suspected abuse or neglect may be made known to Local Authority Safeguarding Hub and the School's role in this
- To maintain links with the Local Authority Children Safeguarding Partnership
- To ensure staff receive appropriate safeguarding training, regular safeguarding updates and are aware of local safeguarding arrangements, procedures and emerging safeguarding risks.
- To help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and Senior Team

- To ensure that the School's PSHCE programme teaches pupils about safeguarding, including safer use of the internet and social media.

Child Protection file

- Where children leave the school, to ensure their child protection file is copied for any new school or college as soon as possible, but transferred separately from the main pupil file, ensuring secure transit, and obtaining confirmation of receipt. Where appropriate, the DSL will also discuss the child's safeguarding needs directly with the receiving school's DSL to ensure continuity of support.
- Consider whether it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue support and have that support in place for when the child arrives.
- Child protection files are securely stored in the Head' office and are only accessible by the DSPs.
- The school retains child protection records securely in accordance with statutory guidance, data protection legislation and the school's records retention schedule. Where safeguarding records relate to child protection concerns or statutory involvement, they will normally be retained until the child's 25th birthday or longer where required by law or where there is an ongoing safeguarding or legal reason for retention.

Safeguarding training

All staff receive safeguarding and child protection policy training, including regular updates, in accordance with *Keeping Children Safe in Education (KCSIE)* and statutory requirements. Training is refreshed at least every two years, with safeguarding updates provided throughout the year.

The Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs) receive training appropriate to their roles, which is updated at least every two years in addition to regular safeguarding updates. This training equips them with the knowledge and skills necessary to carry out their safeguarding responsibilities effectively.

All staff are required to read and understand Part One of *Keeping Children Safe in Education 2026* and confirm that they have done so. Staff also receive safeguarding induction on appointment and are provided with ongoing safeguarding updates throughout the year.

As part of maintaining an effective safeguarding culture, all staff are expected to:

- Encourage a culture of listening to children and taking account of their wishes and feelings in all safeguarding practice.
- Understand the additional online risks faced by children with Special Educational Needs and/or Disabilities (SEND) and be able to support them to stay safe online.
- Maintain an attitude of "it could happen here" where safeguarding is concerned and act in the best interests of the child at all times.

What to do if a pupil makes a disclosure (advice to all)

56. If a pupil discloses directly to a member of staff or volunteer, he/she:
    - Must listen carefully to the child using active listening techniques, remain calm and reassuring, and keep an open mind. Staff must not investigate or make assumptions about what has happened.
    - Must only ask open-ended questions such as 'How did that happen?', 'What was happening at the time?' or 'Is there anything else you want to tell me?'
    - Must not ask leading questions which may be considered as suggesting what might have happened, or who has perpetrated the abuse, as this can later be interpreted as putting ideas into the child's mind.
    - Must not interrupt the child when he/she is speaking.
    - Never promise a child that information will be kept secret or confidential. Explain, in an age-appropriate way, that information cannot be kept a secret and will only be shared with those who need to know in order to help keep the child safe.
    - Should reassure the child they have done the right thing and tell them they are not to blame.

- Must make a written record of the disclosure as soon as possible, using the child's own words wherever possible, and pass it immediately to the Designated Safeguarding Lead (DSL) in accordance with the school's safeguarding procedures.
- Continue to provide appropriate support to the child while avoiding further questioning or investigation. The child's safety and welfare must remain the paramount consideration.

Where there is an immediate risk of harm, staff must contact Children's Social Care and/or the police without delay if a Designated Safeguarding Lead (DSL) or Deputy DSL is not immediately available.

57. Records should:
- be accurate, factual and descriptive, including the date, time and place of the conversation and the essence of what was said and done, by whom and in whose presence;
- Not contain assumptions or personal opinions;
- Clearly distinguish between fact, observation and professional judgement where appropriate;
- identify the source of the information
- be signed, dated and include the full name and role of the person making the record.
- Include, where relevant, any supporting evidence such as body maps, screenshots, photographs, text messages, emails or other digital evidence;
- Be stored securely within the school's safeguarding recording system (e.g.CPOMS) and/or confidential child protection files, with access restricted to authorised staff;
- Be retained and securely disposed of in accordance with the school's retention schedule and statutory guidance;
- Be completed as soon as possible after the event and shared promptly with the Designated Safeguarding Lead (DSL).

58. All suspicions or complaints of abuse must be reported immediately to the Designated Safeguarding Lead (DSL). Where the allegations concern the DSL, it must be reported to the Head. Where the allegation concerns the Head, the procedures set out in Appendix 2 (Allegations Against Staff) must be followed.

59. All safeguarding concerns, discussions, decisions made, the reason for those decisions, and any actions taken will be recorded in writing, shared promptly with the Designated Safeguarding Lead (DSL) and securely stored in accordance with the school's safeguarding procedures and data protection requirements.

60. If a child is in immediate danger or is at risk of suffering significant harm, and a Designated Safeguarding lead (DSL) Deputy DSL or the Head cannot be contacted immediately, staff must make an immediate referral to Children's Social Care (Local Authority Safeguarding Hub) and, where appropriate, contact the police. The DSL must be informed as soon as possible afterwards.

What to do if you have a mental health concern

61. 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. Staff should not view poor mental health in isolation and must always consider whether it may be linked to a safeguarding concern.

62. Where a child's mental health concern is also a safeguarding concern, staff must follow the school's safeguarding and child protection procedures and report the concern to the Designated Safeguarding Lead (DSL) without delay.

63. Where a child's mental health concern is not considered to be a safeguarding concern, appropriate pastoral support should be provided. This may include creating a support plan, where necessary, involving the Designated Safeguarding Lead (where appropriate) pastoral staff, the SENDCo, parents/carers and other relevant professionals.

