The Dean Close Foundation Schools

Independent, Co-educational, Day and Boarding Schools

Safeguarding and Child Protection Policy

(W044)

Registered Charity No: 1086829

Date of Issue: 7th September 2026
Review Date: September 2027
Owner: Foundation Lead for Safeguarding and Health

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1. KEY EXTERNAL CONTACT DETAILS

Gloucestershire Local Authority Designated Officer (LADO)	Nigel Hatton and team 01452 426994 amadmin@gloucestershire.gov.uk
Oxfordshire Local Authority Designated Officer (LADO)	Jo Lloyd and team 01865 810603 lado.safeguardingchildren@oxfordshire.gov.uk
Monmouthshire Designated Officer for Safeguarding (DOS)	Heather Heaney 07917 707343 heatherheaney@monmouthshire.gov.uk
Gloucestershire Children's Social Services (Children and Families Front Door Service / MASH)	01452 426565 option 2 (Monday to Friday 09:00 – 17:00) 01452 614194 (emergency out of hours) childhelp@gloucestershire.gov.uk
Oxfordshire Children's Social Services (MASH)	01865 519800 (Monday to Thursday 08:30 – 17:00; Friday 08:30 – 16:00) 0800 833408 (emergency out of hours) Childrensservices.engagement@oxfordshire.gov.uk
Monmouthshire Child Duty and Assessment Team	01291 635669 (office hours) 0800 3284432 (emergency out of hours) https://www.monmouthshire.gov.uk/social-care/social-care-for-children/

National Support and Advice about Extremism	National Police Prevent advice line 0800 011 3764 Anti-terrorist hotline 0800 789321 https://actearly.uk/ https://act.campaign.gov.uk/ Department for Education Non-emergency number: 020 7340 7264 counter.extremism@education. gov.uk
Support & Advice about Extremism in: **Gloucestershire** **Oxfordshire** **Monmouthshire**	 Prevent@gloucestershire.police.uk preventreferrals@thamesvalley.police.uk https://www.gwent.police.uk/contact/af/contact-us-beta/contact-us/
NSPCC Whistleblowing Advice Line	Weston House, 42 Curtain Road, London, EC2A 3NH 0800 028 0285 (Monday to Friday 8am to 8pm; weekends between 9am and 6pm) help@nspcc.org.uk
NSPCC Report Abuse in Education Advice Line	0800 136 663 help@nspcc.org.uk
Disclosure and Barring Service	DBS customer service, PO Box 3961, Royal Wootton Bassett, SN4 4HF 03000 200 190 customerservices@dbs.gov.uk

Teaching Regulation Agency	Teacher Regulation Agency, Cheylesmore House, 5 Quinton Road, Coventry CV1 2WT 0207 593 5393 TRA.Caseworker@education.gov.uk
OFSTED Safeguarding Children	0300 123 4666 (Monday to Friday from 8am to 5pm) enquiries@ofsted.gov.uk
Independent Schools Inspectorate	0207 6000 100 info@isi.net

2. KEY FOUNDATION AND SCHOOL CONTACT DETAILS

Chair of trustees for the Dean Close Foundation (DCF) **Clerk to the Trustees:** Stef Hildick-Smith 01242 258000 ext. 1292	**Mark Smith** **Lead Nominated Safeguarding Trustee (NST)** Mrs Debra Ritsperis
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Dean Close Airthrie School (DCAS) **27 – 29 Christchurch Road, Cheltenham, GL50 2NY** **01242 512837** **Admin.office@airthrie-school.co.uk** **NST** Mr Simon Bullingham	**DSL** Matthew Medhurst (member of SLT) 01242 512837 Matthew.Medhurst@airthrie-school.co.uk **DDSL** Jason Dobbie (Head) 07471 350706 or 01242 512837 Jason.dobbie@airthrie-school.co.uk
Dean Close Services Ltd (DCSL) **Dean Close House, 67 Lansdown Road, Cheltenham, GL51 6QD** **01242 258000** **office@deanclose.org.uk** **nharris@deancloseKingham.org.uk**	**DSL** Marie Widdowson (Commercial Director) 01242 258023 Duty mobile 07469 159825 mwiddowson@deanclose.org.uk **DDSL**

NST Mr Matt Cansdale	Sam Taylor 01242 267431 srjtaylor@deanclose.org.uk

3. INTRODUCTION AND REGULATORY FRAMEWORK

a. This policy applies to all Dean Close Foundation schools (the schools) and includes Early Years Foundation Stage (EYFS) pupils at DCPPS, DCSJ and DCAS. This policy is reviewed and updated at least annually and is available on the Foundation website where links to individual school websites can be found: https://www.deanclosefoundation.org.uk/

b. This policy has regard to the following guidance and advice:

- *Keeping Children Safe in Education* (September 2026) (*KCSIE*)
    - *KCSIE incorporates the additional statutory guidance Disqualification under the Childcare Act 2006 (September 2018)*
    - *KCSIE also provides links to various toolkits and additional advice and support*
- *Working Together to Safeguard Children* (March 2026) (*WT*)
    - *WT* refers to the non-statutory advice: *Information sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers* (May 2024)
- *Prevent duty guidance: Guidance for specified authorities in England and Wales December 2023. Prevent* is supplemented by a briefing note:
    - *How social media is used to encourage travel to Syria and Iraq* (July 2015)
- *Relationships Education, Relationships, and Sex Education (RSE) and Health Education* (July 2025).
- *Behaviour in schools (February 2024)*
- *Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (July 2026)*
- *Children Missing Education (September 2025)*
- *Digital and technology standards in schools and colleges (June 2026)*
- *Mobile phones in schools (June 2026)*
- *After school clubs, community activities, and tuition (safeguarding guidance for providers) (February 2026)*
- The Charity Commission guidance *Safeguarding and protecting people for charities and trustees* (June 2022)
- *Section 3 of Early Years Foundation Stage Statutory Framework for group and school-based providers (July 2026)*
- *The National Minimum Standards for boarding schools (May 2026)*

c. This policy also considers the procedures and practice of Gloucestershire, Oxfordshire and Monmouthshire as part of the multi-agency safeguarding arrangements set up by each Local Safeguarding Children Board,' health, social services and the police.

d. Equality act 2010

The schools understand and recognise their obligations under the Equality Act and that the school must not discriminate against pupils because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the schools will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. The schools will also consider their duty to make reasonable adjustments for disabled pupils. The schools recognise that effective safeguarding is anti-discriminatory and anti-racist, and understand factors, including economic and social circumstances, ethnicity and disability, which can impact on children and families' lives. Staff are alert to the risk of adultification bias, where children, particularly black children, may be perceived as older than they are, which can lead to their needs being poorly understood and opportunities to provide help being missed.

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

e. Concerns about a child

The schools have a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility. The schools adopt a 'whole school' approach to safeguarding. This means involving everyone in the school, and ensuring that, safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Staff are required to report any concerns about the safety or welfare of a pupil, about the conduct of an adult working in the school or about safeguarding practices in the school in accordance with this policy.

Parents are encouraged to raise any concerns directly with the individual school, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may raise concerns directly with the Foundation or the Department for Education (DfE) if they wish.

The schools have arrangements for listening to children and providing early help. All schools provide listening services and access to professional counsellors or therapists.

At DCS every teacher is trained as a Trusted Emotionally Available Adult (TEAA) which equips them with appropriate listening skills. The school also employees a number of part time fully qualified and trainee counsellors who are available to all pupils. The Pastoral Hub provides a quiet space in which pupils can escape from the business of the school day. Pastoral staff are available to support pupils who request it.

At DCKHS, all houseparents and medical staff have received Mental Health First Aid training. We have a school counsellor who attends school for appointments at least twice a week during term time. The school also operates 'The Hub' where trained senior pupils act as mentors to young pupils in lunchtime sessions.

At DCPS, all staff are trained as TEAA. We also have a number of staff trained as Mental Health First Aiders, and six staff trained in ELSA. These staff offer 'safety net' sessions to vulnerable pupils who are not yet seeing our counsellor

At DCSJS all staff are trained as Trusted Emotionally Available Adults (TEAA), equipping them with the skills to listen, support and respond appropriately to pupils' emotional needs. We also have an ELSA (Emotional Literacy Support Assistant) trained member of staff, alongside trainee counsellors who are available to provide additional support for pupils.

At DCAS, to ensure pupils can easily access help, we use Smoothwall Pulse, a weekly online wellbeing check-in that enables pupils to share concerns or request support from any member of staff. We also have a dedicated Wellbeing Room, providing a calm and welcoming space where pupils can access pastoral support.

4. DEFINITIONS OF CHILD PROTECTION AND SAFEGUARDING

a. Safeguarding and promoting the welfare of children is defined as:

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

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

5. TYPES AND SIGNS OF ABUSE

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the

impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects.

