



Bales College

Safeguarding Policy

2026-27

Policy type	Regulatory (statutory)
Owner / responsible	Mrs Poonam Sachdeva, Designated Safeguarding Lead
Designated Safeguarding Lead	Mrs Poonam Sachdeva, member of the Senior Leadership Team – dsl@balescollege.co.uk , 020 8960 5899
Approved by	William Moore, Proprietor
Scope	All students, both of compulsory school age (CSA) and over compulsory school age, including Student-visa and Child Student-visa holders
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Version history

Version	Date	Author	Summary of changes
v1.0	Aug 2024	DSL	
v2.0	Aug 2025	DSL	Annual review.
V3.0	Aug 2026	DSL	Annual review, inc KCSiE, WtTSC, WtTISA Restrictive Interventions



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1. INTRODUCTION, SCOPE, PERSONNEL

Safeguarding and promoting the welfare of children are defined as:

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

The core safeguarding principles of Bales College ("the school"), are:

- It is the responsibility of the school to safeguard and actively promote the welfare of children;
- Children who are and feel safe make more successful learners.

The Safeguarding Policy, together with the effectiveness of its implementation, is reviewed annually by the Proprietor, unless an incident or new legislation or guidance suggests the need for an earlier review.

This policy is addressed to all members of staff and volunteers, is published on the School website and is available in other formats on request. It applies wherever staff or volunteers are working with pupils even where this is away from the school, for example at an activity centre or on an educational visit.

This policy has been developed in accordance with the principles established by the Education and Skills Act 2008, the Children Acts 1989 and 2004, the Children and Social Work Act 2017 and the Childcare Act 2006; the Education (Independent School Standards) Regulations 2014, and in line with government publications: Working Together to Safeguard Children (March 2026), Keeping Children Safe in Education September 2026 (KCSIE). This policy also takes into account further statutory guidance applicable to the School comprising:

- Disqualification under the Childcare Act 2006 (DfE, August 2018)
- Revised Prevent duty guidance for England and Wales (HM Government, December 2023)
- Channel duty guidance: protecting people susceptible to radicalization (Oct 2023)
- Multi-agency statutory guidance on female genital mutilation (HM Government, July 2020)
- What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015)
- Information sharing: advice for practitioners providing safeguarding services for children, young people, parents and carers (DfE, May 2024)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS, February 2024)
- Children missing education (DfE, September 2025)



- Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (DfE, February 2017)
- Teaching Online Safety in Schools (January 2023)
- Relationships education, relationships and sex education and health education guidance (DfE, July 2025)
- The Human Rights Act (1998) and in particular Article 3, Article 8, Article 14 and Protocol 1 Article 2.
- Equality Act (2010)
- Generative AI: product safety expectations (DfE, 22 January 2025)

In this policy, 'DSL' refers to the 'Designated Safeguarding Lead', or in their absence when the DSL is unavailable, the DDLs (Deputy DSLs).

Any reference to the Local Authority Designated Officer (LADO) also includes the possibility of a team of officers being used by the Local Authority (LA).

Policy Statement, Principles and Aims

The protection and welfare of pupils at Bales College is of paramount importance. The school recognises its moral and statutory responsibility to safeguard and promote the welfare of all children and create a culture of safety, equality and protection. We endeavour to provide a safe and welcoming environment where children are listened to, respected and valued. We are alert to the signs of abuse, neglect and exploitation and follow our procedures to ensure that children receive effective support, protection and justice.

Bales College is also committed to empowering its students to keep themselves safe and a key element of that is the approach to Relationships, Sex and Health Education. There is a separate policy document covering RSE.

Principles

The school is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment, to create an open environment where staff and pupils feel able to raise concerns, and where concerns will be listened to with a readiness to involve support services and other agencies as necessary:

- The welfare of children is given paramount consideration when developing and delivering all school activities;
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection: to feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties;
- All staff, including the Proprietor, are responsible for safeguarding the welfare of children as part of their professional duties; indeed, everyone who comes into contact with children and their families and carers has a role to play in safeguarding children;



- No single professional can have a full picture of a child's needs and circumstances
- All staff have an equal responsibility to act on any suspicion, concern or disclosure that may suggest a child is in need of support services or is at risk of harm

The Best Interests of the Child

A child's wishes or feelings will be taken into account when determining what action to take and what services to provide to protect them; children will be given the opportunity to express their views and give feedback wherever possible. Paramount in all dealings should be asking what is in the best interests of the child.

Appropriate Support and Training

All pupils and staff involved in child protection issues will receive appropriate support from the Senior Leadership of the School who will follow this policy guidance and statutory guidance in all that they do.

Aims of this policy

The aims of this policy are as follows:

- to actively promote and safeguard the welfare of children, staff and others who come into contact with the school and to protect them from harm, thereby fostering a culture of safety, equality and protection;
- to have clear procedures in place for dealing with and referring concerns about a pupil's welfare and allegations of abuse;
- to raise the awareness of all those within the School communities who come into contact with children, including the Proprietor, Head, staff and volunteers of their responsibilities to safeguard children and to report concerns;
- to ensure consistent good safeguarding practice throughout the School.

Framework for the policy

This policy has been written in accordance with government statutory guidance and locally agreed multi-agency procedures (Westminster). There are five main elements:

- Establishing a safe environment in which children can learn and develop and which protects all those who come into contact with the School from harm.
- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe.



- Ensuring safe recruitment in checking the suitability of staff and volunteers to work with children.
- Developing and then implementing procedures for identifying and reporting cases, or suspected or likely cases, of abuse, neglect or harm.
- In accordance with his/her agreed child protection plan, supporting pupils who have been abused.

Key Personnel – Bales College

DSL: Mrs Poonam Sachdeva, as the Designated Safeguarding Lead, (DSL) has lead responsibility for safeguarding and child protection (including online safety) and sits on the SLT.

Tel. 020 8960 5899

Mob 07590 267 909

E: dsl@balescollege.co.uk

Whilst the activities of the DSL can be delegated to the appropriately trained deputy, the ultimate lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) remains with the DSL. DDSLs may take on any of the DSL roles and activities described in this policy.

Deputy DSLs are:

Dr Ben Moore —

benmoore@balescollege.co.uk

Miss Corina Barbu —

cbarbu@balescollege.co.uk

Mr James Childs —

jchilds@balescollege.co.uk

Mr Nico Lopez-Valle — [nlopez-](mailto:nlopez-valle@balescollege.co.uk)

valle@balescollege.co.uk

The DSL and DDSLs meet weekly but often communicate daily to discuss any individual cases and concerns. The DSL is the first point of contact for all staff; keeping the central file and registers of categories of pupils. The DSL communicates with the LADO and Children's Services locally, with whom they are able to build up strong contacts and may handle any communication with the Police.

Pupils are made aware of the DSL names through prominent signs in reception, as well as during relevant PSHEE sessions and assemblies.

The Proprietor, Mr William Moore, also has 'status and authority' to take responsibility for child protection matters. He can be contacted via 020 8960 5899

Other pastoral concerns should be reported to the Head of academic: Mr John Corcut: jcorcut@balescollege.co.uk

Any concerns can also be raised with Dr Ben Moore, Head of school.



Key Personnel – Local Authority

Local Safeguarding Children Partnership contact details:

Referral and Assessment Team – **020 7641 4000**

(accesstochildresservices@westminster.gov.uk)

Emergency Duty Service:

Contact details: 020 7641 2388 outside of the hours above (or 020 7641 4000 + option 1 for emergency social worker)

Named LADO

Aqualma Daniel

Tel: 07870 481 712

Email Aqualma.Daniel@rbkc.gov.uk

LADO Manager

Sally Smith

Tel: 07967 764 794

Email: Sally.Smith@rbkc.gov.uk

LADO

Duty Protection Advisor: 020 7641 7668

Westminster Prevent Team;

Abdul Yusuf: Prevent Safeguarding Officer

Tel: 07817 054 699

Ayusuf1@Westminster.gov.uk

Kiran Malik: Prevent Coordinator Manager

020 7641 6032

kmalik@Westminster.gov.uk

Julie Knotts: Prevent Education Officer



jknotts@Westminster.gov.uk

07790 980223

Prevent@westminster.gov.uk

Key Contacts – other

Anti-Terrorism Hotline 0800 789 321

Disclosure and Barring Service (DBS)

Referrals: 01325 953 795

PO Box 181, Darlington, DL1 9FA



2. ROLES AND RESPONSIBILITIES

Roles and responsibilities for Safeguarding & Child Protection

Proprietor

It is the Proprietor's overall responsibility to ensure compliance with child protection statutory requirements and actively promote the wellbeing of pupils. The reporting of Safeguarding practice at the School enables the Proprietor to ensure compliance with current legislation and to identify areas for improvement. The Proprietor recognises that close liaison with the local authorities is also vital in order that appropriate support and training can be given.

The Proprietor will ensure that:

- There is an effective and statutorily compliant safeguarding and child protection policy and procedures in place, together with a staff Code of Conduct and that these are provided with other required documentation to all staff (including temporary staff and volunteers) on induction;
- Committed staff are appointed to the Safeguarding team and that they have the appropriate authority and the time, funding, training, resources and support to fulfil the role and responsibilities as outlined above;
- The school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children 2026 through effective implementation of the child protection policy and procedures and good cooperation with local agencies;
- The school's safeguarding arrangements take into account the procedures and practice of the local authority as part of the multi-agency safeguarding procedures, including understanding and reflecting local protocols for assessment and the WLSCP threshold document.
- The school's safeguarding provision is audited in conjunction with the local authority on an annual basis;
- They are available to liaise with the local authority and/or partner agencies on issues of child protection;
- instigates the annual review of this policy, and ensures:
- The school has statutorily compliant procedures for dealing with concerns/allegations made against members of staff including allegations made against the Proprietor (see part four of KCSIE and Appendix 3 of this document);
- The School also has procedures in place to handle allegations against other children of child-on-child abuse;
- The School operates safer recruitment policies and procedures that include the requirement for at least one member of a recruitment panel to have undertaken safer recruitment



training and for appropriate checks to be made in line with national guidance (see part three of KCSIE and the School's Recruitment policy and procedure).

- The School operates an effective training strategy that ensures all staff, including the Proprietor receive child protection training, in accordance with WLSCP local safeguarding partner guidance.
- All staff undergo safeguarding and child protection training (including online safety) at induction and that all staff receive updates at least annually.
- All Staff have the opportunity to contribute and shape safeguarding arrangements and the child protection policy.
- The DSL and Deputy DSL receive refresher training at two-yearly intervals as a minimum, with annual updates.
- An annual review of safeguarding is instigated, carried out and approved and that the minutes of Governance meetings record in detail the relevant discussion and actions taken in carrying out and approving their annual review of safeguarding.
- Where necessary, an appropriately trained and informed teacher is appointed to promote the educational achievement of any child who is 'looked after' or previously looked after.
- Appropriate safeguarding responses are in place to deal with pupils who go missing from the school, in particular any pupils who go missing on repeat occasions.
- Appropriate online filters and monitoring systems are in place.
- Pupils are taught about safeguarding, including online safety.
- The child's wishes and feelings are taken into account when determining what action to take and what services and support to provide.
- The School has procedures in place to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.

The Proprietor will:

- Ensure that the safeguarding and child protection policy and procedures are implemented and followed by all staff;
- Allocate sufficient time and resources to enable the DSL, Deputy DSL to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- Ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively. Reporting wrongdoing by staff in the workplace, whether or not it involves the safeguarding and welfare of children, is dealt with in accordance with the School's Whistle Blowing procedures;
- Provide immunity from retribution or disciplinary action against staff in the event of them 'whistleblowing' in good faith.



