

B01: Safeguarding Policy

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Safeguarding Policy

B01

DSL

Sept 23, Jan 24, July 25

Aug 2025

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Introduction

St Hugh's School (SHS) is committed to safeguarding and promoting the welfare of children (everyone under the age of 18). We expect all staff to share this commitment and to become familiar with our Safeguarding Policy.

This policy applies to all teaching, non-teaching, residential, pastoral, support, peripatetic, contract staff and ancillary staff, volunteers and any other adults working at the school. All references in this document to "staff" or "members of staff" should be interpreted as relating to the aforementioned unless otherwise stated. It also applies in the Early Years Foundation Stage (EYFS) and the Senior School (16+) stage of the school.

This Policy takes account of local procedures set out by Oxfordshire Safeguarding Children Partnership (OSCP) including their referral thresholds. Their full procedures can be viewed at [Safeguarding procedures, guidance and resources - Oxfordshire Safeguarding Children Partnership](#). This policy is available on the SHS website and to parents upon request.

This policy and the accompanying procedure have been developed in accordance with the following statutory guidance in addition to local safeguarding procedures:

[Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children, December 2023: Working together to safeguard children: statutory framework \(publishing.service.gov.uk\)](#)

[Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2025 here](#)

'What to do if you're worried a child is being abused' guidance here: [Stat guidance template \(publishing.service.gov.uk\)](#)

Key Points

If you are worried that a child is being abused, neglected, exploited or is in need of further support:

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Speak to Mrs Julia Veness (01367 870700 Ext. 714/07595529414) who is the Designated Lead for Safeguarding venessj@st-hughs.co.uk

If you are unable to contact the DSL speak to a Deputy Designated Lead (DDSL):

Richard Clarke – Deputy Head Pastoral clarker@st-hughs.co.uk

Jessica Blythe - Assistant Head: Lower School including EYFS blythej@st-hughs.co.uk

If the Deputy Designated Safeguarding Leads are not available speak to:

David Griffiths – Headmaster headmaster@st-hughs.co.uk

Speak to the Oxfordshire MASH (Multi Agency Safeguarding Hub) (professional consultation line): 0345 050 7666 (office hours) or 0800 833 408 (outside of office hours).

Mrs Lorraine Chitty is the Safeguarding Governor - safeguardinggovernor@st-hughs.co.uk

If you are concerned that a member of staff may be harming a child, you should straight away:

Speak to the Headmaster, Mr David Griffiths headmaster@st-hughs.co.uk. If your concern is about the Headmaster or DSL, you should speak to the Chair of Governors, Neill Lawson-Smith.

Speak to the DSL, Mrs Julia Veness (01367 870700 ext. 714/07595529414) venessj@st-hughs.co.uk

Speak to the Chair of Governors, Neill Lawson-Smith chair@st-hughs.co.uk

If you have any concerns about an adult in a position of trust.

Speak to the Oxfordshire LADO:
01865810603 Lado.safeguardingchildren@oxfordshire.gov.uk

If you are concerned about extremism or radicalisation:

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Speak to the DSL, Mrs Julia Veness (01365 870700 ext. 714/07595529414) venessj@st-hughs.co.uk

Call the Oxfordshire MASH (Multi Agency Safeguarding Hub) (professional consultation line): 0345 050 7666 and the team will direct as appropriate.

Call out of hours Emergency Duty Team (EDT) 08450 507666

Or phone the police (101, or 999 in emergencies)

School's named 'Prevent' lead: Julia Veness - venessj@st-hughs.co.uk

Useful Contacts

Oxfordshire MASH (Multi Agency Safeguarding Hub) (professional consultation line): 0345 050 7666 and the team will direct as appropriate.

Locality Community Support Service (LCSS) worker: sammy-jo.hills@oxfordshire.gov.uk
07711117520/ 0345 2412705 or [LCSS Website Page](#)

Police (emergency only): 999

Oxfordshire Safeguarding Children Partnership (OSCP). Full procedures can be viewed at [Home - Oxfordshire Safeguarding Children Partnership](#)

Speak to the Oxfordshire LADO: 01865810603 or
email: Lado.safeguardingchildren@oxfordshire.gov.uk

Independent Person: Hilary Lloyd; Email – lloydh@st-hughs.co.uk

1. Safeguarding Information for all staff

Aims and objectives of safeguarding in our school

Our commitment is to safeguard and promote the welfare, health (mental and physical) and safety of our students by creating a culture of vigilance and maintaining an open, safe, caring, and supportive atmosphere.

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Safeguarding and promoting the welfare of children, is defined for the purposes of this guidance as: protecting children from maltreatment, whether that is within or outside the home, including online; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. (*Keeping Children Safe in Education– 2025*).

St Hugh's achieves these aims by:

- Ensuring the recruitment of individuals who are suitable and appropriate to work with children and who have positive safeguarding attitudes.
- Providing excellent pastoral care and fostering optimism and a positive school atmosphere where students feel secure and are encouraged to talk. Adults in our school take welfare concerns seriously and pupils are encouraged to find a person (whether a staff member or peer) whom they trust and to speak to that person about any issues which may be worrying them. Pupils are additionally reminded of specific individuals with whom they can talk to, in assemblies, PSHE, form time, via posters and their Prep Diaries/Planners, and through informal conversations.
- Valuing and promoting effective relationships with parents and professionals from other agencies.
- Teaching safeguarding and Relationships and Sex Education as part of a broad and balanced PSHE and RSE curriculum. (*The Relationships Education, Relationships and Sex Education and Health Education (England) Regulations 2019*). For further details see A08 (PSHE policy) and A09 (RSE policy)
- Teaching, via PSHE, RSE and a varied curriculum, to identify, reduce and manage risks. Emphasis is put on giving pupils the skills to ask for help when they need it. This includes educating pupils through regular internal and externally provided ICT safety talks, about the safe use of electronic equipment and access to the internet.
- Ensuring that children are safeguarded from potentially harmful and inappropriate online material through embedding a whole school approach towards online safety, including the use of appropriate filters and monitoring systems. For further details see B19 Online Safety Policy.
- Teaching pupils fundamental British values and resilience to the risks of radicalisation.
- Ensuring that all staff are trained, supported, and supervised to enable them to identify abuse and welfare concerns and deal with such concerns appropriately and sensitively.

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- Encouraging staff to discuss child protection, safeguarding and welfare concerns confidentially with the Designated Safeguarding Lead (DSL), to ensure they have confidence in their own abilities to identify and appropriately handle welfare concerns and cases of abuse and neglect.
- Creating a culture of openness, trust, and transparency in which any concerns about the conduct of staff, visitors and other adults in school can be shared and dealt with in an appropriate and sensitive manner.
- Following the procedures laid down in this Policy.

Roles and Responsibilities

The **governing body and proprietors** are collectively responsible for ensuring that safeguarding arrangements are fully embedded within the school's ethos and reflected in the school's day-to-day practice.

All staff members, governors, volunteers and external providers know how to recognise signs and symptoms of abuse, how to respond to pupils who disclose abuse and what to do if they are concerned about a child.

Our school acknowledges the need to treat everyone equally, with fairness, dignity and respect. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents.

The school and governing body takes all reasonable action to limit children's exposure to the risks from the school's IT system and ensures the school has appropriate filters and monitoring systems in place and regularly review their effectiveness in line with national expectations.

The DSL and DDSLs track and review all Safeguarding and Pastoral logs every half-term to check for trends and act appropriately.

Staff Responsibilities

Everyone who encounters children, and their families has a role to play in safeguarding children. School staff (especially in a boarding school) are particularly important as they are

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in a position to identify concerns early and provide help for children and prevent concerns from escalating. SHS will work with parents, social care, the police, integrated care services and other services to promote the welfare of children and protect them from harm.

All staff are required to read and understand Keeping Children Safe in Education Part 1 or Annexe A depending on their role in school.

- All school staff have a responsibility to provide a safe environment in which children can learn.
- All school staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. (*See KCSIE – Sept 2025 Part 1 or Annex A and Annex B*).
- All staff then have a responsibility to take appropriate action.

Induction & Training

All staff receive appropriate safeguarding and child protection training (including online safety, which amongst other things includes an understanding of the expectations, applicable role and responsibilities in relation to filtering and monitoring). In addition, all staff members will receive regular safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, staff meetings) as required, but at least annually, to provide them with relevant skills and up to date knowledge of emerging and evolving safeguarding issues to safeguard children effectively.