64. Further guidance is available in the Department for Education publication Mental Health and Behaviour in Schools and the school's Mental Health and Wellbeing Policy.

65. Staff recognise that only appropriately trained professionals should diagnose mental health conditions. School staff are not expected to make diagnoses but should remain alert to signs that may indicate a child is experiencing poor mental health or may require safeguarding, pastoral support or specialist mental health intervention. Any concerns that a child may be at risk of harm must be treated as a safeguarding concern and reported in accordance with this policy.

Confidentiality and Communicating with Parents

66. Staff, supply staff or volunteers who receive sensitive information about children and their families must only share this information on a need to know basis with appropriate professionals, in accordance with the school's information sharing procedures, statutory guidance and data protection legislation.

67. Parents will be made aware of the School's Safeguarding and Child Protection Policy and its availability on the school website.

68. Parents should be informed prior to referrals being made to other agencies, unless to do so would place the child, or another person, at further risk or cause evidence to be removed or destroyed.

69. The DSL will ensure that the school's information sharing arrangements comply with government guidance. Any written communications containing sensitive information must only be sent to other professionals on a need-to-know basis, using secure mail processes e.g. secure email.

Investigation, referral and reporting

70. The Proprietors will ensure that staff and volunteers are aware that it is their responsibility to:

- protect children from abuse
- be aware of the school's child protection procedures in this Policy
- know how to access and implement the procedures, independently if necessary
- report any matters of concern to the DSL
- Share safeguarding information appropriately, proportionately and in a timely manner in accordance with statutory guidance
- undertake appropriate training, including refresher training, which will be updated regularly in accordance with Local Authority Children Safeguarding Partnership requirements

71. It is not the responsibility of School staff to investigate suspected abuse. The school is not an investigation or intervention agency for child protection, but it has an important role to play at the recognition and referral stages. The school will take into account the procedures published by the Local Authority Children Safeguarding Partnership when dealing with allegations of abuse.

72. On being notified of a complaint or suspicion of abuse, the DSL will:

- operate safeguarding procedures in line with the Local Authority Children Safeguarding Partnership
- take into account the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to Children and Family Services and the police
- take into account the wishes or feelings of the pupil, while recognising that the child's best interests and safety remain paramount. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes
- take into account duties of confidentiality, so far as applicable.

73. If there is doubt over whether a referral should be made, the DSL will consult with the Local Authority Safeguarding Hub on a no-name basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to the Local Authority Safeguarding Hub will be made without delay. Where required by local safeguarding partnership procedures, written confirmation of the referral will be provided promptly. If the initial referral is made by telephone, the DSL will confirm the referral in writing to

the Local Authority Safeguarding Hub within 24 hours. Local Authority Safeguarding Hub should make a decision within one working day of a referral being made about what course of action they are taking and should inform the referrer of the outcome. This will include determining whether:

- the child requires immediate protection and urgent action is required; whether the child is in need, and should be assessed
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed
- any services are required by the child and family and what type of services
- further specialist assessments are required in order to help the local authority to decide what further action to take.

74. If no response or acknowledgement is received within one working day, the DSL, or the referrer, should follow up on the referral.

75. The DSL will keep the Head informed of the case unless the complaint involves the Head in which case the Proprietors will be consulted.

76. Staff must not investigate suspected abuse or any allegations against other staff themselves.

77. If the child's situation does not appear to be improving, the DSL or the staff member should continue to press for reconsideration if they believe the child's circumstances require it and follow local escalation procedures to ensure the child's welfare and safety remain the priority.

Children in need:

78. A child in need is defined under section 17 of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

In circumstances where a pupil has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies, the DSL will liaise with the Local Authority Safeguarding Hub and where appropriate an inter-agency assessment will take place, including Early Help assessments and Family Help or other multi-agency planning arrangements, where appropriate, in accordance with local safeguarding partnerships procedures.

Children at risk:

79. Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, to enable them to decide whether they should take any action to safeguard and promote the child's welfare. Under section 31 (10) of the Children Act 2004, the question of whether harm suffered by a child is significant relates specifically to the child's health and development. Their health or development should be compared with that which could reasonably be expected of a similar child and the parenting that we would reasonably expect them to receive from their parent/carer.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, the school will make a referral to Children's Social Care immediately and, where appropriate, involve the police. The safety and welfare of the child will remain the school's paramount consideration throughout the referral process.

All pupils identified as children in need or children at risk of harm will be provided with the appropriate levels of pastoral support led by a DSL in conjunction with class teachers.

The school recognises the fact that some pupils may be disproportionately vulnerable and at greater risk of harm. For example, some may be at more risk of harm from specific issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

Children potentially at greater risk of harm

80. Children who need a social worker (Child in Need and Child Protection Plans) Children may need a social worker due to safeguarding or welfare needs. Local authorities should share the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

81. There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children.

82. Children requiring mental health support Schools have an important role to play in supporting the mental health and wellbeing of pupils. For further information see 'Mental Health' on page 17.

Private Fostering

83. Private fostering occurs when a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related to, in that person's home. If a member of staff becomes aware that a child may be in a private fostering arrangement, they should raise this, in the first instance, with the DSL. The DSL will notify the local authority without delay in accordance with statutory guidance on private fostering arrangements.

Allegations of abuse made against staff and other adults

84. The school has procedures for dealing with allegations against members of staff, volunteers, trainee teachers, contractors and individuals supplied by third-party organisations who work with children. These procedures are designed to strike a balance between the need to safeguard and promote the welfare of children whilst ensuring that staff and other adults are treated fairly and protected from unfounded, false or malicious allegations. Where safeguarding concerns relate to an individual working for a third-party organisation, including contractors, agency workers, visiting professionals or other external providers, the school will work closely with the individual's employer and the Local Authority Designated Officer (LADO), where appropriate, to ensure concerns are managed promptly, fairly and in accordance with statutory guidance.

