



**Safeguarding and Child Protection Policy
Whole School Policy including EYFS**

TPS aspires for each child to thrive personally, socially and academically by creating an inclusive environment that promotes wellbeing, encourages curiosity and celebrates individual success.

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Section 1: Important Contact Details

1.1. School Contact Details

The Board of Governors have appointed the Head of Pre-Prep as the Designated Safeguarding Lead (DSL). The Deputy Head and the Senior Teacher deputises for the Head of Pre-Prep, but the ultimate lead responsibility for safeguarding and child protection remains with the DSL.

The DSL and/or the Deputies will be always be available during school hours. The DSL or the Deputies will be available out of school hours.

In the Early Years Foundation Stage (EYFS), the Designated Safeguarding Lead who will liaise with the local statutory authorities is the Head of Pre-Prep. Staff working in EYFS with concerns about child protection issues must contact the DSL regarding their concerns.

Further details regarding the role of the DSLs can be found in [Appendix 1](#).

The Board of Governors ensures that the School has a nominated Governor with leadership responsibility for safeguarding arrangements.

Contact details are set out below:

Safeguarding Team

Email: safeguarding@twickenhamprep.co.uk

Tel: School Office: 020 8979 6216

- Designated Safeguarding Lead Mrs Barbara Barnes
- Deputy Designated Safeguarding Lead Mrs Amanda Hepburn
- Deputy Designated Safeguarding Lead Mr James Edwards
- Online Safety Co-ordinator Miss Coran Jones

For any allegation of abuse against a member of staff or volunteer:

Headmaster Mr Oliver Barrett
School Office: 020 8979 6216
Email: head@twickenhamprep.co.uk

For any allegation of abuse against the Headmaster:

Chair of the Governors Mr Harry Bates
School Office: 020 8979 6216
Email: hbates@twickenhamprep.co.uk

Safeguarding Governor:

Ms Barbara Flight: School Office: 020 8979 6216
Email: bflight@twickenhamprep.co.uk

1.2. Key Contact Details

All referrals for safeguarding issues, including those related to radicalisation, must be made to the SPA in the first instance.

Richmond Single Point of Access (SPA) 020 8547 5008 8am – 5.15pm
or
020 8770 5000 (out of
hours/weekends)
spa.referrals@achievingforchildren.org.uk

Full local procedures may be found on the following website: [Richmond LSCB](#)

Local Authority Designated Officer (LADO) **020 8891 7370/ 07774 332675**
020 8547 5008 8am – 5.15pm
or
020 8770 5000 (out of
hours/weekends)
lado@achievingforchildren.org.uk

Kingston & Richmond Local Safeguarding Children Partnership (LSCP)

1st Floor Civic Centre
44 York Street
Twickenham
TW1 3BZ
Tel: 07834 386459
lscb-support@kingrichlscb.org.uk

LSCP Independent Chair: Andrew Wadey
andrew.wady@met.police.uk

Contacts of the London Safeguarding Children’s Board and Partnership Contacts can be found [here](#).

List of Initial Response Teams' Contact Details of Children's Services (Social Care) covering the catchment of our pupils:

Ashford	01932 794479	Chiswick/Hounslow	020 8583 3400
Elmbridge/Weybridge	0300 200 1006	Kingston	020 8547 5888

The Disclosure and Barring Service (DBS) – Barring Referrals

PO Box 181

Darlington

DL1 9FA

Tel: 01325 953 795

dbsdispatch@dbs.gsi.gov.uk

OFSTED Safeguarding Children

- Tel: 0300 123 4666 (Monday to Friday from 8am to 6pm)

NSPCC/Government Child Abuse Whistleblowing Helpline: 0800 028 0285

Email: Whistleblowing@ofsted.gov.uk

For Prevent matters, as stated above, all referral must be made to the SPA in the first instance but other contact details are:

- **Police emergency contact number: 999**
- **Local police non-emergency contact number: 101**
- **Non-emergency DfE advice (Due diligence and counter extremism group)**
 - Tel: 020 7340 7264
 - Email: counter-extremism@education.gsi.gov.uk
- **Anti-terrorist hotline: 0800 789 321**

Contacts for Pupils

Childline: 0800 1111

NSPCC: 0808 800 5000

Section 2: Introduction

2.1. Guidelines

These guidelines have regard to the following statutory guidance:

- Keeping Children Safe in Education 2024
- Working Together to Safeguard Children 2023 (Updated Feb 2024)
- Disqualification under the Childcare Act 2006 (Updated Aug 2018)
- Prevent Duty Guidance for England and Wales 2023 (Updated March 2024)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (England) Regulations 2019 (Updated Sep 2021).

This policy has been written with reference to the:

- Education (Independent School Standards, England) Regulations 2014 (as amended)
- Statutory Framework for the Early Years Foundation Stage 2014 (Updated Nov 2024).

It is in accordance with procedures from the Kingston and Richmond Safeguarding Children Partnership (LSCP).

The Kingston and Richmond Safeguarding Children Partnership are a team of key professionals from three sectors:

- Local authority
- Clinical commissioning group
- Chief officer of police.

The School is committed to working with the safeguarding partners to promote the welfare of our pupils and protect them from harm, including identifying and responding to their needs.

All Governors are made aware of their obligations under the following:

- Human Rights Act 1998
- Equality Act 2010
- Data Protection Act 2018 and UK GDPR: and
- Local multi-agency safeguarding arrangements.

2.2. Introduction

The safety and welfare of all our pupils at Twickenham Preparatory School is at the forefront of all we do and underpins all relevant aspects of process and policy development. **This is paramount above all else.** This is a vital responsibility which involves the whole school community.

Where there is a safeguarding concern the School ensures the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

Safeguarding and promoting the welfare of our pupils is defined as:

- Protecting pupils from maltreatment, inside or outside the home, including online

- Preventing impairment of pupils' mental and physical health or development
- Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all pupils to have the best outcomes
- Providing help and support to meet the needs of children as soon as problems emerge.