All new staff members will undergo safeguarding and child protection training at induction. This will include meeting with the DSL, training on the school's safeguarding and child protection policy, online safety, the code of conduct/staff behaviour policy, low level concerns guidance, the behaviour policy, the safeguarding response to children who are absent from education, and the role of the designated safeguarding lead. Copies of the school's policies, procedures and Part One of KCSIE (or Annex A for those staff who do not work directly with children) will be provided to new staff at induction.

The Headteacher will ensure that an accurate record of safeguarding training undertaken by all staff is maintained and updated regularly.

In considering safeguarding training arrangements the Governing Body will also have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour

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effectively to ensure a good and safe educational environment and require teachers to have a clear understanding of the needs of all pupils.

All staff should be aware of indicators of abuse, neglect and exploitation so that staff are able to identify cases of children who may need help or protection. Staff should be aware that children can be at risk of harm inside and outside of school, inside and outside of home and online. Staff should exercise **professional curiosity** and know what to look for as this is vital for the early identification of abuse, neglect or exploitation.

If staff are unsure, they should speak to the DSL or Deputies for advice and clarification.

Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.

All staff should be aware of the risk of child-on-child abuse in schools and report any concerns they may have. Staff should reassure victims they are being taken seriously, they will be supported and kept safe. Victims must never be made to feel they are creating a problem by reporting sexual harassment or sexual violence.

SHS staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan); the Learning Support department are particularly vigilant of this.
- 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 or county lines;
- is frequently missing/goes missing from education, home or care;
- is persistently absent from education.
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking, or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;

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- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. They should be aware behaviours linked to issues such as drug taking, alcohol abuse, experience unexplainable and/or persistent absences from education, and the sharing of consensual or non-consensual nude/semi-nude images (also known as sexting or youth produced sexual imagery) put children in danger.

Staff should be alert to their responsibilities and oversight in relation to filtering and monitoring of pupils' access to online material.

Staff are aware of contextual safeguarding; and consider wider environmental factors outside a pupil's family life that may pose a threat to their safety or welfare. This could include criminal and sexual exploitation by county lines gangs. The school assesses the risks and issues in the wider community and stays alert to these risks.

Types of abuse, neglect and exploitation (reference to KCSIE 2025)

All school and college staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). They 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 as far as they meet the needs of another person. It may include not giving the child opportunities to express their views,

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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, hearing or experiencing the ill treatment of another (KCSIE 2024). It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether 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.

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 because 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.

Signs of abuse may include depression, low self-esteem, shyness, poor academic achievement, isolation, self-harm, neurosis, unusual wounds, eating disorders, and excessive behaviour. Most frequently changes in behaviour can be an indicator.

Procedures

(Please refer to Working Together to Safeguard Children (Dec 2023) and the flowchart in KCSIE 2025).

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If staff notice any indicators of abuse, neglect or exploitation or signs that a child or young person may be experiencing a safeguarding issue they should record their concerns on the school's safeguarding management system (CPOMS) and pass it to the DSL without delay.

Staff should not consider if it is worthy of reporting. All concerns must be reported without delay.

What to do if you are concerned.

If a child makes an allegation of abuse, neglect or exploitation against an adult or other child or young person, it is important that you:

- Stay calm and listen carefully;
- Accept what is being said;
- Allow the child/young person to talk freely – do not interrupt or put words in the child/young person's mouth;
- Only ask questions when necessary to clarify, do not investigate or ask leading questions;
- Reassure the child, but do not make promises which it might not be possible to keep;
- Do not promise confidentiality;
- Emphasise that it was the right thing to tell someone;
- Reassure them that what has happened is not their fault;
- Do not criticise the perpetrator;
- Explain what must be done next and who must be told;
- Make a written record, include the time, date, and your position in school; ideally on CPOMS, if this is impossible (e.g., on a school trip) a paper copy must be signed, dated and timed, and the DSL alerted.
- Do not include your opinion.
- Pass the information to the DSL or Deputy without delay
- Consider seeking support for yourself and discuss this with the DSL as dealing with a concern can be distressing

When a record of a safeguarding concern is passed to the DSL, they will assess the concern using the Threshold of Needs document ([Threshold of needs - Oxfordshire Safeguarding Children Partnership](#)). If the concern reaches Level 1 or 2, the DSL or DDSL will contact LCSS for Early Help Support. If the concern reaches Level 3 or 4, contact may then be made to

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Oxfordshire MASH (Multi Agency Safeguarding Hub) (professional consultation line): 0345 050 7666 and the team will direct as appropriate.

School staff might be required to contribute to assessments and multi-agency plans to provide additional support to children. This might include attendance at Child in Need and Early Help meetings, child protection conferences or core group meetings. The school is committed to providing as much relevant up to date information about the child as possible, including submitting reports for child protection conferences in advance of the meeting in accordance with procedures and timescales.

If in exceptional circumstances, the designated safeguarding lead (or Deputies) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or Deputy) as soon as is practically possible.

This guidance should be followed in all cases of suspected abuse whether at school or away from it and if the alleged abuser is an adult, or adults, or another child, or children. Bullying becomes a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.' (See the Anti-Bullying Policy – B02).

Staff should never guarantee confidentiality to pupils or adults wishing to tell them about something serious, as this may not be in the best interests of the child. Staff may reassure them that they will not tell anyone who does not have a clear need to know, and that they will pass on information in confidence only to the people who must be told in order to ensure that the appropriate action is taken. All staff involved will also take whatever steps they can to protect the informant from any retaliation or unnecessary stress that may occur after a concern has been made.

If the concern of abuse involves staff members (or volunteers), these will be passed on to the Headmaster. If the allegation is about the DSL, it should be raised with the Headmaster or in his absence the Chair of Governors. If the allegation is about the Headmaster, it should also be raised with the Chair of Governors. The DSL (or the Headmaster or the Chair of Governors depending on the above) will make a referral without delay to children's social care.

Allegations against anyone working at the school will be referred to the LADO within one working day. If a crime has been committed the matter will be reported to the police.

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If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point. Research and Serious Case Reviews have repeatedly shown the dangers of failing to take effective action. Poor practice includes: failing to act on and refer the early signs of abuse and neglect; poor record keeping; failing to listen to the views of the child; failing to re- assess concerns when situations do not improve; sharing information too slowly; and a lack of challenge to those who appear not to be taking action.

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.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral is made to local authority children's social care and if appropriate the police (see 'When to call the police: guidance for schools and colleges' [here](#). Referrals should follow the local referral process'.

Early Help (Appendix A outlines ways SHS provides 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 rather than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the local early help process is and how and where to access support.

Early help means providing help and support to meet the needs of children as soon as a problem emerges in a child's life (KCSIE 2025). All staff should be aware of the early help process and understand their role in it. It includes identifying emerging problems and potential unmet needs; liaising with the DSL; sharing information with other professionals to support early identification and assessment; and in some cases, acting as the lead professional in undertaking an assessment of the need for early help. Staff should be particularly alert to a child who has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit. In the context of

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managing reports of child-on-child sexual violence and/or sexual harassment, 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. (KCSIE 2025).

In cases when it is needed, the school has a network of educational specialists, and medical, physical, emotional, and mental health professionals to turn to.

The Early Help Assessment (EHA) will be undertaken by a lead professional who should provide support to the child and family, act as an advocate on their behalf and coordinate the delivery of support services. The lead professional role could be undertaken by the DSL or a teacher (or a GP, family support worker, health visitor and/or special educational needs coordinator). For an early help assessment to be effective it should be undertaken with the agreement of the child and their parents or carers. If parents and/or the child do not consent to an early help assessment, then the lead professional should make a judgement as to whether, without help, the needs of the child will escalate. If so, a referral to children's social care may be necessary.

Record keeping

Records of all concerns, discussions and decisions made including the rationale for those decisions should be made. These recordings should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc (KCSIE 2025). Information will be kept confidential and stored securely on CPOMS record keeping system.

