

SAFEGUARDING AND CHILD PROTECTION POLICY

Prior Park College

Policy Owner DSL/Deputy Head Pastoral	Applies to Prior Park College	Superseded documents Safeguarding and Child Protection Policy v4
Associated documents All PPC specific and PPS Associated Safeguarding Policies	Review frequency Every year (unless the legislation/regulations update before this time) Implementation date 14 September 2026	Legal Framework See Section Two

This policy is reviewed annually, or more regularly as required, prior to approval by Trustees, where applicable.

Last reviewed by:	Deputy Head Pastoral and DSL (Mrs Isobel Burton), Headmaster (Mr B Horan) and Head of Compliance (Miss Emma Wickham)
Date last reviewed:	August 2026
Approved by Trustees:	Approved by Headmaster, Nominated Safeguarding Trustees, Chair of Trustees and Board of Trustees
Date of approval:	9 September 2026
Date for next approval:	September 2027

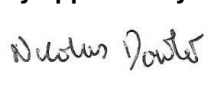
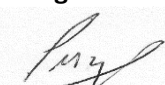
**This Policy has been approved by the Nominated Safeguarding Trustees and the Chair of Trustees; it will be ratified by the BOT on 9 September 2026*

Prior Park Schools (PPS) is a family of Christian schools based in Bath and Gibraltar. Prior Park College (PPC) and Prior Park Paragon (PPP) are incorporated in England as Prior Park Educational Trust Ltd. Prior Park Gibraltar (PPG), is incorporated in Gibraltar as Prior Park School Ltd. Both are companies limited by guarantee and registered charities.

The Prior Park Schools mission, underpinned by shared values, is to steward a thriving family of communities with love for the young people they serve at their heart. These vibrant communities cultivate creativity, foster integrity, and transform lives.

Prior Park Schools Values:

Curiosity – Generosity – Courage

Policy Approved by: Safeguarding Trustees Mr Nic Dowler and Mr Paul Lyon  	Date: 1 September 2026
Designated Safeguarding Lead: Mrs Isobel Burton 	Date: 1 September 2026
Chair of Trustees: Mr David Catlow 	Date: 1 September 2026

Prior Park Schools Safeguarding Statement

Safeguarding and child protection are at the forefront of all that Prior Park College does. The best interests of the child are central to systems, decisions and practice.

Safeguarding is everyone's responsibility. Every adult working for or on behalf of the School must act on concerns and must never assume that somebody else will take action.

Children are listened to, respected and taken seriously. A child does not need to make a formal disclosure before staff act on a concern.

All children have an equal right to protection. Staff remain alert to additional barriers faced by children with SEND, health conditions, communication needs, protected characteristics, experience of care, family adversity, boarding status or other vulnerabilities.

The School maintains an 'it could happen here' culture, professional curiosity and a whole-school approach to safeguarding.

1. Safeguarding contact details

Position	Name	Contact details
Headmaster	Mr Ben Horan	bhoran@priorparkschools.com
Designated Safeguarding Lead (DSL) & LAC Lead	Mrs Isobel Burton	iburton@priorparkschools.com
Deputy Designated Safeguarding Lead (DDSL) & E-Safety Lead	Mr Dave Sackett	dsackett@priorparkschools.com
Deputy Designated Safeguarding Lead (DDSL)	Ms Laura Sutherland	lsutherland@priorparkschools.com
Deputy Designated Safeguarding Lead (DDSL) and Senior Attendance Champion	Mrs Jill Bendry	jbendry@priorparkschools.com
Deputy Designated Safeguarding Lead (DDSL) & Boarding Lead(s)	Mrs Sukey Holder & Mr David Holmes	sholder@priorparkschools.com dholmes@priorparkschools.com
Nominated Safeguarding Trustee(s)	Mr Paul Lyon Mr Nic Dowler	plyon@priorparkschools.com ndowler@priorparkschools.com
Chair of Trustees	Mr David Catlow	dcatlow@priorparkschools.com

*For external lettings, safeguarding issues should be reported to:
James Lindsay jlindsay@priorparkschools.com

B&NES Council- Who to contact with a concern about a child?

Role	Name	Contact Details
Head of Service Children's Quality Assurance and Safeguarding	Sarah Hogan	01225 395218
Team Manager Triage Team	Ellis Woodley	01225 395076 ChildCare_Duty@bathnes.gov.uk CDC: 01225 396111
Virtual School Headteacher	Sarah Gunner	01225 477395
B&NES Prevent Lead	Samantha Jones	01225 396364 samantha_jones@bathnes.gov.uk Regional Police Prevent Team on 01179 455 536 • Email: channelsw@avonandsomerset.pnn.police.uk

Who to contact with a concern about an adult?

Deputy Safeguarding Lead and Local Authority Designated Officer (LADO)	Katie Williams	Katie Williams 01225 396810 LADO@bathnes.gov.uk
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Other BANES useful contacts

Director of Education & Safeguarding	Chris Wilford	01225 477109
Director of Children's Services & Education	Jean Kelly	01225394930
Assistant Director Children & Young People	Phoebe Holland	01225396907
Head of Service - Care Outcomes	Jo Parker	01225396957
Head of Service – Safeguarding Outcomes	Sam MacDonald	01225396860

Other useful contact details

Organisation	Phone
Childline	0800 1111
NSPCC	0808 800 5000
Kidscape (Anti-bullying helpline for parents)	0845 120 5204
Report Abuse in Education	0800 136 663
National Domestic Abuse Helpline	0800 2000 247
Child Exploitation Online Prevention (CEOP)	0370 496 7622 www.ceop.police.uk/safety-center/
Children Missing Education Manager of the Education Inclusion Team (Sharon Lympos)	01225 394241 or email: sharon_lympoos@bathnes.gov.uk or her team B&NES CMES, Riverside, Temple St, Keynsham BS31 1DN
CAFAIT	01225 396312/313 or the Emergency Duty Team 01454 615165
MASH Wiltshire	Integrated Front Door Number: 0800 4560108 MASH@Wiltshire.gov.uk
Children Reported Missing in Local Authorities	North Somerset 01275 888303 • Wiltshire 01225 713010

SENDIASS	SENDIASS offer information, advice and support for parents and carers of children and young people with SEND.
CAMHS	01865 903 330 E-mail: baneswiltscamhsspa@oxfordhealth.nhs.uk

Key B&NES safeguarding contacts

- Children's Social Care: 01225 396111 or 01225 477929; Triage: Childcare_duty@bathnes.gov.uk; Out of Hours Emergency Duty Team: 01454 615165.
- If there is a risk of immediate serious harm to a child, the DSL will immediately inform CAFAIT on 01225 396312/313 or the Emergency Duty Team 01454 615165 or the Police 999.
- Local Authority Designated Officer (LADO): Katie Williams LADO@bathnes.gov.uk; 01225 396810. Allegations or concerns about adults who work or volunteer with children should be referred through the current B&NES LADO process within one working day where the threshold is met or may be met.

2. Purpose, scope and legal framework

2.1 Purpose and scope

This policy sets out Prior Park College's arrangements for safeguarding and promoting the welfare of children under 18. It applies to Trustees, the Headmaster, all employees, supply and agency staff, contractors, volunteers and anyone working on behalf of the School. It applies to both day and boarding students, school premises, educational visits, transport and activities, online teaching, remote contact, alternative provision and other circumstances in which the School has safeguarding responsibilities.

2.2 Definition of safeguarding

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

2.3 Statutory and regulatory basis

- Keeping Children Safe in Education 2026 (KCSIE 2026), effective 1 September 2026.
- Working Together to Safeguard Children 2026.
- Working Together to Improve School Attendance, statutory guidance, updated July 2026.
- Children Missing Education statutory guidance and the School Attendance (Student Registration) (England) Regulations 2024.
- The Children Acts 1989 and 2004; Education Act 2002; Children and Social Work Act 2017.
- Education (Independent School Standards) Regulations 2014, including safeguarding, welfare, attendance and suitability requirements.
- National Minimum Standards for Boarding Schools, current edition 2026
- Prevent Duty Guidance: England and Wales 2023 and the Counter-Terrorism and Security Act 2015.
- Equality Act 2010 and Human Rights Act 1998.
- Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025, together with current safeguarding information-sharing guidance.
- Relationships Education, Relationships and Sex Education (RSE) and Health Education statutory guidance, revised for implementation from 1 September 2026.
- Mobile Phones in Schools statutory guidance, to be followed from 1 September 2026.

- Crime and Policing Act 2026
- Online Safety Act 2023
- Restrictive interventions, including use of reasonable force, in schools guidance.
- Relevant B&NES and South West safeguarding partnership procedures.

The School will have regard to the latest statutory guidance in force. Where this policy and later statutory guidance differ, the statutory requirement will take precedence, and the policy will be updated without delay.

2.4 Related policies

- Staff Code of Conduct
- Safer Recruitment
- Low-Level Concerns
- Child-on-Child Abuse
- Behaviour
- Anti-Bullying
- Registration and Attendance
- Children Missing / Missing Child Procedure
- E-Safety / Online Safety and Acceptable Use
- Mobile Phones
- First Aid and Medical suite of policies
- Artificial Intelligence (AI) policies
- Cyber Incident Response and IT Resilience
- Prevent Duty
- Raising a Concern at Work 'Whistleblowing'
- Mental Health and Wellbeing
- SEND
- RSE
- PSHE and FBV
- Educational Visits Policy and accompanying handbook
- Visitors and Contractors onsite
- Restrictive Interventions
- Health and Safety
- Taking, Using and Storing Student Images
- Social Media
- Boarding policies and procedures

3. Safeguarding principles and culture

- The welfare and best interests of the child are paramount.
- Staff maintain an attitude of 'it could happen here' and act with professional curiosity.
- Safeguarding concerns are considered in context, including risks in the home, school, peer group, community and online.
- Children may communicate distress through behaviour, attendance, presentation or indirect comments. Staff must not wait for a disclosure.