- Ensure that children's safety and welfare are addressed through the curriculum.
- Be able to understand safer recruitment procedures and processes and deal with allegations made against members of staff and volunteers.
- Make unannounced visits each term to speak to staff, check records and discuss safeguarding with pupils.

All Staff

All staff, which includes the Proprietor, teaching and support staff, trainee teachers, supply staff including temporary staff and all volunteers who do not fall under visitor procedures, (hereafter 'staff'), have a statutory responsibility to:

- read this Safeguarding policy, including the safeguarding response to children missing from education;
- read at least part one of Keeping Children Safe in Education
- read the School's Behaviour policy and the Staff Code of Conduct;
- understand the role of the DSL and be able to identify the DSL and Deputy DSL and work with them and, if required, to support social workers to take decisions about individual children;
- provide a safe environment in which children can learn;
- be aware of systems, policies and procedures within the School which support safeguarding;
- be aware of the indicators of abuse, neglect and exploitation so that they are able to identify children who may be in need of extra help or who are suffering, or are likely to suffer, harm and in such circumstances to take appropriate action, working with other services as needed;
- attend appropriate safeguarding and child protection training on appointment and subsequent refresher training at least annually with safeguarding partner guidance, including training regarding the Prevent duty;
- make a direct referral to Westminster Children's Services immediately (via Front Door for Families) if, at any point, there is a risk of immediate serious harm or if the child is suffering harm;
- expect to support social workers and other agencies following any referral;
- be prepared to identify children who may benefit from Early Help (see this policy for relevant indicators). Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse;
- staff should keep in mind that cases should be kept under review and consideration given to a referral for assessment if the child's situation does not appear to be improving or is



getting worse – staff should follow local escalation procedures to ensure concerns have been addressed and most importantly that the child’s situation improves.

Staff should not assume that a colleague or another professional will take action, and should be mindful that early information sharing is vital for effective support being put in place.

DSL (and Deputy DSLs)

The DSL is a member of the Senior Leadership Team and takes day to day lead responsibility for safeguarding and child protection. The school will ensure that the DSL is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Parents are welcome to approach the DSL if they have any concerns about the welfare of any child in the school, whether these concerns relate to their own child or any other. If preferred, parents may discuss concerns in private with the child’s tutor who will notify the DSL in accordance with these procedures.

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

Managing referrals

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



Working with others

- To act as a point of contact with the three safeguarding partners
- To take lead responsibility in early help cases and liaise with other agencies
- To liaise with the Head in respect of police investigations or investigations under section 47 of the Children Act 1989 which involve the school
- To liaise with the 'Case Manager' and Local Authority Designated Officer regarding all child protection concerns which involve a member of staff
- To liaise with staff (especially pastoral support staff, the School Counsellor, IT Technicians and SEND advisors) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies
- To act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

Raising awareness

- To ensure this Policy is known, understood and used appropriately
- To ensure this Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Board of Governors regarding this
- To ensure this Policy is available publicly
- To ensure that parents are aware that referrals about suspected abuse or neglect may be made known to Local Authority Safeguarding Hub and the School's role in this
- To maintain links with the Local Authority Children Safeguarding Partnership
- To ensure staff are aware of training opportunities and the latest local policies on safeguarding
- To help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and Senior Team
- To ensure that the School's PSHE programme teaches pupils about safeguarding, including safer use of the internet and social media.

Child Protection file

- Where children leave the school, to ensure their child protection file is copied for any new school or college as soon as possible, but transferred separately from the main pupil file, ensuring secure transit, and obtaining confirmation of receipt.



- Consider whether it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue support and have that support in place for when the child arrives.
- Child protection files are securely stored in the Head's office and are only accessible by the DSPs.
- The school retains child protection files indefinitely where a referral has been made/social care has been involved or a child has been the subject of a multi-agency plan. Where there are low-level concerns with no multi-agency involvement the school will consider retaining the child protection file for 25 years from date of birth or indefinitely.

Undertake training

- To undergo training, at least every two years, to acquire the knowledge and skills required to carry out the role
- To undertake Prevent awareness training
- To ensure knowledge and skills are refreshed at regular intervals, as required, but at least annually to keep abreast of developments relevant to their role so they:
 - Understand the assessment process for providing early help and intervention, and the process of referrals
 - Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and effectively contribute when required to do so
 - Ensure each member of staff has access to and understands this Policy and child protection procedures, and in particular, new and part-time staff
 - Are alert to the specific needs of children in need, those with special educational needs and young carers
 - Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
 - Are able to keep detailed, accurate, secure written records of concerns and referrals
 - Understand and support the school with regards to the requirements of the Prevent duty and can provide advice and support to staff on protecting children from the risk of radicalisation
 - Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School
 - Understand the expectations, applicable roles and responsibilities in relation to filtering and monitoring with regard to online safety
 - Can recognise the additional risks that children with Special Educational Needs and/or Disabilities face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with Special Educational Needs and/or Disabilities to stay safe online
 - Obtain access to resources and attend relevant refresher training courses; and
 - Encourage a culture of listening to children and taking account of their wishes and feelings, amongst all staff, in any measure the school puts in place to protect them.



All D/DSLs receive Advanced Refresher training annually and take advantage of specialist training opportunities.

In addition to the above responsibilities as set out in KCSIE, the DSL will:

- Notify the local authorities if a child with a Child Protection Plan is absent for more than two days without explanation.
- Consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum, for example through Information and Communications Technology (ICT), Personal, Social and Health Education (PSHE) and/or Relationships and Sex Education (RSE).
- Ensure appropriate safeguarding responses are in place and are implemented to deal with pupils who go missing from the School, in particular any pupils who go missing on repeat occasions.
- Understand safer recruitment procedures and processes and be able to apply them as a member of an appointment panel.
- Liaise with other agencies that support the pupil such as Social Services, Child and Adolescent Mental Health Service, the local authority Prevent coordinators, Education Welfare Service and Educational Psychology Service.
- Be responsible for the Prevent policy, updating the Prevent Risk Assessment and for approving and maintaining a log of all visiting speakers who attend the School.

Record Keeping

The DSL and Deputy DSL record all information relating to child protection. All safeguarding concerns, chronologies and records of decisions are held on MyConcern, the School's safeguarding recording system, to which all staff have access for the purpose of raising and updating a concern. This includes ensuring staff feel confident to raise a concern and that staff are able to update a concern, noting concerns, decisions made and the reasons for those decisions.

The DSL also liaises with the Proprietor, as appropriate, about safeguarding issues especially enquiries under Section 47 of the Children Act 1989 and police investigations.

Liaison between the DSL and the Proprietor

When an issue arises which has potential child protection implications, the DSL will inform the Proprietor. At this stage, it may not be possible to make a clear judgement as to the seriousness of the issue, but it can be stated whether external agencies (Social Services/Medical professionals/Police) have been contacted.

The DSL will outline the next steps and the Proprietor will continue to be made aware of actions and guidance in order to provide oversight of the School's response.



Allegations that may meet the harm threshold are managed under Part 4 of Keeping Children Safe in Education 2026. The Head of School acts as case manager and will discuss the allegation with the Local Authority Designated Officer (LADO) within one working day; the School will not investigate, interview or suspend a member of staff before taking the LADO's advice. An allegation is never routed through, or managed by, the person it concerns.

- An allegation against any member of staff, volunteer, trainee, supply teacher or contractor is reported to the Head of School, who contacts the LADO within one working day.
- An allegation against the Designated Safeguarding Lead is reported to the Head of School as case manager, who contacts the LADO within one working day; the DSL takes no part in managing the case.
- An allegation against the Head of School is reported to the Proprietor, who acts as case manager and contacts the LADO within one working day.
- An allegation against the Proprietor, or a member of the proprietor body, is reported directly to the LADO (and to the police where a crime is alleged) and must not be routed through the Proprietor. The School will also notify the Independent Schools Inspectorate (ISI) and the Department for Education, and an independent person will oversee the process.

The Designated Safeguarding Lead would always keep information to the Proprietor to a 'no names' basis.

Training

The DSL ensures that: all staff have received the required annual safeguarding training in line with local procedures and expectations and have signed to indicate that they have read and understood this.

Safeguarding induction

This includes reading and understanding the school Safeguarding policy; the response to children absent from education; dealing with child-on-child abuse; online safety; the role and identity of DSL and DDSL; reading KCSIE part one and KCSIE Annex A (leaders and those who work directly with children); understanding how to apply the pupil behaviour policy (such as preventing all forms of bullying, including cyberbullying, prejudice-based and discriminatory bullying; the staff code of conduct (including whistleblowing and acceptable use of IT, staff/pupil relationships, the low-level concerns policy and comms including use of social media).

The Code of Conduct includes detail of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

Safeguarding training (annually and as required)



All staff receive training and child protection updates as required (for example via email and staff meetings) to enable them to fulfil their responsibilities listed above, including the importance of sharing information, how to manage a report of child on child sexual violence and sexual harassment (in accordance with Part 5 of KCSIE), making a referral themselves and finding guidance on how to do this, as well as the role they might be expected to play in any assessment;

- all staff read Part one of KCSIE and understanding is checked by an informal quiz. and KCSIE Annex A is read by leaders and those who work directly with children
- All staff are trained to know what to do if a child tells them he/she is being abused, exploited or neglected, and to reassure victims that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.
- Staff are trained to manage a report of child-on-child sexual violence and sexual harassment in accordance with Part 5 of KCSIE.
- all staff understand the difference between a 'child in need' and a 'child at risk';
- all staff receive Prevent awareness training as part of the Safeguarding training; the DSL and Deputies complete an advanced training course relating to the Channel programme and the Prevent Duty.
- all staff are re-trained as and when required and that an accurate record of staff attendance of induction and refresher training is maintained.
- all staff complete a safeguarding questionnaire at least annually to demonstrate understanding of the core components of KCSIE and the School's safeguarding policy.
- Staff are given the chance to provide feedback or ideas relating to the safeguarding at Bales College.
- All staff will be required to sign to confirm they have read, understood and agreed to comply with the requirements outlined in these documents.
- A register will be taken at each safeguarding and child protection training session.

Training for the Proprietor

The Proprietor receives appropriate safeguarding and child protection training to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a whole school approach to safeguarding.

Safeguarding Guidelines for all



All members of the school community (proprietor, staff, pupils and parents) are expected to adhere to the following standards of good practice:

We expect all staff to treat children with respect by;

- Setting a good example by conducting ourselves appropriately;
- Involving children in decision-making which affects them;
- Encouraging positive and safe behaviour among children;
- Being a good listener;
- Being alert to changes in children's behaviour
- maintaining an attitude of 'it could happen here' where safeguarding is concerned;
- Recognising that challenging behaviour may be an indicator of abuse;
- Asking the child's permission before doing anything for them which is of a physical nature (except where there is an urgent need to take action to protect them or to prevent them from harming others), such as assisting with dressing, physical support during PE or administering first aid;
- Maintaining appropriate standards of conversation and interaction with and between children and avoiding and discouraging the use of inappropriate, sexualised or derogatory language;
- Being aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of neglect and/or abuse.
- Be alert to the context in which safeguarding incidents and/or behaviours can occur, including association with factors outside the school. Staff should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.
- Promoting the School ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued.
- Making clear to all pupils that if they have any problems or worries, these can be taken to a form tutor, a subject teacher or any member of the management team.

Multi-agency work

The DSL works closely in partnership with the Westminster Local Safeguarding Children Partnership (WLSCP) to ensure that the school always follows relevant local arrangements. The pupil intake at Bales College means that we also work in partnership with other safeguarding partnership across London.