Children may be abused in a family or in an institutional or extra-familial context by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children. This includes in teenage relationships, or under the guise of 'honour' based abuse including forced marriage and female genital mutilation, or abuse related to faith or belief such as allegations of demonic possession.

Abuse can be:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect.

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

6. PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

a. What staff should do if they have concerns about a child

If staff (including trustees, trainee teachers, supply staff, agency staff and volunteers) have any concern about a child, they should follow the procedures in this policy and report their concern to the DSL (or the DDSL in the DSL's absence in the relevant school) immediately using the contact details set out in 'Key School Contact Details' above. The DSL will consider, with reference to local authority procedures, whether the report can be managed internally, or a family help assessment is needed, or if it should be referred to external agencies such as children's social care and/or the police. A referral should normally be made by the DSL or DDSL, but anyone can make a referral if necessary. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made.

All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. These should be treated as safeguarding concerns and reported in accordance with this policy.

Staff should not assume that somebody else will act or share information that might be critical in keeping children safe. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

Gloucestershire Safeguarding Children Partnership (GSCP) Multi Agency Safeguarding Procedure Manual can be accessed using the link:
https://www.gloucestershire.gov.uk/gscp/gloucestershire-safeguarding-children-partnership-multi-agency-safeguarding-procedure-manual/

Oxfordshire Safeguarding Children Partnership (OSCP) Multi Agency Procedures Manual can be accessed using the link:
https://www.oscp.org.uk/practitioners/multi-agency-procedures-and-resources/

Gwent Safeguarding Board (GSB) safeguarding procedures can be accessed using the link:
https://www.gwentsafeguarding.org.uk/en/protocols-and-procedures/the-wales-safeguarding-procedures-for-children-and-adults-at-risk-of-abuse-and-neglect

Where staff have safeguarding concerns about a child who is not a pupil of the school (for example, a sibling of a pupil, or a child attending an activity on the school's premises), they should follow the same procedures and report their concern to the DSL immediately.

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

If staff (including trustees, trainee teachers, supply staff, agency staff and volunteers) believe that a child has been harmed or is in immediate danger or at risk of harm, an immediate referral to children's social care and/or the police should be made. Anyone can make a referral. Referrals will generally be made by the DSL following receipt of a report from staff. However, staff must feel confident to make a referral themselves if they believe a child is in immediate danger or at risk of harm.

Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and decide about the next steps and type of response required.

c. Information Sharing

The Trustees recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the schools and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required.

Fears regarding sharing information under data protection laws (the Data Protection Act 2018, the UK General Data Protection Regulation and the Data (Use and Access) Act 2025) must not be allowed to stand in the way of safeguarding and promoting the welfare of children, and data protection laws do not prevent the sharing of information for the purposes of keeping children safe. When deciding what information to share, staff should consider:

- The relevancy of the information, including to the current safeguarding risk
- What is necessary for the receiving setting to know
- Whether it is clearly presented and appropriately contextualised.

Professional judgement should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. Care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk. If in doubt about what information can and should be shared, staff should speak to the DSL. The Trustees will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

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

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* (May 2024) supports staff who have to make decisions about sharing information.

The schools have appropriate arrangements in place to ensure that safeguarding information is transferred, reviewed and actioned promptly at all transition points, including in-year moves, in line with the statutory guidance. When sharing safeguarding information, the schools will clearly distinguish current safeguarding concerns and support needs from historic information.

Where a school receives safeguarding information for pupils this will be reviewed by the DSL who will take steps to clarify any information that is unclear or incomplete. Where there are issues or concerns this may include a conversation between the DSLs at both settings. The DSL will ensure that key staff are aware of any relevant information for new pupils.

Where a school receives any information that indicates an incoming pupil may present a risk to others and/or themselves, the school will assess the risk and put in place a safety and support plan for when the child arrives.

d. Receiving a disclosure

If a member of staff receives a disclosure from a child they should:

- Listen carefully
- Avoid asking leading questions
- Observe the pupil's behaviour
- Reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- Ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- Not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken
- Be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns
- Determine how best to build trusted relationships with children and young people which facilitate communication.

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

e. Wishes of the Child

Where there is a safeguarding concern, the school will ensure the pupil's wishes and feelings are considered when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The school manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for pupils to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The schools implement a child-centred approach to safeguarding. Whilst the schools are committed to working collaboratively, and in partnership, with parents and carers as far as possible the wishes and feelings of the child and what is in their best interest is always central to the school's decision-making process.

f. **Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the school and can occur between children outside school. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The school will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The school will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

g. Early Help and Family Help

Early help means the support available to all children and families through universal and community-based services, including schools, health services, and other local provision. Its purpose is to improve resilience and outcomes or to reduce the chance of problems getting worse. Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

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

Where a pupil's needs go beyond what universal early help services can address for example, where a child has multiple and/or complex needs, or where their circumstances make them more vulnerable the child may require targeted support through Family Help.

The schools have effective measures in place to identify emerging problems and potential unmet needs of individual pupils. All staff undertake appropriate training to ensure that they know when to share information with other agencies and what action to take to support early identification and assessments.

In the first instance, staff who identify a pupil that may benefit from Early Help, or Family Help should discuss this with the school's DSL. If appropriate, the DSL will work with the relevant Safeguarding Children Board and/or one of the safeguarding partners to undertake an assessment. Where the

child's needs can be met through universal early help, the DSL will coordinate the school's response and liaise with relevant services. Where a pupil's needs are more complex and may require a multi-disciplinary Family Help assessment, the DSL will make a referral in accordance with the local authority's referral process. Further guidance can be found in Working Together to Safeguard Children (March 2026) and the Families First Partnership Programme Guide.

If Early Help or Family Help is provided, the matter will be kept under review and consideration given to a referral to children's social care for a child protection assessment if the pupil's situation does not appear to be improving or if concerns escalate.

h. Referral to external agencies

Not all concerns about a pupil's welfare will meet the threshold for referral to external agencies. Where the DSL determines that a concern can be managed internally, and doing so does not place the child at additional risk, the school will put in place appropriate pastoral support. This may include, for example, monitoring by the pupil's tutor or appropriate middle management, referral to the school's pastoral support team, counsellor or wellbeing team, or engagement with parents or carers. The DSL will keep such cases under review and will escalate to external agencies if the pupil's situation does not improve or if further concerns arise.

i. Record Keeping

All concerns, discussions, and decisions (including the rationale for those decisions) made under these procedures should be recorded in writing, usually on CPOMS. This includes instances where referrals were or were not made to another agency, such as children's social care or the Prevent programme. This will help if/when responding to any complaint about the way a case has been handled.

Safeguarding records should be clear, factual, and distinguish between observed concerns, professional opinion, and historic information. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. In all but exceptional circumstances, the record should be made on CPOMS so that an accurate chronology can be kept.

The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of KCSIE.

7. RESPONDING TO SPECIFIC SAFEGUARDING ISSUES

a. Radicalisation and Prevent

All staff should be aware of the indicators which may signal that children are at risk of radicalisation or being drawn into terrorism and should report any concerns to the DSL of the school. A Prevent referral or referral to children's social care may be made depending on the level of risk. If staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must

call 999, submit a MARF to the relevant local authority or 'phone the MASH or the National Police Prevent advice line.

The schools, in recognition that pupils may be susceptible to being drawn into terrorism or other forms of extremism, carry out appropriate risk assessments as necessary following consultation with local partners, such as the police which assess how their pupils or staff may be at risk of being radicalised into terrorism, including online. Such risk assessments are discussed with the Head, DSL and NST of that school to ensure the school's safeguarding arrangements are sufficiently robust to ensure that those at risk of radicalisation are identified, and appropriate support is provided and is regularly revised as needed.

b. Female Genital Mutilation (FGM)

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

c. Serious violent crime

All Foundation staff should be aware of the indicators which may signal that children are at risk from or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a pupil (as opposed to a pupil being in immediate danger), as above they should report this to the School's DSL as soon as possible.

d. Nude or semi-nude images and/or videos (including those generated using AI)

The schools are alert to the safeguarding risks arising from AI in this context, including the generation of deepfake intimate images using AI tools and the use of AI to create child sexual abuse material. Taking and sharing AI-generated intimate images of those aged under 18 is a criminal offence. Staff should be aware that incidents involving AI-generated imagery should be treated with the same seriousness as those involving real images and referred to the DSL immediately.

The schools recognise that images of pupils published by a school on its website, social media channels, or in marketing materials may be vulnerable to misuse, including manipulation using AI tools. The school's approach to obtaining consent for, publishing, and managing pupil images (including the steps taken to mitigate the risk of AI manipulation of published images) is set out in the Foundation Photography, Filming and Recording Policy (W024). Staff should refer to that policy for

guidance on the publication of pupil images and should report any concerns about the misuse or manipulation of published images to the relevant DSL immediately.