- Children may face barriers to reporting because of fear, shame, disability, language, dependency, sexual orientation, gender identity, culture, previous experiences or concern about consequences. Staff should build trusted relationships and make reporting routes accessible.
- Victims are never made to feel that they are creating a problem by reporting abuse, sexual violence or sexual harassment.
- Safeguarding practice is anti-discriminatory and inclusive. The School considers whether a child's protected characteristics or other circumstances increase vulnerability or create barriers to support.
- Concerns, decisions and actions are recorded promptly, clearly and securely.
- The School will maintain accessible and age-appropriate routes through which students can raise concerns, seek help and provide feedback about safeguarding, including access to trusted adults and pastoral staff. The child's wishes and feelings will be sought and, where appropriate, recorded when safeguarding decisions and referrals are made. A child's wishes will be taken seriously but will not prevent action necessary to protect that child or another child from harm.
- Safeguarding is supported through the College's pastoral systems, including tutors, Heads of House, boarding staff, counselling and wellbeing provision, the Health and Wellbeing Centre, SEND support and other trusted adults. Relevant pastoral and safeguarding information will be brought together so that apparently minor or separate concerns can be considered cumulatively and patterns of need, harm or vulnerability identified early.

4. Roles and responsibilities

4.1 All staff and adults working for the School must

- Read and understand Part One of KCSIE 2026 and the School safeguarding systems and policies relevant to their role. KCSIE 2026 removes the previous shorter Annex A route, so all staff are expected to read Part One.
- Complete safeguarding induction and required updates, including online safety, filtering and monitoring, Prevent, child-on-child abuse, attendance and the Staff Code of Conduct.
- Recognise indicators of abuse, neglect, exploitation, mental health concerns, radicalisation and other safeguarding risks.
- Report concerns immediately to the DSL or a DDSL and record them on the School's safeguarding system. Any member of staff may make a direct referral to children's social care where necessary.
- Know how to respond to a disclosure: listen, do not investigate, do not promise confidentiality, reassure appropriately, record the child's words and report promptly.
- Report allegations or concerns about adults in accordance with sections 13 and 14 of this policy, including low-level concerns.
- Understand that safeguarding includes attendance. Unexplained, repeated, persistent or severe absence may be a warning sign and must be considered alongside other welfare information.
- Support multi-agency work and share information lawfully and proportionately when required to safeguard a child.

4.2 Designated Safeguarding Lead

The DSL is a senior member of the leadership team with lead responsibility for safeguarding and child protection, including online safety and understanding the School's filtering and monitoring arrangements. Final lead responsibility remains with the DSL and is not delegated.

- Manage and quality-assure referrals to children's social care, the police, Channel/Prevent and other agencies.

- Provide advice, support and challenge to staff and maintain effective links with safeguarding partners.
- Maintain secure, accurate and up-to-date child protection records and ensure appropriate transfer when a child changes school.
- Promote educational outcomes for children who have or have had a social worker, and ensure safeguarding information informs support for attendance, engagement and achievement.
- Work with attendance, pastoral, SEND, boarding, mental health and online-safety leads so that information is joined up and patterns are identified early.
- Ensure staff induction, training and regular safeguarding updates are effective and understood.
- Ensure the policy is reviewed at least annually and after significant incidents, statutory changes or identified weaknesses.
- Report appropriately to the Headmaster, Nominated Safeguarding Trustee and Board while protecting confidential case information.
- The DSL or a DDSL should ordinarily be available to discuss safeguarding concerns during the school day, and appropriate arrangements will be in place for school activities outside normal hours. The absence or unavailability of the DSL/DDSL must never delay safeguarding action. Where necessary, staff must contact a member of SLT, children's social care, the police or emergency services directly and inform the DSL/DDSL as soon as practicable.

A fuller DSL role description is retained at Appendix 5.

4.3 Deputy DSLs

DDSLs are trained to the same standard as the DSL and carry out delegated safeguarding activity. They provide cover whenever the School is open and during relevant out-of-hours or holiday activity. Final lead responsibility remains with the DSL.

4.4 DSL availability and absence

During term time, the DSL or a suitably trained DDSL will always be available during School hours for staff to discuss safeguarding concerns. Ordinarily this will be in person, although in exceptional circumstances appropriate remote availability may be used.

The School will maintain robust cover arrangements for any period when the DSL is unavailable, including through illness, leave or other absence. These arrangements will ensure that:

- a trained DDSL has clear responsibility for operational safeguarding matters during the DSL's absence;
- staff know who is acting as the safeguarding lead and how to contact them;
- safeguarding reports, including those received electronically or through the School's safeguarding reporting systems, continue to be monitored and acted upon without delay;
- referrals, statutory notifications, allegations and other time-critical safeguarding matters are not delayed because of the DSL's absence;
- appropriate safeguarding cover is arranged for out-of-hours, residential, trip and out-of-term activities; and
- significant actions and decisions taken during the DSL's absence are appropriately recorded and handed over to the DSL on their return.

Where the DSL is absent for a prolonged period, the Headmaster will ensure that a suitably trained DDSL has sufficient time, authority, resources and access to information to undertake the necessary functions

of the DSL. Ultimate lead responsibility for safeguarding and child protection remains with the appointed DSL and is not delegated.

4.5 Headmaster

- Ensure this policy and the Trustees' safeguarding arrangements are implemented effectively.
- Provide the DSL team with sufficient time, authority, training, funding and resources.
- Ensure concerns about staff practice can be raised safely and are managed under the appropriate allegations, low-level concerns or whistleblowing procedure.
- Act as case manager for allegations against staff unless the allegation concerns the Headmaster.
- Ensure safer recruitment, attendance, online safety, curriculum safeguarding and risk-management arrangements are effective.

4.6 Board of Trustees and Nominated Safeguarding Trustee(s)

- Hold overall responsibility for ensuring safeguarding arrangements meet statutory and regulatory requirements and operate in the best interests of children.
- Ensure an effective safeguarding policy is published, reviewed at least annually and implemented in practice.
- Ensure appropriate safer recruitment and Single Central Register arrangements, staff and Trustee training, online filtering and monitoring, and arrangements for children to report concerns.
- Ensure safeguarding is considered strategically across attendance, boarding, SEND, mental health, behaviour, alternative provision, educational visits and use of premises.
- Receive appropriate assurance through audits, reports, visits and challenge, and ensure identified weaknesses are remedied without delay.
- The Nominated Safeguarding Trustee meets the DSL regularly, supports the annual safeguarding audit and reports assurance and concerns to the Board.
- Safeguarding and child protection will be a standing item at each routine meeting of the Board of Trustees and the discussion, and any actions will be minuted appropriately. Termly safeguarding assurance will include, in anonymised form, relevant trends in referrals and concerns; child-on-child abuse; allegations and low-level concerns; attendance and children missing education; alternative provision; boarding; online safety and filtering/monitoring; safer recruitment and SCR compliance; staff and Trustee training; multi-agency work; significant changes to statutory or local guidance; and progress against safeguarding audits and action plans.
- As part of safeguarding assurance, the Nominated Safeguarding Trustee will undertake appropriately documented visits which include discussion with the DSL and relevant senior staff and proportionate sampling or scrutiny of safeguarding systems, including the Single Central Register, training records and safeguarding record-keeping. Trustee oversight must test implementation and effectiveness rather than relying solely on confirmation that policies or systems exist.

Following a significant safeguarding incident, allegation, low-level concern pattern, referral or near miss, the DSL and relevant leaders will consider whether the case identifies learning for policy, practice, supervision, training, safer recruitment, risk assessment or safeguarding culture. Actions identified will be recorded, allocated, monitored to completion and, where appropriate, reported to Trustees and/or the LADO.

5. Training, induction and safeguarding awareness

All new staff, supply staff, trainee teachers, volunteers and Trustees receive safeguarding information appropriate to their role before or at the start of work. This includes the identity of the DSL team, this policy, the Staff Code of Conduct, behaviour arrangements, online safety and filtering/monitoring responsibilities, low-level concerns, whistleblowing, child-on-child abuse, attendance and the School's response to absence.

From 1 September 2026, all staff, including staff who do not work directly with children, must read and understand Part One of KCSIE 2026. The former condensed Annex A route has been removed. The School may additionally provide the DfE Part One overview as a quick-reference aid, but it does not replace reading Part One.

All staff receive safeguarding and child-protection training at induction and updates at least annually, with additional updates as needed. Training and updates include, as relevant to role:

- the four categories of abuse and the expanded KCSIE indicators of abuse, neglect and exploitation;
- child-on-child abuse, including harassment, violence, harmful sexual behaviour, serious physical harm and threats involving weapons;
- child criminal exploitation, child sexual exploitation, county lines, organised networks, modern slavery and the risk that exploited children may be criminalised for actions carried out under coercion;
- domestic abuse, including child-to-parent/caregiver abuse, stalking, coercive control and financial exploitation;
- mental health, including self-harm, eating disorders, suicidal ideation and suicide as potential safeguarding concerns;
- online safety, generative AI, deepfakes, nudification tools, nudes and semi-nudes, misogynistic content and influencers, filtering and monitoring, cyber security and information security;
- Prevent and susceptibility to radicalisation;
- attendance, children absent from education, children missing education and alternative provision;
- children with SEND, medical conditions, young carers and other additional vulnerabilities;
- children who are lesbian, gay or bisexual and children questioning their gender, including the School's decision-making and safeguarding arrangements where a request for support with social transition is made;
- safer working practice, allegations, transferable risk, low-level concerns and whistleblowing; and
- the School's mobile-phone-free arrangements and procedures for reporting breaches that create safeguarding concerns.

DSLs and DDSs complete role-specific training at least every two years, Prevent awareness training, and refresh their knowledge and skills regularly and at least annually. Training equips them to understand Family Help and statutory intervention, local thresholds and assessment protocols, information sharing, trauma and adversity, online risks, SEND vulnerabilities, mental health, educational outcomes, and the views and wishes of children.