Family Help (including targeted early help and statutory services)



Working Together to Safeguard Children 2026 combines “Early Help” and “Section 17” support with a unified “Family Help” approach, intending that families experience a single, coherent pathway with a named lead practitioner, either a social worker or practitioner from partner agencies. Family Help is designed to be delivered through multi-disciplinary teams, enabling professionals to collaborate earlier and more effectively.

All staff play an important role in safeguarding and promoting the welfare of children and must identify children who may benefit from targeted early help from Family Help support and services. Early help means providing support as soon as a problem emerges at any point in a child’s life. Staff training identifies that this may be done for example, by immediately speaking with the DSL, or their deputies, regarding any concerns or emerging issues, sharing information with other professionals to support early identification and assessment etc. Taking these steps may prevent concerns from escalating. Staff are also trained to understand the statutory services under Section 17 (Child in Need) and Section 47 (Child at Risk),

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

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have an EHCP)
- has a mental health need
- is a young carer
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, gangs, organised crime or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, had suspensions, is on a part-time timetable, is at risk of permanent exclusion or in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves



- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

The school will also be alert to the potential need for early help for a child who comes from a split family, looked after children, previously looked after children and care leavers. The DSL will inform the class teacher/tutor about the child's circumstances. The class teacher/tutor will monitor the child and liaise with the DSL over any necessary special arrangements and support.

The school understands the importance of all involved in supporting children and families sharing information and taking prompt action. 'It Could Happen Here' is a vital principle underpinning all training and approaches to safeguarding at Bales College.



3. AREAS OF SCHOOL LIFE UNDERPINNED BY SAFEGUARDING

Safer Recruitment

The school is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance, and in accordance with the School's Recruitment and Selection Policy.

The school obtains Disclosure and Barring Service clearance for all staff and complies with guidance concerning the Childcare (Disqualification) Regulations 2018 and the Education Act 2006. The school conducts checks including a prohibition from teaching check and prohibition from management (S.128 direction) check, where applicable, via the Teaching Regulation Agency. Separate barred list checks are carried out when a DBS is pending or when the "3-month rule" is being applied. From September 2026 the "supervision exemption" for supervised volunteers is removed and supervised volunteers who teach, train, instruct, care for, or supervise children frequently (more than 3 days in a 30-day period) or overnight now require an enhanced DBS check with children's barred list information. Our practice has always been to undertake detailed checks. KCSiE 2026 para 315 contains a summary of regulated activity.

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

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

The school will make a referral to the Disclosure and Barring Service (PO Box 3961, Wootton Bassett, SN4 4HF, Tel: 03000 200 190) as soon as possible if the criteria are met, that is they have caused harm or pose a risk of harm to a child, in cases where:

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

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



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

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

The school complies with the Childcare (Disqualification) Regulations 2018 and the Education Act 2006. Staff connected to the School's Early Years and Later Years provisions are under an ongoing duty to inform the school if their circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to the School's Recruitment, Selection and Disclosure Policy for further information about this duty. The guidance applies to all staff, supply staff and volunteers working in the school.

Work experience providers

In any work experience placements arranged by the school, we ensure that the placement provider has policies and procedures in place to protect children from harm, taking account of the guidance in KCSiE 2026 para 403-407.

Homestay hosts

Schools quite often make arrangements for children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to whom they are not related. This might happen, for example, as part of a foreign exchange visit or sports tour, often described as 'homestay' arrangements. KCSiE 2026 para 408-413 provides guidance that the school will follow to determine the required checks and processes to support successful homestay arrangements.

Private Fostering providers

Private fostering occurs when a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related to, in that person's home. If a member of staff becomes aware that a child may be in a private fostering arrangement, they should raise this, in the first instance, with the DSL. The school will then notify the local authority of the circumstances.

Monitoring/Supervising Staff and Volunteers

The school is committed to safer recruitment and ensuring that all necessary checks are carried out for staff and volunteers. As part of the recruitment process, all new staff follow an induction process which includes a 'Day One Induction' meeting which focuses on safeguarding procedures and information, including online safety.

Clear expectations are set out for all staff and volunteers in the Code of Conduct which emphasises safeguarding and appropriate behaviour for staff and appropriate supervision for pupils and this is



re-issued at the start of each academic year to all staff. The Whistleblowing policy is also highlighted to all staff who may have a concern about the behaviour of a colleague or, more generally, the school's safeguarding practices.

The school's expectations of appropriate supervision for pupils and monitoring of visitors are set out in the Visitors policy and Supervision policy. A log of all visiting speakers is kept by the DSL to monitor those who present to the pupil body, in accordance with our Prevent Policy.

Abuse of Trust and Inappropriate Relationships

All School staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all children must be beyond reproach.

All staff are aware of the potential for a pupil's relationship with another pupil to be or become abusive and are alert to this possibility and the requirement for concerns of this nature to be referred under the procedures detailed in this policy.

Children potentially at greater risk of harm

Whilst all children should be protected, the school recognises that some groups of children are potentially at greater risk of harm than others, both online and offline. This includes:

- children who need a social worker
- children who are absent from education,
- children in elective home education,
- children requiring mental health support,
- looked after children and previously looked after children,
- care leavers,
- young carers,
- children with special educational needs, disabilities or health issues,
- children who are lesbian, gay or bisexual,
- children who are questioning their gender

[KCSiE 2026 para 214-282](#) contains comprehensive guidance, briefly summarised below.

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

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a wide range of safeguarding issues. Our attendance policy outlines the care we take to respond to any pupil absence and thereby support their overall wellbeing.



Many home educated children have a positive learning experience and the school would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all and where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we will follow KCSiE guidance to liaise with the local authority to ensure decisions are in the best interests of each child.

Schools have an important role to play in supporting the mental health and wellbeing of pupils. For further information see the section on [Mental Health](#).

For proper care of looked after children and previously looked after children, appropriate staff must have access to the information they need in relation to a child's legal status and contact arrangements with birth parents or those with parental responsibility. The DSL should have details of the child's social worker and the name of the Virtual School Head (see [KCSiE 2026 para 239-244](#)) in the authority that looks after the child. A previously looked after child potentially remains vulnerable and all agencies must work together, taking prompt action when necessary to safeguard these children, who are a particularly vulnerable group.

Maintained schools must appoint a designated teacher to work with local authorities to promote the educational achievement of registered pupils who are looked after. As an independent school we follow this process when relevant.

Local authorities have on-going responsibilities to the children who cease to be looked after and become care leavers. The school will work with the local authority when this is relevant to one of its pupils.

The school is alert to the needs of young carers, recognising that early identification is essential to ensure young carers receive support at the right time and by the appropriate services.

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration; these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than others; the potential for them being disproportionately impacted but without outwardly showing any signs; communication difficulties in managing or reporting that what is happening to them is abuse; their need for intimate care and likely dependency on adults for care, and issues over cognitive understanding to differentiate between fact and fiction in online content and then repeating the content/behaviour in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND require close liaison with the DSL and SENCO.

An incident relating to the management of a child's medical condition does not itself warrant a referral to local safeguarding partners, unless an incident highlighted concern that the child or



might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition.

A child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm, but they can sometimes be vulnerable to discriminatory bullying, as can a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not).

Guidance to schools regarding children who are questioning the way they feel about being their gender is clear that it is not for schools to initiate any action in this area. Guidance focuses on circumstances where a child or their parent has raised a request relating to social transition to which a school is responding. [KCSiE 2026 para 252-282](#) provides detailed guidance, including the interaction of gender-questioning considerations with other policies, and how to support children living in stealth and those who wish to detransition.

Complaints about staff

The school's complaints procedure will be followed where a parent raises a concern about poor practice or wrongdoing by staff in the workplace that does not involve the safeguarding and welfare of children. The complaints policy and procedure is available to all parents and staff.

Complaints from staff involving wrongdoing in the workplace are dealt with under the School's Whistleblowing policy and Disciplinary and Grievance policy. Note that where a staff member feels unable to raise an issue with the school, or feels that their genuine concerns are not being addressed, additional whistleblowing channels are open to them, including the NSPCC whistleblowing helpline: 0800 028 0285 (8am to 8pm) or email help@nspcc.org.uk

Allegation against a member of staff

The Arrangements for Dealing with Allegations against Staff (see Appendix 3) and the separate Low Level Concerns Policy (see Appendices 7 and 8) will apply if there is an allegation that an adult working or volunteering at the school in any capacity has:

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

These instances may have taken place outside school but we would always follow the guidance because of the potential of 'transferable risk'.

If the allegation is made against a supply teacher, contractor or other person not directly employed by the school, the organisation or agency of employment will be informed in addition to following the procedures in this policy.



Allegations against former members of staff or volunteers who are no longer teaching should be referred to the police; concerns or suspicions about applicants for positions at the school should be referred to the DSL who will refer them to the LADO, or in an emergency or in cases of serious harm, directly to the police. Historical (non-recent) allegations of abuse should be referred to the police.

The Proprietor should be always informed of allegations made against former members of staff/volunteers who are no longer working at the school.

Health & Safety, Extended School Activities and Educational Visits

The School's Health & Safety and Educational Visits policies are set out in separate documents, and reflect the consideration given to the protection of our children both physically within the school environment and away from the school when undertaking School trips and visits.

Where extended School activities are provided by and managed by the school, our own Safeguarding and Child Protection Policy and procedures apply. Where other organisations provide services or activities on our site the member of the school's staff responsible for arranging the services or activities will check that the service or activity providers have appropriate procedures in place, including relevant risk assessments and safer recruitment procedures.

When our children attend off-site activities, including those abroad on School trips, we will check that effective child protection arrangements are in place. All staff are bound by the School's Educational Visits Policy when arranging and organising off-site trips.

KCSIE clarifies that in circumstances where a school arranges for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related the responsible adults will be engaging in regulated activity for the period of the stay. In such cases and where the school has the power to terminate such a homestay the school would be the regulated activity provider. Where the child's parent(s) or a pupil themselves arranges their own homestay, this would be a private arrangement, therefore, the school would not be the regulated activity provider.

Photography and images

The use of photographic images of pupils in publications and on the school's website is covered under the school's GDPR policies. We co-ordinate use of pupil images in accordance with these and data protection law.

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place. To protect children we will: - only use images in accordance with the school's policy; - ensure that children



are appropriately dressed; - encourage children to tell us if they are worried about any photographs that are taken of them.

Further guidance for staff on the taking and storing of photographs and images of pupils is contained in the Code of Conduct. From time to time professional photographers are invited into the School to take group photographs or pictures of significant events; any professional photographers hired by the School will be subject to appropriate vetting checks.

Photographs, digital images or videos of pupils may be taken by parents and family members, either on the School site or when pupils are involved in organized activities off site. Parents and family members are welcome to take photographs or videos of School events which may include images of other pupils. To respect the privacy of others and in some cases for protection purposes, these images should not be made publicly available on social networking sites or on other public areas of the internet. Parents should not take photographs of their child or fellow pupils in the swimming pool or changing rooms.

Advances in technology, including generative artificial intelligence (AI), mean that an image of a child — even an ordinary photograph taken for an innocent purpose — can be digitally altered, or wholly created by AI, to produce a sexualised or otherwise harmful image, including what are commonly described as deepfakes or ‘deep nudes’. For this reason the School controls how images of pupils are captured, stored, shared and published, limits the circulation of pupil images, and asks parents not to post images that include other pupils online.