The school will work cooperatively with third party organisations while ensuring safeguarding concerns are managed in accordance with statutory guidance, including appropriate liaison with the Local Authority Designated Officer (LADO), employers and relevant regulatory bodies where required.

85. If the allegation is against the Head, then the allegation should be reported to the Safeguarding Proprietor. The Safeguarding Proprietor will refer the allegation to the Local Authority Designated Officer. The Head must not be informed of the allegation prior to contact with the chair and the LADO.

86. These procedures will be used in respect of cases where it is alleged that a member of staff or volunteer has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have occurred outside of work.

87. The school will provide appropriate support for the members of staff who are subject to an allegation, including a named contact where appropriate. Allegations will be managed as quickly as possible, consistent with a fair and thorough process that protects children while also ensuring appropriate support for the individual concerned.

88. The Head will take the lead and act as 'case manager'. Additional information may be sought such as previous history, whether the child has made similar accusations in the past and the member of staff's current contact with children. The initial discussions may lead to a decision that no further action is necessary and it should be recorded as such. In this situation the Head should determine what action should follow in respect of the person who made the allegation.

89. The Head should inform the member of staff about the allegation as soon as possible and provide as much information as possible without compromising any investigation. The Head will consider carefully whether the member of staff should be suspended or whether alternative arrangements can be put in place. Suspension will only be considered if there is no reasonable alternative. Note that in the event of an allegation against the Head, the Head will not be informed of the allegation prior to reporting to the Chair of the Board and LADO. A decision to suspend the Head will be taken by the Proprietors.

90. If further investigation is deemed necessary, then the Head will determine how and by whom this investigation will be undertaken.

91. Where it is or becomes clear that an investigation by the police or children's social care is unnecessary, an internal investigation and hearing will be undertaken. The Designated Safeguarding Lead may be appointed Lead investigator. Following a hearing, involving the member of staff, a union representative and the Head a decision will be reached, ranging from no further action to dismissal or a decision not to use the person as a volunteer.

92. Parents or carers of a child involved should be told of the allegation as soon as possible if they do not already know, subject to any concerns raised by the police or children's social services. They should be kept informed about progress of the investigation but should also be made aware of the prohibition on reporting or publishing allegations about teachers in section 141F of the Education Act 2002.

93. The school will report promptly to the Disclosure and Barring Service (DBS) any person whose services are no longer used by the school for regulated activity (effectively anyone employed at the school) and the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a child. The following list describes the reasons where services are no longer required.

- Dismissal
- Non-renewal of a fixed term contract
- No longer engaging or refusing to engage a supply teacher
- Terminating the placement of a student teacher or other trainee
- No longer using staff employed by contractors
- No longer using volunteers
- Resignation
- Voluntary withdrawal from supply teaching, contract working, teacher training or volunteering

94. Where a teacher has been dismissed (or would have been dismissed had they not resigned) and a prohibition order is appropriate, then the Foundation has a duty to consider whether a referral should be made to the Teaching Regulation Agency (TRA). This would be likely in the event of unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction, at any time, for a relevant offence. Where a school 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 first, they must consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002.
Where allegations relate to an individual employed or supplied by a third-party organisation , including an employment agency contractor, the school will work closely with the individual's employer and the Local Authority Designated Officer (LADO), where appropriate, to ensure allegations are managed promptly, fairly and in accordance with statutory guidance.

Allegations of abuse made against supply staff

95. In some circumstances the school will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency. Whilst the school is not the employer of supply teachers, the school will ensure allegations are dealt with properly. In no circumstances will the school cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome.

96. The Proprietors will discuss with the agency whether it is appropriate to suspend the supply teacher whilst they carry out their investigation. Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school, are under the supervision, direction and control of the governing body when working in the school. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is 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 will inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Low-level Concerns

97. The school encourages everyone affected by its operation to report to the Head, any concern – even if no more than one which causes a sense of unease of 'nagging doubt' – they may have that an adult working in or on behalf of the school may have acted in a way that is inconsistent with expected standards and/or the Staff Code of Conduct.

98. The purpose of this Low-level Concerns Policy is to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour which are set out in the Staff Code of Conduct are constantly lived, monitored and reinforced by all staff.
Low level concerns relating to individuals supplied by third-party organisations, including agency staff, contractors, trainee teachers or other external providers, will be shared promptly with the individual's employer and managed in accordance with the school's Low-level Concerns Policy and statutory guidance.

99. Where a low-level concern is raised about the DSL, it should be reported to the Head.

100. All members of staff are encouraged to self-refer where, for example, they have found themselves in a situation which could be misinterpreted or might appear compromising to others, and/or on reflection they believe that they have behaved in a way that falls below the expected standards. The DSL will usually share the concern with the Head and they will address it in a proportionate manner. They will gather as much evidence as they can by speaking where possible with the person who raised the concern, the individual involved and any witnesses. They will consider whether it is indeed a low-level concern or whether it is sufficiently serious to meet the harm threshold.

101. All low-level concerns will be recorded in writing by the Head. The record will contain details of the concern, the context in which the concern arose, and action taken, together with the rationale for all decisions and actions. The name of the individual sharing the concern will also be noted: if the individual wishes to remain anonymous, that will be respected as far as reasonably possible.