The School will maintain evidence that required safeguarding reading, training and updates have been completed and understood. Staff will be required at least annually to confirm completion of mandatory safeguarding requirements, including required KCSIE reading, the Safeguarding and Child Protection Policy, Staff Code of Conduct and other role-relevant safeguarding procedures.

Failure to complete mandatory safeguarding requirements will be followed up promptly. If staff do not complete the required training following the any reminders, they may be asked to not come to work until they have completed the required training (it may also be that they are not paid during this time).

Trustees receive safeguarding training at induction and regular updates sufficient to enable effective oversight, including KCSIE 2026, filtering and monitoring, safer recruitment and regulated activity, allegations and low-level concerns, attendance, alternative provision, boarding and the effectiveness of safeguarding culture and practice.

6. Universal support, Family Help and multi-agency working

The School seeks to identify needs early and provide or coordinate support before problems escalate. Staff understand the distinction in KCSIE 2026 and Working Together 2026 between universal services and community-based early help, and targeted early help delivered through Family Help.

Where needs require coordinated targeted support, the DSL will consider a referral to Family Help in accordance with B&NES thresholds and procedures. Family Help brings together targeted early help and support under section 17 of the Children Act 1989 where appropriate, with the aim of providing a more seamless offer, consistent practitioner relationships and a family help plan led through multi-disciplinary working.

The child's voice, wishes, feelings, identity, relationships, culture, communication needs and lived experience must inform assessment and planning. Parents and carers should be engaged unless doing so would increase risk or otherwise be contrary to the child's welfare. Practitioners should recognise the impact that racism, discrimination and previous experiences of services may have on trust and engagement.

The School will contribute to Family Help assessments and plans, family group decision-making where appropriate, multi-agency meetings and reviews. Where another practitioner leads an assessment, the School will provide relevant safeguarding, attendance, educational, SEND, health and contextual information and will challenge respectfully where the plan is not protecting or helping the child effectively.

Family Help is not a lower standard of safeguarding. If risk increases, support is ineffective, new information indicates significant harm, or there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm, the DSL will consider referral to children's social care without delay. Existing Family Help plans must be linked to any statutory assessment or child-protection planning so that information and support are not fragmented.

The School works with B&NES and, where relevant, a child's home or placing authority, health, police, safeguarding partners and other agencies. It contributes to assessments, strategy discussions, child-protection conferences, core groups and plans, and permits appropriate access to children by children's social care. Staff should respectfully challenge or escalate where they believe a child is not receiving the help or protection required.

The School's multi-agency practice is inclusive, anti-racist and anti-discriminatory. Staff challenge racism and discrimination and remain alert to disproportionality in referrals, sanctions, attendance, exclusions, child-on-child incidents and access to support.

If the School disagrees with another agency's decision or believes risk has not been adequately addressed, the DSL will use the local escalation/resolution procedure and record the action taken.

7. Attendance as a safeguarding issue

Regular attendance is a safeguarding priority as well as an educational one. The School follows Working Together to Improve School Attendance and its Registration and Attendance Policy. Attendance information is considered alongside pastoral and safeguarding information so that changes and patterns are identified early.

- First-day and unexplained absence procedures must be robust, timely and capable of confirming a child's whereabouts and safety.
- Repeated, persistent or severe absence, absence for part of the day, unexplained changes in attendance, and failure to return when expected must trigger professional curiosity and appropriate pastoral/safeguarding review.
- Barriers to attendance should be understood through early, respectful engagement with the child and family. Support should be offered and coordinated with relevant services where needed.
- Where absence may indicate abuse, neglect, exploitation, criminal or sexual exploitation, domestic abuse, mental ill-health, radicalisation, forced marriage, FGM, trafficking or other harm, the DSL must consider safeguarding action and referral.
- Where absence is associated with wider difficulties, the school will seek to understand the barriers affecting the child's attendance and work collaboratively with the child, their parents or carers and relevant professionals.
- The school will consider appropriate support before or alongside formal attendance interventions. This may include pastoral support, reasonable adjustments, SEND provision, health support, community-based early help, Family Help or involvement from other agencies.
- Safeguarding concerns will always take precedence over attendance enforcement.
- Particular consideration will be given to children who are known to be vulnerable or whose circumstances mean that absence may present an increased safeguarding risk.
- The School distinguishes absence from education from children missing education (CME) and follows statutory and local procedures for both. Required notifications to the local authority are made promptly.
- The school recognises that children missing education may be at increased risk of abuse, neglect and exploitation.
- The school will follow statutory and local authority procedures when a child's whereabouts are unknown or where a child leaves the school without the destination school being confirmed.
- Safeguarding information will be transferred securely and promptly when a child moves to another education setting, in accordance with KCSIE and relevant statutory guidance.
- Where there are significant safeguarding concerns, the DSL will consider making direct contact with the DSL at the receiving setting to ensure that information necessary to safeguard the child is understood.
- Where a student is in alternative provision, the School remains responsible for safeguarding and monitors attendance and welfare at least at the frequency required by the placement and risk assessment. Changes in provision or staffing that may affect safety must be communicated to the School.
- Where the school places a child with an alternative provision provider, the school remains responsible for safeguarding the child and satisfying itself that appropriate safeguarding arrangements are in place.
- Before a placement in alternative provision begins, appropriate safeguarding and suitability checks will be completed in accordance with statutory guidance.

- The school will maintain appropriate communication with the alternative provision provider, monitor the child's attendance, welfare, progress and safety and respond promptly to concerns.
- Safeguarding information necessary to keep the child safe in alternative provision will be shared appropriately with the alternative provision provider.
- Absence from alternative provision will be followed up promptly and concerning or unexplained absence will be considered as a potential safeguarding matter.
- Before elective home education, especially where a child is vulnerable, the School will work with parents and the local authority to consider safeguarding and educational implications and share relevant information lawfully.
- The School holds at least two emergency contact numbers for each student where reasonably possible and keeps contact information under review.
- The School designates a member of the Senior Leadership Team as the Senior Attendance Champion, with overall responsibility for championing and improving attendance. The Senior Attendance Champion works closely with the DSL, pastoral leaders, SENCO, boarding staff and other relevant colleagues, recognizing that absence may be an indicator of safeguarding risk. **The Senior Attendance Champion for 2026 is DDSL Jill Bendry.**
- The Senior Attendance Champion provides strategic leadership of attendance; establishes and maintains effective systems for improving attendance and reducing absence; maintains a strong understanding of attendance and absence data with the DSL; monitors patterns and trends, including persistent and severe absence and attendance of vulnerable groups; evaluates the effectiveness of interventions; and ensures that students and families receive appropriate support to overcome barriers to attendance.
- Where attendance information indicates or contributes to a safeguarding concern, information must be shared promptly with the DSL/DDSL. Attendance intervention must not delay a safeguarding referral or other protective action.
- The Senior Attendance Champion works with the local authority and other agencies as required, including through attendance support arrangements, Family Help and multi-agency safeguarding processes.
- A reduced or part-time timetable will only be used in exceptional circumstances and in accordance with statutory guidance and local procedures.
- Any arrangement will be time-limited, regularly reviewed and have a clear plan for increasing the child's education towards full-time provision where appropriate.
- Before and during any reduced timetable, the school will consider the child's safeguarding, SEND, health and welfare needs and the arrangements in place to keep the child safe when they would ordinarily be attending school.
- The DSL and other relevant professionals will be involved where safeguarding concerns exist.

8. Recognising abuse, neglect and exploitation

Staff must be familiar with the four categories of abuse—physical abuse, emotional abuse, sexual abuse and neglect—and with specific safeguarding issues described in KCSIE and the appendices to this policy. Abuse can occur inside or outside the home, in school, in the community or online; it may be perpetrated by adults or children. Technology may be the setting for abuse or may facilitate offline harm.

Specific issues include child criminal and sexual exploitation, county lines, group-based and organised-network exploitation, domestic abuse, stalking, coercive control, child-to-parent/caregiver abuse, financial exploitation, serious violence, knife crime and threats involving weapons, child-on-child abuse

including harassment and violence, sexual violence and sexual harassment, harmful sexual behaviour, making or sharing nudes and semi-nudes, AI-generated or manipulated sexual imagery, deepfakes and nudification, online abuse, misogyny and harmful attitudes, modern slavery and trafficking, honour-, faith- or belief-based abuse including FGM and forced marriage, radicalisation, cybercrime, fabricated or induced illness, homelessness and temporary accommodation, private fostering, children with family members in prison, young carers, and children absent or missing from education.

Safeguarding issues frequently overlap. A child may experience multiple harms at the same time and may be both a victim of harm and display harmful behaviour. Staff must avoid labels that obscure vulnerability.

Child sexual abuse can be hidden and difficult to disclose. Most sexual abuse is committed by people known to the child, although it can also be committed or facilitated by an individual, group or organised network. Staff must remain professionally curious about behavioural, attendance, emotional, relational and online indicators and must not wait for a direct disclosure.

Child criminal or sexual exploitation may constitute modern slavery. Children may identify with, depend on or fear the group exploiting them, and may be criminalised for conduct carried out under coercion. Safeguarding and referral decisions must take account of exploitation and coercion.

The school recognises that exploitation can occur within families, peer groups, relationships, communities and organised networks and can take place both online and offline. Children may not recognise that they are being exploited and may appear to cooperate with or consent to situations which are harmful to them.

Staff will consider indicators including unexplained gifts or money, changes in behaviour, relationships with concerning individuals or groups, increased absence, going missing, disengagement from education, offending behaviour, substance misuse, unexplained injuries or increased secrecy around online activity. A child's apparent participation in offending or other concerning behaviour will not prevent the school from considering whether that child is being abused or exploited.