Any nude or semi-nude image that involves a child is treated as a safeguarding matter — whether the image is real, digitally altered or AI-generated, and regardless of who made it. A member of staff who becomes aware of such an image, or of AI tools being used to create or share one, must not view, copy, share, forward or delete it, and must report it to the DSL immediately. The DSL will respond in line with the School’s procedures on the sharing of nudes and semi-nudes and on child-on-child abuse, and will escalate to the police and the Report Remove/CEOP route where appropriate. Pupils are taught about these risks — including deepfakes, ‘nudifying’ apps and other AI-generated images — through the PSHE and RSHE programme. Further detail is set out in the Online Safety section and in the section on the making and sharing of nudes and semi-nudes.

If the behaviour of an adult capturing images seems unusual or the pupil appears to be worried by someone taking photographs of them, staff will act to challenge the adult (where they feel safe and confident to do so) and report the matter to the DSL as soon as possible, and in as much detail as possible, to allow the concern to be followed up. The police will be informed in cases of serious concern.

Flash photography can cause distress or trigger seizures in those with medical conditions and therefore should not be used.



Safeguarding Education for pupils

The school promotes the welfare of children through the Assembly programme, PSHEE curriculum and the school newsletter. Pupils are given the information to avoid situations and persons, including over the internet and mobile technology, which/who could lead them into harm.

Bullying

Bullying is a subset of abuse that can take different forms, including: physical, emotional, verbal, ostracism, homophobic and gender-related bullying and/or cyber bullying. The school is determined that no kind of bullying will be tolerated by pupils, parents or staff at the school.

The School's Anti-bullying policy is available from the school office and has been developed mindful of the government guidance Preventing and Tackling Bullying (July 2017). All School staff, pupils and parents must be aware that engaging in bullying behaviour or condoning or failing to challenge or report bullying would lead to the application of child protection procedures and in the case of a member of staff being complicit, or otherwise involved, in bullying behaviour, to the application of the procedure in Appendix 3 (Allegations of abuse) of this policy.

If there is a concern that a child is at risk of serious harm from bullying behaviour, or that the cause or effect of the bullying is the significant impairment of health or development of a child (either alleged perpetrator or victim) the school's safeguarding procedures will be followed; the police will be informed in cases of serious harm.

The school's Anti-bullying policy applies to bullying behaviour outside of the school of which the school becomes aware.

Use of 'Reasonable Force and restrictive interventions'

KCSiE 2026 para 203 confirms that there are circumstances when it is appropriate for staff to use force to safeguard children and this applies to any member of staff at the school. It can also apply to people whom the Head has temporarily put in charge of pupils, such as unpaid volunteers or parents accompanying pupils on a school organised visit. The use of physical intervention should be avoided if possible. The use of unwarranted physical force is likely to constitute a criminal offence.

All forms of corporal punishment are unlawful and the School does not use or threaten corporal punishment.

DfE Guidance [Restrictive interventions, including use of reasonable force, in schools \(April 2026\)](#) states that all members of school staff have a legal power to use reasonable force to prevent or stop a pupil from:

1. causing injury to themselves or others
2. committing a criminal offence
3. damaging property



4. causing disorder among pupils at the school, whether during a teaching session or otherwise

There is no legal definition of "reasonable force", and it will always depend on the circumstances. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

Note that:

- any use of force should be proportionate to the behaviour of the pupil involved and the seriousness of the harm prevented
- staff should recognise the additional vulnerability of children with SEN, disabilities and certain medical conditions before using reasonable force (see next para)
- physical force could not be justified to prevent a pupil from committing a trivial misdemeanour
- any force should always be the minimum needed to achieve the desired result
- whether it is reasonable to use force and the degree of force that could be reasonably employed might also depend on the age, understanding and sex of the pupil

KCSiE 2026 para 205 highlights the importance of recognising the additional vulnerability of children with SEND, mental health problems or with medical conditions when using 'reasonable force' in response to risks presented by incidents involving such children. By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents, schools can reduce the occurrence of challenging behaviour and the need to use 'reasonable force'.

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

The school's separate policy on restrictive interventions and the use of reasonable force provides further details and outlines staff training.

Secure and safe premises

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

The School is small and all members of staff are known to one another and to pupils, so staff



are not routinely issued with identity badges; any unfamiliar adult on the premises is therefore readily apparent. Visitors and contractors are clearly identifiable because they are issued with badges, as set out below.

Visitors

School visitors include professionals such as educational psychologists, social workers, and other education-related practitioners, as well as educational visitors like guest speakers or performers. They may also include contractors working on the building or grounds, children's family members, or others attending school events. When inviting guest speakers or performers, the school will assess the educational value, the age appropriateness of what is going to be delivered and the level of checks required.

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

Contractors who are not required to undergo DBS checks will be issued with a visitor's badge and will be supervised at all times whilst on School premises. Contractors who have undergone requisite DBS checks will be issued with a contractor's ID and are not required to be supervised whilst on School premises.

Online Safety and the Safer Use of Technology

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

PSHE lessons educate pupils to be aware of the risks associated with unrestricted mobile phone access to the internet, including sexual harassment, making or sharing of nudes or semi-nudes and the viewing and sharing of pornography and other harmful content.

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

- **content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising



and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI, and online bullying.
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If staff feel pupils, students or staff are at risk, this is to be reported to the Anti-Phishing Working Group (apwg.org).

The school uses the guidance to support use of Generative AI ([Generative artificial intelligence in education](#)) and [online resources](#) (See *Materials for all school and college staff* and *Materials for school and college leaders*) to help school staff use AI safely and effectively.

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

KCSIE 2026 (paragraph 171) requires that a review of the effectiveness of filtering and monitoring is carried out at least once every academic year by the SLT member responsible for filtering and monitoring, with the support of the School's DSL and IT support. This includes checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record is kept of these checks. In practice the School goes beyond this annual minimum: the checks are carried out termly by the Designated Safeguarding Lead together with the Head of School, drawing on IT support for the technical verification, and the result of each check is recorded on the School's server in the safeguarding section.

Cyber Security and Resilience

The school maintains appropriate cyber security measures in accordance with the DfE's 'Cyber security standards for schools and colleges' guidance. This includes: - Regular assessment of cyber security risks and vulnerabilities - Appropriate technical controls to protect systems and data - Staff training on cyber security awareness and incident reporting - Incident response procedures for cyber security breaches - Regular backup and recovery testing cybersecurity incidents that may affect the safety of children or compromise safeguarding information will be treated as safeguarding concerns and reported to the DSL immediately

Bales College technology curriculum is designed to help pupils develop a responsible approach to all technology, keeping themselves and others safe.



Mobile Phones and devices

All students need to learn to focus on their academic work for extended periods to ensure that they make good progress.. Students in years 7-11 are not allowed to use mobile phones **under any circumstances**, The procedures are as follows:

- Form tutors collect mobile phones at the start of the tutor period and hand them in to the school office.
- Students collect their phones from the school office at the end of the day.
- Using mobile devices for filming students is a serious offence and will be dealt appropriately which could include exclusion from school.
- Sixth-form students are subject to the same rule: they must hand in their mobile phones when they arrive at School — at registration, or directly to the School office if they enter or return to the School later in the day — and must not use their phones anywhere in School during the school day.
- The phones are each student's personal responsibility, and the school does not accept any responsibility for them if they are lost or stolen.
- Where phones are confiscated, they will be placed in the school safe until they are returned.

The Staff Code of Conduct and ICT Acceptable Use Agreement include guidance on the use of mobile phones, smart technology and cameras (including other electronic devices with imaging and sharing capabilities).

Guidance to parents and staff on use of cameras in school is also set out as follows:

- parents may bring mobile phones onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publications of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.
- If parents wish to contact their child during the school day, they should ring the school office.
- staff may bring mobile phones/personal devices onto the premises but should not take photographs of pupils on their mobile phones/personal devices. Staff should only use equipment provided or authorised by the school when taking photographs of pupils for official School purposes. The school has a separate policy for the use of mobile phones. Mobile phones are only permitted in areas where pupils are prohibited.



4. REVIEW OF POLICY AND PRACTICE

Monitoring and review

The Proprietor confirms efficient enforcement of this policy through an annual review by the DSL, and any deficiencies in these arrangements are to be addressed at once. It is the responsibility of both to confirm efficient enforcement review and updates may take place more frequently where necessary, and changes will be highlighted to staff, parents and pupils as appropriate.

Any child protection incidents at the school will be followed by a review of the safeguarding procedures within the school and a prompt report to the Proprietor. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the school's procedures.

An annual log of safeguarding incidents is kept by the DSL and reviewed by the Proprietor each July or August.



5. SPECIFIC CHILD PROTECTION PROCEDURES

It is important that a child at risk or in need receives the right help at the right time to address risks and prevent issues escalating. It is therefore important that all staff understand their responsibility to: identify, act on and refer the early indicators of abuse, neglect and exploitation; keep clear written records; listen to the views of the child; reassess concerns when situations do not improve; share information quickly and challenge inaction.

Recognising abuse

To ensure that children are protected from harm, we need to understand what types of behaviour constitute abuse, neglect and exploitation.

The government document 'What to do if you're worried a child is being abused' (March 2015) can be helpful. The NSPCC website also provides very useful additional information on abuse, neglect and exploitation.

Abuse, neglect and exploitation are forms of maltreatment. Somebody (adult or child) may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a young or immature child home alone. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

It is important to note that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Staff are aware that children may not feel ready to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful. This should not prevent professional curiosity and discussions with the DSL.

There are different categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect, as defined in part one of KCSiE and reproduced in Appendix 1 of this policy.

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

Specific safeguarding issues (Annex A of KCSiE)

[Annex A of Keeping Children Safe in Education: Further information](#) contains important additional information about specific forms of abuse and safeguarding issues. KCSiE requires school and college leaders and these staff who work directly with children to read Annex A.



Many of these issues are also raised elsewhere in KCSiE. A summary is provided below. The DSL reviews these issues annually to determine whether any are of heightened relevance for the school and its children in the coming year.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members, by people known but not related to the victim (such as neighbours, friends and acquaintances) and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence, for example, as they start walking to school on their own, it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

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

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

These are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual or criminal activity. In some cases, the abuse will be in exchange for something the victim needs or wants, and/or will be to the financial benefit or increased status of the perpetrator or facilitator.

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

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



- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship.
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posting on social media)
- can be perpetrated by individuals or groups, males or females, and children or adults
- can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse
- is typified by some form of power imbalance in favour of those perpetrating the abuse
Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

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

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

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

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

Victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, with children manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

CCE and CSE can affect both male and female, including children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute



modern slavery, and further information is available in the [Modern Slavery statutory guidance](#). In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

County lines

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

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children which explain each step of the process and the special measures that are available:

<https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds>

<https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds>

Children who are absent/missing from education

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

Staff should follow the school’s procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions and/or prolonged periods, to help identify the risks of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. The school’s procedures for such absences, and for notifying the local authority, are set out in the Attendance Policy. The DSL and the Senior Attendance Champion will monitor unauthorised absence, particularly where children are absent on repeated occasions.

The school will fulfil its statutory duty in notifying the Local Authority when adding or removing a pupil’s name from the admission register outside of the usual transition points i.e.,



where a compulsory school-aged child leaves a school before completing the school's final year or joins a school after the beginning of the school's first year. The school will make reasonable enquiries to establish the whereabouts of the child jointly with the Local Authority before deleting their name from the register and will also notify the Local Authority within five days of adding a pupil's name at a non- standard transition point.