102. Records of low-level concerns will be regularly reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to. Where a pattern is identified, the Head and the DSL will decide on a course of action: this might be an internal disciplinary procedure or referral to the LADO if the harm threshold is met. They will consider if any wider cultural issues in the school enabled the behaviour to occur and if appropriate policies could be revised or extra training given to minimise the risk of recurrence. The review of low-level concerns will include consideration of whether any patterns indicate a safeguarding concern requiring referral to the Local Authority Designated Officer (LADO), Children's Social Care or the police, where appropriate.

103. Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, such as misconduct or poor performance. Those that relate exclusively to safeguarding will not be referred to in a reference unless they meet the threshold for referral to the LADO and are found to be substantiated. Where a low-level concern relates to supply staff or a contractor, their employer will be notified

about the concern, so that any potential patterns of inappropriate behaviour can be identified.

Recording low-level concerns

104. A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward. Where concerns are reported verbally to the Head a record of the conversation will be made by the Head which will be signed, timed, and dated. Responding to low-level concerns Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Head, or if designated, the DSL will:

- Speak to the person reporting the concern to gather all the relevant information, gathering as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses.
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police

105. Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses. The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with the school's Staff Behaviour and Code of Conduct: no further action will be required
- constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via the Capability and Disciplinary Procedures.
- serious enough to consult with or refer to the LADO: a referral should be made to the LADO.

106. The school will consider if any wider cultural issues in school enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

107. The Allegations procedure will be followed if, when considered with any other low-level concerns that have previously been raised about the same individual, the concerns should be reclassified as an allegation and managed in accordance with the school's allegations procedures. Where appropriate, this may include referral to the Local Authority Officer (LADO), the police and/or Children's Social Care.

108. In consideration with any other low-level concerns that have previously been made, records will be made of:

- all internal conversations including any relevant witnesses
- all external conversations, e.g. with the LADO, the decision and the rationale for it
- any action taken.

FAQs about Low-level Concerns

109. Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

110. Should staff report concerns about themselves (i.e. self-refer)? It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Behaviour and Code of Conduct. In these circumstances they should self-refer This will enable a potentially difficult situation to be addressed at an early opportunity if necessary. Where behaviour is consistent with the Staff Behaviour and Code of Conduct, feedback will be given to both parties to explain why the behaviour was consistent with the Staff Behaviour and Code of Conduct.

111. Should the low-level concerns file be reviewed? The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained. References Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

112. What is the role of the Proprietors? The Head will regularly inform the Proprietors about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g. with relevant data. The Safeguarding Proprietor may also review an anonymised sample to ensure that these concerns have been handled appropriately.

Allegations of abuse made against pupils (Child-on-Child Abuse)

113. All staff should be aware that children are capable of abusing their peers i.e., child-on-child abuse. Child-on-child abuse is unacceptable and will be taken seriously by the school. The school has a zero-tolerance approach to child-on-child abuse. Abuse will never be tolerated or dismissed as "banter", "part of growing up", "just having a laugh", or "boys being boys", and all concerns will be taken seriously and responded to appropriately. The school will always consider the needs of both the alleged victim and the alleged perpetrator. Where appropriate, safeguarding support will be provided to all children involved. However, the safety and welfare of the victim will always remain paramount. It can manifest itself in many ways, this is most likely to include, but may not be limited to:

- bullying (including cyberbullying)
- abuse in intimate personal relationships between children
- causing someone to engage in sexual activity with or without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- sexual violence and sexual harassment
- 'upskirting' is where someone takes 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. It is a criminal offence. Anyone of any gender, can be a victim.
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals.

114. The school recognises that child-on-child abuse exists on a continuum of behaviour ranging from inappropriate or problematic behaviour through to abusive, harmful sexual behaviour and sexual violence. Each concern will be considered individually and responded to proportionately, taking account of the age and developmental stage of those involved, the nature of the behaviour, any power imbalance, and whether there are wider safeguarding concerns.

115. Staff should be aware that gender issues can be prevalent when dealing with this type of abuse i.e., that it is more likely that girls will be victims and boys perpetrators, and that child-on-child abuse should not be tolerated or passed off as banter, part of growing up or "just having a laugh". The threshold for dealing with such abuse is when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. Such abuse will be referred to local agencies.

116. The Personal, Social, Health and Citizenship Education (PSHE) syllabus aims to enable students to lead responsible, healthy and assertive lives and to develop skills and knowledge which will equip them with the ability to deal with a range of issues. A unit of lessons on good relationships is included in the PSHE programme. The unacceptable nature of all forms of bullying is introduced into form discussion, assemblies and into lessons where appropriate, e.g. drama improvisation.

117. Pupils who have been subject to child-on-child abuse are encouraged to immediately report any concerns to their teachers or speak directly to a member of the Senior Leadership Team (SLT). If a pupil makes an allegation of child-on-child abuse, staff should follow the procedure as set out under 'What to do if a pupil makes a disclosure'

as seen on page 24 and Appendix 2. All reports of child-on-child abuse will be taken seriously, acted upon promptly and recorded in accordance with the school's safeguarding procedures.

118. A pupil against whom an allegation of abuse has been made may be suspended from School during the investigation and the school's Behaviour Policy and Anti-bullying Policy will apply.

119. The School will take advice from the Local Authority Safeguarding Hub on the investigation of such allegations, which give reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse, who are all treated as being "at risk". If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the school will ensure that, subject to the advice of Local Authority Safeguarding Hub, parents are informed as soon as possible, and that the pupil is supported during the interview by an appropriate adult.

120. Support will be available to the victims, alleged perpetrators and any other children affected by child-on-child abuse. The school recognises that children who display harmful sexual behaviour may themselves have experienced abuse, trauma or neglect. Safeguarding assessments will therefore consider the needs of all the children involved while ensuring that the safety and welfare of the victim remains the school's primary consideration. The school will work with Children's Social Care, the police, health services and other relevant agencies where appropriate to ensure all children involved receive suitable safeguarding and pastoral support.