The school recognises that children may experience domestic abuse directly or indirectly and that domestic abuse can have a significant impact on children's safety, wellbeing, development and education. Domestic abuse may include physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse and psychological or emotional abuse. Staff will also be alert to abusive behaviour within children's and young people's intimate relationships.

Information received through arrangements such as Operation Encompass will be managed sensitively and used to provide appropriate support to the child.

Further information is retained in Appendices 1 and 2.

9. Listening to children and recording concerns

- Listen carefully and calmly; take the child seriously.
- Do not promise secrecy. Explain that information will be shared only with people who need to help keep them safe.
- Do not ask leading or investigative questions. Use only open prompts necessary to clarify what the child is saying.
- Do not confront an alleged perpetrator or undertake your own investigation.
- Record as soon as possible: date, time, place, who was present, the child's words as accurately as possible, observations, questions asked, actions taken and the name of the person informed.

- Report immediately to the DSL/DDSL using CPOMS or directly. Urgent action must not be delayed while completing a record.
- Where there is immediate danger or a serious crime, contact emergency services as required and inform the DSL as soon as practicable.
- The school recognises that racism, misogyny, sexism, homophobia, biphobia, transphobia, ableism and other forms of discriminatory behaviour can cause harm and may form part of wider safeguarding concerns.
- Staff will challenge discriminatory language, harassment and behaviour and will consider whether incidents indicate a wider safeguarding concern, including child-on-child abuse, exploitation, radicalisation or harmful attitudes and behaviours.
- The school will promote an inclusive and anti-discriminatory culture in which children feel able to raise concerns and are confident that they will be listened to.
- The school will ensure that safeguarding practice is child-centred.
- Staff will listen to children and take their wishes and feelings seriously. Children will be given opportunities to express their views in ways appropriate to their age, communication needs and understanding.
- Staff will not assume that a child will verbally disclose abuse. Changes in behaviour, presentation, attendance, relationships or engagement may communicate that something is wrong.
- Where a child has communication difficulties or additional needs, reasonable steps will be taken to enable their voice to be heard.
- Safeguarding information will be shared internally on a need-to-know basis. Staff who need information in order to safeguard, supervise or support a child will be given sufficient information to fulfil that responsibility, but no more than is necessary. It may be appropriate to tell staff that a child requires particular support, vigilance or adjustment without disclosing the underlying safeguarding detail. Recipients must understand the confidential and sensitive nature of the information.

10. Responding to concerns about a child

When a concern is reported, the DSL/DDSL considers the child's wishes and feelings, immediate safety, known history, attendance, siblings and other children, contextual and online factors, vulnerability, family circumstances, and local threshold guidance. The response may include school support, early help, referral to children's social care, police involvement, Prevent/Channel action, or another specialist service.

Anyone may make a referral directly to children's social care. Staff must not delay a referral because the DSL is unavailable. If a referral has been made and the child's situation does not improve, the referrer and DSL should follow up and, where necessary, escalate.

Parents are normally informed and involved unless doing so would place a child at increased risk, impede a police or social-care investigation, create undue delay, or otherwise be contrary to the child's welfare. Consent is not required to make a child-protection referral where there is a safeguarding basis to share information.

11. Female genital mutilation and mandatory reporting

Teachers must personally report to the police known cases of FGM in a girl under 18 where the statutory mandatory reporting duty applies, as soon as possible. Unless there is a good reason not to, the DSL

should also be informed so that wider safeguarding action can be considered. Concerns that a girl may be at risk of FGM are managed under normal safeguarding procedures.

12. Child-on-child abuse, sexual violence and sexual harassment

The School has a zero-tolerance approach to abuse, harassment and violence and does not dismiss harmful behaviour as ‘banter’, ‘just having a laugh’ or an inevitable part of growing up. Child-on-child abuse may include bullying, abuse in intimate relationships, serious harassment and violence, physical abuse, sexual violence, sexual harassment, consensual or non-consensual sharing of nude or semi-nude images, upskirting, initiation/hazing, exploitation and harmful online behaviour.

All reports are taken seriously. In response to allegations, the DSL completes an immediate risk assessment considering the victim, the alleged perpetrator(s), other children and staff, and the wider context. Support and safety planning are kept under review. Decisions about internal management, early help, children’s social care and police referral are made in line with KCSIE Part Five and BANES procedures. The School recognises that children who display harmful behaviour may themselves be vulnerable and may need safeguarding support.

Victims and alleged perpetrators are treated fairly and supported appropriately. The School avoids automatic separation measures that unnecessarily burden the victim, while taking proportionate steps to keep all children safe. Disciplinary action may run alongside safeguarding and criminal processes where appropriate.

13. Allegations and concerns about staff, the DSL, supply staff, trainee teachers, contractors and volunteers

13.1 Scope and harm threshold

This section applies to any person who works for or on behalf of the School, including staff, the Designated Safeguarding Lead (DSL), Deputy DSLs, supply and agency staff, trainee teachers, contractors and volunteers. It applies to concerns arising in school and to behaviour outside work where this may indicate that a person is unsuitable to work with children.

An allegation meets the harm threshold where it is alleged that a person 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 may pose a risk of harm to children; or
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

Staff are not expected to decide whether the threshold is met before reporting a concern. Concerns must be reported promptly and any doubt about the threshold should be resolved through the case-management process and, where appropriate, consultation with the LADO. A concern that does not meet the harm threshold must still be considered under the School’s low-level concerns procedure.

13.2 Immediate reporting and the role of the DSL

- An allegation or concern that may meet the harm threshold about a member of staff, supply or agency worker, trainee teacher, contractor or volunteer must be reported immediately to the Headmaster, who normally acts as case manager.

- An allegation about the DSL or a DDSL must be reported immediately to the Headmaster. The DSL/DDSL who is the subject of the allegation must not screen, manage or investigate that allegation.
- An allegation about the Headmaster must be reported directly to the Chair of Trustees, without first informing the Headmaster. The Chair acts as case manager.
- An allegation about a Trustee must be reported to the Chair of Trustees. If the allegation concerns the Chair, it must be reported to the Nominated Safeguarding Trustee.
- Where the Headmaster is unavailable, the School's formally identified alternative case-management arrangement will be used so that action is not delayed.

The DSL has an important safeguarding role in allegations cases but is distinct from the case manager. Unless the DSL is the subject of the allegation or there is another conflict of interest, the case manager will liaise with the DSL about the welfare and safeguarding needs of the child and any other children who may be affected. The DSL will ensure that any necessary referral to children's social care, police, Prevent/Channel or another safeguarding agency is made without delay and may liaise with the case manager and LADO as required. The DSL will not undertake a substantive investigation into the adult allegation unless this is agreed through the case-management process.

13.3 Referral to and consultation with the LADO

The Local Authority Designated Officer (LADO) provides oversight, advice and guidance in the management of allegations against people who work with children. The School will follow the current B&NES LADO procedure and relevant local safeguarding partnership procedures.

- The case manager will make only such basic enquiries as are necessary to establish the facts and whether there may be any foundation to the allegation. Nothing will be done at this stage that could jeopardise a police, children's social care or other statutory investigation.
- Where the harm threshold is met, or may be met, the case manager will refer to the LADO without delay and within one working day.
- Where the case manager is unsure whether the harm threshold is met, the LADO process will be used to obtain advice. A concern will not be categorised as low-level simply to avoid LADO consideration.
- No substantive internal investigation will begin before the initial LADO discussion unless immediate action is necessary to protect a child or preserve evidence. Any such action will be proportionate and recorded.
- The case manager will record the referral or consultation, information provided, advice received, decisions, reasons and agreed next steps.
- Suspension following an allegation is not automatic and is not a disciplinary sanction. The case manager will consider, with the LADO where appropriate, whether the circumstances require suspension or whether an alternative arrangement can safely manage risk while enquiries proceed. Any decision will have regard to the welfare of children, the integrity of the investigation and the need for a proportionate response.
- The case manager will maintain a clear contemporaneous record of decisions and actions taken in response to an allegation, including consultation with the LADO or other agencies, interim risk-management decisions, information provided to relevant parties and the reasons for key decisions. Records will be retained and shared in accordance with KCSIE 2026, data-protection requirements and the School's retention schedule.

13.4 Safeguarding the child and other children

The LADO process does not replace the School's duty to safeguard children. Where there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, the DSL or DDSL will ensure that a referral is made to children's social care without delay. Where a crime may have been committed or there is immediate danger, the police will be contacted as required.

The case manager and DSL will consider the safety, welfare and support needs of the child, siblings, other students and any other children who may be affected, including children in the adult's family or community. Appropriate risk assessments, support and information-sharing arrangements will be put in place and reviewed.

13.5 Initial LADO discussion and case management

- The case manager and LADO will consider the nature, content and context of the allegation and agree the appropriate course of action, including whether police or children's social care involvement is required.
- The case manager will follow LADO and statutory-agency advice about informing the person who is the subject of the allegation, parents/carers, the child, an employing agency or contractor and other relevant parties.
- Suspension is not an automatic response. The case manager will consider whether there is cause to suspect a child is at risk of harm, whether the allegation may be grounds for dismissal, or whether suspension is necessary to allow an investigation to proceed. Alternatives to suspension will be considered where safe and appropriate.
- The LADO oversees and advises on the management of the allegation; the LADO does not ordinarily conduct the employer's investigation. Where further enquiries are required, the case manager will agree with the LADO how and by whom they should be undertaken. Where independence is required, the School will secure an appropriately independent investigator.
- Cases will be progressed as quickly as possible through a thorough and fair process, with review arrangements agreed with the LADO.
- The school/LADO considers not just patterns concerning one adult, but patterns involving departments, locations, activities, times of day, supervision arrangements or accepted staff culture.