All members of staff in an education setting have a duty to recognise and refer any incidents involving nude or semi-nude images and/or videos including those generated using AI e.g. deepfakes and will be equipped with the necessary safeguarding training appropriate to the school in which they work, and support to enable them to recognise concerns.

For this purpose, 'making or sharing nudes and semi-nudes' refers to the creation, sending or posting of nude or semi-nude images, videos, or live streams by persons under the age of 18 online. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nude or semi-nude images and/or videos may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

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

Many professionals may refer to 'nudes and semi-nudes' as:

- Youth produced sexual imagery or 'youth involved' sexual imagery
- Indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18.
- 'Sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images
- Image-based sexual abuse. This term may be used when referring to the nonconsensual sharing of nudes and semi-nudes.

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nude or semi-nude images and/or videos being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003. Any direct disclosure by a pupil must be taken seriously and staff should ensure the pupil is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of sharing of nude or semi-nude images and/or videos including those generated using AI being shared by a pupil or of a pupil, they should refer the incident to the relevant DSL as soon as possible. All incidents involving the sharing of nude or semi-nude images will receive a safeguarding response, regardless of whether they are consensual or non-consensual. The individual school will take a proportionate approach that considers the age,

development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (March 2024) when responding to a report of the making or sharing of nude or semi-nude images and/or videos including those generated using AI s. This will include:

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

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs)
- The images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent. See the Foundation Sexual Violence and Harassment between Pupils policy (W065)
- The images involve sexual acts and any child or young person in the images or videos is under 13
- There is reason to believe a child or young person is at immediate risk of harm owing to the sharing of nude or semi-nude images and/or videos including those generated using AI, for example, they are presenting as suicidal or self-harming.

If none of the above apply, the individual school may decide to respond to the incident without involving the police or children's social care. All incidents relating to nude or semi-nude intimate images and/or videos including those generated using AI being shared need to be recorded, whether they have been referred externally or not, including the reasons for the decision made. The decision to respond to an incident without involving the police or children's social care will only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to any pupil or young person involved and the risks can be managed within the individual school's pastoral support and disciplinary framework. Any decision in this regard will be made by the DSL (or equivalent) with input from the Head. The decision will be made and recorded in line with this Policy and will be based on consideration of the best interests of any pupil or young person involved. Any decision will consider proportionality as well as the welfare and protection of any pupil or young

person. The decision will be reviewed throughout the process of responding to the incident. If doubts remain local safeguarding arrangements will be followed.

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

e. Children absent from education

Children who are absent from education particularly on repeat occasions and/or for prolonged periods, and children missing education can act as a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is important that the school's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

Each Foundation school has a policy and procedure for unauthorised absence and for dealing with children who are absent, repeatedly and/or for prolonged periods, and children missing from education. Further detail can also be found at Appendix 1 of this policy.

Where reasonably possible, every Foundation school will hold more than one emergency contact number for each pupil to provide the school with additional options to make contact with a responsible adult particularly when a child who is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safeguarding concern.

The school will report to Gloucestershire, Oxfordshire, Monmouthshire or other relevant local authority a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more as outlined in each school's attendance policy.

When working with local authority children's services where school absence indicates safeguarding concerns the individual school will have regard to the statutory DfE guidance *'Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (July 2026)* and to the EYFS Statutory Framework for children aged 0-5 years.

f. Mental health support

Each school has an important role to play in supporting the mental health and wellbeing of its pupils. Specifically, staff can support the fulfilment of 4 key roles:

- Promoting good mental wellbeing and preventing the onset of mental illness
- Observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one
- Ensuring early targeted support is provided through internal or external agencies
- Liaison with/referral to specialist services where needed.

All staff should be aware that mental health problems can, in some cases, develop into a safeguarding concern. This could include, for example, self-harm, eating disorders, or suicidal ideation. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL. Where support is needed, the DSL will consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk.

The DSL will call 999 if there is immediate danger and NHS 111 for urgent non-emergency mental health support.

Staff should not wait for a formal diagnosis before raising a concern with the DSL. If staff feel that a child is in immediate danger and the DSL or DDSL is not available, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person.

g. Children with a social worker (Children in Need and Child Protection Plans)

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

Local authorities should share the fact a pupil has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the pupil's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

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

h. Concerns about another staff member

The schools provide clear and comprehensive guidance about the standards of appropriate behaviour and actions of its staff in the Foundation Code of Conduct (W080) All staff are expected to comply with the standards contained within this code of conduct at all times.

If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff (including supply staff, trainee teachers, volunteers, and contractors), then:

- This should be referred to the Head, who will consider whether an onward referral to the LADO is required
- Where there is a concern/allegation about the Head, this should be referred to the Warden and/or the Chair of Trustees
- Where there is a conflict of interest in reporting the matter to the Head, Warden or Chair of Trustees this should be reported directly to the LADO. The LADO's details are provided in this policy under Key External Contacts.

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, trainee teachers, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the procedure set out below under 'Dealing with concerns or allegations that do not meet the harm threshold/low level concerns.'

i. Concerns about safeguarding practices in the schools

All Foundation schools aim to ensure there is a culture of safety, raising concerns and an attitude of 'it could happen here' among all staff.

Where staff have concerns about poor or unsafe practices and potential failures in a school's safeguarding systems, these should be raised in accordance with the Foundation's Whistleblowing Policy (W035). There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

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

8. ARRANGEMENTS FOR DEALING WITH CHILD ON CHILD ABUSE (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)

Child-on-child abuse (including child on child sexual violence and harassment) is abuse by one or more children against another child(ren). It is a safeguarding concern for both the victim and the alleged perpetrator(s) and is preventable (See the Foundation Child-on-Child Abuse Policy W055). It can happen both inside and outside of school, and online. It can manifest itself in many ways and can include:

- Bullying (including cyber bullying, prejudice-based and discriminatory bullying)
- Discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents
- Abuse in intimate personal relationships between children (also known as teenage relationship abuse)
- Physical abuse and harm (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm),
- Physical assault and harm, or the threat of harm with a weapon
- Initiation/hazing type violence and rituals
- Upskirting

- Consensual and non-consensual making or sharing of nude or semi-nude images and/or videos including those generated using AI e.g. deepfakes
- Harmful sexual behaviours, sexual violence and sexual harassment, which may include misogyny/misandry
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- A group of children sexually assaulting or sexually harassing a single child or group of children.

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

Foundation schools take a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as 'banter' or 'part of growing up'. Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or 'just having a laugh' or 'boys being boys.' Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The schools acknowledge that even if there have been no reported cases of child-on-child abuse in relation to pupils within the individual school, such abuse may still be taking place and is simply not being reported. Each school will ensure that pupils are aware of how they can report abuse, and that they are aware of the procedures that the school will follow once a report has been made. These procedures will be well promoted and in an age-appropriate format that is easily accessible and easily understood by the pupils of that school.

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

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

The schools recognise that pupils with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. Each school will consider extra pastoral support for those pupils. The schools also recognise that certain pupils may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

DCS, DCKHS, DCPS and DCSJ recognise that children can be particularly vulnerable in boarding and are alert to the potential for child-on-child abuse. Each school will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times.

Each school takes the steps to minimise the risk of child-on-child abuse outlined in W055.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures below rather than the Foundation Anti-Bullying Policy (W045) and individual school behaviour policies:

- A pupil against whom an allegation of abuse has been made may be suspended from the school during the investigation
- The school will take advice from the appropriate MASH on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s)
- If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the school will ensure that, subject to the advice of the relevant MASH, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed
- Confidentiality will be an important consideration for the school and advice will be sought as necessary from the appropriate MASH or safeguarding partner
- The school will have regard to the procedures set out in KCSIE at all times.

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL who should consider:

- Parents or carers should normally be informed unless doing so would put the victim at greater risk
- The basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed
- Ultimately, the DSL will balance the victim's wishes against their duty to protect the victim and other children.

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

Each school will follow the DDMSC / UKIS guidance 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (March 2024), when responding to an allegation that nude or semi-nude images and/or videos including those generated using AI have been shared.

In the event of disclosures about child-on-child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by individual school pastoral systems and support from external agencies will be sought, as appropriate.

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

- The victim
- Whether there may have been other victims
- The alleged perpetrator(s)
- All the other pupils (and, if appropriate, staff) at the school especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded on the Foundation template and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The individual school will explain to the pupil in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. Each school will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse.

Each school acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing school premises (including during any before or after school-based activities and boarding), and school transport. Each school will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

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

The individual school will keep a written record of all concerns, discussions and decisions made, usually on CPOMS.