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

Children with family members in prison

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

<https://www.nicco.org.uk/>

Cybercrime

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

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

Domestic abuse (inc Operation Encompass)

is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological, physical, sexual, financial and emotional. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave



the family home as a result. Operation Encompass is an information-sharing scheme between the police and relevant education settings operating in all police forces across England and Wales. In November 2025, a new statutory duty was placed on the police to notify a child's education setting if they have reasonable grounds to believe a child may be a victim of domestic abuse.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL, and any deputies, should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Modern Slavery and the National Referral Mechanism

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

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

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

An individual could have been a victim of human trafficking and/or slavery, servitude and forced or compulsory labour.

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

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. It can happen in many different ways and settings. The school and its staff have a duty to have due regard to the need to prevent people from being drawn into terrorism (the Prevent duty). Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

The Government's Counter Extremism Strategy defines 'Extremism' as: "the vocal or active opposition to our fundamental values, including, democracy, the rule of law, individual liberty



and the mutual respect and tolerance for those of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.”

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

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

Prevent Duty and Channel

The Prevent Duty is a duty on schools to prevent people from becoming terrorists or supporting terrorism and is part of all schools’ wider safeguarding obligations. The DSL is aware of local procedures for making a Prevent referral. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be susceptible to radicalisation. When referring an individual to Channel that person will need to give their consent before any support through the programme is provided. It is a voluntary process which allows the individual to withdraw from the programme at any time.

All staff are encouraged to familiarise themselves with the government’s website <https://educateagainsthate.com/>. The website is designed to equip school leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people.

Serious violence

KCSiE 2026 highlights that serious violence is a continuing safeguarding concern. It may involve physical assault, weapons, bullying, and criminal exploitation. Staff must report any concerns about weapons to the DSL or deputy. The DSL will assess the risk and take appropriate action which might include a safety and support plan, and action to de-escalate peer conflict.



Schools play a key role, and staff must be alert to signs that a child may be at risk of or involved in serious violence.

Indicators which may signal children are at risk from, or are involved in committing serious violence include:

- • increased absence from school or college,
- • a change in friendships or relationships with older individuals or groups,
- • a significant decline in educational performance,
- • signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

KCSiE 2026 identifies the likelihood of involvement in serious violence may be increased by factors such as:

- • being male,
- • having been suspended, spent time in Alternative Provision or permanently excluded from school,
- • having experienced child maltreatment,
- • having been involved in offending, such as theft or robbery,
- • having used drugs or alcohol in early adolescence, and
- • having previously been a victim or previously perpetrated violence

Violence can often peak in the hours just before or just after school, when pupils are travelling to and from school and can concentrate in particular places. These times can be particularly risky for young people involved in serious violence. The school considers where these places might be, with a view to working with partners to promote safety for children. Listening to children and consulting with staff can help establish when and where they feel unsafe.

Working with wider partners can also help build understanding of the local context and help co-ordinate a collective safeguarding response around the school day. Advice for schools is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance. The Youth Endowment Fund (YEF) has produced practical guidance and an accompanying self-assessment tool to help introduce evidenced practice for preventing children becoming involved in violence.

Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence. A list of these locations can be found [here](#). Schools within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain partnership



working to tackle serious violence across local areas and ensure a joined-up approach to young people across the risk spectrum.

Honour or faith- based abuse

This encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation, forced marriage, and practices such as breast ironing.

Female Genital Mutilation (FGM)

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

Female Genital Mutilation (FGM) mandatory reporting duty for teachers

Whilst all staff should speak to the DSL, or a deputy DSL, with regard to any concerns about FGM, there is a specific legal duty upon teachers to personally report to the police cases where they discover that an act of FGM is suspected or appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. It will be rare for teachers to see visual evidence, and they should not be examining pupils. Staff failing to report such cases will face disciplinary sanctions.

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

Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve Children's Social Services as appropriate. The duty does not apply in relation to at risk or suspected cases i.e., where the teacher does not discover that an act of FGM appears to have been carried out or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

Forced marriage

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Forcing a person into a marriage is a crime in England and Wales. It is also a crime to carry out any conduct whose



purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages. There is a clear distinction between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement still remains with the prospective spouses.

Other safeguarding issues

Child-on-child abuse: Allegations of abuse made against pupils

(including sexual harassment and sexual violence)

All staff are aware that children are capable of abusing their peers i.e., child-on-child abuse. All child-on-child abuse is unacceptable and will be taken seriously by the school. The school has a zero tolerance approach to child-on-child abuse, recognising it as a *preventable* safeguarding issue for both the victim and alleged perpetrator. Timely, evidence-based support can prevent children from going on to commit abuse or violence. We minimise the risk of child-on-child abuse through an ethos of care and respect, through modelling respectful behaviour, through PSHEE, and through establishing trusted relationships that give children confidence to speak out.

Child-on-child abuse can manifest itself in many ways, this is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children
- physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- physical assault and harm, or the threat of harm with a weapon,
- harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry. Part five of this guidance sets out how schools and colleges should respond to reports of this nature,
- consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,
- upskirting (which is a criminal offence),
- initiation/hazing type violence and rituals.

Part five of KCSiE outlines how schools should respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This



includes incidents occurring outside of school, and/or online. It reinforces that all staff working with children are advised to maintain an attitude of ‘it could happen here’, and this is especially important when considering child-on-child abuse.

Preventing child-on-child abuse

Staff are aware that gender issues can be prevalent when dealing with this type of abuse i.e., that it is more likely that girls will be victims and boys perpetrators. Child-on-child abuse should never be tolerated. Downplaying the significance of certain behaviour, such as dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviour, misogyny/misandry, an unsafe environment for children and, ultimately, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it. KCSiE highlights the escalatory nature of misogyny and the benefits of early identification in minimising the risk of HSB, sexual harassment and sexual violence. Staff will always challenge behaviour such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras or lifting up skirts.

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

Responding to child-on-child abuse

Pupils who have been subject to child-on-child abuse are encouraged to immediately report any concerns to their teachers or form teacher, or to speak to one of the Safeguarding Team directly. Alternatively, pupils may seek help from the School Counsellor. KCSiE reminds schools of the importance of well-promoted and accessible systems that enable children to confidently report abuse, knowing their concerns will be taken seriously. We use lessons and assemblies to teach children about healthy, positive relationships, how to report concerns, and to help them understand, in an age-appropriate way, what abuse is. We aim to provide children with the language to report abuse, so they know how to tell a trusted adult if anyone is behaving in a way that makes them feel uncomfortable.

If a pupil makes an allegation of child-on-child abuse, staff should follow the procedure as set out under [What to do if you have a safeguarding concern about a child](#).

A pupil against whom an allegation of abuse has been made may or may not be suspended from School during the investigation, depending on circumstances and how best to support all involved. The school’s Behaviour Policy and Anti-bullying Policy will apply.



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

Support will be available to the victims, perpetrators and any other children affected by child-on-child abuse. This will be determined by the DSL, inevitably on a case-by-case basis, in discussion with those affected and with other relevant parties, and may be in the form of counselling with the school counsellor. The DSL will follow the guidance outlined in KCSiE 2026 Part five (para 526-647).

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

Child Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap, can occur online and offline, both physically and verbally, and are never acceptable.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

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

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

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

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



[KCSiE 2026 para 540](#) emphasises that schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

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

Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. Within this Policy, sexual harassment is referred to in the context of child-on-child sexual harassment.

Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include but is not limited to:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual & consensual sharing of sexual images and videos;
 - sexualised online bullying
 - unwanted sexual comments and messages, including, on social media
 - sexual exploitation; coercion and threats
 - upskirting

It is important that all victims are taken seriously and offered appropriate support. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. The victim should never be made to feel that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.

If a pupil makes a disclosure directly to a member of staff or volunteer he/she must follow the process as set out under [What to do if a pupil makes a disclosure](#) . Staff are reminded not to view or forward illegal images of a child.

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

Victims may not disclose the whole picture immediately and may be more comfortable



providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged and the school will ask the victim if they would find it helpful to have a designated trusted adult to talk to about their needs. The choice of any such adult should be the victim's and the school will respect and support this choice.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and lesbian, gay, bi or trans (LGBT) children are at greater risk.

Relationships and Sex Education (RSE)

The Relationships Education, Relationships and Sex Education and Health Education Regulations (England) Regulations 2021 states that pupils receiving primary education must be taught Relationships Education, and pupils receiving secondary education must be taught Relationships and Sex Education. The regulations were updated on 15 July 2025, adding revised guidance on RSHE which is in force from 1 September 2026.

KCSiE 2026 para 156-161 reinforces the importance of opportunities to teach children about safeguarding. We have a whole-school approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. Personal, Social, Health and Economic Education (PSHE Education) is compulsory in independent schools; the school provides PSHE lessons throughout the school.

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

The school seeks to work in partnership with parents to enable parents to feel confident about the Relationships and Sex Education programme, and that it will be delivered sensitively and inclusively respecting backgrounds and beliefs. The school's RSE Policy, including the curriculum plan and draft PSHE programme, is circulated to parents each year, with parents being invited to make suggestions for development as part of the school's consultation process. The RSE policy and schemes of work are published to parents via the school website.

Mental health

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School has a separate Mental Health and Wellbeing Policy, which sets out how the School supports pupils' mental health and wellbeing, complemented by the PSHE and RSHE programme and the School's pastoral system.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe pupils day-to-day and identify those whose



behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If a child is struggling with their mental health, is self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which staff in school are well placed to recognise. These could include:

- • significant changes in behaviour,
- • ongoing difficulty sleeping,
- • withdrawing from social situations,
- • not wanting to do things they usually like, and
- • physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention. The school arranged taking for staff in mental health first aid (explain detail or other arrangements that make it clear how the school knows how to respond appropriately

If staff have a concern about a child's mental health that is also a safeguarding concern, they must speak to the DSL or deputy. If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

Gender questioning pupils and school premises

KCSIE 2026 added a new section, para 105-116, relating to school premises, specifically relating to toilets, changing rooms and showers. Schools must not allow children into toilets designated for the opposite biological sex and must provide separate toilets for boys and girls aged 8 and over, apart from where individual toilets are in a room that can be locked from the inside, intended for use by one pupil at a time. For mixed-sex toilets, schools should assess safeguarding risks and plan accordingly - for example, mixed-sex toilets should be in individual, lockable rooms and open directly onto public areas such as a corridor.

If a gender-questioning child does not want to use the toilet designated for their biological sex, schools should consider whether they can provide an alternative toilet facility, without compromising the provision of single-sex facilities that do not compromise the safety, comfort, privacy or dignity of the child, or of any other children. Schools must keep a clear record of these situations, ensure they are communicated appropriately, and review them regularly.

Schools must not allow a child, aged 11 years or older at the start of the school year, to undress in front of a child of the opposite biological sex. When responding to a request to support any



degree of social transition, a school must not allow a child access to changing rooms designated for the opposite sex.

If a gender-questioning child does not want to use the changing rooms and showers designated for their sex, schools should consider whether they can provide an alternative changing or washing facility without compromising the provision of single-sex facilities. Schools must keep a clear record of these situations, ensure they are communicated appropriately, and review them regularly.

Boarding and Residential Accommodation (including on school trips)

KCSIE 2026 added a new section, para 197-202, relating to Boarding and Residential Accommodation. Schools must not allow a child to share overnight accommodation with a child of the opposite biological sex. Responding to a request to support any degree of social transition must not include allowing access to boarding or residential accommodation designated for the opposite sex. If, however, a child does not want to share a room with another child of the same biological sex, alternative arrangements should be sought where possible. Alternative arrangements should not compromise the safety, comfort, privacy or dignity of any child. They might include, for instance, finding a suitable separate room for the child.

In allocating sleeping arrangements such as dormitories, tents or shared rooms for school trips, schools must have regard to their duties under the Equality Act, their safeguarding obligations, and other relevant regulations and standards, including those relating to boarding and residential accommodation.