13.6 Supply staff, trainee teachers, contractors, volunteers and use of premises

The School retains safeguarding responsibility where an allegation concerns a supply teacher, agency worker, trainee teacher, contractor or volunteer. It will work with the person's employer, agency, training provider or contracting organisation and the LADO. The School will not simply cease to use the person's services without considering the allegation and ensuring that the appropriate safeguarding process is completed.

Where an allegation relates to an individual or organisation using School premises for activities involving children, the School will follow its safeguarding procedures and make the appropriate LADO referral where the harm threshold is met or may be met.

13.7 Outcomes, referrals, records and learning

- Outcomes and records will be managed in accordance with current statutory guidance, LADO advice, data-protection requirements and the School's employment procedures.
- Where the statutory criteria are met, the School will make a referral to the Disclosure and Barring Service. A referral to the Teaching Regulation Agency will also be considered where applicable.

- References will contain safeguarding information where required by statutory guidance. Allegations that are unfounded, false, malicious or unsubstantiated will not be included in references.
- Non-recent allegations will be managed in accordance with current statutory and local procedures.
- The case manager, DSL and LADO, as appropriate, will consider lessons learned, including whether changes are required to safeguarding practice, safer working arrangements, supervision, training, recruitment, policies or procedures. Any identified weakness will be remedied without delay.

14. Low-level concerns and safer working culture

A low-level concern is any concern—however small—that an adult may have acted in a way inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work, but which does not meet the harm threshold. Low-level does not mean insignificant.

- Staff should share low-level concerns promptly in accordance with the School's Low-Level Concerns Policy. Self-referral is encouraged where a member of staff believes their own conduct could be misinterpreted.
- The Headmaster/DSL determines whether the harm threshold may be met and seeks LADO advice where there is doubt.
- Concerns are recorded in writing, including context, action and outcome, and stored securely with access restricted appropriately.
- Records are reviewed for patterns, cultural issues, training needs or concerns about individuals. Where a pattern emerges, the School considers whether the matter now meets the harm threshold or requires disciplinary/capability action.
- Relevant low-level concerns about supply staff or contractors are shared with their employer.

15. Online safety, artificial intelligence, filtering, monitoring and information security

Online safety is integral to safeguarding. The School's approach addresses content, contact, conduct and commerce risks and reflects the fact that online and offline risks overlap. Online safety is reflected in this child protection policy and in related acceptable-use, mobile-phone, information-security and curriculum arrangements.

15.1 Generative artificial intelligence

The School recognises the educational benefits of generative AI while managing safeguarding, ethical, data-protection, intellectual-property and information-security risks. Staff and students must use AI only in accordance with School policy and approved systems.

Safeguarding risks include grooming or harmful contact facilitated by AI, misleading or harmful content, impersonation, deepfakes, nudification tools, AI-generated sexual imagery, bullying, coercion, scams, extremist or misogynistic material, disclosure of personal or confidential information and attempts to circumvent filtering or monitoring.

All incidents involving the making or sharing of nude or semi-nude images require a safeguarding response, whether consensual or non-consensual and whether the image is real, altered or wholly AI-generated. Staff must not view, copy, forward or store such imagery except where specifically permitted by safeguarding guidance and the DSL's direction.

The school recognises that safeguarding risks can occur online as well as offline and that technology may facilitate abuse, harassment, exploitation and other forms of harm. The school recognises the developing safeguarding risks associated with generative artificial intelligence and other emerging technologies. Staff and students will be made aware that images, videos, audio and other content may be digitally altered or wholly generated using artificial intelligence.

The creation or sharing of sexualised or nude/semi-nude imagery involving children, including AI-generated or manipulated imagery such as deepfakes or "deep nudes", will be treated as a safeguarding concern and managed in accordance with the school's safeguarding procedures and relevant statutory guidance.

The school will provide age-appropriate education about safe, responsible and ethical use of technology, including generative AI through the pastoral and PSHE program.

15.2 Filtering and monitoring

The Board assigns a named member of the Senior Leadership Team operational responsibility for filtering and monitoring. The DSL has lead safeguarding responsibility and works with the responsible SLT member and IT support/provider.

The School will:

- maintain filtering and monitoring systems appropriate to the age range, needs and risk profile of students, including boarders and children at greater risk of harm;
- identify clearly who manages filtering, who reviews monitoring alerts, who may change settings and who escalates safeguarding concerns;
- carry out a documented review of the effectiveness of filtering and monitoring at least once in every academic year and after significant system changes, incidents or identified weaknesses;
- ensure the annual review is led by the responsible SLT member with support from the DSL and IT support/provider;
- test and record that filtering is operating appropriately on all internet-connected School devices and networks in all relevant locations, including boarding areas and any other sites where School-managed connectivity is provided;
- ensure relevant leaders and staff understand what the systems do, their limitations, how alerts are reviewed and how concerns are escalated;
- block harmful and inappropriate content without unreasonable over-blocking that impedes teaching, learning or safeguarding;
- maintain effective monitoring strategies proportionate to safeguarding need; and
- consider the DfE filtering and monitoring standards and relevant Prevent risk assessment when reviewing provision.

Filtering and monitoring requirements apply to the use of generative AI in education.

15.3 Information security and access management

The School maintains proportionate cyber-security, information-security and access-management arrangements to reduce disruption, prevent unauthorised access and data breaches and mitigate safeguarding risks. Access to safeguarding and other sensitive systems is role-based and reviewed appropriately. Staff must report suspected account compromise, unauthorised access, malicious software, cybercrime or data loss promptly.

15.4 Annual online-safety review

Technology and related risks evolve rapidly. The School will review its whole-school approach to online safety at least annually, supported by a risk assessment reflecting the risks faced by its students. Findings, actions and follow-up will be recorded and reported through safeguarding governance arrangements.

15.5 Mobile phones and smart devices

The School follows the statutory Mobile Phones in Schools guidance. The School is a mobile-phone-free environment by default throughout the school day, including lessons, transitions, breaktimes and lunchtime, subject only to clearly defined exceptions such as reasonable adjustments, medical needs, safeguarding requirements or other exceptional circumstances approved under the Mobile Devices Policy.

Boarding arrangements have separate, proportionate rules outside the school day. Those rules protect students' welfare, sleep, privacy and online safety and are consistent with the Boarding, Acceptable Use and Mobile Phone policies.

Any phone or smart-device use connected with bullying, sexual imagery, harassment, filming without consent, exploitation, criminality, radicalisation or another safeguarding concern must be reported to the DSL/DDSL.

16. Prevent duty and radicalisation

The School has due regard to the need to prevent people from being drawn into terrorism. It assesses local and contextual risk, trains staff to recognise susceptibility to radicalisation, works in partnership with the local authority and safeguarding partners, and maintains appropriate online filtering and monitoring. Concerns are reported to the DSL, who considers referral through local Prevent/Channel arrangements and, where necessary, children's social care or police. The DSL holds and amends a Prevent Risk Assessment annually.

17. Children with additional vulnerabilities

Safeguarding arrangements are adapted where children may face additional risks or barriers to recognition and reporting. This includes children with SEND or health conditions, children with mental health needs, looked-after and previously looked-after children, children who have or have had a social worker, young carers, children in kinship care, privately fostered children, children affected by domestic abuse or parental offending, children in alternative provision, children who are absent or missing from education, children in temporary accommodation, children who are lesbian, gay or bisexual, children questioning their gender, and boarders.

17.1 SEND and communication needs

Staff must avoid assumptions that indicators of abuse are explained by disability, behaviour, diagnosis or medical condition. Additional barriers may include peer isolation or prejudice-based bullying, disproportionate impact of bullying without outward signs, communication difficulties, limited understanding that conduct is abusive, dependence on adults for care, intimate-care needs, isolation and difficulty distinguishing fact from fiction online.

Reports involving children with SEND require close liaison between the DSL/DDSL and SENCO. Appropriate communication support, reasonable adjustments and additional pastoral support will be put in place.

17.2 Medical conditions and allergies

An incident concerning management of a medical condition or allergy is not automatically a safeguarding referral. However, the DSL must consider safeguarding action where the incident suggests increased risk of neglect, abuse or exploitation, including repeated failure to provide essential medication or necessary medical information in a way that places the child at risk.

17.3 Young carers

The School actively considers whether a child may be providing significant or inappropriate care for a family member. Staff should be alert to fatigue, lateness, absence, anxiety, isolation, reduced attainment or reluctance to participate in activities. The DSL/pastoral team will consider appropriate assessment, Family Help, local young-carer support and reasonable educational adjustments.

17.4 Lesbian, gay and bisexual children

Being lesbian, gay or bisexual is not itself a safeguarding risk. Children who are, or are perceived to be, lesbian, gay or bisexual may be vulnerable to discriminatory bullying or harassment. The School takes proactive steps to prevent and respond to such behaviour.

17.5 Children questioning their gender and requests relating to social transition

The school recognises that children who are questioning their gender may require sensitive and thoughtful support. In accordance with Department for Education (DfE) guidance and Keeping Children Safe in Education 2026, the school will ensure that the child's safety, welfare and best interests are at the centre of its response.

The school will not initiate or suggest social transition. Where a child or their parent or carer makes a request relating to social transition, including a request concerning a change of name, pronouns or uniform, the school will take time to understand the individual circumstances of the child and will not automatically agree to, or reject, the request.

Staff will listen carefully to the child's wishes and feelings and seek to understand the wider circumstances surrounding the request. This will include, where relevant, consideration of the child's age and developmental stage; mental health and psychosocial needs; SEND or other additional needs; family and peer relationships; any clinical advice available; the influence of peers, social media or other external factors; and whether the child is experiencing bullying, discrimination, abuse, exploitation or any other safeguarding concern.

The school recognises that gender non-conforming interests, appearance or behaviour do not in themselves mean that a child is questioning their gender. School policies and practice will, therefore, seek to avoid unnecessarily rigid gender stereotypes and enable children to participate in school life without assumptions being made about their gender identity because of their interests, clothing, appearance or behaviour.