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

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the pupil 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. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the individual school's behaviour policy.

9. DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF (INCLUDING SUPPLY TEACHERS AND TRAINEE TEACHERS), VOLUNTEERS AND CONTRACTORS

Foundation school's procedures for managing concerns or allegations against staff (including supply staff, trainee teachers, volunteers and contractors) who are currently working in a Foundation school or premise whether in a paid or unpaid capacity follows DfE statutory guidance and relevant local authority arrangements and applies when staff (including volunteers) have (or are alleged to have):

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

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

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

If an allegation is made against anyone working with children in the Foundation or a school, before contacting the LADO, the Foundation or school will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any substance to the allegation. The Foundation or school should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations.

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

1. Allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is usually the Head or Warden or can be delegated to a senior member of staff. Where the Head is absent or is the subject of the allegation, reports should be made to the

Warden and/or Chair of Trustees. Where the Head or Warden is the subject of the allegation, the Head or Warden must not be informed of the allegation prior to contact with the Warden or Chair of Trustees and LADO.

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

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

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

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

    - Redeployment within the Foundation or school so that the individual does not have direct contact with the pupil(s) concerned
    - Providing an assistant to be present when the individual has contact with pupils
    - Redeploying to alternative work in the Foundation or school so the individual does not have unsupervised access to pupils
    - Moving the pupil(s) to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the pupil(s) concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted
    - Temporarily redeploying the member of staff to another role in a different location, for example to an alternative Foundation school where available.

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

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

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

7. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the Foundation or school to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the relevant school. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

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

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

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

11. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service (DBS) or Teaching Regulation Agency (TRA) should be made where an allegation is substantiated and the person is dismissed or the Foundation or school ceases to use their services, or the person resigns or otherwise ceases to provide their services. The Foundation or school has a legal obligation to report promptly to the DBS any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. If an investigation leads to the dismissal or resignation prior to dismissal of a

member of teaching staff specifically, the Foundation or school must consider making a referral to the TRA and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

12. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the Foundation or school's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

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

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

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

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

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the pupil 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. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Warden or Head will consider whether any disciplinary action is appropriate against a pupil who made

it in accordance with the individual school's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

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

a. Procedure for managing allegations about supply teachers, trainee teachers (if not directly employed) and contractors

The Foundation's procedures for managing allegations against staff above also apply to staff not directly employed by the Foundation, for example, supply or trainee teachers provided by an employment agency or business. The Foundation will usually take the lead on handling allegations to ensure appropriate action is taken. The Foundation will be responsible for gathering the facts and managing the safeguarding process, but agencies should be fully involved and will usually lead on any disciplinary action. The Foundation will co-operate with any enquiries from the LADO, police and/or children's social care.

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

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

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

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

b. Safeguarding concerns and allegations about organisations or individuals using Foundation premises

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

(usually Dean Close Services Limited - DCSL) will follow their safeguarding policy and procedures, including informing the LADO.

When services or activities at the Foundation are provided under the direct supervision or management of Foundation staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the Foundation, the Foundation will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the Foundation will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the Foundation on these matters where appropriate. The Foundation will expect, where appropriate, providers to fully comply with the DfE guidance *After school clubs, community activities, and tuition (safeguarding guidance for providers) (February 2026)* and will seek assurance in this regard.

The Foundation has arrangements in place for the use of school premises for non-school activities including the availability of the DCSL DSL or DDSL and how they can be contacted.

10. DEALING WITH CONCERNS OR ALLEGATIONS THAT DO NOT MEET THE HARM THRESHOLD KNOWN AS LOW-LEVEL CONCERNS (also see appendix 3)

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

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

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

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

The aim of the Foundation Code of Conduct (W080) is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code of conduct at all times.

The procedure for sharing confidentially any such concerns is via this link:

Low Level Concerns Reporting

The Head or Warden is the ultimate decision-maker in respect of all low-level concerns.

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

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

If a concern is raised by a third party, the Head or delegated senior member of staff will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way. The Foundation or school will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with data protection laws at all times. The information will be retained for 10 years or until the individual has left employment, whichever is longer.

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

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

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

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

11. SAFER RECRUITMENT (SEE W041 RECRUITMENT POLICY)

The Foundation is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of pupils in the Foundation whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the Foundation.

All staff and prospective staff seeking employment in EYFS are informed that they have an ongoing obligation to disclose to the Foundation or school any information that may affect their suitability to work with children. This includes, but is not limited to, any cautions, convictions, relevant orders, or any other matter that may affect their suitability. This requirement is communicated at the point of recruitment and is reiterated to existing staff at regular intervals.

All members of staff in the Foundation including part-time staff, temporary and supply staff, trainee teachers and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For regulated activity appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the Foundation may undertake an online update check through the DBS Update Service.

For schools that have EYFS provision: In respect of staff working in, or having unsupervised contact with children in, the school's early years provision, an enhanced DBS disclosure and barred list check must be obtained before the individual starts work or begins volunteering. No individual may commence work or volunteering in the early years provision until the results of both the DBS disclosure and barred list check have been received and are satisfactory.

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

Full details of the Foundation's safer recruitment procedures for checking the suitability of staff, trustees and volunteers to work with children and young people can be found in W041).

The Foundation's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised can be found in the Visiting Speakers Policy (W034).

12. MANAGEMENT OF SAFEGUARDING (also see Appendix 2)

Each school within the Foundation has a DSL (as detailed in the Key School Contact section at the beginning of this policy who is a member of the Senior Leadership Team and at least one DDSL. At DCPPS, DCSJ and DCAS the DSL's role covers the whole school including the Early Years Foundation Stage.

The names of the DSLs and DDSLs to whom reports should be made in the absence of the DSL are listed in the key contacts. The Foundation ensures that there is DSL cover in all areas of the Foundation at all times.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in each school. The DSL's responsibility is to maintain an overview of safeguarding within the school, to open

channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the Foundation and school's policies and procedures in practice. The DSL will also take lead responsibility for online safety and understanding the filtering and monitoring systems and processes the school has in place. The DSL works with the relevant NST and the Foundation safeguarding lead to review and update the Foundation's Safeguarding and Child Protection Policy (W044).

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

This includes sharing information that would allow the new school to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme, as well as information relating to serious violence or harmful sexual behaviours. It would be good practice for a conversation to take place between the DSLs at both settings, where there are issues or concern.

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

During term time, the DSL and/or a DDSL will always be available in person or on a phone during school hours (and 24 hours for those in boarding) for staff in each school to discuss any safeguarding concerns. If a DSL or DDSL is not available in person, they can be contacted via the email addresses and phone numbers listed in key contacts. The Foundations schools have robust cover arrangements in place for when the DSL is unavailable, including a shared confidential mailbox or equivalent system to ensure safeguarding concerns are received, monitored and acted upon without delay.

The DSL or DDSL should liaise with the three safeguarding partners and work with other agencies in line with *WT*. '*NPCC When to call the police: guidance for schools and colleges*' (npcc.police.uk) can assist the DSL or DDSL understand when they should consider calling the police and what to expect when they do. If a school has questions about any police investigation, it will ask the police. The DSL or DDSL will also be responsible for liaising with pastoral and mental health support services, where safeguarding concerns are linked to mental health.

The DSL and DDSL should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.

Whilst the Head should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse, exploitation and neglect, are understood and

followed by all staff, the Trustees are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Full details of the DSL's role can be found at Annex B of KCSIE 2026.

13. TRAINING

The induction and training in each Foundation school are in line with advice from the relevant local safeguarding children board and safeguarding partners.

a. All Staff

All new staff will be provided with induction training that includes:

- The Safeguarding Child Protection Policy W044 (including the policy and procedures to deal with child-on-child abuse)
- The role and identity of the DSL and DDSLs
- The individual school behaviour management policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying W045)
- The staff code of conduct (W080) the Foundation's Whistleblowing Policy (W035) and Staff Acceptable Use of ICT Policy (W056)
- The safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing education (individual school policies).
- the online safety policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- a copy of Part one of KCSIE 2026
- School leaders and staff who work directly with children will also be required to read Part Five and Annex A of KCSIE 2026.

Links to the above documents are provided to all staff during induction and INSET.

Temporary staff and volunteers are provided with links to the policies above and a Safeguarding leaflet.