121. The school acknowledges that, even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

Safer Recruitment

122. The school is committed to operating safer recruitment procedures in accordance with Keeping Children Safe in Education, relevant legislation, statutory guidance and the School's Recruitment and Selection Policy.

123. The school obtains appropriate pre-employment checks, including Disclosure and Barring Service (DBS) checks where required, for all staff, volunteers, agency workers, contractors and trainee teachers in accordance with the relevant legislation and statutory guidance. Where the school uses staff supplied by third-party organisations, including agency workers, contractors, visiting professionals or other external providers, the school will obtain written assurance that appropriate safer recruitment checks have been completed before those individuals work with children. The school will also satisfy itself that safeguarding arrangements remain appropriate throughout the period of engagement. The school will act promptly if concerns arise about the suitability of any individual supplied by a third-party organisation and will work with the employer, the Local Authority Designated Officer (LADO), where appropriate, and any other relevant agencies.

124. Individuals who have lived or worked outside the UK undergo the same checks as all other staff, plus additional checks made with authorities in those countries where they have lived or worked for more than three months continuously in the previous ten years.

125. The school will ensure that assurance is obtained of appropriate child protection checks and procedures having been applied to any staff employed by another organisation and working with the School's pupils on another site.

126. The school will make a referral to the Disclosure and Barring Service as soon as possible if the criteria are met, that is they have caused harm or pose a risk of harm to a child, in cases where:

- it is decided to dismiss a member of staff (including the Head) or to cease using the services of a Proprietor, contractor, volunteer or student at the School because he or she is considered unsuitable to work with children (a settlement/compromise agreement will not be used)
- a member of staff (including the Head), Proprietor, contractor, volunteer, student or any other person at the school tenders his or her resignation, or ceases to provide his or her services, and child protection allegations have been made.

Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.

The Disclosure and Barring Service is responsible for bringing together the services for the checking of criminal records and the barring of individuals deemed unsuitable to work with children or vulnerable adults.

Any such incidents will be followed by a review of the safeguarding procedures within the School with a report being presented to the Proprietors without delay.

127. The school complies with the Childcare (Disqualification) Regulations 2018 and the Education Act 2006. Staff connected to the School's Early Years and Later Years provisions are under an ongoing duty to inform the school if their circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to the School's Recruitment, Selection and Disclosure Policy for further information about this duty. The guidance applies to all staff, supply staff and volunteers working in the school. Where safeguarding concerns relate to individuals employed or supplied by a third-party organisation, including employment agencies or contractors, the school will work closely with the relevant employer, employment agency (where applicable), the Local Authority Designated Officer (LADO) and any other relevant agencies.

Secure School Premises

128. The school will take all practical steps to ensure that School premises are as secure as circumstances permit.

129. All visitors are required to sign in on arrival at Reception and sign out on departure. All visitors will have their identity checked and be given a name badge with the title "Visitor" which must be clearly displayed and worn at all times whilst on School premises. Visitors who are not required to undergo DBS checks must be supervised whilst on School premises by a member of staff or appropriately vetted volunteer. Visitors who have undergone requisite DBS checks are not required to be supervised whilst on School premises.

130. Contractors who are not required to undergo DBS checks will be issued with a visitor's badge and must be supervised at all times whilst on School premises. Contractors who have undergone requisite DBS checks will be issued with a contractor's ID and are not required to be supervised whilst on School premises. Where possible, appointments will be made during out of school hours.

131. All staff are issued with identity badges displaying their name and photograph. The badges must be clearly displayed and worn at all times whilst on School premises.

Safer Use of Technology

132. The School's Online Safety Policy and ICT Acceptable Use Agreement set out comprehensive guidance and advice to pupils, staff and all members of the School community. Pupils are taught online safety as part of a broad and balanced curriculum, which includes lessons on staying safe online as part of the Personal, Social and Health Education syllabus.

133. PSHCE lessons educate pupils about the risks associated with unrestricted internet and mobile phone access, including online sexual harassment, the sharing of nude or semi-nude images, exposure to pornography and other harmful content, and the impact of inappropriate online behaviour. Pupils are also taught about deepfakes, artificial intelligence, misinformation and fake news, including the legal and safeguarding risks associated with the malicious use of AI-generated content.

134. Pupils mobile phones and other personal electronic devices must be handed into reception immediately upon arrival at school. All devices will be securely stored in a locked location throughout the school day and returned to pupils at the end of the school day before they leave the premises. Devices must not be accessed or used during the school day unless expressly authorised by a member of staff for educational or safeguarding purposes.

135. The Staff Code of Conduct, Online Safety Policy (including the Pupil Mobile Phone Policy)) and ICT Acceptable Use Agreement provide comprehensive guidance on the appropriate use of mobile phones, smart technology (including other electronic devices with imaging, recording and sharing capabilities) and cameras. Guidance for staff, pupils and parents is set out within these policies.

- Upon entering the school, devices must be switched off and stored securely at the school reception at the beginning of the school day.
- Devices may be collected at the end of the school day.
- Parents and visitors may bring mobile phones onto the premises; however, photographs or video recordings may only be taken during authorised school events and in accordance with the schools guidance. Parents should be reminded that publishing Images, including on social networking sites, may be unlawful where consent has not been obtained or where publication places a child at risk.
- Staff may bring mobile phones or personal devices onto the premises but must not use them to take photographs of pupils. Staff should only use equipment provided or authorised by the school when taking photographs of pupils for official school purposes.
- The school's online safety policy can be used as guidance regarding the use of mobile phones. Mobile phones are only permitted in areas where pupils are prohibited.
- The school reserves the right to restrict or prohibit the use of personal devices on the premises where this is necessary to safeguard children, staff or visitors.