In line with DfE guidance, parents and carers should be actively involved in decisions concerning their child and their views will be treated as important. Where a child raises a request without the knowledge of their parents or carers, staff will encourage the child to discuss the matter with them. The school will normally involve parents or carers unless there is a safeguarding reason to believe that doing so would place the child at risk of significant harm. Any such concern will be discussed with the Designated Safeguarding Lead and managed through the school's safeguarding procedures.

Social transition is recognised as an active intervention, and the school will therefore take a careful, individual and evidence-informed approach to any request. No individual member of staff should

independently make or implement changes relating to social transition. Any agreed arrangements will follow the school's established decision-making process, involve appropriate senior leaders and parents or carers, and take account of relevant safeguarding duties, DfE guidance and the school's obligations under the Equality Act 2010 and Human Rights Act 1998.

Where appropriate clinical advice is available for an individual child, the school will take this into consideration. Particular caution will be exercised in relation to requests concerning pre-pubertal children.

Any arrangements agreed with a child and their parents or carers will be kept under review. The school will continue to consider the child's wellbeing, safeguarding needs and wider circumstances and will respond appropriately if those circumstances change.

The school will protect children who are questioning their gender from bullying, harassment and discrimination. Bullying or discriminatory behaviour will not be tolerated and will be addressed in accordance with the school's behaviour, anti-bullying and safeguarding procedures. At the same time, the school will respect the lawful rights and beliefs of other members of the school community and will seek to maintain a respectful environment for all.

Requests concerning single-sex toilets, changing facilities, accommodation, PE or sport will be considered in accordance with the specific provisions of Keeping Children Safe in Education 2026, relevant DfE guidance and the school's legal obligations. Safeguarding, privacy, dignity and the safety and rights of all children will be considered when arrangements are made.

Information about a child who is questioning their gender will be handled sensitively and shared only where appropriate and in accordance with safeguarding and data protection requirements. Safeguarding concerns will be recorded and referred to the Designated Safeguarding Lead in accordance with the school's usual safeguarding procedures.

18. Mental health and safeguarding

The School has an important role in promoting mental wellbeing, preventing the onset or escalation of mental ill-health, identifying emerging difficulties, providing early targeted support and liaising with or referring to specialist services.

Mental health difficulties can develop into safeguarding concerns and can also indicate that a child has suffered or is at risk of abuse, neglect or exploitation. Staff should be alert to self-harm, signs of an eating disorder, suicidal ideation or suicide risk as well as changes in behaviour, presentation, attendance, eating, sleep, relationships or engagement.

Staff do not diagnose mental health conditions. Where safeguarding concerns are linked to mental health, they must be reported to the DSL/DDSL. The DSL liaises with pastoral staff, the mental health lead, school health services and, where available, the Mental Health Support Team and external services.

Where support is needed, the DSL/DDSL considers whether parents or carers should be informed to support the child's wellbeing, unless doing so would place the child at additional risk. Mental health support must never be used as a substitute for a safeguarding referral where statutory thresholds are met.

19. Boarding and residential safeguarding

The School recognises the additional safeguarding responsibilities arising from residential care and complies with KCSIE 2026 and the current National Minimum Standards for Boarding Schools. Boarding

staff receive the same core safeguarding training as other staff plus boarding-specific training, supervision and guidance.

- Boarders have access to trusted adults, the DSL team, pastoral and health support and an independent listener, and know how to raise concerns privately.
- Child-on-child abuse, harmful sexual behaviour, relationships, consent, boundaries, online safety, misogyny and discrimination are addressed proactively in boarding.
- Safeguarding arrangements cover evenings, nights, weekends, holidays, trips and any period when the School is responsible for accommodated children.
- Visitors, overnight guests, household members, contractors and other adults in or near boarding accommodation are managed through clear access, supervision, suitability and reporting arrangements.
- Adults aged 16 or over living in boarding accommodation who are not students or employees are subject to the checks and safeguarding arrangements required by the current National Minimum Standards and School policy.
- Boarding staff report any change in circumstances that may affect their own or a household member's suitability to have contact with children.
- Boarders' access to staff residential accommodation and shared/public spaces is managed safely and consistently with the current National Minimum Standards.
- Boarding accommodation, toilets, washing and changing arrangements preserve students' safety, privacy and dignity and comply with the applicable requirements for sex-separated accommodation and facilities.
- Mobile-phone and personal-device arrangements outside the school day are proportionate, clearly communicated and risk assessed, including arrangements for sleep, online contact, image sharing and filtering/monitoring on School-managed networks.

Where students are hosted by families, educational guardians, partner schools or other accommodation providers in connection with a School-arranged visit, exchange or activity, the School will consider the safeguarding suitability of the arrangements in advance. Appropriate assurances, risk assessments and checks will be obtained in accordance with KCSIE 2026, the Boarding NMS and applicable law. The DSL will have oversight of safeguarding concerns arising from such arrangements and students will be told how to seek help while away from School.

Visiting students staying in School accommodation are treated as temporary boarders where the School or its staff are responsible for their care, and safeguarding arrangements are applied accordingly.

Where the School arranges or facilitates accommodation for visiting children, safeguarding expectations will be agreed with the visiting school or organisation before the placement. Relevant information about individual safeguarding, medical, SEND or welfare needs will be shared lawfully with those who need it, and clear arrangements will be established for reporting concerns during the stay.

Relevant safeguarding and welfare information concerning boarders must be communicated securely between pastoral, boarding and safeguarding staff at appropriate handovers so that changes in behaviour, presentation, relationships, attendance or online activity are considered cumulatively.

20. Safer recruitment, regulated activity, visitors, contractors and use of premises

The School follows KCSIE 2026 Part Three and its Safer Recruitment Policy. Required checks are completed and recorded on the Single Central Register. Recruitment decisions consider suitability,

identity, references, qualifications where required, right to work, criminal-record and barred-list information, prohibition checks, section 128 directions where applicable, overseas information, online searches where appropriate and all other checks required by law or statutory guidance. At least one member of every recruitment panel must have completed appropriate safer-recruitment training. Recruitment documentation will identify the trained panel member and evidence that safeguarding and suitability have been considered throughout shortlisting, interview, checks and appointment.

20.1 Regulated activity and volunteers

KCSIE 2026 reflects the Crime and Policing Act 2026 removal of the previous supervision exemption from regulated activity. The School will not rely on supervised status as an exemption where the statutory definition now places the activity within regulated activity.

A volunteer in a school role involving teaching, training, instructing or supervising children on more than three days in a 30-day period, or overnight, is treated as engaging in regulated activity in accordance with the 2026 legal framework. The School completes the level of DBS and barred-list check required by law for volunteers in regulated activity and undertakes proportionate risk assessment and checks for other volunteers.

The School's Safer Recruitment Policy and SCR procedures must be read with the current KCSIE 2026 regulated-activity provisions; any legacy procedure referring to the former "supervision exemption" must not be used.

The duty to make a DBS referral where statutory criteria are met applies to volunteers as well as employees and other persons in regulated activity.

20.2 Supply staff, trainee teachers and contracted staff

The School shares safeguarding responsibility with agencies, training providers and contractors. It obtains required assurances and does not assume that a third party has completed appropriate checks without evidence. Concerns and allegations are managed under section 13, including specific liaison with the relevant employer or training provider.

20.3 Visitors and self-employed persons

Visitors are categorised and managed according to the purpose of the visit, level of access to children and whether they are supervised. Self-employed persons are checked at the level for which they are legally eligible and required, according to the nature of the activity.

Where a visitor or external speaker will have significant interaction with students, or if required, the School will undertake a proportionate safeguarding and Prevent risk assessment. This will consider the purpose and content of the visit, access to children, supervision, relevant background information and any risk that the activity could expose students to harmful, extremist or otherwise inappropriate material.

20.4 Work experience and homestay

Work-experience supervision and homestay arrangements are managed in accordance with the revised KCSIE 2026 regulated-activity provisions. Where the School arranges accommodation for a student with a host family, required suitability checks and safeguarding arrangements are completed before placement and kept under review.

20.5 Use of School premises by other organisations

Where School premises are hired or rented to another organisation or individual for activities involving children, the School seeks and records assurance that the provider has appropriate safeguarding and

child-protection policies and procedures, inspects or tests those arrangements where appropriate, and ensures there is a route for safeguarding liaison with the School.

Safeguarding requirements form a condition of any transfer-of-control, hire or letting agreement. Failure to comply may result in termination of the arrangement. Where the activity is directly supervised or managed by School staff, the School's own safeguarding arrangements apply.

21. Information sharing, confidentiality and records

Safeguarding information is only shared, when necessary, proportionate, relevant, adequate, accurate, timely and secure. Data-protection law does not prevent information sharing for safeguarding. The School applies the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 alongside current safeguarding information-sharing guidance.

Staff should not assume that consent is always required. Where there is a lawful safeguarding basis to share information, concerns about data protection must not delay action. Before sharing, staff should consider the purpose, necessity, proportionality, accuracy, recipient, security and potential risks of sharing or not sharing. The rationale should be recorded where significant decisions are made.

- Child-protection records are separate from the main student file, confidential, secure, chronologically clear and accessible only to those who need them.
- Records distinguish clearly between observed fact, the child's words, professional opinion and historic information.
- Records include a clear summary of the concern, follow-up, decisions, reasons, actions and outcomes, including why a referral was or was not made.
- When a child transfers school, the DSL ensures the child-protection file is transferred securely as soon as possible, within five days for an in-year transfer or within the first five days of a new term, with confirmation of receipt.
- The transferred file includes a clear structured summary of current safeguarding concerns, relevant context and ongoing support needs. Historic information is presented with appropriate context so that it does not obscure current risk.
- The receiving School ensures safeguarding information is reviewed by an appropriately trained person and seeks clarification where information is unclear or incomplete. Information is used to support, not disadvantage, the child.
- The DSL considers whether key information should be shared with the receiving school in advance, including where this is needed to manage serious violence, harmful behaviour, Channel support or another risk to the child or others.
- Records relating to allegations and low-level concerns are retained and disclosed in accordance with KCSIE, employment law, data-protection requirements and School policy.
- No member of staff should assume that another colleague or professional has shared, or will share, information necessary to safeguard a child. Where information may be relevant to a child's safety or welfare, staff must ensure that it reaches the DSL/DDSL or other appropriate agency. Data protection law must not be used as a reason to delay or prevent necessary safeguarding information sharing.
- When a child leaves the School, the DSL will ensure that the child-protection file is transferred securely and separately from the main student file to the receiving school or college as soon as possible and within the timescale required by current KCSIE. Confirmation of receipt will be

obtained. Where the destination is unknown, the School will follow its Children Missing Education procedures and make the required enquiries and notifications without delay.