This policy applies to all staff, governors and volunteers working with pupils whether on school premises or away from the School, for example at an activity centre or on a school trip. This policy is made available to parents via the school website and the Parent Portal. This policy can be made available in large print or other accessible format if required.

2.3. Our Core Safeguarding Principles are:

- The welfare of pupils is paramount; it is the School's responsibility to safeguard and promote the welfare of pupils
- To be alert to the signs of abuse, neglect and exploitation and follow our procedures to ensure that pupils receive effective support and protection
- All pupils, whatever their age, culture, disability, gender, language, racial origin, religious beliefs or sexual identity, have the right to protection from abuse
- Ensure pupils know that there are adults in the School whom they can approach if they are worried
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately
- Opportunities will be provided in Personal, Social & Health Education (PSHE), Relationships Education (Reception - Year 6) and Relationships and Sex Education (Year 7/8) for pupils to develop the skills they need to recognise and stay safe from abuse. Pupils are taught about safeguarding, including online safety, through various teaching and learning opportunities, within a broad and balanced curriculum
- Pupils who are and feel safe make more successful learners
- Corporal punishment is never used nor is its use ever threatened within the School
- All staff, whether teaching or non-teaching, have a responsibility to report concerns
- Policies will be reviewed annually, unless an incident or new legislation or guidance suggests the need for an earlier date of review
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to and valued.

2.4. Statement of Intent

The Governing Body ensures that the School has:

- Appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
- A Designated Safeguarding Lead and Deputy Safeguarding Leads for safeguarding and child protection who are members of the Senior Leadership Team (SLT) and have received appropriate training and support for these roles. Training in child protection and inter-agency working must be updated every two years by this person
- A nominated Governor with leadership responsibility for safeguarding arrangements to liaise with the DSL to ensure that the Child Protection Policy is updated and reviewed on an annual basis (by the Governing Body) or as and when required if prior to the annual review to ensure the policy is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt.

- A nominated Governor responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Headmaster
- Procedures for dealing with allegations of abuse made against members of staff
- Child protection policies and procedures which are available publicly via the school's website
- Appropriate filters and monitoring systems in place to limit children's exposure to risks from the School's IT system and regularly reviews their effectiveness
- A strategy to ensure that children are taught how to keep themselves and others safe, including online. That the information is age appropriate and sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse and children with special educational needs and/or disabilities.
- Safer recruitment procedures in line with national guidance
- A training strategy to ensure all staff, including the Headmaster and all Governors, receive mandatory safeguarding and child protection (including online safety which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction, in addition to regular refresher training, in accordance with the local safeguarding partners requirements
- Appropriate staff training in place for General Data Protection Regulations (GDPR) and Data Protection Act 2018

The School will:

- Ensure the Safeguarding and Child Protection Policy is updated and reviewed on an annual basis and throughout the year as and when required to ensure that safeguarding issues are kept up to date as they emerge and evolve, including lessons learnt
- Ensure that every member of staff and the members of the governing body know the name of the Designated Safeguarding Lead responsible for child protection and their role
- Ensure that all staff understand their responsibilities in being alert to the signs of abuse and responsibility for referring their concerns to the Designated Safeguarding Lead
- Ensure that parents have an understanding of the responsibility placed on the School and staff for child protection
- Ensure that children's social care services are notified if there is an unexplained absence of more than two days of a child who is on the child protection plan
- Keep electronic records of concern about pupils, even where there is no need to refer the matter immediately
- Ensure all electronic records are stored securely
- Develop and follow procedures where an allegation is made against a member of staff or volunteer ensuring that allegations are dealt with quickly, fairly and consistently, provide effective protection for the pupil and the individual subject to the allegation
- Ensure safe recruitment practices are always followed (see TPS Recruitment & Selection Policy)
- Report to the Disclosure and Barring Service as soon as possible, if the criteria are met, any person (whether employed, contracted, a volunteer or pupil) whose services are no longer used because he or she is considered unsuitable to work with children
- Ensure appropriate safety checks are carried out on staff from other agencies who are employed in the School

- Ensure any deficiencies or weaknesses in child protection arrangements are remedied without delay
- Work in partnership with local safeguarding partners.
- Continue to work proactively in information sharing with local agencies as and when required.

Section 3: Reporting Concerns

3.1. Reporting Concerns

If staff have any concerns about a child's welfare, they should act on them immediately and report their concerns without delay. It is not a staff member's responsibility to investigate or decide whether a child has been abused.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and reporting a concern.

3.2. Reporting Concerns About a Child

When adults in the School have a concern about a child or young person (as opposed to a child being in immediate danger) they must:

- Report their concern immediately on CPOMS
- Discuss their concerns with the DSL as soon as possible (if the DSL or a Deputy DSL are not available, staff should speak to a member of the SLT and/or take advice from children's social care)
- Agree a course of action
- Staff are permitted to make a direct referral to children's social care.

[See Appendix 2](#) for further information

3.3. Reporting a Threat of Immediate Danger and/or Risk of Harm to a Child

If, at any point, a child is in immediate danger or is at risk of serious harm, a referral will be made to children's social care and/or the police immediately. Parental consent is not required to make such a referral. Anybody can make a referral. If the referral is not made by the DSL, the DSL must be informed as soon as possible that a referral has been made. If the child's situation does not appear to be improving the staff member with concerns must press for re-consideration.

[See Appendix 2](#) for further information.