Where a child's concern reflects a request for support with social transition, the school or college should consider the KCSiE 2026 section on "Considering requests for support with social transition" before making any decisions.

Making and sharing of nudes and semi-nudes (implications for devices)

Further detail about staff viewing pupils' devices or phones can be found in the school's behaviour policy. This sets out the context in which electronic devices may be searched by staff, and makes very clear that if a Child Protection issue is suspected, the device must be handed to the Designated Safeguarding Lead without any content first being viewed. Part 5 of KCSIE makes it clear that staff should not view or forward alleged illegal images of a child, and signposts advice for staff on what to do when viewing an image is unavoidable.

The DSL may be duty-bound to inform the local authorities and the Police.

The school employs a very wide range of measures to support pupils and parents in making wise and sensible use of the internet. These include assemblies and sessions within the PSHE and RSHE curriculum for all year groups, through which pupils are taught that making, storing or sharing indecent images is unlawful and can have serious consequences, including for a pupil's place at



the School. All of this takes place within a framework of work on self-esteem, confidence and treating people with kindness and respect, in 'real life' and online.

In addition to making the sanctions for involvement in sharing nudes and semi-nudes very clear, the school will provide appropriate pastoral support to the perpetrator and the victim.

Sexually active pupils

If a pupil reveals that he or she is sexually active it may be a child protection issue. The member of staff concerned should report this to the Designated Safeguarding Lead. They will then decide, having due regard to the pupil's age and maturity, whether this is indeed a child protection issue. If so, steps should be taken to arrange appropriate support. If sexual activity were to take place on school premises or on a school trip (when normal School rules always apply), this would also be considered a disciplinary matter).

The DSL will, when considering who needs to be informed, consider matters of the age of the pupils involved and the possibility of pupil-on-pupil abuse.

What is consent?

This vital question is covered in PSHEE in the school to ensure that pupils at School understand consent in an age-appropriate context. Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Self-harming, eating disorders, anxiety or depression

It is recognised that some young people have a problem with self-harming/eating disorders/anxiety/depression and that this may be as a result of unhappiness in some aspect of their life (which may, in the worst case scenario, be linked to a child protection issue). Staff (especially those in positions of pastoral responsibility) should be vigilant and aware of the causes and symptoms of self-harming/eating disorders/anxiety/depression and should refer any cases to the DSL or Deputy as soon as possible.

Missing Pupils

Staff should be alert to the possible safeguarding implications of a pupil running away or deliberately going missing.



Unexplained absences of pupils on the child protection register

The Designated Safeguarding Lead must notify Social services if there is an unexplained absence of more than two days of a pupil who is on the child protection register. In such a case, where the child

is not at morning registration, contact is made as soon as possible to find out what explanation is given for absence. Depending on the response received, a referral will be made more urgently.

What to do if you suspect a child is at risk of harm

If a member of staff is concerned that a pupil may be suffering harm or is at risk of harm, they must act on this immediately. Staff should refer to the DSL, or Deputy in the DSL's absence, as soon as possible.

If there is a risk of immediate serious harm to a child a referral should be made to Children's Social Care immediately, or in an emergency, dial 999 and request the appropriate emergency service.

Anybody can make such a referral. The DSL should be informed as soon as possible.

There will be occasions when you suspect that a child may be at serious risk, but you have no 'real' evidence. The child's behaviour may have changed, their art or written work could be concerning or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

Record these early concerns and pass it to the DSL immediately. If the child does begin to reveal that they are being harmed or is at risk of harm, including radicalisation, you should follow the advice in section below: 'If a child discloses information to you'.

Follow-up options to support a child include: - Managing support internally via the school's own pastoral support processes; - An Early Help assessment; - A referral to local services.

If a child discloses information to you

The NSPCC have created a very helpful resource entitled Let Children Know You're Listening (Helping adults respond to children disclosing abuse).

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

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets or promise



confidentiality. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen; if you leave it till the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

During your conversation with the child:

- Allow them to speak freely. - Remain calm and do not over-react – the child may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’. Reassure victims that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.
- Do not be afraid of silences – remember how hard this must be for the child. Under no circumstances ask investigative or leading questions – such as how many times this has happened, whether it happens to siblings too, or what does the child’s mother think about all this.
- At an appropriate time tell the child that in order to help them you must pass the information on.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid admonishing the child for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive but the child may interpret it that they have done something wrong.
- Tell the child what will happen next. The child may agree to go with you to see the DSL. Otherwise let them know that someone will come to see them before the end of the day.
- Follow the procedure outlined below:

Taking action: advice for staff:

- Write up your conversation as soon as possible on MyConcern, the School’s safeguarding recording system, and tell the DSL the same day. Logging a concern does not by itself discharge the duty to report it: the DSL, or a Deputy DSL in the DSL’s absence, must also be told that day.
- Seek support if you feel distressed.

Note: best practice dictates that you should not write any notes whilst the pupil is speaking. Write up your notes immediately after the meeting, and give the DSL these notes, however rough. If an aide-memoire is required, only very brief phrases or notes should be jotted down - the priority is



to listen, not to write down everything that is said, and the writing of any notes may lead a pupil to clam up. Remember that you should only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation.

Key points to remember for taking action are:

- in an emergency take the action necessary to help the child, for example, call 999;
- report your concern to the DSL as soon as possible, unless it involves an allegation against a member of staff or volunteer in which case the procedures in Appendix 3 should be followed;
- if the DSL is not available, ensure the information is shared with Deputy DSL that day.
- If there is a risk of immediate serious harm to a child and it is not possible to report the matter in accordance with this procedure, a referral should be made to local children's services immediately.
- never start your own investigation;
- share information on a need-to-know basis only
- do not discuss the issue with colleagues, friends or family;
- seek support for yourself if you are distressed.

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

The school's initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.

Staff should remember they should not:

- promise confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are



necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;

- recognise that a child is likely to disclose to someone they trust: this could be anyone on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- recognise that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse;
- keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- listen carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;
- consider the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;
- only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- inform the designated safeguarding lead (or deputy), as soon as practically possible, if the
- designated safeguarding lead (or deputy) is not involved in the initial report.

Reporting directly to child protection agencies

In line with KCSIE, any staff member can make a referral to children's social care although where possible, there should be a conversation with the DSL to agree a course of action.

Staff should follow the reporting procedures outlined above. However, they may also share information directly with the Westminster Children's Service (Front Door for Families), the police or the NSPCC if:



- the situation is an emergency and the DSL, or Deputy, the Proprietor are unavailable
- or if they are convinced that a direct report is the only way to ensure the child's safety. If, at any point, there is a risk of immediate serious harm to a child, and you are unable to share the information with the DSL, Deputy DSL or the most senior person in the school you can find to help you, a referral should be made to the local authority immediately.

Remember: anybody can make a referral.

When referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made.

Under these circumstances, you (or, if necessary, the most senior person in the school that you can find to help you) should contact the team at Westminster Children's Services, using the local authority contact information in Section 7 of this policy.

They will require basic information from you such as: - Your name - Address - Details of the child that you have concerns about.

This information is taken to help the specialist safeguarding team make enquiries, and contact you again if necessary. Information you supply is held in the strictest of confidence and not disclosed to any party; including those connected to the child you have concerns about.

Other ways to report your concerns:

- Referral to the local specialist services or Front Door for Families services may be appropriate, and these should be made in accordance with the referral threshold set by the WLSCP
- Call the local Police – 101 for non-emergency police
- Contact the NSPCC – for help if you are unsure whether to report your concerns. Call 0800 800 5000 to speak in confidence, or text anonymously to 88858.
- Call Abdul Yusuf (Westminster Prevent Safeguarding Officer - Tel: 07817 054 699)
- DfE Helpline for non-emergency advice on radicalisation: 020 7340 7264 and counterextremism@education.gsi.gov.uk

Notifying parents

The school will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively, and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from the local authority. This is also subject to advice from the LADO if the allegation involves a member of staff.



For the avoidance of doubt, referrals do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

Action by the DSL - Referral

The DSL will make a referral to Westminster Front Door for Families immediately if it is believed that a child has suffered or is at risk of suffering harm.

In situations where a pupil is not at risk of suffering harm but is instead in need of additional support from one or more agencies (referred to as a 'child in need'), the DSL will still liaise with the local authority in accordance with inter agency procedures and, depending on their advice, will complete an assessment form or engage with any other approach offered by the local authority (e.g. 'Team around the Child') to ensure assessment/referral of the pupil and/or his parents for appropriate social care services.

If there is room for doubt as to whether a referral should be made, the DSL will consult with the local authority on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of harm, a referral will be made without delay.

If the initial referral is made by telephone, the DSL will confirm the referral in writing within 24 hours. If no response or acknowledgment is received within three working days, the DSL will contact the local authority again.

Referrals following an allegation against a member of staff or volunteer will be dealt with in accordance with the procedures set out in Appendix 3.

In cases of possible radicalisation, the DSL will consider a referral to the Channel programme.

Confidentiality, sharing information and UK GDPR

When making decisions on what information to share and when, the most important consideration is whether information sharing is likely to safeguard and protect the child. Staff must consider if the information shared is necessary for the purpose for which it is being shared, ensure it is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Whilst the School understands the specific responsibilities arising from the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 to process personal information fairly and lawfully, staff must be clear that this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about



information sharing cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Staff must not promise confidentiality to a pupil and will always act in the best interests of the pupil.

Staff should only discuss concerns with the DSL, Deputy DSL or the Proprietor depending on the subject of the concern. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, the police and Children's Services to agree the information that should be disclosed and to whom. The reporting restrictions applicable to such matters will be observed.

All written information will be stored in a locked facility and any electronic information will be kept in a password-protected area.



6. ALTERNATIVE PROVISION

Alternative provision (AP) refers to education arranged by the school for pupils who, because of exclusion, illness, or other reasons, would not otherwise receive suitable education. This includes placements at alternative provision academies, pupil referral units, hospital schools, or with other registered providers. Where the School places a pupil with an alternative provider, it retains responsibility for the safeguarding of that child.

Continuing Safeguarding Responsibility

In accordance with KCSIE, where the School places a pupil with an alternative provider, the School must:

- Retain overall responsibility for the safeguarding of that child.
- Ensure the alternative provision is of good quality and meets the needs of the pupil.
- Satisfy itself that the provider has appropriate safeguarding policies and procedures in place, including a safeguarding policy, safer recruitment procedures, and a designated safeguarding lead.
- Obtain written confirmation from the provider that appropriate safeguarding checks have been carried out on all staff working with the pupil
- Continue to monitor the attendance, behaviour, and progress of the pupil while they are placed in alternative provision.
- Maintain regular contact with the alternative provider to ensure appropriate arrangements are in place and any concerns are communicated promptly.

Due Diligence Before Placement

Before placing a pupil with an alternative provider, the school should conduct appropriate due diligence. This must include:

- Reviewing the provider's safeguarding policy and confirming it is current and comprehensive.
- Confirming the provider has a designated safeguarding lead with appropriate training.
- Obtaining written confirmation that all staff have undergone appropriate safer recruitment checks, including enhanced DBS checks with barred list checks for those in regulated activity.
- Confirming arrangements for filtering and monitoring of online activity.
- Visiting the provision where possible to assess the environment and meet staff.
- Reviewing any inspection reports (Ofsted or other) where available.
- Confirming arrangements for reporting safeguarding concerns back to the School.