Records should include:

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

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

Multi - Agency working - SHS is fully committed to multi -agency working in line with statutory guidance (*Working Together to Safeguard Children* – Dec 2023). We work with all external agencies in the best interests of the child. We will always adhere to the procedures and practice of the local authority. Information will be shared securely with other professionals and local agencies. This commitment

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includes children who are in the care of the local authority where we recognise additional vulnerability to under-achievement.

In addition to the child protection file, the DSL will consider if it would be appropriate to share any information with a pupil's new school in advance of a child leaving, if the information would allow the new school to have support in place for when the child arrives.

Information Sharing – SHS recognises information sharing is vital in identifying and tackling all forms of abuse, and follows guidance set out in *The DfE Data Protection Guidance for Schools document: [here](#) (2025)* in addition to *Working together to safeguard children (2023)* and *Information sharing: advice for practitioners providing safeguarding services (2018)*. Whilst the *Data Protection Act 2018 and GDPR (General Data Protection Regulation)* places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure, SHS recognise this is **not** a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. This includes on occasions sharing information without consent.

Online safety – SHS recognises it is essential that children are safeguarded from potentially harmful and inappropriate online material, including misinformation, disinformation and conspiracy theories (KCSIE 2025). As such, appropriate filters and monitoring systems are in place in line with the standards set out in *Meeting digital and technology in schools and colleges – March 23*

(See B19 Online Safety Policy, Teaching Online Safety in School (DfE – June 2019)

Online and e-safety incidents should be passed to the DSL, Mrs Julia Veness (venessj@st-hughs.co.uk).

Safety during Remote Learning follows:

https://www.saferrecruitmentconsortium.org/files/ugd/f576a8_0d079cbe69ea458e9e99fe462e447084.pdf and is covered extensively in Policy S07)

Staff receive online safety training through INSET, staff meetings and outside speakers.

Governors have oversight of online safety through termly safeguarding meetings and the annual school safeguarding audit.

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The child's wishes - The Governing body and leadership team ensure the child's wishes or feelings are considered when determining what action to take and what services to provide to protect individual children through ensuring there are systems in place for children to express their views and give feedback. The Governing body ensures that staff members do not promise confidentiality to the child and always act in the interests of the child.

Code of Conduct (S08 and B21 acceptable use of ICT for staff) All staff must behave responsibly and professionally in all dealings with children and specifically with students for whom they have a duty of care. All staff must follow the procedures set out in our separate policy entitled 'Code of Conduct.' Staff should always avoid behaviour which might be misinterpreted by others. Please see here for further guidance: https://www.saferrecruitmentconsortium.org/files/ugd/f576a8_0d079cbe69ea458e9e99fe462e447084.pdf

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child. *The Sexual Offences Act 2003.*

Only the school cameras or other school devices may be used to take photos, which must be promptly downloaded to the school computer system and then deleted from the device. See Staff Handbook for further guidance.

In the EYFS setting mobile phones and personal cameras must be stored away in the staff room/ staff cupboards, and staff should not wear 'electronic devices with imaging and sharing capabilities'.

Whistleblowing - All adults have a responsibility to report any concerns about poor or unsafe practice, including in relation to the care and protection of a pupil or pupils. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

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If a member of staff believes that best practice in this area is not being adhered to or that practice may put a student or students at risk, they should in the first instance report their concern to the Head, unless their concern relates to the Head in which case, they should report their concern to the Chair of Governors. (See School Whistleblowing policy S15).

No member of staff will suffer a detriment or be disciplined for raising a genuine concern about unsafe practice, if they do so in good faith and following the whistleblowing procedures.

Where an adult feels unable to raise a concern about poor safeguarding practice with the DSL or Head, or where they feel that their concern is not being addressed, they can contact the NSPCC whistleblowing helpline on 0800 028 0285 (this line is open Monday – Friday, 8.00am - 8.00pm) or emailhelp@nspcc.org.uk

If you believe that a child is being abused by individuals outside the school, you can make a referral to Children’s Social Care by calling the MASH on 0345 050 7666 (office hours) or 0800 833 408 (outside of office hours).

Further guidance can be found [here](#)

Further guidance for staff can be accessed through:

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2> and through the NSPCC website [NSPCC | The UK children's charity | NSPCC](#)

Support and supervision for staff - All staff should feel comfortable and confident approaching the DSL, Deputy DSLs, or any other member of senior leadership about any safeguarding and/or pastoral care concerns, including in relation to unsafe practice (see Whistleblowing). If a staff member would like additional support and/or training to fulfil their safeguarding responsibilities, including in identifying and/or handling concerns they should speak to the DSL who will work with the member of staff to ensure that they are adequately supported. Safeguarding and pastoral care responsibilities are a key part of staff appraisals and staff should use this process to build and improve their knowledge, confidence, and experience in this area.

This policy should be read in conjunction with the following policies: Staff Code of Conduct, Whistleblowing, Anti-Bullying, Recruitment policy and procedure, e-Safety, Restraint, Missing Pupil, Behaviour Policy, Intimate Care Policy, Acceptable Use of ICT, Mobile Phones and Social Networking, Adults Living on Site Policy.

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The school does not organise Homestay or arrange “Deputy provision.”

Specific safeguarding issues (Refer to Annex B KCSIE 2025) *If staff have any concerns, they should discuss them with the DSL, Headmaster or Deputies*

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools and colleges can be found on the TES, MindEd and the NSPCC websites. Local guidance and procedures can be found on Oxfordshire Safeguarding Children Partnership (OSCP). Full procedures can be viewed at [Safeguarding procedures, guidance and resources - Oxfordshire Safeguarding Children Partnership](#).

Staff can also access government guidance as required on the issues listed below via GOV.UK and other government websites: (See KCSIE, Annex B - 2025 and click on specific links)

All incidents and/or behaviours will be considered in the context within which they occur.

Child on Child Abuse: (see also B02 Anti Bullying Policy and KCSIE (2025) Part 5)

Staff should be aware that children can abuse children. It can happen in school, outside of school and online.

As a boarding school SHS is particularly alert to pupil relationships and the potential for child on child abuse. All staff are taught to be aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include but is not limited to bullying (including cyber bullying), gender-based and prejudiced violence, grooming, sexual harassment, sexual assaults, sexting (sharing nudes and semi nudes), gender issues within groups of girls and boys, up skirting, abuse in interpersonal relationships between peers, and initiation ceremonies (“hazing”).

Child on child abuse will never be normalised, tolerated, or passed off as “banter” or “part of growing up” as this can lead to a culture of unacceptable, normalised behaviour and an unsafe environment for children.

SHS recognise that it is more likely that girls will be victims and boys’ perpetrators, but that all child on child abuse is unacceptable and will be taken seriously.

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SHS recognise 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.

Pupils are actively encouraged to report any form of child-on-child abuse, sexual harassment or sexual violence to an adult they trust, their parents or their peers. Children will always be treated with respect and their concerns will be taken seriously. SHS will ensure children know that the law on child-on-child abuse is there to protect rather than criminalise children.

If a member of staff suspects a child is at risk of or experiencing child on child abuse, you should discuss your concerns with the DSL so that a course of action can be decided. A decision will be made on whether to:

- Refer to social care and/or the police
- undertake an early help assessment
- manage internally with or without external agency support.

When dealing with child on child abuse it is important that the victim's welfare is of paramount importance. When managing child on child abuse internally SHS will:

- Act quickly and sensitively
- Gather the information from all parties concerned to obtain all the facts. Ideally meetings with children will be conducted with two adults present.
- Only ask open questions to obtain clarity: What happened? Who saw what happened? What was seen and heard? Did anyone intervene?
- When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.

When deciding on the next course of action SHS will consider:

- Was the act deliberate and with the intent to cause physical, sexual or emotional harm?
- Has the child experienced this abuse before?
- Has the child done this before?
- Does the child understand the impact of their behaviour on others?

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All children involved (whether perpetrator or victim) will be treated as being "at risk". Where there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm, the allegation will be referred to children's social care. The DSL follows local multi-agency procedures. Where appropriate, the matter will be dealt with under the School's Anti-Bullying Policy with the use of relevant disciplinary sanctions. The victim and perpetrator will be fully supported through the pastoral care system.

Child on child abuse can impact a child or young person in many ways, so it is important to promote a culture where staff understand what it is and what can influence a child's behaviours. Every opportunity within the curriculum is taken to help teach young people that the behaviour is not the norm and that it is unacceptable in any situation.