3.4. Reporting Concerns About an Adult

If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers, governors, contractors and supply staff from external agencies) posing a risk of harm to children, then:

- Concerns about the conduct of other adults in the School should be taken to the Headmaster without delay (or where that is not possible, to the Designated Safeguarding Lead)
- Concerns about the Headmaster or a Governor should be taken to the Chair of Governors (Mr Harry Bates), who can be contacted via email: hbates@twickenhamprep.co.uk
- If there is a conflict of interest in reporting the matter to the Headmaster, this should be reported to the Local Authority Designated Officer (LADO)

- Concerns about the Chair of Governors (Mr Harry Bates), should be taken to LADO

The School recognises that it has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- The harm test is satisfied in respect of that individual
- The individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence
- The individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

A referral will be made as soon as possible, and ordinarily on conclusion of an investigation, when an individual is removed from working in regulated activity, which could include being suspended, or is redeployed to work that is not regulated activity.

3.5. Reporting Concerns about Safeguarding Practices Within the School (Whistleblowing)

Where there are concerns about the way that safeguarding is carried out in the School, staff must refer to the School's Whistleblowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- A criminal offence has been committed, is being committed or is likely to be committed
- A legal obligation has been breached
- There has been a miscarriage of justice
- The health or safety of any individual has been endangered
- The environment has been damaged
- Information about any of the above has been concealed.

The NSPCC runs a **Whistleblowing Advice Line** on behalf of the Government, the number is 0800 028 0285 or email: help@nspcc.org.uk

Further information can be found at:

<https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

3.6. Key Points to Remember for Taking Action are:

- If a child is at immediate risk of serious harm a referral must be made to children's social care or the police immediately
- Do not start your own investigation
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- Seek support for yourself if you are distressed.

3.7. Referring a Concern Externally

Every complaint or suspicion of abuse from within or outside the School will be taken seriously and in all proper circumstances will be referred to an external agency such as the children's social care services at the Local Authority, the child protection unit of the police or

the NSPCC, without investigation within the School. Parental consent is not required for referrals to statutory agencies.

In each of these cases the matter will be referred to children's social care services and in the case of allegations against a member of staff or a volunteer to the Local Authority Designated Officer (LADO) and that any doubts or concerns over apparently borderline cases will be discussed informally with children's social care initially on a "no names" basis.

[See Appendix 2](#) for further information.

3.8. If a Child Discloses Information to You

The School recognises that the initial response to a report from a child is incredibly important. How the School responds can encourage or undermine the confidence of future victims of abuse to report or come forward.

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults or they may believe, or have been told that the abuse is their own fault.

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen, if you leave it till the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

During your conversation with the child:

- Allow them to speak freely
- Remain calm and do not over react – the child may stop talking if they feel they are upsetting you
- Give reassuring nods or words of comfort –“I’m so sorry this has happened”, “I want to help”, “this isn’t your fault”, “you are doing the right thing”
- Do not be afraid of silences
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the child’s mother think
- At an appropriate time tell the child that in order to help them you must pass the information on
- Do not offer any physical touch or comfort as it may be anything but comforting to a child who has been abused
- Never admonish the child for not disclosing earlier
- Never make a child feel ashamed for making a report
- Explain in such a way that avoids alarming or distressing a child that the law is in place to protect rather than criminalise them
- Reassure the child that they are being taken seriously and they will be supported and kept safe. Never give the impression that the child is creating a problem by reporting abuse, sexual violence or sexual harassment. Abuse that occurs online or outside school should not be downplayed and should be treated equally seriously

- Tell the child what will happen next. The child may agree to go with you to see the Designated Safeguarding Lead
- Report verbally to the Designated Safeguarding Lead
- Write up your conversation as soon as possible on CPOMS
- Seek support if you feel distressed.

3.9. Incidents that must be Reported/Recorded

If any of the following occur you must report this immediately to another colleague and record the incident.

- If you accidentally hurt a pupil
- If a pupil seems particularly distressed
- If a pupil appears to be sexually aroused by your actions
- If a pupil misunderstands or misinterprets something you have done.

3.10. Record Keeping

All concerns, discussions and decisions (including reasons for the decisions) should be recorded on CPOMS, kept confidential and ensure access is restricted and secured.

Records should include:

- A clear and comprehensive summary of the concern
- Follow up
- Action taken
- Decision reached
- Outcome.

3.11. Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside the School. All staff, but especially the DSL (or deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Additional information regarding contextual safeguarding can be found [here](#).

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

3.12. Information Sharing

Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst the Data Protection Act 2018 and GDPR places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child or vulnerable adult being placed at risk of harm. Schools have clear powers to share, hold and use information for these purposes.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. When the School places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil.

The governing body ensures that staff who need to share 'special category personal data' are aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk. Schools should not under the GDPR as supplemented by the Data Protection Act 2018 provide pupils' education data where the serious harm test under that legislation is met. If in any doubt about sharing information, staff should speak to the DSL or a Deputy DSL.

Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent the School sharing where there are real safeguarding concerns.

The School will use its judgement when making decisions on what information to share and will apply the principles set out below. The most important consideration is whether sharing information is likely to safeguard and protect a child.

- Necessary and proportionate
- Relevant
- Adequate
- Accurate
- Timely
- Secure
- Record

For further information see [Information Sharing](#).

Section 4: Managing Allegations or Concerns

4.1 Safeguarding concerns and allegations made about a member of staff; including supply staff, volunteers and contractors

At TPS we recognise the possibility that adults working in the School may harm children, including governors, volunteers, supply teachers, contractors and agency staff.

Any concerns about the conduct of adults in the School should be reported as detailed in Clause 3.4.

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. If a complaint is received the person receiving the complaint must take it seriously and immediately inform the Headmaster.

The Headmaster will decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).

It is an allegation if the adult 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 (also includes behaviour outside the School).

When an allegation is made against a member of staff, set procedures must be followed.

Before contacting the LADO, the School will conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

Allegations should be reported to the LADO 'without delay'.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.

The accused person will be informed of the allegation as soon as possible after the LADO has been consulted.

The School recognises its statutory duty to consider referral of cases involving serious professional misconduct to the Secretary of State via the Teaching Regulation Agency (TRA).