Information Sharing with Alternative Providers

The School should share appropriate information with the alternative provider to enable them to safeguard the pupil effectively. This should include:

- Relevant safeguarding information about the pupil, including any known risks or vulnerabilities.
- Information about any current involvement with children's social care.
- Details of any Child Protection Plan, Child in Need Plan, or Early Help assessment.
- Relevant medical information that may affect the pupil's safety or care.
- Information about any special educational needs or disabilities relevant to safeguarding.
- Emergency contact information and any restrictions on contact.
- Any court orders or legal matters affecting the pupil.

Information sharing must be proportionate and necessary for safeguarding purposes. Parents/carers should be informed that relevant safeguarding information will be shared with the alternative provider unless doing so would place the child at risk.

Notification of Safeguarding Concerns

The alternative provider must notify the School promptly of any safeguarding concerns or incidents involving the pupil. The School must establish clear protocols with the provider, ensuring:

- The provider knows who to contact at the School (DSL contact details must be provided).
- There is a clear process for reporting concerns, including what should be reported and expected timescales.
- The provider will notify the School immediately of any serious safeguarding incident.
- The provider will inform the School of any concerns about the pupil's welfare, attendance, behaviour, or circumstances.
- The provider will notify the School of any arrangements or circumstances that may put the child at risk ().

Attendance Monitoring

The School must maintain oversight of the pupil's attendance at the alternative provision. This should include:

- Clear arrangements with the provider for daily attendance reporting.
- Immediate notification by the provider if the pupil fails to attend without explanation.
- Regular review of attendance patterns and prompt follow-up of concerns.



- Integration of AP attendance data with the School's overall attendance monitoring.
- Escalation procedures where persistent absence occurs.

Review of Placements

All alternative provision placements should be reviewed regularly to ensure they continue to meet the pupil's needs and that appropriate safeguarding arrangements remain in place. Reviews should:

- Take place at least termly, or more frequently where concerns exist.
- Include input from the pupil, their parents/carers, the alternative provider, and the School.
- Consider whether the placement continues to be appropriate.
- Review safeguarding arrangements and update information sharing as necessary.
- Document outcomes and any agreed actions.

Unregistered Settings

The School must not place a pupil in an unregistered setting (i.e., a setting providing full-time education that is not registered with the DfE) unless it is satisfied that the setting is operating lawfully. The School should be particularly vigilant about:

- Settings that describe themselves as offering part-time provision but which in practice provide full-time education.
- Settings that have not been inspected or registered.
- Settings where there is limited transparency about safeguarding arrangements.
- Any setting where the School cannot verify appropriate safeguarding checks have been completed.

Record Keeping

The School must maintain clear records of all alternative provision placements, including:

- Details of the provider, including registration status and contact information.
- The rationale for the placement.
- Written confirmation of safeguarding checks and policies.
- Records of information shared with the provider.
- Records of monitoring visits, communications, and reviews.
- Any safeguarding concerns raised and how they were addressed.

Roles and Responsibilities



The Designated Safeguarding Lead (or deputy) should:

- Oversee the safeguarding aspects of all alternative provision placements.
- Ensure appropriate information sharing protocols are in place.
- Be the point of contact for safeguarding concerns raised by alternative providers.
- Maintain oversight of pupils placed in alternative provision.
- Liaise with external agencies as required.



7. LINKS TO POLICIES TO BE USED FOR FURTHER GUIDANCE

Linked Policies The following documents are provided electronically to staff, paper copies can be provided on request:

- Safeguarding & Child Protection policy
- Anti-bullying policy
- Behaviour policy, including Use of Reasonable Force policy
- Staff Code of Conduct
- Supervision policy
- Complaints policy and procedure
- Data protection policy
- Drugs, Alcohol and Substance policy
- Online Safety policy
- First Aid Policy
- SEND policy
- ICT Acceptable Use Policy
- Missing Pupil Policy
- Whistleblowing Policy
- The Prevent policy and Prevent Risk Assessment

The guidance should also be read alongside:

- statutory guidance Working Together to Safeguard Children;

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

- departmental advice What to do if you are Worried a Child is Being Abused - Advice for Practitioners; <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>



8. APPENDICES

Appendix 1 Indicators of Abuse, Neglect, Exploitation and Modern Slavery

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill-treatment that is not physical as well as the impact of witnessing ill-treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also



commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

Exploitation and Modern Slavery: these are explained further in the section relating to Annex A of KCSiE)



Appendix 2 Recognising Indicators of Abuse

As part of training, staff are also provided with the following guidance for recognising the indicators of abuse:

Physical abuse

Physical indicators:

- Unexplained bruises and welts on the face, throat, upper arms, buttocks, thighs or lower back in
- unusual patterns or shapes which suggests the use of an instrument on an infant in various stages of healing that are seen after absences, weekends, or vacations.
- Unexplained burns, cigarette burns, especially burns found on palms, soles of feet, abdomen, buttocks; immersion burns producing "stocking" or "glove" marks on hands and feet; "doughnut shaped" on buttocks or genital area.
- Rope burns.
- Infected burns indicating delay in treatment; burns in the shape of common household utensils or appliances.

Behavioural Indicators:

- Behavioural extremes (withdrawal, aggression, regression, depression).
- Inappropriate or excessive fear of parent or caretaker.
- Antisocial behaviour such as substance abuse, truancy, running away, fear of going home.
- Unbelievable or inconsistent explanation for injuries.
- Lies unusually still while surveying surroundings (for infants).
- Unusual shyness, wariness of physical contact.

Emotional Abuse

Physical Indicators:

- Eating disorders, including obesity or anorexia.
- Speech disorders (stuttering, stammering).
- Developmental delays in the acquisition of speech or motor skills.
- Weight or height level substantially below norm.
- Flat or bald spots on head (infants) Nervous disorders (rashes, hives, facial tics, stomach aches).



Behavioural Indicators:

- Habit disorders (biting, rocking, head-banging).
- Cruel behaviour, seeming to get pleasure from hurting children, adults or animals; seeming to get pleasure from being mistreated.
- Age-inappropriate behaviours (bedwetting, wetting, soiling).
- Behavioural extremes, such as overly compliant-demanding; withdrawn-aggressive; listless excitable.

Sexual Abuse

Physical Indicators:

- Torn, stained or bloody underclothes.
- Frequent, unexplained sore throats, yeast or urinary infections.
- Somatic complaints, including pain and irritation of the genitals.
- Sexually transmitted diseases.
- Bruises or bleeding from external genitalia, vagina or anal region.
- Pregnancy.

Behavioural Indicators:

- The victim's disclosure of sexual abuse.
- Regressive behaviours (thumb-sucking, bedwetting, fear of the dark).
- Promiscuity or seductive behaviours.
- Disturbed sleep patterns (recurrent nightmares).
- Unusual and age-inappropriate interest in sexual matters.
- Avoidance of undressing or wearing extra layers of clothes.
- Sudden decline in school performance, truancy.
- Difficulty in walking or sitting.

Neglect

Physical Indicators:

- Poor hygiene, including lice, scabies, severe or untreated diaper rash, bedsores, body odour.
- Squinting.
- Unsuitable clothing; missing key articles of clothing (underwear, socks, shoes); overdressed or underdressed for climate conditions.
- Untreated injury or illness.



- Lack of immunisations.
- Indicators of prolonged exposure to elements (excessive sunburn, insect bites, colds).
- Height and weight significantly below age level.

Behavioural Indicators:

- Unusual school attendance.
- Chronic absenteeism.
- Chronic hunger, tiredness, or lethargy.
- Begging for or collecting leftovers.
- Assuming adult responsibilities.
- Reporting no caretaker at home.

Child Sexual Exploitation

Physical indicators:

- Tiredness, mood swings
- Bruising
- Sexually transmitted diseases
- Pregnancy

Behavioural indicators

- Sudden decline in school performance, punctuality, attendance
- In possession of expensive goods
- Going to places you know they cannot afford
- Age-inappropriate clothing
- Inappropriate sexualised behaviour
- Secretive Mixing with older people

Female Genital Mutilation

Physical indicators:

- Difficulty walking, sitting, standing
- Spend longer than normal in the bathroom
- Bladder or menstrual problems

Behavioural indicators:

- May talk about a 'special procedure' or 'special occasion to become a woman'
- Abroad for a prolonged period



- Unusual absence or Reluctant to undergo normal medical examinations

Radicalisation

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

We might consider the following when looking for indicators, although no single checklist can be created in the case of radicalisation:

Disclosure: eg writing, drawings, poems, accessing extremist material, Expressions of support for terrorism: 'us' and 'them' language, justifying use of violence. Personal crisis: family tension, sense of isolation, changes in friendship group, low self-esteem, questioning identity, family, faith, belonging. Personal circumstance: migration, local community tension, a sense of grievance triggered by a personal experience eg of racism, discrimination

No list of abuse or neglect indicators can include all signs, and staff are advised to use their best judgement.



Appendix 3 - Allegation of Abuse against a member of staff

NB “staff” includes full and part time employees, volunteers, student teachers and contractors.

It is expected that all staff (including contractors) involved in the management of allegations of abuse made against a member of staff or volunteer or former member of staff or volunteer will comply at all times with DfE statutory guidance contained within the document: Keeping Children Safe in Education.

School staff, because of their daily contact with children in a variety of situations including the wider caring role, are particularly vulnerable to accusations of abuse. Their relationships with pupils may lead to allegations being made against them by pupils or adults with parental responsibilities. In any such case, these procedures need to be applied with common sense and judgement; a quick response and resolution is a priority.

All staff should feel able to raise concerns about poor or unsafe practical and potential failures in the school’s safeguarding regime and know that such concerns will be taken seriously by the Senior Leadership team. The School’s Whistleblowing policy covers this in more detail.

The School's procedures

The School's procedures for dealing with allegations made against staff or volunteers or former staff or volunteers will be used where the member of staff or volunteer is alleged to have: - 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; or - Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children.

This procedure relates to members of staff who are currently working in the school regardless of whether the school is where the abuse is alleged to have taken place. Allegations against former members of staff or volunteers who are no longer working at the school will be referred to the police, and to the LADO as well.

If an allegation is made against a member of staff, the school’s priority will be to achieve a quick resolution of that allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation. All such allegations must be dealt with as a priority without delay.

All staff are informed as part of their training that any member of staff can make a referral, as specified in KCSIE.

The procedures to be followed in all such cases are outlined in Part 4 of KCSIE here:

Of particular significance are the sections in Part 4 of KCSIE on the use of suspension, appropriate information sharing, what to do on conclusion of a case and whether any lessons can be learned, regardless of the outcome of the case (see below).



Reporting an allegation against staff or volunteers

All allegations, complaints, concerns or suspicions against staff or volunteers, should be reported to the Head of school. In no case should an allegation, complaint, concern or suspicion be reported to the individual who is the subject of the concern, and neither should that individual be informed of the allegation, complaint, concern or suspicion at this stage.

All allegations, complaints, concerns or suspicions about the Head of school should be direct to the LADO, rather than to the Proprietor, Mr Bill Moore, due to the conflict of interest.

All allegations, complaints, concerns or suspicions about the Proprietor should be reported to the LADO using the contact information above.

The Head should discuss the allegation immediately with the LADO in order to consider the nature, content and context of the allegation and to agree a course of action. The LADO will be informed within one working day of all allegations that come to the school's attention and appear to meet the criteria and the LADO may consult the Police and Children's Services as appropriate. The welfare of the child will be considered including how risk will be assessed and liaison with external agencies.

In borderline cases, or where there is room for doubt as to whether to make a referral, the case manager will still consult the LADO informally for advice before any investigation takes place and within one working day. The LADO may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

No investigation will be undertaken into allegations without prior consultation with the LADO so as not to jeopardise statutory investigations. Borderline cases will be discussed informally with the LADO without naming the school or individual until the LADO has advised whether a referral is required. Any allegations not meeting the criteria will be dealt with in accordance with Westminster Safeguarding Children Board's procedures. All such cases will be handled within the school without delay.