In cases when nudes or semi nudes are shared, we will follow guidance from UKCIS (UK Council for Internet Safety): [Sharing nudes and semi-nudes: how to respond to an incident \(overview\) \(updated March 2024\) - GOV.UK](#). Images will never be viewed or shared between staff.

A log will be kept of all child on child abuse cases in school.

Mental Health - All staff at SHS are 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. School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern and are actively encouraged to report these concerns. All pastoral leads hold a mental first aid certificate, including: Mrs Julia Veness, Mr Richard Clarke, Mrs Jessica Blythe, Mrs Netty Lings, Mrs Katie Godfrey, Mrs Trisha Chandler, Mr Simon Tomlinson, Miss Meghan Costello, Mr Jono Harris-Bass, Miss Sally Ewins, Mr David Griffiths.

Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or a deputy. Any concerns will be recorded on CPOMS and followed up by the DSL and Deputy Head Pastoral in the SLT meeting.

Pupils with a social worker - At SHS, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

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This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making individual welfare plans to support pupils who have a social worker.

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. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur with technology.

Indicators of child sexual exploitation may 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 and persistently going missing 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.

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- 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);

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- 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); and
- Sexual identity.

See *Child sexual exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation - February 2017* for further information and advice

Child criminal exploitation: - 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 with technology.

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; and
- children who regularly miss school or education or do not take part in education.

‘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”.

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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 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.

Children absent from education

Unexplained and/or persistent absences (KCSIE 2025), can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

It is important that the school's procedures for unauthorised absence and for dealing with children who are absent from education are followed, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes when problems are first emerging but also where children are already known to LA children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where absence from

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education may increase known safeguarding risks within the family or in the community. As such, all staff should be aware of the school's unauthorised absence procedures and children missing education procedures.

This includes informing the LA if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the LA, when applicable, when removing a child's name from the admission register at non-standard transition points.

School attendance is high and carefully monitored. Poor or irregular attendance is flagged to the DSL via CPOMS and the school office. In response to the guidance in Keeping Children Safe in Education (2025) the school has:

- Staff who understand what to do when children do not attend regularly
- Early Help will be offered when attendance is a concern.
- Appropriate policies, procedures and responses for pupils who go missing 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 we plan to take pupils off-roll when they:
 - a. leave school to be home educated
 - b. move away from the school's location
 - c. remain medically unfit beyond compulsory school age
 - d. are in custody for four months or more (and will not return to school afterwards); or
 - e. are permanently excluded

Parents may choose elective home education (EHE) for their children. EHE can mean that children are less visible to the services needed to safeguard and support them. In line with the Education (Pupil Registration) (England) Regulations 2006, SHS will inform the LA of all deletions from the admissions register when a pupil is taken off roll. Where a parent has expressed their intention to remove a pupil from a school for EHE, the DSL will be informed. The DSL/Headmaster, alongside other key professionals, will coordinate a meeting with the parent/s, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker. Where children are removed from roll for

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Elective Home Education and there are safeguarding concerns, school will ensure that concerns are shared with the LA.

We 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, we will record the name of the pupil's new school and their expected start date.

The school follows guidelines to hold more than one emergency contact number for each pupil, thereby giving the school added options to contact a responsible adult. Further information and support include:

- schools' duties regarding children missing education, including information schools must provide to the LA when removing a child from the school roll at standard and non-standard transition points can be found in the DfE's statutory guidance: [here](#)
- General information and advice for schools can be found in the Government's guidance: [Missing Children and Adults strategy - GOV.UK \(www.gov.uk\)](#)
- guidance for schools concerning children who are absent from education [Working together to improve school attendance \(applies from 19 August 2024\) \(publishing.service.gov.uk\)](#)

Honour Based Abuse (HBA), Female Genital Mutilation, Forced Marriage - So-called 'honour-based' abuse (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. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead (or Deputy). Staff need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

There are a range of potential indicators that a child may be at risk of HBA. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of [Multi-agency statutory guidance on female genital mutilation - GOV.UK \(www.gov.uk\)](#).

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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.

SHS recognises the mandatory duty on teachers and health professionals to report disclosures on FGM to the police. (Section 5B of the FGM Act 2003, as inserted by section 74 of the Serious Crime Act 2015). Therefore teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out

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

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 PSHEE
- 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

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 prolonged 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

The Marriage and Civil Partnership (Minimum Age) Act 2022 received royal assent in April 2022 and came into force on 27 February 2023. This Act raises the age of marriage and civil

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partnership to 18 in England and Wales to protect children from the risks of exploitation or a forced marriage.

- **Looked after children** – SHS recognise the additional vulnerability of looked after and previously looked after children. In the event of SHS taking any ‘Looked after children’ the Governing body will appoint a designated teacher to promote the educational achievement of children who are looked after and to ensure that this person has appropriate training. Due regard will be taken of the [Designated teacher for looked-after and previously looked-after children - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Private fostering - is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a **private** arrangement made between a parent and a carer, for 28 days or more. SHS will inform the Local Authority if we are made aware of a child or young person who may be subject to private fostering arrangements. On admission to the school, SHS will take steps to verify the relationship of the adults to the child who is being registered.

Children with special educational needs and disabilities - SHS recognises that additional barriers can exist in recognising abuse, neglect and exploitation in this group of children. Further exploration will always be made of indicators of possible abuse such as behaviour, mood, and injury. It is understood that children with SEN and disabilities may be disproportionately impacted by behaviours such as bullying without outwardly showing any signs. They also be more prone to isolation. Every effort will be made in such cases to overcome any communication barriers. At SHS we provide extra pastoral support to these children.

Reasonable force - There are circumstances when it is appropriate for staff to use reasonable force to safeguard children and young people. 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. See SHS59 Staff Handbook for further advice in addition to the following link: [Use of reasonable force in schools - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

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The school does not have a “no contact” policy. Whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances. See School Restraint Policy for further advice)

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, SHS recognises the additional vulnerability of these groups, and if necessary, will draw up individual behaviour plans for more vulnerable children; agreeing them with parents and carers. Several members of staff have restraint training.

Preventing radicalisation – Children are vulnerable to extremist ideology and radicalisation. 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) and settings (such as the internet). Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour, and peer relationships (but there are also very powerful narratives, programmes, and networks that young people can come across online so involvement with groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race, or sexuality
- graffiti, artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school’s core values

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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.

SHS is aware of its duty under the The Prevent Duty 2023 [Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/115442/prevent-duty-guidance-england-and-wales-2023.pdf) to have due regard to the need to prevent students from being drawn into terrorism. A risk assessment is a core part of implementing the Prevent duty and therefore SHS assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology: [Prevent duty: risk assessment templates - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/115442/prevent-duty-risk-assessment-templates-2023.pdf) The referral procedures set out above also apply where there are concerns about children who may be at risk of being drawn into terrorism. The DSL is the designated Prevent Lead. Procedures are in place to check the suitability of visiting speakers.

Children and the court system – SHS’s pastoral team will support any child going through the court system either as a victim or a witness.

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 or where they see, hear or experience its effects (KCSIE 2025):

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional, or other abuse.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Our school setting is part of Operation Encompass. Operation Encompass is a national police and education early intervention safeguarding partnership which supports children who experience Domestic Abuse. Operation Encompass means that the police will share

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information with our school setting about all police attended Domestic Abuse incidents which involve any of our children PRIOR to the start of the next school day. The notification informs us about the context of the incident and includes the Voice of the Child.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

NSPCC - UK; domestic-abuse signs, symptoms, effects

Refuge; what is domestic violence? effects of domestic violence on children

Safelives; young people and domestic abuse.

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 well-being, 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” (KCSIE, 2025)

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Further advice is provided in the Home Office’s *Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance*.

Children who are lesbian, gay, bisexual, or gender questioning

The fact that a child or a young person may be lesbian, gay, bisexual or gender questioning is not in itself an inherent risk factor for harm. However, children who are lesbian, gay, bisexual or gender questioning can be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, bisexual or gender questioning (whether they are or not) can be just as vulnerable as children who identify as lesbian, gay, bisexual or gender

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questioning. SHS recognise these risks and school policies and the RSE curriculum promote equality, diversity and inclusivity and encourage children to seek the help of a trusted adult with whom they can be open.