In the event that the School dismisses a teacher for misconduct, or would have dismissed them had they not resigned first, the School will consider whether to refer the case to TRA.

The School also recognises its statutory duty to make referrals to the Disclosure and Barring Service (DBS) where a member of staff is dismissed or resigns in circumstances where there has been actual harm, or risk of harm, to a child.

4.2 Organisations or Individuals using School Premises

In the event that the School receives an allegation relating to an incident that happened when an external organisation or individual has hired the school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), the School will follow its own safeguarding policies and procedures, including informing the LADO.

4.3 Low-level Concerns

Creating and embedding a culture in which all concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- Encourage a culture of openness, trust and transparency
- Enable the School to identify concerning, problematic or inappropriate behaviour early
- Minimise the risk of abuse
- Ensure that adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries, and in accordance with the expected behaviours (as detailed in the Staff Code of Conduct), ethos and values of the School.

Concerns may be graded low-level if the concern does not meet the criteria for an allegation; and the adult has acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work.

Example behaviours include, but are not limited to:

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language.

If the concern has been raised via a third party, the Headmaster will collect as much evidence as possible by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously (if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)
- To the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- Name of individual sharing their concerns
- Details of the concern
- Context in which the concern arose
- Action taken

Records will be kept confidential, held securely and comply with the Data Protection Act 2018. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

For further details see Low-Level Concerns Policy.

4.4. Allegation Against a Pupil

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's Policy on Behaviour and Discipline will apply. The School will take advice from children's social care on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse. 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 children's social care, parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult.

4.5. Unfounded or Malicious Allegations

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Headmaster will consider whether to take disciplinary action in accordance with the School's Behaviour and Discipline Policy.

Where a parent has made a deliberately invented or malicious allegation, the Headmaster will consider (in accordance with the School's terms and conditions) whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or member of staff unreasonably.

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

Section 5: Safeguarding Information

5.1. Specific Safeguarding Issues

Keeping Children Safe in Education (2024) also acknowledges the following as specific forms of abuse and safeguarding issues:

- Child abduction and community safety incidents
- Children and the court system
- Children absent from education
- Children with family members in prison
- Child criminal exploitation (CCE)
- Child sexual exploitation (CSE)
- Child on child sexual violence and sexual harassment
- County lines
- Cybercrime
- Domestic abuse
- Homelessness
- Mental Health
- Modern Slavery and the National Referral Mechanism
- So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)
- Serious violence
- Preventing radicalisation
- The Prevent Duty
- Channel

Further detail regarding these areas can be found in [Appendix 3](#) of this document or [Annex B of KCSIE 2024](#).

5.2. Pupils with Special Educational Needs or Disabilities (SEND) or Certain Medical Conditions

Children and young people with SEND or certain medical conditions can face additional safeguarding challenges because:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEND or certain medical conditions being disproportionately impacted by things like bullying without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges.

The School identifies pupils who might need more support to be kept safe or to keep themselves safe.

Further information regarding the additional pastoral support provided to pupils with SEND or certain medical conditions can be found in the School's Special Educational Needs and Disability Policy and from specialist organisations such as:

- [The Special Educational Needs and Disabilities Information and Support Services \(SENDIASS\)](#). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND.
- [Mencap](#) - Represents people with learning disabilities, with specific advice and information for people who work with children and young people
- [NSPCC - Safeguarding children with special educational needs and disabilities \(SEND\)](#)
- [NSPCC - Safeguarding child protection/deaf and disabled children and young people](#)

5.3. Children who are Lesbian, Gay, Bisexual or Gender Questioning

A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a culture where they can speak out or share their concerns with members of staff.

Caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It is recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, the school should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

5.4. Online Safety

The use of technology is a source of education, communication and entertainment. However, it has also become a significant component of many safeguarding issues, providing platforms that facilitate harm to children.

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

- **Content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views
- **Contact:** being subjected to harmful interaction with other users; for example, commercial advertising as well as adults posing as children or young adults
- **Conduct:** personal online behaviour that increase the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying

- **Commerce:** such as online gambling, inappropriate advertising, phishing and or financial scams. Suspected phishing should be reported to the [Anti-Phishing Working Group](#).

Pupils receive guidance, education and training on online safety through our PSHE programme. Cyber-bullying by pupils, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures, and they can be escalated to safeguarding concerns.

Pupils are not permitted access to mobile phones during the school day. Pupils in Year 6-8 who bring mobile phones to school, must hand the phone in to the School Office on arrival. Phones may only be collected when the pupils leave the School.

The School has also put in place appropriate filters and monitoring systems to limit children's exposure to the above risks, while being mindful not to place unnecessary restrictions on their learning. Please refer to the school's Online Safety Policy and Anti-Bullying Policy for further information.

Where pupils are being asked to learn online at home the School will follow advice issued by the Department for Education.

The School ensures that staff receive online safety training (including expectations and their role and responsibilities in filtering and monitoring) as an integrated element of regularly updated safeguarding training.

5.5. Pupils with a Social Worker

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect, exploitation and complex family circumstances. Local authorities should share the fact a child has a social worker with the School, and the DSL will use this information so that decisions can be made in the best interests of the pupil's safety, welfare and educational outcomes.

5.6. Mental Health

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

Staff 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. However, staff should not attempt to make a diagnosis of a mental health problem. The School follows the advice contained in the DofE guidance [Mental Health & Behaviour in Schools](#) (updated Nov 2018).

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

If staff have a mental health concern about a pupil that is also a safeguarding concern, immediate action should be taken, by following this policy and speaking to the DSL or a Deputy DSL.

5.7. Mobile Phones and Cameras

Personal mobile phones, cameras and video recording equipment cannot be used when in the presence of children on school premises. All mobile phones must be stored securely out of reach within the setting during contact time with children. (This includes staff, governors, visitors, parents and volunteers).