Staff will remain alert to safeguarding risks arising from the misuse of emerging technologies, including artificial intelligence, and will respond in accordance with the schools safeguarding procedures.

136. The school recognises that many children now have unrestricted access to the internet through mobile phones and other internet-enabled devices using mobile phone data (including 4G and 5G), WI-FI and other internet services. This access can expose children to harmful content, harmful contact, criminal or exploitative behaviour and unsafe online behaviours.
Students must not:

- Use mobile phones to sexually harass, intimidate, bully, or exploit other students
- Take, share, possess, or request indecent or sexually explicit images or videos
- Use artificial intelligence (AI), deepfake technology or image editing tools to create, share or distribute harmful, abusive, indecent or sexually explicit content involving another person.
- Share nude or semi-nude images consensually or non-consensually
- Access, upload, view, or distribute pornography or other harmful online material
- Use mobile data services to bypass school safeguarding and filtering systems
- Record or photograph students or staff without permission

137. Any incident involving online abuse, sexual harassment, child-on-child abuse, indecent Imagery (including AI-generated imagery), pornography or harmful online content will be treated as a safeguarding matter and managed in accordance with statutory guidance, the school's safeguarding procedures and the school's online safety policy.

Confiscation and Searches

138. Where there are reasonable grounds to suspect that a device contains prohibited, harmful or illegal material, the school may confiscate and search the device where lawful to do so, in accordance with the school's Behaviour Policy, Safeguarding and Child Protection Policy and the Department for Education guidance on searching, Screening and Confiscation.

Sanctions

139. Failure to comply with this policy may result in:

- Confiscation of the device
- Parental or carer contact
- Loss of permission to use personal devices in school
- Detentions, isolation, suspension, or other behaviour sanctions
- Referral to the Designated Safeguarding Lead (DSL) and, where appropriate, external agencies, including Children's Social Care and the police.

140. KCSIE identifies four broad categories of online safety risk (the Four C's)

Content: being exposed to illegal, inappropriate, or harmful content, for example: AI-generated indecent or sexually explicit imagery, deepfakes, manipulated imagery, pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

- Online scams- including phishing, fraud, sextortion (where a child is blackmailed using real or AI-generated sexually explicit images), impersonation scams and other attempts to obtain money, personal information or images.
- AI-related risks- including the malicious use of deepfakes, AI chatbots, image generators and other generative AI tools to deceive, manipulate and exploit others.
- Fake or AI-generated social media profiles.

Contact: Being subjected to harmful online interaction with other users, including peer-on peer abuse, online bullying, coercion, grooming, commercial advertising, adults posing as children or young adults with the intention of grooming or exploiting them for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.

Commerce: risks such as online gambling, phishing, fraud, financial scams, inappropriate advertising, in-app purchases, subscription traps, loot boxes and other commercial practices designed to exploit children financially.

The school recognises that online risks are constantly evolving and will regularly review its online safety curriculum, filtering and monitoring arrangements, and staff training to reflect emerging risks and technologies.

141. The school will do all it reasonably can to limit pupils' exposure to the above risks when using the school's devices and school networks, by having in place a robust filtering and monitoring system to safeguard pupils from potentially harmful and inappropriate material online without "over blocking" or imposing unreasonable restrictions as to what pupils can be taught through online teaching.

Training

142. All safeguarding and child protection training will be delivered in accordance with statutory guidance, Keeping Children Safe in Education, local safeguarding partnership arrangements and relevant legislation.

143. The DSL and DDSLs attend child protection training courses and training on inter-agency working at least every two years in keeping with Annex C: Role of the designated safeguarding lead of Keeping Children Safe in Education 2026. The DSL and Deputy DSLs undertake Prevent awareness training and maintain their knowledge and skills through regular safeguarding updates.

144. All staff, including temporary staff and volunteers, will be provided with the following documents in their induction training:

- this Policy (which includes our procedure for Children Missing in Education)
- the Code of Conduct for Staff (including anti-bullying, incl cyberbullying, prejudice-based and discriminatory bullying)
- the Whistleblowing procedure
- the Missing Pupil Policy
- the Behaviour Policy and anti-bullying policy
- Guidance regarding online safety
- Wellbeing Policy
- the role, identity and contact details of the DSL and DSLs
- Part One of KCSIE (Sept 2025) and Annex B by school leaders and those who work directly with children

145. Induction training is provided to ensure that staff understand the school's safeguarding policies and have an up-to-date knowledge of safeguarding issues. This will include, amongst other content, training to enable staff to identify signs of possible abuse (including child-on-child abuse, whether inside or outside school or online) and neglect at the earliest opportunity and to respond in a timely and appropriate way.

146. All staff, including the Head, receive a copy of Part One of Keeping Children Safe in Education (Sept 2026). School leaders and staff working directly with children will also be provided with a copy of Annex B (where applicable) of Keeping Children Safe in Education during induction training. Staff are required to complete a declaration confirming they have received, read and understood Part 1 and, if applicable, Annex B.

147. At least every two years, the DSL will ensure that the Head, all staff members and the Proprietors undertake child protection training appropriate to their roles which will be updated regularly in accordance with the Local Authority Children Safeguarding Partnership requirements and National Legislation. The purpose of this training will be to ensure that staff understand the school's safeguarding policies, and in particular, the Safeguarding and Child Protection Policy, and that they have an up-to-date knowledge of safeguarding issues. This will include, amongst other content, training to enable staff to identify signs of possible abuse and neglect at the earliest opportunity and to respond in a timely and appropriate way. Training will also include emerging safeguarding themes, including online safety, artificial intelligence, child-on-child abuse, mental health, and contextual safeguarding where appropriate.