All staff are also required to:

- Read Part One of KCSIE 2026 in full and confirm that they have done so via an online form. Each time Part one of KCSIE is updated by the Department for Education, staff will be updated on the changes via an online form.
- Understand key information contained in Part one of KCSIE. Each school will ensure staff understanding by regular review and INSET
- Receive training in safeguarding and child protection regularly, in line with advice from the relevant local safeguarding children board and the safeguarding partners. Training will usually include:
    - Online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring)

  - Harmful sexual behaviours (including child-on-child sexual violence and harassment)
  - The safe and effective use of AI including training on identifying and mitigating the key risks associated with AI, including risks to safeguarding, data protection, ethics, and intellectual property. Each school will draw on the DfE's support materials on *Generative artificial intelligence in education*, developed in partnership with the Chiltern Learning Trust and the Chartered College of Teaching, including Module 3 on safe use
  - Prevent awareness training to equip staff to understand the factors that lead people to support terrorist ideologies or engage in terrorist related activity, be able to recognise susceptibility to terrorism and be aware of what action to take in response, including each school's internal Prevent arrangements and risk assessment.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The school provides these via, for example, emails, e-bulletins, and staff meetings
- All EYFS staff are required to attend safeguarding training specifically designed for staff caring for 0-5 year olds which must cover all the areas set out in Annex C to the EYFS Statutory Framework: 'Criteria for effective safeguarding training.' Training must be renewed every two years by the DSL/external provider/LA, and all staff are required to attend. EYFS staff are supported to put their training into practice via regular updates and reminders from the DSL and INSET training sessions, as well as regular meetings with their line manager/Head of Department which will always include safeguarding as an agenda item.

The Clerk to the Trustees will ensure that all Trustees receive appropriate safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the Foundation and schools are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

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

In addition, the Trustees should ensure that the Foundation complies with the DfE's Data Protection guidance for schools, ensuring Foundation and school staff, and trustees know how to comply with data protection law, develop their data policies and processes, what staff and pupil data to keep and the importance of good practices for preventing personal data breaches.

b. DSL(s) (also see Appendix 2)

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children

susceptible to radicalisation, record keeping and promoting a culture of listening to children, training in the LSCE's approach to *Prevent* duties and harmful sexual behaviours.

The DSL receives additional training on AI-related safeguarding risks, including the creation and sharing of AI-generated intimate imagery (deepfakes), the potential for AI tools to be used to groom or exploit children, and the application of each school's filtering and monitoring arrangements to generative AI tools. Training will be reviewed and updated at least annually to reflect the rapidly evolving nature of AI technology.

The DSL also receives more in-depth training, including on extremist and terrorist ideologies, how to make referrals and how to work with Channel panels. This training is updated at least every two years, enabling the DSL to support other staff on Prevent matters and update them on relevant issues. Further details of the required training content for the DSL are set out in Annex B of KCSIE 2026.

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

All DDSLs are trained to the same level as the DSLs.

14. OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

The Board of Trustees has Nominated Safeguarding Trustees (NSTs) with specific responsibilities for safeguarding and related areas, in order to provide strategic oversight, support and challenge to the Foundation and each school's leadership.

Each school has a Nominated Safeguarding Trustee as detailed in the key contacts section at the beginning of this policy. The NST takes a lead role at board level in championing safeguarding and child protection within each school. The Foundation NST champions safeguarding and child protection within the whole Foundation. Their responsibilities include liaising regularly with each DSL to maintain oversight of safeguarding activity; reviewing and challenging the effectiveness of safeguarding policies and procedures; ensuring that the annual review of this policy is carried out and that safeguarding remains a standing agenda item at Trustee Board meetings; monitoring safeguarding training compliance for staff and Trustees; and reporting to the full Trustee Board on safeguarding matters at least termly. Every NST receives enhanced safeguarding training to enable them to provide informed strategic challenge and is familiar with the local multi-agency safeguarding arrangements for each school.

The Foundation considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the Foundation's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, including lessons learnt. A Foundation Annual Safeguarding Review is presented to the full trustee body in June. The Foundation draws on the expertise of staff, including the DSL(s), in shaping the Foundation's safeguarding arrangements and policies.

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

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

15. THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

a. Teaching children how to keep safe

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

Internet safety (including when children are online at home) is an integral part of each school's curriculum and also embedded in PSHE and Relationships Education and/or Relationships and Sex Education (RSE).

b. Filtering and monitoring

The Foundation has appropriate filters and monitoring systems in place in each school to safeguard children from potentially harmful and inappropriate material online when using the Foundation's IT systems. Fortinet, Switchshop, Sophos, and Smoothwall are the main systems used

Such systems aim to reduce the risk of pupils being exposed to illegal, inappropriate or harmful materials online for example:

- Pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories (content risk)
- Reduce the risk of pupils being subjected to harmful online interaction with other users or generative AI applications that simulate this, including commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes (contact risk)
- Restrict access to online risks such as online gambling, inappropriate advertising, phishing and/or financial scams (commerce risk)
- Help manage online behaviour that can increase a pupil's likelihood of, or causes, harm for example making, sending and receiving explicit images e.g. consensual and non-consensual making or sharing nude or semi-nude images and/or videos including those generated using AI e.g. deepfakes and/or pornography, sharing other explicit images and online bullying (conduct risk).

The Foundation ensures compliance with the DfE's 'Cyber security/filtering and monitoring standards for schools' by:

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems
- Reviewing the effectiveness of the filtering and monitoring provision at least annually. Reviews will be carried out by the SLT member responsible for filtering and monitoring, with the support of the school's DSL and IT support. They will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record is kept of these checks
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs

The Foundation utilises the DfE's 'plan technology for your school' service to self-assess compliance against the filtering and monitoring standards and ensures that any recommendations are incorporated as appropriate. The Foundation ensures that its filtering and monitoring arrangements address risks, including in relation to any generative AI tools used within the Foundation.

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

c. Use of artificial intelligence (AI)

The Foundation schools recognise that artificial intelligence, including generative AI, presents both significant opportunities and safeguarding risks in education. The Foundation is committed to ensuring that the use of AI is safe, ethical, transparent and aligned with the Foundation's safeguarding obligations. The Foundation's approach to AI safeguarding is embedded within the existing provisions of this policy, including in relation to filtering and monitoring, online safety, training and responding to specific safeguarding issues.

The Foundation is alert to the safeguarding risks arising from AI, including but not limited to:

- The generation of deepfake images and AI-generated intimate imagery
- The potential for AI chatbots to produce harmful, inaccurate, or age-inappropriate content
- The risk of 'cognitive offloading' where pupils defer their critical thinking to AI tools
- The use of AI to facilitate grooming, exploitation, or the creation of child sexual abuse material.

Any safeguarding or wellbeing concern arising from the use of AI tools should be reported to the relevant DSL immediately, using the procedures set out in this policy.

This includes, but is not limited to, concerns about:

- A pupil creating, sharing, or being the subject of AI-generated intimate imagery (deepfakes)
- A pupil being exposed to harmful, inaccurate, or age-inappropriate content through an AI tool
- A pupil's personal data being compromised through the use of an AI tool
- A pupil interacting with an AI chatbot in a way that causes concern for their welfare or mental health

- A member of staff using AI in a way that may compromise pupil safety or data security.

The school DSL will investigate any AI-related safeguarding concern and determine whether it should be referred to external agencies such as children's social care and/or the police, in accordance with the procedures set out in this policy.

The Foundation staff acceptable use of ICT policy (W056) and individual school pupil acceptable use policies sets out further detail on the Foundation's approach to AI, including approved tools, acceptable use guidelines, academic integrity expectations and data protection arrangements. Staff should refer to these policies alongside the safeguarding procedures set out in this policy.

d. Use of mobile phones

Foundation schools operate as a mobile phone-free environment by default, in accordance with the DfE's statutory guidance on mobile phones in schools. Pupils do not have access to their mobile phones throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime (unless a clearly defined exception has been agreed by a member of SLT).

Each school has a mobile phone policy appropriate for the age and diversity of the pupil body.

The Foundation recognises that notwithstanding the mobile phone ban, pupils may still have access to the internet via mobile phone networks (i.e. 3G, 4G and 5G), through other personal devices such as smart watches or, where permitted, personal laptops or tablets, particularly boarders during the evenings and at weekends. The Foundation's filtering and monitoring systems may not apply to content accessed via pupils' personal devices where those devices are not connected to a school network. To mitigate this risk, the pupils are not allowed to have smart devices in school without the explicit permission of a member of the SLT of that school.

All devices brought into a Foundation by a pupil must comply with that school's acceptable use policy.

e. Cyber security

The Foundation recognises that cyber security is a safeguarding concern. If a child's sensitive data is compromised by a cyber-attack, it puts their safety and wellbeing at risk. The Foundation takes measures to safeguard children by protecting personal information and ensuring appropriate cyber security systems are in place, in line with the DfE's *Cyber security standards for schools and colleges* and the *Digital and technology standards in schools and colleges (April 2026)*.