Staff have permission to use their mobile phones in emergency situations.

Personal calls on mobile phones may be made in non-contact time but not within the teaching areas or the Pre-Prep Department.

Personal mobiles, cameras or video recorders should never be used to record classroom activities. School equipment only should be used.

In the case of school events, parents are permitted to take photographs/video footage of *their own child* in accordance with the school's Guidelines for Taking, Using and Storing Images of Pupils. However, parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other pupils should not be made accessible to others via the internet (for example on Facebook, YouTube or other social media channels), or published in any other way.

Most school events will be videoed/photographed by the School and then made available to parents.

Section 6: Safeguarding Training

6.1. Safeguarding & Child Protection Training

Child abuse, particularly sexual abuse, can arouse strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with judgements about the appropriate action to take. Staff receive the following training in child protection:

- **DSLs:** attend training every two years; and in addition to formal training, their knowledge and skills are refreshed at regular intervals, at least annually
- **All other staff:** receive regular safeguarding and child protection updates (including online safety and filtering and monitoring) as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. All staff including governors are required to read Part 1 and Annex B of Keeping Children Safe in Education on an annual basis (including induction). In addition Governors are required to read Part 2 of Keeping Children Safe in Education.
- **Safer Recruitment training** is available to all relevant staff and governors who are involved in the recruitment process (see TPS Safer Recruitment Policy & Procedures).
- **Prevent Duty:** all staff receive prevent awareness training. The DSL team are able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

6.2. Induction

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

- Safeguarding & Child Protection Policy
- Low Level Concerns Policy
- Behaviour & Discipline Policy
- Code of Conduct for Staff
- Online Safety (including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring)
- Safeguarding response to children who are absent from education
- Whistleblowing Policy
- The identity and contact details of the Safeguarding Team
- Part 1 & Annex B of Keeping Children Safe in Education (2024)
- Part 2 of Keeping Children Safe in Education (2024) – the governing body
- CPOMS

Section 7: Good Practice Guidelines

7.1. Good Practice Guidelines

All staff must demonstrate exemplary behaviour in order to protect themselves from false allegations. The following are common sense examples of how to create a positive culture and climate:

- Work in an open environment, avoiding private or unobserved situations wherever possible/practical and encourage open communication
- Treat all pupils with equal respect and dignity
- Always put the welfare of each pupil first
- Maintain a safe and appropriate distance from pupils
- Be an excellent role model and do not smoke or drink alcohol in the company of pupils
- Give enthusiastic and constructive feedback rather than negative criticism
- Staff speaking to a pupil and being concerned about possible abuse must make it clear that confidentiality cannot be promised to a pupil
- Staff must avoid asking leading questions when speaking to a pupil where the pupil is reporting on an incident that could be interpreted as abuse.

7.2. Practices to be Avoided

Staff are required to familiarise themselves with the guidance for physical restraint of pupils given in the Staff Code of Conduct (TPS Reference Drive: R:Policies).

Staff must avoid spending excessive time alone with pupils away from others. If a case arises where this is unavoidable actions wherever possible must be with the full knowledge of others.

7.3. Practices Never to be Sanctioned

- Engaging in rough physical or sexually provocative games
- Sharing a room with a child on an off-site visit
- Allowing or engaging in any form of inappropriate touching
- Allowing pupils to use inappropriate language unchallenged
- Making sexually suggestive comments to a pupil, even in fun
- Deliberately reducing a pupil to tears as a form of control
- Allowing allegations made by a pupil to go unchallenged, unrecorded or not acted upon
- Inviting or allowing pupils to stay with you at your home unsupervised
- Carrying out actions of a personal nature for a pupil which they could do themselves. It may sometimes be necessary for staff to do things of a personal nature for pupils. These tasks must only be carried out with the full understanding and consent of parents. Avoid taking on the responsibility for tasks for which you are not appropriately trained
- Communicating electronically (e.g. by 'phone or computer) with pupils unless clearly sanctioned by the School.

Appendix 1: The Role and Responsibilities of the DSL

The DSL is responsible for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) at the School. The key role of the DSL is to:

- Manage referrals from School staff or any others from outside the School. Including:
 - Refer cases of suspected abuse to the local authority children’s social care as required
 - Support staff who make referrals to local authority children’s social care
 - Refer cases to the channel programme where there is a radicalisation concern as required
 - Support staff who make referrals to the channel programme
 - Refer cases where a person is dismissed or left due to risk/harm to a child to the disclosure and barring service as required
 - Refer cases where a crime may have been committed to the police as required.
- Work with external agencies and professionals on matters of safety and safeguarding
- Be aware of pupils who have a social worker
- Point of contact with three safeguarding partners
- Liaise with the Headmaster to inform him of issues; especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. Awareness of the requirement for children to have an Appropriate Adult. Further information can found in the [statutory guidance PACE Code C 2023](#)
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety
- Undertake training required to carry out the role
- Raise awareness of safeguarding and child protection amongst the staff and parents
- Ensure that a pupil’s child protection file is transferred to the pupil’s new school as soon as possible
- Consider if appropriate to share child protection information with a new school in advance of the pupil leaving
- Preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

The School ensures that the DSL:

- Is appropriately trained
- Acts as a source of support and expertise to the school community
- Has an understanding of local safeguarding procedures as communicated by the three local safeguarding partners in line with [Working Together to Safeguard Children](#)
- Contacts the police as/when required, following guidance issued by the [NPCC](#)
- Keeps written records of all concerns when noted and reported by staff or when disclosed by a child, ensuring that such records are stored securely
- Keeps a record of the rationale for any decisions made
- Refers cases of suspected neglect, abuse and/or exploitation to children’s social care or police
- Notifies children’s social care if a child with a child protection plan is absent for more than two days without explanation
- Ensures that when a child with a child protection plan leaves the School, their information is passed to their new school and the child’s social worker is informed