2. The Management of Safeguarding including the role of the Designated Safeguarding Lead

The responsibility of the Governing Body and management committees

The Governing Body ensures that they comply with their duties under legislation and are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

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They also have regard to Keeping Children Safe in Education (2025) to ensure that the policies, procedures, and training at SHS are effective and comply with the law.

- The Governing Body review the policy and practice of Safeguarding annually and supply sufficiently detailed minutes to demonstrate the depth of this review. Safeguarding is a standing item on termly Governing Body meetings.
- The Governing Body will receive appropriate safeguarding and child protection (including online) training at induction and their training will be regularly updated.
- The Governing Body will ensure any deficiencies or weakness in child protection arrangements is remedied without delay
- The Governing Body will ensure the staff code of conduct covers amongst other things, an acceptable use of technologies, staff/pupil relationships and communications including the use of social media.
- The Governing Body have in place appropriate safeguarding responses to children who go missing from SHS, in the form of the Missing Child Policy.
- The Governing Body ensure there are procedures in place to handle allegations against members of staff and volunteers. Such allegations should be referred to the Local Authority Designated Officer (LADO).
- The Governing Body ensure that children are taught about how to keep themselves and others safe, including online.
- The Governing Body should ensure SHS appoint an appropriate senior member of staff, to the role of designated safeguarding lead.

The DSL discusses the termly Safeguarding report with the lead Governor for safeguarding before each meeting of the Governing Body. The Lead Governor (Mrs Lorraine Chitty) will undertake training in Safer Recruitment and Child Protection and will renew Child Protection training regularly. The Governors undergo safeguarding training specific to their role as governors and this is updated regularly.

The School (The Safeguarding Governor, DSL, Headmaster and Director of Finance and Operations)) completes an annual self-assessment audit on request of the Oxfordshire County Council and submits this to the relevant local authority in respect of section 11 of *The Children Act* (2004). This demonstrates to the LA (Local Authorities) that the school considers the need to safeguard and promote the welfare of children and provides appropriate confirmation that there are safe systems and processes in place. Any additional priorities for development are included into the school improvement plan.

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The Headmaster ensures that the above policies and procedures, adopted by governing body, and particularly concerning referrals of cases of suspected abuse, neglect and exploitation, are followed by **all** staff.

The Headmaster meets with the DSL weekly to discuss safeguarding concerns, allegations, or issues.

SHS ensures that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures.

The school's senior management and the governing body will ensure that action is taken to remedy any deficiencies and weaknesses identified in child protection arrangements without delay.

Use of school premises for non-school activities

The Governing Body and the Bursar will ensure that where school premises are hired or rented out to organisations or individuals, sports associations, or service providers to run community or extra-curricular activities, appropriate arrangements are in place to keep children safe.

The Governing Body/ Bursar will seek assurance that the body concerned has appropriate child protection and safeguarding policies and procedures in place, including inspecting these as needed. Arrangements will also be put in place for the body hiring or renting the school facilities or premises to liaise with the school on these matters where appropriate.

These arrangements will apply regardless of whether the children who attend any of these services or activities are children on the school roll.

Where a lease or hire agreement is entered into the Governing Body will ensure safeguarding requirements are included as a condition of use and occupation of the premises; this will make clear that any failure to comply would lead to termination of the agreement. The guidance on Keeping Children Safe in After School Clubs, Community Activities and Tuition (September 2023) [details](#) the safeguarding arrangements that schools and colleges should expect these providers to have in place.

Site Security

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All staff members have a responsibility to ensure our buildings and grounds are safe, this includes ensuring the safety of any visitors into school.

Our visitor policy is held in All Staff Team-policy.

St Hugh's will not accept the behaviour of any individual, parent or anyone else, that threatens school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site.

Designated Safeguarding Lead (DSL) and job description (Reference to KCSIE Sept 2025)

The Designated Safeguarding Lead (currently Julia Veness) takes lead responsibility for safeguarding and child protection, including online safety and monitoring and filtering systems. The DSL is a member of the senior leadership team and has authority within the school to carry out the duties of the post including committing time and resources and, where appropriate, supporting and directing 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 has a specific job description which is explicit to the role and mirrors Annex C in Keeping Children Safe in Education (September 2025). The school's Deputy DSLs (Designated Safeguarding Leads) are;

- Richard Clarke – Deputy Head Pastoral
- David Griffiths - Headmaster
- Jessica Blythe – Assistant Head: Lower School including EYFS

Thereby ensuring there is always an appropriately trained and designated person available. All Deputy designated safeguarding leads are trained to the same standard as the DSL, and the role will be explicit in their job descriptions. The Headmaster is also DSL trained.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead.

Managing referrals - The designated safeguarding lead works closely with OSCP and can contact them for help and advice. She:

- refers cases of suspected abuse to the local authority children's social care as required and in a timely manner.

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- Act as a source of support, advice and expertise to staff members on matters of child protection and safeguarding, including contextual safeguarding.
- supports staff who make referrals to local authority children's social care;
- refers cases to the Channel programme where there is a radicalisation concern as required.
- supports 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; and
- refer cases where a crime may have been committed to the Police as required.
- Refer to the Oxfordshire Threshold of needs to assist with decision making - [Oxfordshire-Threshold-of-Needs-2021.pdf \(oscb.org.uk\)](#)
- Have responsibility to ensure there is at least one key adult for 'Operation Encompass'* and a point of contact for Child Exploitation. *Guiding principles of the scheme are here [National settings : Operation Encompass](#). An annual information letter will be sent to parents.
- To ensure that the Local Authority are notified if children are persistently absent or [missing from education](#)

Work with others - The designated safeguarding lead:

- recognises and is committed to their responsibility to work with other professionals and agencies in line with statutory guidance.
- Recognises that our School is not the investigating agency when there are child protection concerns. We will, however, contribute to the investigation and assessment processes as required. We recognise the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.
- should liaise with the three safeguarding partners in line with *Working together to safeguard children. Dec 2023*) and *NSPCC – When to call the police (2020)*
- liaises with the Headmaster to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;

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- if required, liaises with the “case manager” (as per Part four) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and
- liaises with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice, and expertise for staff.
- Liaises with mental health care teams (in school and externally) when there is a safeguarding concern.
- Liaises with Alternative Providers, when/if necessary, and obtains written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. checks that SHS would otherwise perform on its own staff). This includes written confirmation that the alternative provider will inform SHS of any arrangements that may put the child at risk (i.e. staff changes), so that the SHS can ensure itself that appropriate safeguarding checks have been carried out on new staff (KCSIE 2025 Paragraph 169).
- Liaises with Alternative Providers to ensure records of their addresses are up to date and in addition to any subcontracted provision or satellite sites a child may attend. SHS should regularly review the alternative provision placements they make. Reviews should be frequent enough (at least half termly) to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child’s needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed (KCSIE 2025 Paragraph 170).

Training

The DSL will ensure all staff undertake appropriate annual updates in order to:

- be able to recognise signs of abuse and how to respond to them, including special circumstances such as child sexual exploitation, female genital mutilation, fabricated or induced illness
- understand the assessment process for providing early help and intervention e.g. OSCP threshold of need, preventative education, and the local offer.
- have a working knowledge of how the local authority conducts initial and review child protection (CP) case conferences and contribute effectively to these
- be alert to the specific needs of children in need (as specified in section 17 of the Children Act 1989), those with special educational needs, pregnant teenagers, young carers, those

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who are privately fostered, susceptible to exploitation, radicalisation and subject to seeing, listening or hearing domestic abuse.

- Encourage a culture of listening to children and taking account of their wishes and feelings in any action the school takes to protect them.
- Ensure each member of staff has read and understood the school's safeguarding policy and procedures, including providing induction on these matters to new staff members. Induction and training must include the school's behaviour policy and the school's procedures for managing children who are absent from education, as well as the staff code of conduct, the child protection policy, responsibilities in relation to filtering and monitoring in relation to ICT and dealing with disclosures and managing allegation processes.
- Organise face-to-face whole-school Safeguarding training for all staff members at least **every three years**.
- The DSL will ensure their training remains in date (every 2 years)
- All staff should be aware of key policies within their school which supports safeguarding and these should be explained to them as part of staff induction.
- Ensure the school allocates time and resource every year for relevant staff members to attend training and receive continuous professional development opportunities.
- Maintain accurate records of induction, ongoing training, and continual professional development (CPD) relating to safeguarding.
- The designated safeguarding lead will undertake and arrange Prevent awareness training.
- In addition to the formal training set out above, the DSL regularly attends local safeguarding meetings, training days and receives e-bulletin updates.
- Understand and support the school or college with regards to the requirements of the Prevent duty and can provide advice and support to staff on protecting children from the risk of radicalisation.
- Obtain access to resources and attend any relevant or refresher training courses.