The Foundation's arrangements include maintaining an information asset register, keeping hardware and systems registers up to date, and having a disaster recovery and business continuity plan that addresses digital technology. The School is working towards meeting the six core digital and technology standards by 2030.

f. **Relationships Education AND/OR Relationships and Sex Education**

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

Each school's Relationships Education/RSE curriculum is delivered as part of a whole school approach to wellbeing and positive relationships that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment derogatory behaviour or other forms of physical violence and conflict. The Foundation schools focus on building positive attitudes and skills, promoting healthy norms about relationships, including sexual relationships where relevant, and about health, including mental health. Each school's curriculum also addresses online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help at an age appropriate level. The Foundation recognises that discussions about sensitive topics in Relationships Education/RSE can lead to increased safeguarding reports. All staff know what to do if they have concerns that a pupil is being neglected or abused, including those who have seen, heard or experienced the effects of domestic abuse.

All Foundation schools have regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when planning for and teaching Relationships Education.

The Foundation school's RE/RSE Policies sets out the curriculum content, how and when it will be taught, and who is responsible for teaching it, including any external providers each school will use. Each school proactively engages and consults parents in the development and review of this policy. [Parents will be informed of their right to request that their child is withdrawn from sex education.]

g. Sport

The Foundation recognises that sport and physical activities can present unique safeguarding risks. Staff involved in the delivery of sport and physical education should be alert to safeguarding concerns that may arise in these settings, including risks associated with physical contact, changing facilities, one-to-one coaching, and away fixtures or tours. The Foundation schools will have regard to the relevant provisions in KCSIE, and any guidance issued by relevant national governing bodies of sport or professional associations. Where a school engages external sports coaches or providers, it will satisfy itself that appropriate safeguarding checks have been carried out and that providers have adequate safeguarding policies in place.

h. **Looked after children**

The Board of Trustees ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

The DSL is the designated member of staff who has responsibility for their welfare and progress. The Foundation ensures that the designated member of staff receives appropriate training in order to carry out their role.

i. Arrangements for visiting speakers (also see appendix 4)

Each Foundation school has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. Each school has a responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned

to the ethos and values of the Foundation and the British values of democracy at an age appropriate level.

Each school will undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the school. This will consider any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

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

Visiting Speakers, whilst on a school site, will be supervised by a school employee. On attending a school, visiting speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The school shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

j. Arrangements for use of school premises for non-school activities

Dean Close Services Limited (DCSL) oversee all use of Foundation premises by outside organisations as well as organising and running their own courses and events.

When services or activities at the Foundation are provided under the direct supervision or management of school staff (usually DCSL), this policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the Foundation, DCSL will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and DCSL will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the Foundation on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are pupils on the school roll.

The Foundation will ensure that the DSL or DDSL for DCSL can be contacted and/or is available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll. At DCKHS Natasha Harris is the DSL for outside lets. There is also a rota of DSL cover for each school to assist in safeguarding matters arising on the premises.

The Foundation will ensure that safeguarding requirements are included in any agreement for use of the Foundation premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement. DCSL can provide full copies of contractual arrangements on request.

When considering the safeguarding arrangements any providers have in place the Foundation will have regard to the DfE's non statutory guidance *'After school clubs, community activities, and tuition (safeguarding guidance for providers)' (February 2026)*.

k. Operation Encompass

The Foundation schools are part of Operation Encompass, which is an information sharing scheme placed on a statutory footing by Section 49A of the Domestic Abuse Act 2021 (as inserted by Section 20 of the Victims and Prisoners Act 2024). Operation Encompass supports children who experience domestic abuse.

Under this statutory duty, the police are required to notify a Foundation school if they have reasonable grounds to believe that a child may be a victim of domestic abuse. This duty applies in respect of all children connected to a household where police attended a domestic abuse incident, including children who were not physically present at the time of the incident. This sharing of information should occur prior to the start of the next school day. The notification should be sent to the DSL (known as the Key Adult) and include the child's details, their relationship to the perpetrator and the voice of the child, such as what they are saying and how they are behaving.

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

l. Temporary accommodation notification

Where a Foundation school receives a notification from the local housing authority, under the Children's Wellbeing and Schools Act 2026, that a child has been placed in temporary accommodation, the Designated Safeguarding Lead (or a deputy) will:

- Assess whether the child's welfare needs have changed and whether additional pastoral, academic or safeguarding support is required
- Liaise with relevant agencies, including the local housing authority and, where appropriate, local authority children's social care, to ensure coordinated support is provided
- Make a referral to local authority children's social care where there are concerns that the child has been harmed or is at risk of harm.

This notification does not replace existing safeguarding and welfare duties. Staff who become aware of concerns about a child's welfare arising from homelessness or temporary accommodation should report these to the DSL in the usual way.

16. EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

The Foundation adheres to the requirements set out in the EYFS Statutory Framework including the requirements regarding safer sleeping arrangements, paediatric first aid training, safer eating and children's privacy in relation to toileting and nappy changes.

a. Disqualification from working in childcare

Where staff work in or are involved in the management of a Foundation school's early years or provision of care of pupils under the age of eight, the Foundation will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-

appointment, and from time to time during employment. This forms part of the Foundation's safer recruitment practices.

The school records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the Foundation will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the Foundation will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

b. Use of mobile phones and cameras

The Foundation's policy on the use of mobile phones and cameras in EYFS settings can be found in individual school's AU policies. Foundation staff are not permitted to use their personal mobile devices or cameras in any EYFS setting. Staff who wish to use take photographs or video of pupils whether on a personal or school device must first speak with the Head or DSL to obtain their approval before taking any image of a pupil. Staff who wish to use their personal mobile devices or cameras in an EYFS setting for any other reason must first speak with the Head. Staff who act in breach of this may be subject to disciplinary action. Parents are not permitted to use their mobile phones or camera in or around the EYFS setting without prior approval and/or permission from the Head.

c. Screen use

The Foundation has regard to Government guidance on screen use for children in the early years, including the impact of screen time on children's health, development and wellbeing. The Foundation's approach to screen use in EYFS settings is age-appropriate and is set out in the policy for each school. Staff in the EYFS setting are aware of the risks associated with excessive or inappropriate screen use for young children and take steps to manage and limit children's exposure to screens in line with the guidance.

d. Designated Safeguarding Lead for the EYFS

The Designated Safeguarding Lead who takes lead responsibility for safeguarding children in the early years settings is named on the key contact's page.

e. Duty to notify Ofsted

The EYFS setting will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the school is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the setting became aware (or ought reasonably to have become aware) of it.

The EYFS setting will notify Ofsted within 14 days of any allegation of harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

f. Safeguarding training

The Foundation ensures staff are trained in line with the criteria set out in Annex C of the EYFS Statutory Framework and are supported to implement the Policy on an ongoing basis.

The DSL provides support, advice and guidance to all staff on an ongoing basis, and on specific safeguarding issues that may arise. The DSL attends a training course, consistent with the criteria set out in Annex C of the EYFS Statutory Framework (July 2026).

The EYFS setting safeguarding training will be renewed every two years and the school will consider whether staff need to undertake annual refresher training during any two-year period and to keep up to date with changes to safeguarding procedures or as a result of any safeguarding concerns that may occur in the setting.

APPENDIX 1 – SIGNS AND TYPES OF ABUSE AND SPECIFIC SAFEGUARDING ISSUES

All Foundation staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and often overlap and can put children at risk. Staff should understand that children can experience more than one type of harm simultaneously. Therefore, staff should always be vigilant and always raise any concerns with the DSL or DDSL.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSL, should consider whether children are at risk of abuse or exploitation in situations outside the home. This is often referred to as 'extra-familial harm.' Extra-familial harm can occur in a range of extra-familial contexts, including in school, peer groups, or within community/public spaces, and/or online. Children may experience this type of harm from other children and/or from adults and harm may be perpetrated or facilitated by individuals or groups. Forms of extra-familial harm include child criminal exploitation (such as county lines and financial exploitation), serious violence, modern slavery and human trafficking, online harm, sexual exploitation (including group-based child sexual exploitation), child-on-child sexual abuse and other forms of harmful behaviour displayed by children towards their peers, domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking) , and the influences of extremism which could lead to radicalisation. Children of all ages can experience extra-familial harm.

While any child can experience harm outside the home, children with special educational needs or disabilities, those missing from home, care or education, looked after children, and those with previous experience of abuse or neglect, may be at greater risk of harms such as sexual or criminal exploitation. Perpetrators, including those acting in organised groups, may purposefully target children who are already vulnerable.