148. Whenever such training takes place, in consultation with the Local Authority Children Safeguarding Partnership, the School will discuss and take account of any specific local requirements and the context of the school which needs to be taken account of in the training.

149. The school will ensure that all staff, including supply staff, part-time staff and volunteers, receive safeguarding and child protection training appropriate to their role. The DSL's will deliver safeguarding training and child protection training throughout the academic year and ensure all staff receive the required induction, regular safeguarding updates and refresher training. Safeguarding updates will be provided whenever there are significant changes to legislation, statutory guidance, local safeguarding arrangements or emerging safeguarding risks. Training will include, where appropriate, child protection, Prevent, online safety, filtering and monitoring, artificial intelligence and other emerging technologies, child-on-child abuse, contextual safeguarding and other current safeguarding themes to ensure staff have the knowledge and skills necessary to safeguard children effectively.

150. The Head and Senior Leadership Team will monitor and evaluate with Proprietors the effectiveness of the safeguarding training provided to staff. The safeguarding training will be subject to review at least annually (or more frequently if changes to legislation, regulation or statutory guidance so require).

Monitoring and review

151. Any child protection incidents at the school will be followed by a review of the safeguarding procedures within the School by the DSL and a prompt report to the Proprietors. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the school's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.

152. The Safeguarding and Child Protection Policy will be subject to review at least annually (or more frequently if changes to legislation, regulation or statutory guidance so require) by the DSL and Senior Leadership Team.

153. The Safeguarding and Child Protection Policy will also be subject to critical review by the Proprietors, who have received safeguarding training, on an annual basis, the outcome of which will be reported to the full Board.

154. The Proprietors will review this Policy annually and the implementation of its procedures, including good cooperation with local agencies, and approve the amendments to the Policy, which will, in turn, be signed off by the Proprietors. This annual review will take account of evidence such as staff training in safeguarding matters, referral data, analysis of any issues and themes which have emerged in the school and how these have been handled, initiatives to educate pupils about safeguarding, and details of any contribution the school has made to local discussions and multi-agency working on safeguarding matters. The annual review will be conducted in conjunction with the Head and Senior Leadership Team (including the DSL).

155. The date of the next review and the identity of the reviewer are shown on the front page of this policy.

Appendix 1: Safeguarding Concern Form

Copies of this form are available in classrooms, the staff room and in the School Office. Please complete as soon as possible after the disclosure is made and hand straight to the DSL or, in their absence, a DDSL.

Your name:	Name of child:

Date:	Time:
Where was the disclosure made:	Who was present:
Please give a detailed account of the disclosure or concern here and continue overleaf or on a separate sheet if necessary:	
This is a true and accurate account of the disclosure, signed:	

*Appendix 2: Checklist – Reporting process if you have a safeguarding **concern about a child***

If you suspect a child is at risk of harm immediately, alert the Designated Safeguarding Lead (DSL) or, in their absence, a Deputy (DDSL):
Miss Katherine Tyler (DSL)
Miss Melissa Gillespie (DDSL)
Mr Sean Kelly (DDSL)

If a child makes a disclosure:

LISTEN – do not interrupt the child, use active listening techniques, do not appear shocked or upset

Ask open questions (eg. Can you tell me more about…? How did it happen? Who was there? Tell me about your relationship with…? What happened?)

Never ask leading questions (eg. Did she hit you? Did it happen more than once?)

BELIEVE – do not make assumptions about what you are being told

SUPPORT – reassure the child that they have done the right thing and they are not in trouble

REPORT

Write down the contents of your conversation immediately, ideally on a Safeguarding Concern Form. Try to recount the disclosure in the child's words. Take the form straight to the DSL or, in their absence, a DDSL.
Miss Katherine Tyler (DSL)
Miss Melissa Gillespie (DDSL)
Mr Sean Kelly (DDSL)

Do not investigate the concern yourself or promise confidentiality. Explain that the information will only be shared with those who need to know in order to keep the child safe.

REPORT

If you cannot contact a DSL, alert the Multi Agency Safeguarding Hub on 0208 359 4066
Note that referrals to statutory agencies do not require parental consent.

*Appendix 3: Checklist – Reporting process for **allegations of abuse against members of staff, Proprietors,** contractors, volunteers, supply staff or students who work with children*

Where 'lower level' concerns and allegations (low-level concerns) do not meet the harm test, they are addressed separately. Please refer to the Low Level Concerns section of the Safeguarding Policy for detailed guidance.

For allegations that a person may harm a child or put them at risk of harm - immediately report

allegations/complaints of abuse against staff (other than the Head), DSL, Proprietors, contractors, volunteers, supply staff or students who work with children to the Head.

Where a conflict of interest arises in reporting to the Head, report

to the LADO directly

If appropriate, the Head will liaise with:

- DSL
- Proprietors
- The supply agency who has provided the member of staff, if relevant

The Head reports the matter to the Local Authority Designated Officer (LADO) within one working day.

The School complies with any strategy formulated by relevant agencies.

The parents/carers of the child involved, and the accused person, will be informed of the allegation after consulting with the LADO. The parents/carers will be kept informed of the progress of the case.

Effective support will be provided for employees facing an allegation.

The school will also consider whether any immediate safeguarding s]action is required to protect children while enquiries are ongoing, taking account of the welfare of both the child and the adult concerned.

*Appendix 4: Checklist – Reporting process for an **allegation of abuse against the Head***

Immediately report

Allegations of abuse against the Head, without notifying the Head, to the Safeguarding Proprietor (Susi Earnshaw).

Parents: contact the Safeguarding Proprietor (Susi Earnshaw) at the School address.