Raise Awareness - The designated safeguarding lead should:

- ensure the school's child protection policies are known, understood, and used appropriately;
- ensure the school's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly.

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- ensure the child protection policy is available publicly and parents know referrals about suspected abuse, neglect and exploitation may be made and the role of the school or college in this.
- Ensure that all staff are aware of the school's policy on ICT and understand the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- link with the local safeguarding partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff.
- Be aware of pupils who have a social worker
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teaching staff and the SLT.

Record Keeping -

- All child protection and safeguarding concerns, discussions and decisions made and the reasons for such decisions are recorded accurately. Most information is recorded and stored on CPOMS. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc. Letters and some historical paper information are kept securely in a locked cabinet.
- Schools should have at least two emergency contacts for every child in the school in case of emergencies and in case there are welfare concerns at the home.
- Maintain a chronology of significant incidents for each child with safeguarding concerns, including a record of decisions made and the reasons for those decisions.
- Ensure such records are kept confidentially and securely and separate from the child's educational record.
- When a child leaves, our school will contact the Designated Safeguarding Lead at the new school or college and will ensure that the safeguarding file is forwarded to the receiving setting within 5 school days, retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving setting and/or evidence of recorded delivery.

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Availability - During term time the DSL or Deputy is always available (during school hours) for staff to discuss any safeguarding concerns. The Headmaster and House Parents live on site so can also normally be available.

The Designated Safeguarding Lead will provide briefings to the school on any changes to safeguarding legislation and procedures and relevant learning from Child Safeguarding Practice Reviews (CSPR's) in line with Working Together 2023. These will occur annually or more frequently when necessary and will include safeguarding and child protection updates such as online safety (for example, via emails, e-bulletins, and staff meetings), to provide them with the skills and knowledge to safeguard children effectively.

The school will maintain accurate and up to date records of staff induction and training.

3. Safer Recruitment (see S07 Recruitment Policy and Part 3 of KCSIE 25)

Recruitment, selection and pre-employment vetting

It is vital that schools create a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject, or identify people who might abuse children. SHS is committed to following all Government Safer Recruitment guidance and procedures. The Governing body acts reasonably in making decisions about the suitability of the prospective employee based on checks and evidence including criminal record checks (DBS (Disclosure and Barring Service) checks), barred list checks and prohibition checks together with references and interview information. At least one member of all recruitment panels is trained in safer recruitment.

Any offer of appointment made to a successful candidate, including one who has lived or worked abroad, must be conditional on satisfactory completion of the necessary pre-employment checks.

When appointing new staff, SHS will:

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- verify a candidate's identity. Identification checking guidelines can be found on the GOV.UK website
- obtain (via the applicant) an enhanced DBS certificate (including barred list information for those who will be engaging in regulated activity)
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role
- verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, follow advice on the GOV.UK website
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate and verify professional qualifications, as appropriate
- verify professional qualifications, as appropriate. The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.
- carry out an online search on shortlisted candidates to help identify any issues that are publicly available online. Shortlisted candidates will be informed before online searches are carried out. Ensure that evidence of these checks has been retained

In addition:

- As an Independent School, SHS will check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State
- ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State for prohibition checks or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012
- all schools and colleges providing childcare must ensure that appropriate checks are carried out to ensure that individuals employed to work in reception classes or in wraparound care for children up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations.

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(16+) and required to sign the agreement within the Adults Living on Site Policy. The school does not organise homestay.

For supply staff, SHS single central record will include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff and the date that confirmation was received.

The details of an individual are removed from the single central record once they no longer work at the school or college.

4. Allegations of Abuse Made Against Teachers and Other Staff

Any concerns about an adult working or volunteering in school must be taken to the Headmaster, DSL, or Chair of Governors without delay.

Allegations and concerns can be considered as

- Allegations that may meet the harms threshold.
- Allegation/concerns that do not meet the harms threshold – referred to in the policy as ‘low level concerns.’

Allegations that meet the threshold

The “harm threshold” is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity. It should be used in respect of all cases in which it is alleged that a teacher or member of staff (including volunteers) at SHS 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.

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- behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. (This includes behaviour outside of school)

The initial response to an allegation

Looking after the welfare of the child - SHS will identify if a child has been harmed or is at immediate risk of harm.

Investigating and supporting the person subject to the allegation - The case manager (most likely the Headmaster) will discuss with the LADO, the nature, content, and context of the allegation, and agree a course of action. With the go ahead from the LADO, SHS will conduct basic enquiries 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.

When dealing with allegations SHS will apply common sense, deal with allegations quickly, fairly, and consistently and provide effective protection for the child and support the person subject to the allegation.

SHS will take guidance from the LADO, Customer First and the police as to when to inform the individual of the allegation.

Where the initial discussion leads to no further action, the case manager and the LADO will record the decision and justification for it and agree on what information should be put in writing to the individual.

Further enquiries Where further enquiries are required the LADO and case manager will discuss how and by whom the investigation will be undertaken. (Normally a member of the SLT)

The case manager will monitor the case's progress to ensure it is dealt with as quickly as possible in a thorough and fair process.

Reviews will be conducted at fortnightly or monthly intervals, depending on the complexity of the case. Wherever possible, the first review will take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review meeting if the investigation continues. The LADO will provide advice and guidance. The LADO's role is not to investigate the allegation, but to ensure that a suitable investigation is carried out, whether that is by the police, children's social care, the school, or a combination of these.

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Supply teachers

SHS rarely uses supply teachers but is aware of KCSIE 2025 guidance to ensure any allegations against a supply teacher provided by an employment agency are dealt with fully.

Suspension

The possible risk of harm to children posed by an accused person should be evaluated and managed in respect of the child(ren) involved in the allegations. In some rare cases that will require the case manager to consider suspending the accused until the case is resolved. Suspension should not be an automatic response when an allegation is reported; all options to avoid suspension will be considered prior to taking that step. If the case manager is concerned about the welfare of other children in the community or the teacher's family, those concerns should be reported to the LADO or police. But suspension is highly unlikely to be justified based on such concerns alone.

Suspension should be considered only in a case where there is cause to suspect a child or other children at SHS is/are at risk of harm or the case is so serious that it might be grounds for dismissal. However, a person should not be suspended automatically: the case manager must consider carefully whether the circumstances warrant suspension from contact with children at the school or until the allegation is resolved and may wish to seek advice from their HR adviser and the LADO.

In cases where SHS is made aware that the Secretary of State has made an interim prohibition order in respect of an individual it will be necessary to immediately ensure the individual does not carry out work in contravention of the order, i.e., pending the findings of the TRA investigation, the individual must not carry out teaching work.

The case manager should also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases an investigation can be resolved quickly and without the need for suspension. If the LADO, police and children's social care services have no objections to the member of staff continuing to work during the investigation, the case manager should be as inventive as possible to avoid suspension. Based on assessment of risk, the following alternatives should be considered by the case manager before suspending a member of staff:

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- redeployment within the school so that the individual does not have direct contact with the child or children concerned.
- providing an assistant to be present when the individual has contact with children.
- redeploying to alternative work in the school so the individual does not have unsupervised access to children.
- moving the child or children to classes where they will not encounter the member of staff, making it clear that this is not a punishment and parents have been consulted.
- providing accommodation for the member of staff away from the boarding houses.

These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended.

If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both the case manager and the LADO. This should also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who their named contact is at SHS and provided with their contact details.

Children's social care services or the police cannot require the case manager to suspend a member of staff or a volunteer, although they should give appropriate weight to their advice. The power to suspend is vested in the governing body of the school who are the employers of staff. However, where a strategy discussion or initial evaluation concludes that there should be enquiries by the children's social care services and/or an investigation by the police, the LADO should canvass police and children's social care services for views about whether the accused member of staff needs to be suspended from contact with children in order to inform consideration of suspension. Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment.