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

In all cases, if staff are unsure, they should always speak to the DSL or DDSL

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

Emotional abuse: the persistent emotional or psychological maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, silencing them or 'making fun' of them. It may include verbal abuse (e.g. criticism, belittling, name-calling). It may feature age or developmentally inappropriate expectations being imposed on children. These may

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, rape (including penetration of vagina, anus or mouth and penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place in family settings, in institutional settings, online, and technology can be used to facilitate offline abuse. Child sexual abuse material available online may have been generated in a family environment. Online abuse can also take the form of cyber-grooming or self-generated sexual content under coercion. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. A child of any age or gender can be a victim of sexual abuse. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child-on-child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

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

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

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

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

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

Harmful sexual behaviour (HSB): Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage. The umbrella term 'harmful sexual behaviour' is widely used in child protection and applies to behaviour occurring online, face-to-face, or both. HSB should always be considered within a child protection context. HSB can, in some cases, progress on a continuum. This is consistent with the Hackett Continuum, which distinguishes between developmentally normal, inappropriate, problematic, abusive and violent sexual behaviours.

The Foundation will respond to all signs, reports and concerns of HSB, sexual harassment and sexual violence, including where behaviour falls at the lower end of the continuum. Early intervention in inappropriate behaviour such as misogyny can help to prevent escalation to more serious abuse such as sexual harassment and sexual violence. Children who display HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support. Sexual behaviour between children may be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

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

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

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

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

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

Sharing of nude or semi-nude images and/or videos including those generated using AI: the sending or posting of nude or semi-nude images and/or videos, or live streams including those generated using AI (also known as 'nudes' or 'semi-nudes') online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nude or semi-nude images and/or videos including those generated using AI can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'. Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nude or semi-nude images and/or videos.

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

- Children and young people find nude or semi-nude images and/or videos online and share them claiming to be from a peer
- Children and young people digitally manipulate an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new intimate image and/or video of a young person
- Images created or shared are used to abuse or blackmail peers. Situations could include:
    - Children and young people selling nude or semi-nude images and/or videos of others online
    - Children and young people coercing a peer into sharing self-generated intimate images and/or videos to blackmail them for money, further images, or force them into illegal activity
    - Children and young people hacking a peer's account to share images more widely without consent to publicly shame
- Children and young people create and share nude or semi-nude images and/or videos with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance '*Sharing nudes and semi-nudes: advice for education settings working with children and young people*' (March 2024) sets out the classification of incidents, and how each should be handled.

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

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

Serious violence: indicators which may signal that children are at risk from, or are involved with serious violent crime include disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of committing violence, increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

All staff should also be aware of the associated risks which increase the likelihood of involvement in serious violence which include:

- Being male
- Frequent absence from school
- Having been suspended or permanently excluded from school
- Having experienced child maltreatment
- Having previously been involved in committing violence or other offences (such as theft or robbery)
- Having used drugs or alcohol in early adolescence
- Having previously been a victim of violence

Staff should be aware that children who are involved in committing violence may themselves be victims in need of support. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff must report any concern about a child carrying or using a weapon, or expressing intent to do so, to the DSL immediately. The DSL should assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict. Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. This includes access to trusted adults, social and emotional skill

support, and, where available, targeted interventions such as mentoring or therapeutic support. Practical guidance on evidenced support is available from the Youth Endowment Fund (YEF) (the 'what works' centre for preventing violence.

Specific safeguarding issues: safeguarding issues often overlap and can put children at risk of harm**.** Behaviours linked to drug taking, alcohol misuse, unexplainable and/or persistent absences from education, serious violence, criminal exploitation (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude or semi-nude images including those generated using AI e.g. deepfakes and/or videos. put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/HSB. Safeguarding issues can also be linked to, for example; children missing from education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; radicalisation; relationship abuse; and trafficking.

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

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

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion.
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Group-based child sexual exploitation: Group-based is defined as two or more individuals (whether identified or not) who are known to (or associated with) one another and are known to be involved in or to facilitate the sexual exploitation of children. Being involved in the sexual exploitation of children includes, for example, introducing them to other individuals for the purpose of exploitation, trafficking a child for the purpose of sexual exploitation, taking payment for sexual activities with a child, or allowing their property to be used for sexual activities with a child. This can be perpetrated within or beyond the family, by both children and adults, and groups can be organised or loosely linked.

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

- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

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

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

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

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

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

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts, money, or new possessions
- Children who associate with other children involved in exploitation
- Children who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late
- Children who regularly miss school or education or do not take part in education.

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

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse. CCE and CSE can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. A relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

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

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

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

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

- Go missing (from school or home) and are subsequently found in areas away from their home
- That have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime)
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- Are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
- Owe a 'debt bond' to their exploiters
- Have their bank accounts used to facilitate drug dealing.

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

Modern Slavery: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them

to the National Referral Mechanism is available in the statutory guidance '*Modern slavery: how to identify and support victims (June 2025)*'.

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

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

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

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

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

Mental health: all staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

- Significant changes in behaviour
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention.

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

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

More information can be found in the Mental health and behaviour *in* schools' guidance. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. The NHS Every Mind Matters website also contains helpful information and advice about Looking after a child or young person's mental health.

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

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

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

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

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

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

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

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in the *Multi-agency guidelines: Handling cases of forced marriage (last updated April 2023)* Further information on forced marriage is available in guidance published on gov.uk and by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

Radicalisation: is the process of a person legitimising support for, or use of, terrorist violence.

Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those different faiths and beliefs.

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

There is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. However, it is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be susceptible and act proportionately, which may include making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

Special educational needs and/or disabilities (SEND), or pupils with certain health conditions: Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children

may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- These children may have issues over cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

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

Safeguarding children with medical conditions: The fact that there has been an incident relating to the management of a child's medical condition or allergy would not in itself warrant a referral to local safeguarding partners. The DSL will consider a safeguarding referral where an incident highlights concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to the school, or where they are repeatedly sent without essential medication, thereby putting the child at risk. The school will work collaboratively with healthcare professionals to ensure that any safeguarding concerns arising from a child's medical condition are identified and addressed promptly.

Further information can be found in the DfE statutory guidance on supporting Pupils at School with Medical Conditions. and Allergy safety in schools.

Young carers: A young carer is a person under 18 who provides or intends to provide care for another person. Young carers may face additional safeguarding challenges and may be more vulnerable due to the responsibilities they carry. Staff should be alert to signs that a child is taking on caring responsibilities that are inappropriate for their age and which may be impacting on their attendance, attainment, or wellbeing. Concerns about young carers should be discussed with the DSL.

Children who are lesbian, gay or bisexual: A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a pupil who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are. The school should consider how to address vulnerabilities such as the risk of bullying and take steps to prevent it, including putting appropriate sanctions in place.

Children who are questioning their gender: When supporting a gender questioning child, the school will not initiate any action. The school will take time to understand the thoughts and feelings of children who are questioning their gender and be appropriately professionally curious about the full range of the child's experiences.

Staff should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying. In making decisions about supporting social transitions, staff will comply with their distinct but interacting obligations under safeguarding legislation and equality and human rights law. The DSL will be involved in all cases where a child is questioning their gender. Staff will not adopt any changes relating to social transition unless a decision has been made by a school and a child's parents or carers have been involved. Parents will be involved in the vast majority of cases. In the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them, the DSL will determine what action is needed to safeguard the child, before the parents or carers are contacted or any decisions are taken.

The school complies with its obligations under the Education (Independent School Standards) Regulations 2014 regarding the provision of toilets and washing facilities. The school does not permit children to use toilets designated for the opposite biological sex. The school has regard to the provisions set out in Part two of KCSIE regarding single-sex spaces, changing rooms, and (where applicable) boarding and residential accommodation.

Further guidance on single-sex spaces, sport, and boarding accommodation is set out in Part two of KCSIE (September 2026).

Domestic abuse: Domestic abuse is one of the most prevalent forms of abuse, with Women's Aid estimating that 160,000 children are currently living in households where domestic abuse is taking place. This is likely to be an underestimate, however, with much abuse remaining hidden and not coming to the attention of services. The Domestic Abuse Act 2021 introduced a statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, and psychological, emotional, or other abuse such as 'honour' abuse, faith- or belief-based abuse, forced marriage, female genital mutilation or reproductive coercion, harassment and stalking. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be 'personally connected' (as defined in section 2 of the 2021 Act).

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

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The

government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

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

Operation Encompass: Section 20 of the Victims and Prisoners Act 2024 introduced a new provision into Part 3 of the Domestic Abuse Act 2021 under Section 49A, placing a statutory duty on police forces across England and Wales to notify a child's educational setting if they have reasonable grounds to believe a child may be a victim of domestic abuse. This duty applies to all children connected to the household where police attended a domestic abuse incident, including children not physically present. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

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

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

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

Children who are absent from school: The school's full procedures for dealing with children who are absent from education, including persistently or for prolonged periods staff are referred to the section 'Children absent from education' in the main body of this policy. A child being absent from school is a potential indicator of a range of safeguarding issues such as abuse, neglect, sexual abuse, CSE and CCE.