- For students joining the School, appropriate enquiries will be made of the previous school or education setting to obtain any safeguarding or child-protection information required for continuity of protection and support. The DSL will follow up where expected safeguarding information has not been received.

22. Whistleblowing, complaints and safeguarding concerns about practice

All staff must raise concerns about unsafe safeguarding practice, failures to act, or wrongdoing. Concerns should normally be raised with the Headmaster or senior leader under the Raising a Concern at Work 'Whistleblowing' Policy. Where a member of staff cannot raise a concern internally, or believes it has not been addressed, they may contact the Chair of Trustees or use an appropriate external whistleblowing route. No person should suffer detriment for raising a genuine concern in good faith.

23. Curriculum, student voice and prevention

The School teaches children how to recognise risk, seek help, form healthy relationships and stay safe online and offline through PSHE/RSE, computing, assemblies, tutor/pastoral work and other curriculum opportunities. From 1 September 2026 the programme reflects the revised statutory RSE/Health Education guidance as applicable to independent schools.

Preventative education is delivered through a whole-school culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence and harassment, derogatory behaviour and other forms of physical violence and conflict.

Age- and stage-appropriate teaching includes healthy and respectful relationships; boundaries, consent and kindness; stereotyping, prejudice and equality; body confidence and self-esteem; recognising abusive relationships including coercive and controlling behaviour; sexual harassment and sexual violence; online image sharing; deepfakes and AI-generated sexual imagery; pornography; misogynistic influencers; online scams and manipulation; and when and how to seek help.

Student voice, complaints routes, pastoral systems and boarding arrangements provide multiple, accessible ways for children to raise concerns. Reporting systems are well promoted, and children are reassured that concerns will be treated seriously and that they can safely express their views and give feedback.

24. Serious violence, weapons and knife crime

All staff must be alert to indicators of serious violence, including increased absence, changes in friendships or relationships, decline in performance, signs of self-harm or significant change in wellbeing, unexplained injuries, unexplained gifts or possessions, association with groups or networks, and concerns about exploitation.

Any concern that a student is carrying, has used, has threatened to use, or intends to use a knife, weapon or other object to cause serious harm must be reported immediately to the DSL/DDSL. Staff must not delay reporting while attempting to establish certainty.

The DSL will assess immediate safety, risk to the child and others, possible exploitation or coercion, known peer or community factors and the need for police, children's social care, Family Help or other

specialist involvement. The School will share information lawfully and promptly where necessary to prevent serious violence and will record the rationale for decisions.

25. Domestic abuse and Operation Encompass

The School recognises that domestic abuse can include physical, sexual, emotional and psychological abuse, stalking, coercive or controlling behaviour and financial or economic abuse. Children may experience domestic abuse directly, witness it, hear it, experience its effects or use harmful behaviour towards a parent or caregiver.

Where the School receives an Operation Encompass or equivalent police notification, the DSL/DDSL will ensure that information is handled securely, appropriate support is considered before the child begins the school day where possible, and the notification is considered alongside other safeguarding information. The School follows current B&NES and police arrangements.

26. Sport, PE, toilets, changing rooms and showers

The School applies KCSIE 2026, equality law and the Independent School Standards when organising sport and safeguarding facilities.

Where safety or fairness requires a sport to be single-sex, participation arrangements will be based on biological sex in accordance with the relevant legal exception and guidance from the sport's national governing body. Where there is no safety concern and a student requests different participation arrangements, the request will be considered under the School's social-transition decision-making process, taking account of the child's best interests, other students and safe and fair participation.

The School maintains legally required separate toilet provision for boys and girls aged eight and over, except for lawful self-contained single-user facilities. Students are not permitted to use toilets designated for the opposite biological sex. Where a student does not wish to use facilities designated for their biological sex, the School will consider an appropriate self-contained alternative that protects privacy, dignity and safety without compromising required single-sex provision.

Changing and showering arrangements are managed to preserve privacy, dignity and safety and to comply with applicable premises and safeguarding requirements. Individual arrangements are documented, communicated only to those who need to know and reviewed regularly.

27. Restrictive interventions and reasonable force

The School does not operate a "no contact" policy. Appropriate physical contact may be necessary to support and protect students. Any use of reasonable force must be in line with statutory guidance and "using no more force than is necessary **for the least amount of time**".

Staff must give particular consideration to the additional vulnerability of students with SEND, mental health needs or medical conditions and to duties to make reasonable adjustments. Positive and proactive behaviour support, individual plans and engagement with parents/carers should be used to reduce the likelihood that restrictive intervention will be required.

Any incident raising a safeguarding concern must be reported to the DSL and managed under safeguarding procedures as well as the School's restrictive-intervention arrangements.

28. Alternative provision

Where the School commissions alternative provision, responsibility for safeguarding the student remains with the School.

Before placement, the School undertakes and records due diligence to establish that the provision is suitable for the student's individual needs and that appropriate safeguarding arrangements and checks are in place. The School obtains written confirmation that required safeguarding checks have been completed on staff and that the provider will notify the School of staffing or other changes that could affect safety.

The School will always know where the student is based during school hours, including the address of the provider and any subcontracted or satellite site.

Placements are reviewed at least half-termly, and more frequently where risk requires, to confirm attendance, welfare, safety, educational suitability and continuing appropriateness. A safeguarding concern triggers immediate review and, where necessary, suspension or termination of the placement until concerns are satisfactorily addressed.

The School remains responsible for its own safeguarding assurance even where a provider appears on a local-authority list or register.

29. Temporary accommodation, homelessness and contextual safeguarding

The School is alert to safeguarding risks arising from homelessness, emergency or temporary accommodation, including instability, overcrowding, unsafe adults or environments, exploitation, disrupted attendance and loss of access to support.

The DSL will act on relevant notifications from statutory partners, share information lawfully and consider the child's safety in the home, peer group, community and online. Where a child moves address or accommodation, safeguarding and attendance information will be reviewed promptly and relevant support adjusted.

30. Safeguarding governance and inspection readiness

Trustees and leaders evaluate not only whether policies exist but whether safeguarding arrangements are effective in practice. Assurance includes student voice, staff knowledge, case-file quality, referral timeliness, attendance, alternative provision, safer recruitment and SCR compliance, allegations and low-level concerns, boarding, filtering and monitoring, online safety, mobile-phone implementation, training, premises and lettings, and multi-agency working.

The School will maintain evidence of annual and termly safeguarding assurance, actions arising from audits or incidents, and timely remediation of any weakness. Safeguarding practice will be evaluated against the Independent School Standards, applicable ISI inspection framework and the Boarding NMS as well as statutory guidance.

31. Monitoring, quality assurance and review

- The DSL monitors safeguarding practice day to day and reports regularly to senior leadership.
- The DSL and DDSL team meet once a fortnight to review cases, themes, practice and emerging risks.

- The Nominated Safeguarding Trustee(s) and Head of Compliance meets the DSL at least termly and supports an annual safeguarding audit. The Nominated Safeguarding Trustee(s), Head of Compliance, Head of HR and the three schools' DSLs meet termly to conduct a Safeguarding Committee meeting.
- Trustees receive sufficient information to assure themselves that policy and practice are effective, including attendance, online safety/filtering and monitoring, safer recruitment, training, allegations/low-level concerns, child-on-child abuse, boarding and multi-agency working.
- Safeguarding incidents and near misses are reviewed for learning. Any weakness or deficiency is remedied without delay.
- The policy is reviewed at least annually and whenever statutory guidance, local procedures or School arrangements change.
- A documented filtering and monitoring effectiveness review is completed at least once each academic year by the responsible SLT member with the DSL and IT support/provider.
- The School completes an annual online-safety risk assessment and review.
- Alternative provision is quality-assured and reviewed at least half-termly for each placement.
- The Board receives assurance that KCSIE 2026 safer-recruitment changes, including the removal of the former volunteer supervision exemption, are embedded in recruitment and SCR practice.
- Decisions relating to social transition, facilities and sport are documented and reviewed where circumstances change.
- The School reviews safeguarding arrangements for lettings, premises use, boarding, homestay/lodgings and temporary accommodation notifications where applicable.

Appendix 1. Specific safeguarding issues: staff reference

Staff must report concerns rather than attempt to diagnose or investigate. The following indicators and issues are not exhaustive and often overlap.

A1.1 Child-on-child abuse, harassment and violence

Child-on-child abuse is a safeguarding issue for the child experiencing harm and for the child alleged to have caused harm. It is preventable and must never be normalised as banter or an inevitable part of growing up. It can include bullying, cyberbullying, prejudice-based abuse, physical assault, abuse in intimate relationships, sexual violence, sexual harassment, harmful sexual behaviour, coercion, initiation/hazing, exploitation, upskirting, threats involving weapons and making or sharing nudes or semi-nudes.

A1.2 Nudes, semi-nudes, deepfakes and AI-generated sexual imagery

All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, whether consensual or non-consensual. This includes real images, altered images, deepfakes, nudification and wholly AI-generated imagery. Staff should secure immediate safety, report to the DSL and follow UKCIS guidance. Staff must not routinely view, copy, print, forward or save imagery.