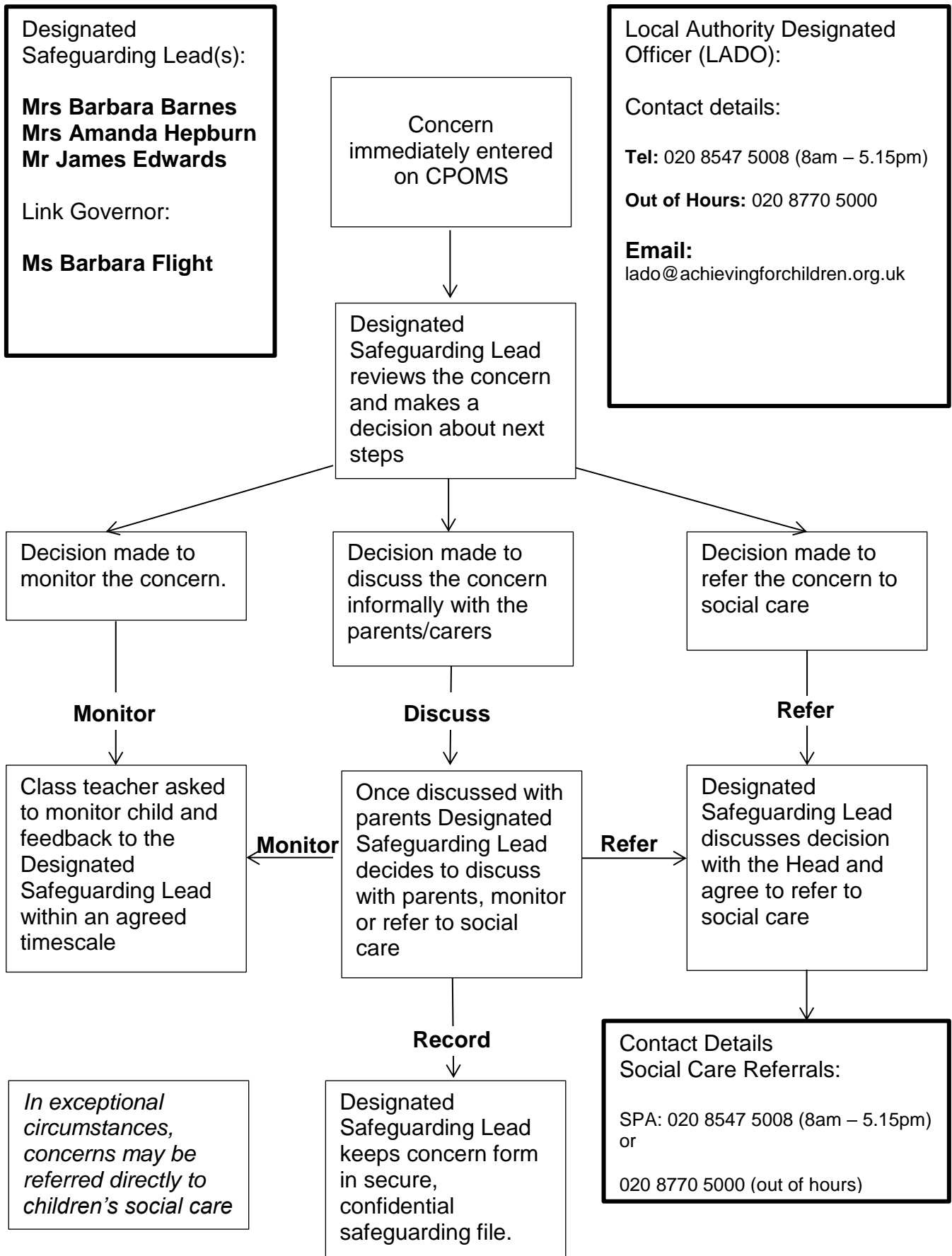
- Attends child protection courses
- Co-ordinates the School's contribution to child protection plans
- Develops links with relevant statutory and voluntary agencies
- Ensures that all staff have read the Safeguarding and Child Protection Policy
- Ensures that records are maintained of staff and governor training on child protection and safer recruitment procedures
- Ensures that the Safeguarding and Child Protection Policy is reviewed annually at a meeting of the Governing Body
- Liaises with the nominated Safeguarding Governor and Online Safety Co-ordinator
- Ensures records are maintained of staff attendance at child protection training
- Ensures this policy is available to parents.

The Deputy DSL's are appropriately trained and in the absence of the DSL carry out those functions necessary to ensure the ongoing safety and protection of children. In the event of long-term absence of the DSL, the Deputies will assume all of the functions above.

The DSL and Deputy DSL's attend training in child protection and interagency working every two years, and in addition to formal training, their knowledge and skills are refreshed at regular intervals (annually as a minimum).

The DSL and Deputy DSL's are most likely to have a complete safeguarding picture and will be the most appropriate people to advise on the response to safeguarding concerns.

Appendix 2: Flow Chart for Raising Safeguarding Concerns about a Child



Appendix 3: Specific Safeguarding Issues

1. Recognising Abuse

To ensure that pupils are protected from harm, an understanding of what types of behaviour constitute abuse, neglect or exploitation is required.

Abuse, neglect and exploitation are forms of maltreatment. 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.

Part one of Keeping Children Safe in Education (2024) defines the following types of abuse.

1.1. 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.

1.2. Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

1.3. Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely

perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

1.4. Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

2. Indicators of Abuse and What you Might See

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed or their abuser has threatened further violence or trauma if they "tell". Staff are required to familiarise themselves with the range of behavioural indicators of abuse and report any concerns to the designated person.

The government guidance 'What to do if you're worried a child is being abused; advice for practitioners' provides detailed advice on the signs of abuse, neglect and exploitation to look out for and the action to take if you think a child is being abused, neglected or exploited.