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Supporting those involved

SHS has a Duty of care to its employees. The welfare of a child is paramount, and this will be the prime concern in terms of investigating an allegation against a person in a position of trust. However, when an allegation or safeguarding concern is being investigated it is likely to be a stressful experience for the adult subject of the investigation, and potentially for their family members. SHS will offer welfare support and recognises the sensitivity of the situation. Information is confidential and should not be shared with other staff or with children or parents who are not directly involved in the investigation.

SHS will:

- manage and attempt to minimise the stress caused by the allegation
- inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary
- advise the individual to contact their trade union representative, or a colleague for support
- appoint a named representative to keep the person informed about the progress of the case
- provide access to counselling or medical advice where appropriate.
- not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Parents or carers of the child or children involved will be:

- formally told about the allegation as soon as possible
- kept informed about the progress of the case, only in relation to their child - no information can be shared regarding the staff member
- made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress as set out in section 141F of the Education Act 2002 (see paragraphs 372-380).

Confidentiality and Information sharing

The school will share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim during the initial assessment of the case.

Where the police are involved, wherever possible the school will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer's disciplinary process.

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The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered in accordance with The Education Act 2011 which amended the Education Act 2002, to introduce reporting restrictions.

The case manager will take advice from the LADO, police and children's social care to agree the following:

- who needs to know and exactly what information can be shared
- how to manage speculation, leaks and gossip
- what, if any, information can be given to the wider community to reduce speculation
- how to manage press interest if, and when, it should arise.

Allegation outcomes

The outcome of allegations will be recorded as

- Substantiated: there is sufficient evidence to prove the allegation
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation
- False: there is sufficient evidence to disprove the allegation
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

The school will make decisions based on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future.

If the allegation is substantiated and the person is dismissed; resigns, or otherwise ceases to provide his or her services or the employer ceases to use the person's services; **the employer has a legal duty to make a referral to the DBS** for consideration of whether inclusion on the barred lists is required.

In the case of a member of teaching staff, the case manager must consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

There is a legal requirement for the school to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child, or if a person otherwise poses a risk of harm to a child.

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Following a criminal investigation or a prosecution the police should inform the LADO and the employer immediately when the investigation and any subsequent trial is complete, if it is decided to close an investigation without charge, or if it is decided not to continue to prosecute after the person has been charged.

Unsubstantiated, unfounded, false, or malicious allegations

If an allegation is determined to be unsubstantiated, unfounded, false, or malicious, the LADO and the case manager will consider whether the child and/or the person who has made the allegation needs help or may have been abused by someone else and this is a cry for help. It may be appropriate to make a referral to children's social care.

If a report is shown to be deliberately invented or malicious, the school may consider whether any disciplinary action is appropriate against the individual who made it.

Returning to work

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager will consider how best to facilitate this. Examples of support may include a phased return and/or a mentor to support in the short term. The case manager will also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending school.

Managing the situation and exit arrangements

'Settlement agreements', by which a person agrees to resign if the employer agrees not to pursue disciplinary action and both parties agree a form of words to be used in any future reference, will not be used, where there are allegations that indicate the person is a risk or poses a risk of harm to children or deemed not suitable to work with children.

SHS would not cease their investigations if the person leaves, resigns or ceases to provide their services before the conclusion in all of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate.

Wherever possible, the accused will be given a full opportunity to answer the allegation and make representations about it. The process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated or otherwise based on all the information available, should continue even if the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record an outcome wherever possible. The person

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concerned should be notified of the conclusion of the allegations and sanctions that might be imposed.

Other than where allegations are false, malicious, unsubstantiated, or unfounded, the outcome will be made clear when providing references to prospective employers.

It is not appropriate to reach a settlement/compromise agreement if the person subject to the allegation resigns or their services cease to be used. However, in limited circumstances schools and colleges sometimes use settlement agreements to end the employment relationship on agreed terms, but not where there is an allegation that the individual poses a risk to children.

Where a settlement/compromise agreement is used, it will not prevent SHS (the employer) from fulfilling their legal duty to refer cases to the DBS where the referral criteria are met; or from providing a reference to potential employers when requested or considering whether to make a referral to the Teaching Regulations Agency where the criteria are met.

Record keeping

Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained at least until the accused has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer. Due regard will be given to The Information Commissioner's published guidance on employment records in its Employment Practices Code.

References

Cases in which an allegation was proven to be false, unsubstantiated, or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated, or malicious should also not be included in any

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reference. Substantiated allegations should be included in references, provided the information is factual and does not include opinions.

Learning lessons

Throughout the process in handling allegations and at conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school's procedures to help prevent similar events in the future. For all other cases, the school will consider the facts and determine whether any improvements can be made.

Non recent allegations

Where an adult makes an allegation to SHS that they were abused as a child, the individual will be advised to report the allegation to the police. Non-recent allegations will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. Abuse can be reported no matter how long ago it happened.

Concerns that do not meet the harm threshold

SHS aims to promote an open and transparent culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared promptly, responsibly and with the right person.

A robust safeguarding culture helps identify concerning, problematic or inappropriate behaviour early, minimises the risk of abuse and ensures that adults working are clear about professional boundaries and act within these boundaries and in accordance with the ethos and values of SHS.

What is a 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 set out in paragraph 425 (KCSIE –24) and S08 Staff Code of Conduct. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of SHS may have acted in a way that:

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

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Examples of such behaviour could 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.
- Humiliating pupils

Concerns may arise in several ways and from a number of sources. For example: suspicion, complaint, or disclosure made by a child, parent, or other adult within or outside of the organisation, or because of vetting checks undertaken.

It is crucial that any such concerns, including those which do not meet the “harm threshold” are shared responsibly and with the DSL and recorded and dealt with appropriately.

S08 Code of Conduct for teaching and support staff lays out expectations of staff behaviour and is clear about what low level concerns are and the importance of sharing these concerns. Low-level concerns about a member of staff should be reported to the DSL or Deputies. Where a low-level concern is raised about the DSL it should be taken to the Head.

Staff are 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.

Recording low-level concerns

All low-level concerns are recorded. The record will include details of the concern, the context in which the concern arose, action taken, and whether the LADO has been informed or not, with the reasons included. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous this should be respected as far as reasonably possible.

Records will be reviewed with the Head so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.

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As part of the review consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

Records will be kept confidentially and securely and comply with GDPR legislation. The school can decide how long they keep such information but will generally follow recommendations that it is retained at least until the individual leaves their employment.

All allegations will be considered for lessons learnt.

References

SHS will only refer to substantiated safeguarding allegations in references. Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference.

Responding to low-level concerns

If the concern has been raised via a third party the Head / DSL should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously
- to the individual involved and any witnesses.

The information collected will help to categorise the type of behaviour and determine what further action may need to be taken. All the above will be recorded along with the rationale for the decisions and action taken.

5. Child on child sexual violence and sexual harassment

(with reference to KCSIE – 2025 Part 5, Sexual Violence and Sexual Harassment between Children in Schools and Colleges - Sept 2021, Review of Sexual abuse in Schools – June 21))

SHS will respond to all reports and concerns of sexual violence and sexual harassment and teaches staff to maintain an attitude of “it could happen here.”

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SHS recognises that 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. School recognises that it can occur within an intimate relationship.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This may adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and lesbian, gay bi-sexual or gender questioning children are at greater risk.

Staff should be aware of the importance of:

- making clear that overtly sexualised language, 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, flicking bras, and lifting skirts, “de-bagging,” “up skirting” (a criminal offence). Dismissing or tolerating such behaviours risks normalising them.

Sexual violence includes rape, assault by penetration and sexual assault as defined by the Sexual Offences Act 2003.

Sexual harassment means ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. 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.

Staff have familiarity with the [Equality Act 2010 and the Public Sector Equality Duty](#) (PSED), the Human Rights Act 1998 and recent reforms to the Act and how they apply to safeguarding

<https://www.gov.uk/government/consultations/human-rights-act-reform-a-modern-bill-of-rights/outcome/human-rights-act-reform-a-modern-bill-of-rights-consultation-response> ,

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Our school acknowledges the need to treat everyone equally, with fairness, dignity and respect. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents. Schools must record incidents across the whole spectrum of sexual violence, sexual harassment and harmful sexualised behaviours so that they can understand the scale of the problem in their own schools and make appropriate plans to reduce it.