A1.3 Child criminal exploitation, child sexual exploitation and organised networks

Exploitation can be committed or facilitated by an individual, group, gang or organised network. A child may identify as part of the group exploiting them. Exploitation may constitute modern slavery. Victims may be coerced into offending and should not be treated solely as perpetrators. Indicators may include unexplained money or possessions, changes in relationships, missing episodes, travel, hotel or taxi use, multiple phones, injuries, sexual-health concerns, association with older individuals, debt, fear, secrecy or sudden changes in behaviour.

A1.4 Domestic abuse and teenage relationship abuse

Domestic abuse may be physical, sexual, emotional, psychological or economic and may include stalking and coercive or controlling behaviour. Children can be victims in their own right. Abuse can also occur in teenage intimate relationships and may be hidden. Child-to-parent or caregiver abuse must be considered as both a safeguarding concern and a possible indicator of unmet need or harm affecting the child.

A1.5 Serious violence

Staff should be alert to indicators including increased absence, friendship changes, decline in performance, significant changes in wellbeing, unexplained injuries or possessions, group association, exploitation and threats or possession of weapons. Any weapons concern is reported immediately.

A1.6 Honour-, faith- or belief-based abuse

This includes FGM, forced marriage and other abuse justified by perceived honour, faith, belief, family or community expectations. Staffs' personal mandatory duty to report known FGM in a girl under 18 applies.

A1.7 Radicalisation and terrorism

Staff should be alert to susceptibility to radicalisation, extremist narratives, online grooming and changes in behaviour or relationships. Concerns are reported to the DSL for consideration under Prevent/Channel and wider safeguarding procedures.

A1.8 Cybercrime

Children may be victims of cybercrime or may be drawn into cyber-dependent offending. Staff should report concerns where a child is involved in unauthorised access, malware, denial-of-service activity or

other suspicious cyber activity, particularly where there may be exploitation, coercion or contact with harmful networks.

Appendix 2. Additional vulnerability and contextual-risk checklist

When assessing a concern, the DSL/DDSL should consider:

- the child's wishes and feelings and how best to communicate with them;
- age, developmental stage, SEND, neurodiversity, communication needs and medical conditions;
- mental health, self-harm, eating disorders and suicide risk;
- attendance, missing episodes, punctuality and changes in engagement;
- family relationships, domestic abuse, parental offending, substance misuse, homelessness and temporary accommodation;
- whether the child is a young carer, in kinship care, looked after, previously looked after or has/had a social worker;
- peer-group dynamics, harmful sexual behaviour, bullying, discrimination and group-based exploitation;
- risks in the neighbourhood, transport, boarding environment, sport, clubs, trips, alternative provision or employment;
- online contact, social media, gaming, AI, image sharing, pornography, scams, misogynistic or extremist material;
- protected characteristics and experiences of racism or discrimination;
- whether the child is LGB, perceived to be LGB, or is questioning their gender;
- whether an adult or child may pose a risk to other children; and
- whether information needs to be shared with another school, children's social care, police, health, Prevent/Channel or another agency.

Appendix 3. Responding to a disclosure or safeguarding concern

- Listen calmly and take the child seriously.
 - Do not promise confidentiality.
 - Do not investigate or ask leading questions.
 - Use only open prompts necessary to clarify what the child is communicating.
 - Reassure the child that they were right to tell you; do not promise an outcome.
 - Consider immediate danger, medical need, evidence preservation and the safety of other children.
 - Report immediately to the DSL/DDSL; contact emergency services where necessary.
 - Record promptly and accurately, including the child's words, observations, questions, actions and who was informed.
 - Do not delay urgent action while completing a written record.
-
1. Continue to treat the child normally and preserve privacy on a need-to-know basis.
 2. The safeguarding record must, so far as known, include the child's full name; date and time of the concern or disclosure; time and place of the disclosure; the names of those present; an accurate account of the child's own words; any questions or prompts used by the member of staff; relevant observations, including the child's presentation or demeanour; any immediate action taken; and the name of the person to whom the concern was reported. Staff must distinguish clearly between fact, observation, allegation and professional opinion.
 3. Contemporaneous notes must not subsequently be rewritten in a way that destroys or obscures the original record. Where a later clarification, correction or summary is required, the original record must be retained and the subsequent entry separately dated, timed and attributable to its author. Safeguarding records must provide a clear chronology of concern, decision, action and outcome.

Appendix 4. Allegations and low-level concerns quick route

A concern about an adult must be reported promptly. Staff do not decide the threshold before reporting.

- Concern/allegation about a member of staff, supply/agency worker, trainee teacher, contractor or volunteer that may meet the harm threshold: report immediately to the Headmaster.
- Concern/allegation about the DSL/DDSL: report immediately to the Headmaster; the person concerned must not screen or manage the allegation.
- Concern/allegation about the Headmaster: report directly to the Chair of Trustees.
- Concern about a Trustee: report to the Chair; if the Chair is concerned, report to the Nominated Safeguarding Trustee.
- Low-level concern: report promptly under the Low-Level Concerns Policy. Self-referral is encouraged.

Where the harm threshold is met or may be met, the case manager follows the B&NES LADO process without delay and within one working day. Where there is doubt, LADO advice is sought.

Appendix 5. Role of the Designated Safeguarding Lead

The DSL is a senior member of the leadership team and holds lead responsibility for safeguarding and child protection, including online safety and understanding filtering and monitoring systems and processes. This responsibility is explicit in the role description and is not delegated, although activities may be delegated to appropriately trained deputies.

A5.1 Availability and cover

During term time the DSL or a trained deputy is available during School hours. Robust cover arrangements apply whenever the DSL is unavailable and during relevant out-of-hours, residential, trip and holiday activity. Arrangements include a reliable route, such as a confidential safeguarding mailbox/system, so that concerns continue to be monitored and acted upon.

A5.2 Manage referrals

The DSL/DDSL:

- refers suspected abuse, neglect or exploitation to children's social care;
- supports staff who make referrals;
- makes or supports Channel referrals where there is a radicalisation concern;
- ensures police contact where a crime may have been committed or immediate risk requires it;
- supports the School to meet DBS referral duties; and
- ensures other statutory notifications and referrals are made where required.

A5.3 Work with others

The DSL acts as a source of support, advice and expertise; is a point of contact with safeguarding partners; liaises with the Headmaster regarding section 47 enquiries and police investigations; understands Appropriate Adult requirements; liaises with the LADO/case manager; and works closely with teachers, pastoral staff, school health staff, SENCO, IT, senior mental-health leads, boarding staff, attendance staff and external agencies.

A5.4 Educational outcomes

The DSL works with strategic leaders to understand how safeguarding and welfare affect attendance, engagement and achievement, maintains oversight of children who have or have had a social worker and supports appropriate academic and pastoral adjustments and high aspirations.

A5.5 Information sharing and child-protection files

The DSL ensures files are secure, accurate, up to date and separate from the main student file; records distinguish fact, opinion and history; transfer arrangements meet KCSIE timescales; structured summaries accompany transfers; receipt is confirmed; and receiving settings are contacted where active discussion is needed.

A5.6 Raising awareness and training

The DSL ensures staff understand safeguarding policies and procedures; the child-protection policy is reviewed at least annually and implementation is reviewed regularly; the policy is publicly available; parents understand the School's safeguarding role; and the School remains linked to local safeguarding-partner training and procedures.

The DSL and deputies train at least every two years, undertake Prevent awareness training and refresh knowledge and skills at least annually.

A5.7 Children's views

The DSL promotes a culture in which children are listened to and their wishes and feelings are considered. Reporting routes must be accessible to children who face communication, disability, language, cultural or other barriers.

A5.8 Holding and sharing information

The DSL understands data-protection law and safeguarding information-sharing principles and maintains detailed, accurate and secure records of concerns, discussions, decisions and rationale, including where referrals are or are not made.

Appendix 6. KCSIE 2026 implementation checklist for September 2026

The Headmaster, DSL, COO, HOC, Head of HR, Chair of Trustees and Nominated Safeguarding Trustee will ensure before or at the start of the 2026/27 academic year that:

- all staff induction and annual update materials require Part One of KCSIE 2026 to be read in full;
- policy and training references use the 2026 annex structure;
- safeguarding definitions and training cover modern slavery, stalking, coercive control, financial exploitation, child-to-parent/caregiver abuse, organised-network exploitation, serious violence and weapons;
- mental-health training includes self-harm, eating disorders, suicidal ideation and suicide;
- procedures cover AI, deepfakes, nudification and all nudes/semi-nudes incidents;
- mobile-phone arrangements comply with statutory guidance from 1 September 2026;
- filtering and monitoring has a named SLT lead and a documented effectiveness review at least once each academic year, including checks across devices and relevant locations;
- information-security and cyber-security arrangements are reviewed;
- social-transition requests, sport, toilets, changing, showers and boarding arrangements comply with KCSIE 2026 and applicable law;
- the Safer Recruitment Policy and SCR processes reflect removal of the former supervision exemption from regulated activity and revised volunteer checks;
- procedures explicitly include trainee teachers in allegation and low-level concern routes;
- alternative provision due diligence, location records, staff-change notifications and at least half-termly reviews are embedded;
- restrictive-intervention procedures reflect current guidance;
- Family Help and Working Together 2026 terminology and local referral pathways are embedded;
- Operation Encompass/local domestic-abuse notifications are operational;
- safeguarding arrangements for lettings/use of premises are written into agreements and quality assured;
- boarding, homestay, host-family, lodging and educational-guardian arrangements are cross-checked against the current Boarding NMS where applicable;
- information-sharing practice reflects the Data (Use and Access) Act 2025 and current DfE advice;
- RSE/PSHE planning reflects revised statutory guidance for September 2026; and
- Trustees receive documented assurance that these changes are implemented in practice, not solely included in policy.