[What to do if you are worried a child is being abused](#)

A child who is being abused and/or neglected may:

- Have bruises, bleeding, burns, fractures or other injuries
- Show signs of pain or discomfort
- Keep arms and legs covered, even in warm weather
- Be concerned about changing for PE or swimming
- Look uncared for
- Change their eating habits
- Have difficulty in making or sustaining friendships
- Appear fearful
- Be reckless with regard to their own or other's safety
- Self-harm
- Frequently miss school or arrive late
- Show signs of not wanting to go home
- Display a change in behaviour – from quiet to aggressive, or happy to withdrawn
- Challenge authority
- Become disinterested in their school work
- Be constantly tired or pre-occupied
- Be wary of physical contact
- Be particularly knowledgeable about drugs or alcohol
- Display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely in isolation provide conclusive evidence of abuse. They must be viewed as part of a jigsaw. What is important is that you report your concerns. You do not need “absolute proof” that the child is at risk.

3. Early Help

Early help is support for children of all ages that improves a family’s resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

Any child may benefit from early help, but all school staff should be particularly alert to the potential needs for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health and care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from education, home or care
- Has experienced multiple suspensions, is at risk of being permanently excluded from school
- 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 drugs or alcohol themselves
- Is at risk of so-called ‘honour’ based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child.

If early help is appropriate, the DSL (or a deputy DSL) will generally lead on liaising with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered.

4. 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 the School can raise concerns amongst pupils and parents, for example, people loitering nearby or unknown adults engaging pupils in conversation. The School provides practical advice to pupils on how to keep themselves safe.

5. Children Absent From Education

All staff should be aware that children being absent from education, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in the future.

The School monitors attendance carefully and addresses poor or irregular attendance without delay.

The School will always follow up with parents/carers when pupils are not at school. The School will ensure that it holds a minimum of two up to date contact numbers for each pupil. Parents should remember to update the School as soon as possible if numbers change.

In response to the guidance in Keeping Children Safe in Education (2024), the School has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who are absent from education (especially on repeat occasions)
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage
- Procedures to inform the local authority when the School plans to take pupils off-roll when they:
 - Leave school to be home educated
 - Move away from the school's location
 - Remain medically unfit beyond compulsory school age
 - Are in custody for four months or more (and will not return to school afterwards); or
 - Are permanently excluded.

The School will ensure that pupils who are expected to attend the School, but fail to take up the place will be referred to the local authority.

When a pupil leaves, the School will record the name of the pupil's new school and their expected start date.

For more information refer to the school's Missing Pupil & Collection Policy, available on the Reference Drive (R) and the school's website.

6. Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. An individual may have been sexually exploited even if the sexual activity appears consensual e.g. they believe they are in a genuine romantic relationship.

CSE may involve physical contact and non-contact activities, such as the involvement in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the Internet.

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

Staff must also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such. Child sexual exploitation is never the individual's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

Staff must ensure they are aware of the key indicators of children being sexually exploited which can include:

- Acquisition of money, clothes, mobile phones etc, without plausible explanation
- Gang-association and/or isolation from peers/social networks
- Exclusion or unexplained absences from school, college or work
- Leaving home/care without explanation
- Unexplainable and/or persistent absences from education or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age/sexually transmitted infections
- Evidence of/suspicions of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being.

The following vulnerabilities are examples of the types of things children can experience that might make them more susceptible to child sexual exploitation.

- Having a prior experience of neglect, physical and/or sexual abuse
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example)
- Recent bereavement or loss
- Social isolation or social difficulties
- Absence of a safe environment to explore sexuality
- Economic vulnerability
- Homelessness or insecure accommodation status
- Connections with other children and young people who are being sexually exploited
- Family members or other connections involved in adult sex work
- Having a physical or learning disability
- Being in care (particularly those in residential care and those with interrupted care histories)
- Sexual identity.

Not all children and young people with these vulnerabilities will experience child exploitation. Child sexual exploitation can also occur without any of these vulnerabilities being present.

For further information see [Child Sexual Exploitation](#)

7. Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced or manipulated to work in cannabis factories, transporting drugs or money across the country (county lines), shoplifting, pickpocketing, vehicle crime or threatening/committing serious violence to others.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of CCE too.

Some of the following can be indicators of CCE:

- 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.

8. County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

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

9. Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet and includes unauthorised access to computers (illegal 'hacking'), and making, supplying or obtaining malware with the intent to commit offences such as hacking. Pupils with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

10. So-Called Honour-Based Abuse (HBA)

So-called HBA encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and must be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

10.1. Indicators

There are a range of potential indicators that a child may be at risk of HBA.

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

Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place and how the School should respond can be found in the links below.

[FGM](#)

[Forced Marriage](#)

10.2. Female Genital Mutilation (FGM)

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.

Victims of FGM are likely to come from a community that is known to practise FGM. Professionals must note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity must always be shown when approaching the subject.

10.2.1. Risk factors for FGM include:

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Girls who are withdrawn from PSHE
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a 'special' procedure to become a woman.

10.2.2. Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (see Section 2.3 of the Multi agency [statutory guidance on FGM](#) for further details), especially before the summer holidays, or parents who wish to withdraw their children from learning about FGM.

10.2.3. Indications that FGM may have already taken place may include:

- Difficulty walking, sitting or standing and may even look uncomfortable
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems
- Frequent urinary, menstrual or stomach problems
- Prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- Reluctance to undergo normal medical examinations
- Confiding in a professional without being explicit about the problem due to embarrassment or fear
- Talking about pain or discomfort between her legs.

10.2.4. FGM Mandatory Reporting Duty

All staff should speak to the DSL (or a deputy) with regard to any concerns about FGM. However, there is a specific legal duty on teachers.

If a teacher, in the course of their work in the profession, discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must personally report this to the police.

Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they must not be examining pupils.