All such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or equivalent and managed in line with your setting's child protection policies. Victims of harm should be supported by the school's pastoral system, their wishes and feelings considered, and they understand the law on child-on-child abuse is there to protect them, not criminalise them.

The DSL should be familiar with the full guidance from the UK Council for Internet Safety (UKCIS), Sharing nudes and semi-nudes: advice for education settings working with children and young people <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (care should be taken to consider when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) 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 sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media;

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- sexual exploitation; coercion and threats

Upskirting

'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. The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019.

Consent

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, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found here: [Rape Crisis England & Wales -](#)

Sexual consent

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

As per Section 1. of this Policy, all staff should report any concerns or allegations to the DSL. Local policies and guidance in KCSIE – 2025 Part 5 will dictate exactly how reports should be managed. Effective safeguarding practice includes:

- not promising confidentiality at this initial stage as it is highly likely a concern will have to be shared further (for example, with the designated safeguarding lead or

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children’s social care) to discuss next steps. Staff should only share the report with those people who are necessary to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;

- recognising a child is likely to disclose to someone they trust: this could be **anyone** at school. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc;
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Notes of such reports could become part of a statutory assessment by children’s social care and/or part of a criminal investigation;
- where the report includes an online element, staff should be aware of Searching Screening and Confiscation Advice (for schools) and UKCCIS sexting advice (for schools and colleges). **The key consideration is for staff not to view or forward illegal images of a child.** The highlighted advice provides more details on what to do when viewing an image is unavoidable.
- if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or Deputy). However, if this is not possible the designated safeguarding lead should be informed as soon as is practically possible.
- Advice about tackling and reporting sexual harassment in schools and colleges is available in the DFE guidance Keeping Children Safe in Education.

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Risk Assessment

When there has been a report of sexual violence, the designated safeguarding lead / Deputy will conduct an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.

The risk and needs assessment should consider:

- the victim, especially their protection and support;
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at school especially any actions that are appropriate to protect them;

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the school or college should be actively considering the risks posed to all their pupils and will put adequate measures in place to protect them and keep them safe.

The designated safeguarding lead (or a deputy) will ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. Any such professional assessments should be used to inform SHS's approach to supporting and protecting their pupils and updating their own risk assessment.

Options to manage the report - Ultimately, any decisions are made by the school on a case-by-case basis, with the Head and DSL (or an alternative) taking a leading role and using the school policies, their professional judgement and support from other agencies, such as children's social care and the police as required. The four likely scenarios to consider when managing a report are

- Internal management
- Early help
- Referral to children's social care
- Referral to the police

At all times the school will refer to and follow advice set out in

- KCSIE: Part 5 – 2025

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- Searching, screening and confiscation: Advice for headteachers, school staff and governing bodies - January 2018
- UKCCIS: Sharing nudes and semi-nudes – December 2020
- KCSIE link to the '[Shore Space](#)' online resource which offers a confidential chat service that supports young people who are concerned about their own or someone else's sexual thoughts and behaviours (KCSIE 2025)
- OSCP Partnership

All concerns, discussions, decisions and reasons for decisions will be recorded (written or electronic). If the pupils involved move schools the DSL will inform the new educational establishment of any ongoing support and transfer the child protection files

A register of all reports of sexual harassment and sexual violence will be kept by the Headmaster/ DSL and periodically reviewed for patterns of concerning, problematic or inappropriate behaviour.

6. Digital Safety, Remote Learning and Filtering & Monitoring

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. Safeguarding harms now also include misinformation, disinformation and conspiracy theories (KCSIE 2025). Guidance on the safe use of Generative AI in an educational setting can be found [here](#) Cyber Security Standards for Schools [here](#).

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, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

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- **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
- **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/or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

The school has an Online Safety policy, which covers the use of mobile phones, cameras and other digital recording devices e.g. i-Pads. For online safety, within the policy there is support about children accessing the internet whilst they're at school using data on their phones. This considers that many children have unlimited and unrestricted access to the internet via 3G, 4G and 5G networks. This access means some children, whilst at school, sexually harass, bully and control others via their mobile and smart technology, share indecent images consensually and non-consensually and view and share pornography and other harmful content. This has been carefully considered within the school's ICT Policy, including the management of devices, filtering and monitoring and access to smart technology. The policy also reinforces the importance of online safety, including making parents aware of what the school asks children to do online (e.g. sites they need to visit or who they'll be interacting with online).

Online Safety Act 2023 – From 25 July 2025, all pornographic websites accessible in the UK must have effective age verification systems in place (e.g. ID checks). Age verification also in place for other harmful content, for example, eating disorders or self-harm. New offences, such as Cyberflashing, Epilepsy trolling, Encouraging serious self-harm, Threatening communications and Sharing intimate images (including deepfakes) have also been added to the Online Safety Act 2023 (KCSIE 2025).

Artificial Intelligence – In KCSIE 2025, updates relating to AI have been included: SHS is required to conduct the following:

Check age limits and terms of service; Choose enterprise-grade tools with organisational control; Create interim guidance for staff and pupils; Update key policies and complete a DPIA (Data Protection Impact Assessment).

Filters and monitoring

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Governing bodies and proprietors are doing all that they reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, governing bodies and proprietors ensure their school has appropriate filters and monitoring systems in place and that there is regular review of their effectiveness.

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies and proprietors also consider the age range of their pupils, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

The appropriateness of any filters and monitoring systems are a matter for individual schools and will be informed in part, by the risk assessment required by the Prevent Duty.

To support schools and colleges to meet this duty, the Department for Education has published filtering and monitoring standards (see below link) which set out that schools and colleges should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs

Governing bodies and proprietors understand their responsibilities for periodically reviewing the effectiveness of these procedures and the standards and will discuss this with IT staff and service providers, discussing what more needs to be done to support schools and colleges in meeting this standard. This includes an understanding of responsibilities to have an appropriate level of security protection and an understanding of evolving cyber-crime technologies and e-security.

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Monitoring and filtering standards: <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>

Cyber security standards: <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges>

The policy for remote learning demonstrates an understanding of how to follow safeguarding procedures when planning remote education strategies and teaching remotely. The school maintains the capability to provide remote education when it is not possible for some or all of their pupils to attend in person.

<https://www.gov.uk/government/publications/providing-remote-education-guidance-for-schools>

This policy will be monitored and reviewed by the Head, DSL – Julia Veness, and the Designated Governor. The next scheduled review will be in July 2026. All annual reviews will be approved at the next full Board Meeting. In the event of any changes in legislation etc., the policy will be updated before then.

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Appendix A: Pastoral Support and Early Help

SHS aims to provide support as soon as a problem emerges. Literature and posters around the school encourage resilience and a school that openly discusses mental health and wellbeing.

- Parents have regular, easy contact with form teachers and boarding staff, who are the first point of reference for pupils' wellbeing. The Parent Handbook explains procedures and lists contact details.
- The Independent Person, Hilary Lloyd, joined us in the 2025-26 academic year. Her contact details are available in the pupils' planners and on posters around school and in the boarding houses.
- Information and concerns are shared at departmental staff meetings. Weekly SLT and pastoral meetings led by the Headmaster and Deputy Head Pastoral Senior Deputy Head, concentrate on specific children with needs and formulate and review welfare plans. Boarding meetings and departmental Staff Meetings also highlight concerns that are then taken to the Pastoral meeting and SLT.
- Children have access to medical support from the school nurse. The DSL, nurse and matrons and others have undertaken a Mental Health First Aid course.
- SHS work with a counsellor who can offer 1:1 counselling and further referral to outside agencies if required.
- Early Help Assessment (assessment referral threshold) process used as appropriate.
- Liaison with other agencies who support the children such as Social Services, Child and Adolescent Mental Health Services, the Educational Psychology Service, and Behaviour Support Services.
- Online Safety awareness training is organised every year for pupils.
- An extensive Year 8 Graduation Programme which include Drug, alcohol, relationships and consent workshops run by outside agencies.
- Talks and lectures are organised for parents and carers offering up-to-date advice and practical tools, to help children with the pressures of growing up.
- Regular and ongoing training is provided for staff.

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