The Safeguarding Proprietor reports

The matter to the Local Authority Designated Officer (LADO) within one working day, without notifying the Head. The school complies with any strategy formulated by relevant agencies.

If the allegation concerns the Safeguarding Proprietor, the matter should be referred directly to the LADO without delay.

Appendix 5 - Useful Definitions

Children and Young Peoples Mental Health Services (CYPMHS) (formerly CAMHS in many areas)

Child and adolescent mental health services, which promote the mental health and psychological well- being of children and young people, and provide multidisciplinary mental health services to all children and young people with mental health problems and disorders to ensure effective assessment, treatment and support, for them and their families.

Child

A person under the age of 18 (s105 Children Act 1989)

Channel

The multi-agency process designed to safeguard vulnerable people who are identified as being susceptible to being drawn into terrorism. It works in a similar way to existing safeguarding partnerships.

Child abuse

Child abuse is a form of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse may occur within the family, in institutions or the community, by adults or by other children.

Child Protection

This is part of safeguarding and promoting welfare. It is the process of protecting individual children identified as either suffering, or likely to suffer, significant harm as a result of abuse or neglect. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

Children in need

Under section 17 of the Children Act 1989 are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or this will be significantly impaired without the provision of services, plus those who are disabled. The key factors in determining whether a child is in need are what will happen to the child's health or development without services being provided; and the likely effect the services will have on the child's standard of health and development.

Designated Safeguarding Lead

This is the individual (or individuals) identified within the school with lead responsibility for child protection and safeguarding matters.

Early Help

Early help is support provided as soon as a problem emerges to improve outcomes for children. It is available at any stage of a child's life and may involve one or more agencies working together with the child and their family.

Local Safeguarding Partners

The three local safeguarding partners (the local authority, a clinical commissioning group for an area within the local authority, and the chief officer of police for a police area in the local authority area) make arrangements to work together with the appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. They have a shared and equal duty to work together to safeguard and promote the welfare of children. They should make arrangements to allow schools to be fully engaged, involved and included in this process. Detailed guidance on these arrangements can be found in Working Together to Safeguard Children 2023.

Safeguarding

This is broader than child protection, and includes the process of protecting children from maltreatment; preventing the impairment of children's health or development; ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes .

Significant harm

Some children are in need because they are suffering, or likely to suffer, significant harm. The Children Act 1989 states "Where the question of whether harm suffered by a child is significant turns on the child's health and development, his health or development shall be compared with that which could reasonably be expected of a similar child". There are no absolute criteria, but factors will be the severity of the ill treatment, the degree and extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation, and the presence or degree of threat, coercion, sadism, and bizarre or unusual elements.

Social Services

The work of local authorities exercising their social services functions with regard to children. This may also be referred to as Children's Social Care or local authority children's social care, or Children's Services (within the local Social Services Department). The LADO will be part of this.

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

Well-being

For children, well-being is the term used in the Children Act 2004 relating to the five Every Child Matters outcomes, i.e. being healthy; staying safe; enjoying and achieving; making a positive contribution; and achieving economic well-being.

Appendix 6 - Safeguarding and Child Protection Issues relating to the specific nature of Susi Earnshaw Theatre School

Context

As a specialist performing arts school with several pupils working in the business, we are mindful of our added responsibility to our pupils beyond the boundaries of our school, when they are working in film, television or theatre. We recognise these additional risks and take measures to mitigate them. To ensure that our pupils are safe going to auditions and when working, we adhere to the rules set out by the local education authorities.

Academic risk

To protect academic wellbeing, the school will only provide a letter to allow a child to take time off school to work if the student is up to date with their academic work. The school provides academic work for pupils who are away working via their school Gmail account, and parents and pupils can contact individual teachers via this e-mail account. When a student returns to school, catch up classes are given if necessary. Pupils are also reminded to welcome their friends back, especially if they have been away on tour, as coming back to school after having time off can sometimes be daunting.

Personal risk

The DSL reviews the safeguarding issues identified within Annex B of Keeping Children Safe in Education annually to determine whether any are of heightened relevance to the school and its pupils.

Due to the nature of a performing arts setting and pupils engaging in professional performance work, particular consideration is given to:

- child abduction and community safety;
- child sexual exploitation (CSE);
- online safety and sharing of images/videos;
- peer-on-peer abuse;
- mental health and wellbeing;
- attendance and children missing education;
- appropriate supervision and chaperoning arrangements for pupils involved in performances and external productions.

The school maintains up to date records of performance licences and retains details of all licensed external chaperones accompanying pupils. Appropriate liaison takes place with production companies, local authorities and relevant departments in relation to attendance, welfare and safeguarding arrangements whilst pupils are engaged in professional work. This helps ensure that statutory safeguarding and pupil welfare requirements are met.

Creating a protective context

To help protect our pupils from harm, we aim to:

- create an environment in the school which encourages our pupils to develop a positive self-image, regardless of race, language, religion, culture or home background.
- work with parents to build their understanding of, and commitment to, the welfare of all our children.
- help pupils to establish and sustain satisfying relationships with their families, with peers and with other adults.
- encourage our pupils to develop a sense of autonomy and independence.
- enable pupils to have self-confidence and the appropriate vocabulary to resist inappropriate approaches.
- enable our pupils to develop an on-going stable relationship of trust with those helping them.
- approach all pupils with positive expectations.
- inform our pupils about, and involve them in, procedures, decisions, concerns and plans.
- inform our pupils of the outcome of assessments and decisions and the reasons, when their views have not met with a positive response.
- provide our pupils with support in their own right, and, when necessary, provide support and advice to their families.
- provide our pupils with advocacy to assist them in putting forward their views.