Unless the teacher has a good reason not to, they must still consider and discuss any such case with the Designated Safeguarding Lead and involve children's social care as appropriate.

This duty does not apply in relation to at risk or suspected cases or in cases where the woman is over 18. In these cases, teachers should follow local safeguarding procedures.

11. Preventing Radicalisation

Children are susceptible to extremist ideology and radicalisation. Where staff are concerned that pupils and young people are developing extremist views or show signs of becoming radicalized, they must discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

The School uses the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

The School are committed to ensuring that pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Extremism: is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

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

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

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect susceptible people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL (or a deputy) making a Prevent referral.

12. The Prevent Duty

The School has a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The DSL (and deputies) are familiar with the revised [Prevent Duty Guidance: for England and Wales](#), especially paragraphs 141-210, which are specifically concerned with education (and also covers childcare). The guidance is set out in terms of three general themes: leadership and partnership, capabilities and reducing permissive environments.

13. Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism.

Guidance on Channel is available at: [Channel guidance](#).

14. Additional Support

Further advice is available that complements the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed [three e-learning modules](#):

- **Prevent awareness e-learning** offers an introduction to the Prevent duty
- **Prevent referrals e-learning** supports staff to make Prevent referrals that are robust, informed and with good intention.
- **Channel awareness e-learning** is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

[Educate Against Hate](#) is a government website designed to support school teachers and leaders to help them safeguard their pupils from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

15. 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
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions.

All staff should be aware of the range of risk factors that increase the likelihood of involvement in serious violence. These may include:

- Being male
- Frequent absence/permanent exclusion from school
- Subjected to child maltreatment
- Involvement in theft or robbery.

Further information can be found at: [Gangs & Youth Violence](#)

16. Child on Child Sexual Violence and Sexual Harassment

Staff should respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school and/or online.

Sexual violence and sexual harassment can occur between two or more children of any age and sex. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. 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.

The school operates a zero-tolerance approach to sexual violence and sexual harassment and staff should be aware of the importance of:

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

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.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers.

Pupils are regularly taught about acceptable behaviour and how the School deals with poor behaviour. Further information regarding the school’s strategy for managing child on child sexual violence and sexual harassment can be found in the School’s Anti-Bullying Policy.

In cases of reports of sexual violence and sexual harassment the School will refer to the following DfE Guidance:

- [Sexual violence and sexual harassment between children in schools and colleges'](#) (Updated Sep 2021).
- [KCSIE 2024](#) Part 5

16.1. Sexual Violence

It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of school.

All staff should understand, that even if there are no reported cases in the School, it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns they should speak to the DSL (or a deputy).

16.2. Sexual Harassment

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include (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.
- Displaying pictures, photos or drawings of a sexual nature
- Upskirting (this is a criminal offence)
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - Consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. In such cases, the School follows guidance published by the UK Council for Child Internet Safety (UKCIS) [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (Published Dec 2020).
 - Sharing of unwanted explicit content
 - Sexualised online bullying
 - Unwanted sexual comments and messages, including, on social media
 - Sexual exploitation; coercion and threats
 - Coercing others into sharing images of themselves or performing acts they're not comfortable with online.

17. Domestic Abuse

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- Physical or sexual abuse
- Violent or threatening behaviour
- Controlling or coercive behaviour
- Economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services)
- Psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners' or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Exposure to domestic abuse and/or violence can have a detrimental and long-term impact on their health, well-being, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult usually the designated safeguarding lead in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the [Operation Encompass website](#).

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available from the [NSPCC](#).

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 080 2000 247.

18. Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

Private foster carers may be from the extended family, such as a cousin or great aunt. However, a person who is a relative under the Children Act 1989 i.e. a grandparent, brother, sister, uncle or aunt (whether of the full or half blood or by marriage) or step-parent will not be a private foster carer.

A private foster carer may be a friend of the family, the parent of a friend of the child, or someone previously unknown to the child's family who is willing to privately foster a child.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or become involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the School. However, it must be clear to the School who has parental responsibility.

School staff must notify the Designated Safeguarding Lead when they become aware of private fostering arrangements. The Designated Safeguarding Lead will speak to the family of the child involved to check that they are aware of their duty to inform the Local Authority. The School itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the School, the School will take steps to verify the relationship of the adults to the child who is being registered.

19. Children with Family Members in Prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. [The National Information Centre on Children of Offenders](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

20. Children and the Court System

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children:

- [5-11-year olds](#)
- [12-17 year olds.](#)

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

Appendix 4: Early Years Foundation Stage

The School has additional safeguarding and child protection responsibilities in EYFS. This is in the case of an allegation of serious harm involving pupils within the setting. Under these circumstances the normal child protection procedures would follow but in addition the School would inform Ofsted (via ISI office) of any allegations of serious harm within 14 days of the allegation.

Appendix 5: Table of Substantive Changes since September 2023

Where	Change
2.1	Amended to reflect 'Working Together to Safeguard Children 2023'
3.0	Early Help amended to reflect revised wording in 'Working Together' guidance. Updated to reflect the School is still responsible for safeguarding if it places a pupil with an alternative provision provider.
Section 5 (5.2)	Addition of links to specialist organisations that offer support in SEND
Section 5 (5.3)	Addition of text to include further clarification to comply with gender questioning children
Appendix 1	Updated to reflect the DSL should also keep a record of the rationale for any decisions made.
Appendix 3 (1.0)	Update to wording 'recognising abuse and neglect' – additional text includes 'including where they see, hear or experience its effects' when referring to domestic violence. Also, 'abuse and neglect' has been changed throughout the document to abuse, neglect and exploitation.
Appendix 3 (3.0)	Additional wording to provide information on Early Help
Appendix 3 (6.0)	Amended wording to reflect 'unexplainable and/or persistent absences from education'
Appendix 3 (12)	Additional information on prevent duties
Appendix 3 (20.0)	Section added on children and the court system