It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, honour or faith based abuse or risk of forced marriage. Staff must follow the school's procedures for dealing with children who are absent, particularly persistently or for prolonged periods.

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

- Fulfil its duty to identify children of compulsory school age who are missing from education
- Follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, exploitation or radicalisation.

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

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

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

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

As children get older and are granted more independence it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

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

www.actionagainstabduction.org and www.clevernevergoes.org

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

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

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

Children with family members in prison: Approximately 193,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health.

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

The Prisoners' Families Helpline provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. Further support for families can be found at the Prisoners' Families Helpline website.

Appendix 2 – Safeguarding and remote teaching and learning

There may be circumstances such as a school closure or prolonged illness when the Foundation requires teachers to teach pupils remotely or provide blended learning. In this eventuality the following points should be considered:

1. Pupils should be contacted via methods that have been approved by the Foundation. These include:
    a. School email
    b. ISAMS
    c. Microsoft Teams or other packages originating from a school email address
    d. Google Classroom and Hangout or other packages originating from a school account
    e. Any Virtual Learning Environments (VLE) platform set up by a Foundation school
    f. Video conferencing packages approved by the school and operated via a school account such as Zoom
    g. Text originating from a school account or phone.

2. The following methods of communication should not be used unless they originate from a school account:
    a. Social media including Snapchat, WhatsApp and TikTok
    b. Text **not** originating from a school account or phone
    c. Personal email addresses.

3. Teaching groups of pupils via a variety of media is highly recommended during a school closure or prolonged absence, however:
    a. If using a camera feed the teacher should ensure that they are properly dressed and there is nothing in the background of the picture that could cause distress or upset
    b. If possible remote learning should originate from school. If this is not possible a suitable home location needs to be identified
    c. All pupils that can be seen during a remote learning lesson should also be properly dressed and in a suitable location
    d. Where possible 1:1 remote tuition should be avoided particularly for younger pupils. Circumstances where it might be appropriate include:
        i. What would normally be 1:1 e.g., ELT, SEN, Music, Drama, or tutorials
        ii. When an individual pupil is away from school
        iii. Where personal coaching, for example in preparation for an exam is necessary
    e. Any 1:1 remote learning should be conducted in an open space where it can be observed and not in a closed office or classroom with no visibility
    f. The pupil and parent/guardian should be informed in advance that the remote teaching session is to take place and to allow the adult to be present in the session if they wish
    g. The 1:1 session can be recorded with the permission of the parent/guardian
    h. If anything, untoward such as a comment or gesture occurs in a remote learning lesson, it should be reported to a member of SLT or the DSL directly as a Low-Level Concern.

4. Anything of a safeguarding nature that is disclosed during a remote learning lesson should be reported to the DSL in the normal way.

Appendix 3 – Low-Level Concerns

1. The Dean Close Foundation has processes and procedures in place to manage any safeguarding concerns about a staff member (including supply staff, volunteers, and contractors). Arrangements detailed in this policy are the procedures that should be followed if an allegation of abuse by a member of staff is made

2. It is also the duty of Foundation to ensure that Low-Level Concerns, which do not meet the allegation thresholds about a member of staff are also recorded so that any potential patterns of inappropriate behaviour can be identified

3. A Low Level Concern is any concern, no matter how small, that an adult may have acted in a way which
    a. Is not consistent with the Foundation Code of Conduct
    b. Related to their conduct outside of work that has causes a sense of unease about that adult's suitability to work with children

4. Staff do not need to determine whether the actions of an adult can be defined as a Low-Level Concern or whether they reach the allegation threshold they just need to make a report. It is the role of the Head teacher, in conjunction with the DSL, if necessary, to make this decision.

5. Any member of staff can report a Low-Level Concern about themselves or a colleague to their line manager, the DSL of the Foundation school concerned, or alternatively, the relevant Head, the Warden, or the Director of HR.

6. Foundation staff should feel confident that they can self-refer when for example they have found themselves in a position which could be misinterpreted, which 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.

7. All Low-Level Concerns should be recorded in writing as part of a professional interview or by email. A confidential record of Low Level Concerns is kept by the Head of each school. The record includes:
    a. The details of the concern
    b. The context in which the concern arose
    c. The names of the individuals (pupils and staff) involved
    d. The name of the reporting member of staff if anonymity is not wanted.

8. Records of Low-Level Concerns will be kept confidentially and securely and comply with GDPR legislation. In most cases, records will be destroyed 7 years after the employee leaves the Foundation.

9. Records will be regularly reviewed in order to:

    a. Identify patterns of concerning, problematic or inappropriate behaviour
    b. Aid decisions on the appropriate course of action to be taken
    c. Provide evidence if the records meet an allegation threshold and a referral to the LADO is made

d. Help in the identification of possible wider cultural issues within the school or Foundation that enabled the concerning behaviour to occur and decide on a course of action to minimise the risk of repeated Low Level Concerns.

10. Spectrum of behaviour:

Allegation
Behaviour which indicates that an adult who works with children has:
• Behaved in a way that has harmed a child, or may have harmed a child
• Possibly committed a criminal offence against or related to a child
• Behaved towards a child or children in a way that indicates they 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, including behaviour that may have happened outside school.

Low-Level Concern
Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:
• is not consistent with an organisation's Code of Conduct, and/or
• relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Appropriate Conduct
Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law

Appendix 4 Safeguarding procedures for Dean Close Services Limited (DCSL)

1. DCSL and the Dean Close Foundation:

a. DCSL is responsible for the commercial use of the Dean Close Foundation facilities, reporting directly to the Chief Financial Officer, Adrian Bowcher (CFOO) and DCSL board
b. DCSL makes extensive use of Dean Close Foundation premises both in term time and during the holidays and is aware that an incident or concern of a safeguarding nature may occur at any time
c. The Commercial Director (CD) is the DSL for DCSL; this is Mrs Marie Widdowson. The Deputy DSL for DCSL is Sam Taylor. The Warden has direct oversight of safeguarding for DCSL; the Nominated Safeguarding Trustee (NST) is Mrs Helen Daltry
d. The DCSL DSL meets with the Nominated Safeguarding Trustee termly. A checklist is worked through, and the completed document is shared with the Warden, Foundation Safeguarding lead and the lead NST.

2. Safeguarding policy

a. DCSL adheres to the Foundation Schools Safeguarding and Child Protection Policy but is aware that some circumstances require slightly different procedures
b. This appendix details specific procedures to be followed by DCSL
c. DCSL is aware that an allegation or concern relating to an incident that happens when an individual or organisation is using school premises for the purpose of running activities for children or vulnerable adults must be investigated following the procedures laid out in the policy.

3. Services and activities under the direct management of DCSL

a. Services operated directly by DCSL on Foundation premises will adhere to the processes and procedures detailed in the Foundation Schools Safeguarding and Child Protection Policy
b. DCSL staff are trained in Safeguarding and Child Protection every three years and read this policy annually so are aware of reporting procedures if there is an incident or concern
c. The DCSL DSL will contact outside agencies as appropriate and record details of the incident or concern as outlined in the policy in a separate secure file. If the DCSL DSL requires extra support, she is able to contact either the Foundation DSL or the Warden
d. DCSL staff are aware of local multi-agency procedures and how referrals are made to Social Care or the LADO
e. If the concern or allegation is about a Dean Close Foundation pupil, the DSL from the appropriate school will be contacted and a record made in the school safeguarding files.

4. Services and activities not under the direct management of DCSL

a. The terms and conditions for the hire of Foundation facilities by individuals or organisations outside DCF are set out in figure 1
b. The Compliance Certificate mentioned in figure 1 ensures that:
    i. DCSL has assurance from the hirer that they have the appropriate Safeguarding and Child Protection policies and procedures in place where relevant

ii. DCSL ensures that the hirer understands its obligation to report concerns about children and vulnerable adults to the DCSL DSL

iii. The hirer knows who the DSL is and that any safeguarding concerns, including within their own group, should be reported as soon as possible but at least within 24 hours

iv. The hirer accepts that the DCSL DSL will act on any report or concern, including reporting to the LADO or Social Care if appropriate.

5. DCSL recruitment

a. All DCSL staff, including casual zero hours staff, follow the normal recruitment procedures through the Human Resources department including obtaining an enhanced DBS check

b. All staff complete an online Safeguarding and Child Protection course as well as statutory reading which includes KCSIE 2023 part one (or annex A) and the Foundation Safeguarding and Child Protection policy when commencing employment

c. DCSL staff receive regular Safeguarding updates and refreshers in line with all other Foundation staff.