All discussions with the LADO will be recorded in writing.

In a strategy discussion or the initial evaluation of the case, the case manager should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim(s).

The initial sharing of information and evaluation by the appropriate agencies may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager should then consider with the LADO



what action should follow both in respect of the individual and those who made the initial allegation.

Disclosure of information

The case manager will inform the accused person as soon as possible after consulting the LADO and will provide as much information as possible at that time.

The parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They will also be kept informed of the progress of the case and the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome in confidence.

Where the LADO advises that a strategy discussion is needed, or police or Local authority services need to be involved, the case manager will not speak to the accused person or the parents or carers until those agencies have consulted and have agreed what information can be disclosed.

The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed and, where necessary, parents and carers will be made aware of the prohibition on reporting or publishing allegations about teachers. If parents or carers express a wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice.

The case manager should take advice from the LADO, police and children's social care services to agree the following: - who needs to know and, importantly, exactly what information can be shared - how to manage speculation, leaks and gossip; - what, if any information can be reasonably given to the wider community to reduce speculation; and - how to manage press interest if and when it should arise.

Where the police are involved, wherever possible the case manager will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

Action to be taken in respect of staff facing an accusation

The school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless external agencies object to this. The individual concerned will be advised to contact their trade



union representative, if they have one, or a colleague for support. He/she will also be given access to welfare counselling and medical advice.

The case manager will appoint a named representative to keep the member of staff informed of the progress of the case and to consider what other support might be appropriate. If the member of staff is suspended he/she will also be kept up to date with current work-related issues.

Where an investigation by the police or local authority is unnecessary, the LADO will discuss the steps to be taken with the case manager. The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to dismissal or a decision not to use the person's services in the future.

It may be necessary to undertake a further enquiries to determine the appropriate action. If so, the LADO will discuss with the case manager how and by whom the investigation will be undertaken.

Suspension

Suspension will not be an automatic response to an allegation and will only be considered in a case where: a. there is cause to suspect a child or other children at the school is or are at risk of harm orb. the allegation is so serious that it might be grounds for dismissal.

All options to suspension will be considered before taking that step. Consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment either within or outside of the school or providing an assistant when the individual has contact with children. The school will give due weight to the views of the LADO when making a decision about suspension.

A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Criminal proceedings

The School will consult with the LADO following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

Return to work

If it is decided that the person who has been suspended should return to work, the school will consider how best to facilitate this, for example, arranging a phased return and / or the provision



of a mentor to provide assistance and support in the short term. The school will also consider how to manage the contact with the child[ren] who made the allegation.

DBS and TRA Referrals and Ceasing to use staff

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

If the school ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met

If the accused person resigns or ceases to provide his / her services, this will not prevent child protection allegations being followed up in accordance with this policy and the statutory guidance. A referral to the Disclosure and Barring Service (DBS) will be made as soon as possible, if the criteria are met as per the guidance published by the DBS.

Staff should be aware that the DBS has statutory authority to bar a person from working in regulated activity with children and/or vulnerable adults in the UK.

Where a teacher is dismissed (or would have been dismissed had he/she not resigned) for misconduct, separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) should be made, as per the flow chart that appears in the guidance published by the TRA.

Guidance for making referrals can be found on the DBS website (<http://www.homeoffice.gov.uk/agencies-public-bodies/dbs/>).

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

Timescales

All allegations must be dealt with as a priority so as to avoid any delay. Where it is clear immediately that the allegation is unsubstantiated or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the Head should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, as far as possible it should be held within 15 working days.



Unsubstantiated, false or malicious allegations

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head of school will consider whether to take disciplinary action in accordance with the school's behaviour and discipline policy.

Record keeping and references - Details of all allegations found to be malicious will be removed from personnel records.

A clear and comprehensive summary of any allegations made against a member of staff, and all details leading to and including a resolution, and a note of any actions taken and decisions reached will be kept on the confidential personnel file and will be retained until the accused has reached normal retirement age or for a period of 10 years if that is longer. However, where an issue or concern relating to a member of staff and the safeguarding of children has been identified, records of any concerns, suspicions or investigations will be kept for 75 years. Such records will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The School will provide information regarding a substantiated allegation for the purposes of future references and DBS disclosures in accordance with the school's safer recruitment procedures. In cases where allegations are found to be malicious or unsubstantiated, reference will not be made in employer references.

Review and Learning Lessons

In accordance with the terms of reference of the Independent Inquiry into Child Sexual Abuse all schools are required to retain information which relates to allegations (substantiated or not) of organisations and individuals who may have been involved in, or have knowledge of child sexual abuse or child sexual exploitation; allegations (substantiated or not) of individuals having engaged in sexual activity with, or having a sexual interest in, children; institutional failures to protect children from sexual abuse or other exploitation. The school's normal policies for data retention and destruction are therefore subject to these overriding responsibilities to cooperate with IICSA.

At the conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.

Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.



Appendix 4 Action to be taken by Staff if a pupil goes missing from a School Trip:

1. Take an immediate head count to ensure that all other pupils are present. All adults and pupils should be asked to calmly explain when they last remember seeing the missing pupil.
2. An adult would search the immediate vicinity and if at a venue, the venue manager should be informed to arrange a search and potentially securing the venue.
3. Other pupils and staff might phone the pupil's mobile number (staff leading the trip will have a full list of contact details for the pupils on the trip)
4. The Head of school should be informed if the pupil is still missing.
5. A strategy would be agreed which may involve returning the rest of the group to school, or moving to a different location (if outside, for example) where the rest of the group can be safely supervised and ideally occupied.
6. The Head of school will phone the pupil's parents to explain what has happened and what steps have been taken. Depending on where the trip is, it may be appropriate for them to go to the venue, or to come to school.
7. Depending on the precise circumstances, either the Head of school or the staff with the group would call the police to notify them of a missing pupil. Precise information, timings and descriptions should be readily available before making this call.
8. A full record of all activities taken up to the stage at which the pupil was found would be made for the incident report.

NB: The Designated Safeguarding Lead may need to be informed, and may need to inform the Local Partnership.



Appendix 5 : Bales College Concern Form

Child's Name:	Class:
Date:	Person Reporting:
DP Signature:	Action Taken:
Date:	



Appendix 6: Bales College Pastoral Report Form

Date: _____ Student: _____ Staff: _____

Issues discussed

Actions

Follow up or further action

Name
Date

Signed

Student
Staff





Appendix 7: Low Level Concerns against Staff Policy

Introduction

Bales College (“the School”) understands the importance of a positive culture where concerns can be identified and spoken about openly and acknowledges that this is a key element of a strong safeguarding system. This Low-Level Concerns about Staff Policy seeks to ensure that all staff who work with children behave appropriately and to enable the early identification and prompt and appropriate management of concerns. This policy is in addition to the School’s Safeguarding Policy and is part of material presented at staff induction and INSET.

Bales College promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the School (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Creating a culture in which **all** concerns about adults are shared responsibly and with the right person, and are recorded and dealt with appropriately, is critical. This encourages an open and transparent culture, helping us identify concerning, problematic or inappropriate behaviour early. It minimises the risk of abuse and ensures that adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school.

A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’, that an adult working in or on behalf of the School may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work. The term ‘low-level’ concern does not mean that it is insignificant. Early identification and prompt management of all concerns about the behaviour of adults who work or volunteer with children is critical to effective safeguarding.

Everyone is required to share their low-level concerns using the school’s LLC report form which ensures a formalised mechanism for reporting low-level concerns;

- To allow staff to self-report to the School to protect themselves in situations where they may have found themselves compromised;
- To identify patterns of behaviour that are concerning;
- To ensure the School continues to have a culture of safeguarding in which all staff understand their responsibility to raise concerns.

Staff should therefore

- a) **report any behaviour by another adult** towards a pupil or another child that may have concerned them
- b) **self-report** in any situation where they feel their behaviour towards a pupil or another young person could be misinterpreted or misconstrued or leave them vulnerable

Concerns regarding the behaviour of another adult towards a child

A low-level concern should be reported when a member of staff is concerned about the behaviour of another adult towards a pupil or another child. This is not just where a professional boundary has clearly been broken: anything which causes staff to have a ‘nagging doubt’ about the way in which



other adults behave or interact with pupils should be notified, in order to protect both pupils and the members of staff involved. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, to behaviour that may look to be inappropriate.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their personal mobile phone, having forgotten to use the school-provided camera phone.
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating, or offensive language.

Self-reporting

From time to time an individual may find him/herself in a situation which might appear compromising to others, or which could be misconstrued. For example, a teacher might sense that a discussion about sensitive topics in RSE makes a group uncomfortable and that they might have considered the discussion inappropriate. Self-reporting this as a concern is one way for the teacher to ensure that the situation is properly understood and not misconstrued.

Equally, an individual may, for whatever reason, have behaved in a manner which on reflection he/she considers falls below the standard set out in the School's Staff Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how these might be perceived.

Reporting Low-level Concerns and the procedure for responding to them

Low-level concerns are reported to the Head of School, either directly or in writing to the Head of School. Low-level concerns relating to staff must be reported to the Head, in the same way as any other allegation.

Once the Head has received the low-level concern, they will in an appropriate sequence according to the nature and detail of the particular concern shared with them:

- Speak to the person who raised the low-level concern (unless it has been raised anonymously);
- Review the information and determine whether the behaviour in question is consistent with the School's Staff Code of Conduct and the law or constitutes a low-level concern;
- If they are in any doubt, seek advice from the LADO – on a no-names basis if necessary;
- Speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);



- Speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);
- The Head will ensure that appropriate and detailed records are kept of all internal and external conversations regarding the concern and context, their determination, the rationale for their decision and any actions taken, and retain records in accordance with the Low-level Concerns about Staff Policy;
- Reports about supply staff and contractors will be notified to their employers so any potential patterns of inappropriate behaviour can be identified

Almost always, there will be a perfectly innocent explanation for what has occurred, and staff should not feel awkward about making a report or being the subject of a report. Reporting these types of concerns is a neutral act and the Head will, on receiving a report, follow the steps above in response to the concern raised.

A member of staff who shares a low-level concern, or a more serious allegation, in good faith will suffer no detriment as a result and will benefit from the protection set out in the School's Whistleblowing Policy.

Some of the circumstances in which staff should raise a low-level concern:

- any incident where s/he feels his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk of misinterpretation
- any use by an adult of sexually inappropriate language, references or jokes to a pupil;
- any adult being overfriendly with pupils, for example, allowing first names to be used, or encouraging the use of nicknames of staff or pupils;
- email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols;
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating children
- any incident of physical contact with a pupil when no one else is present, including (as a protective record, not as an indication of any concern) when administering first aid or medical treatment, and including physical demonstrations in one-to-one sports coaching, music lessons and similar. School medical staff administering first aid or medical treatment are exempt from this requirement;
- any incident where a staff member has been alone with a pupil or pupils in a vehicle where this has not been authorised in advance;
- any social contact with pupils outside of School (other than planned/authorised events, educational visits or trips, or insignificant incidents such as passing a pupil in the street or in a shop or noticing they are sitting, separately, in the same restaurant or cinema) particularly where the member of staff and/or pupil(s) is/are under the influence of alcohol;



- if a pupil becomes aware of and/or uses a staff members home address, mobile or home phone number, or non-school e-mail address;
- any incident where, for whatever reason, a member of staff has not complied with the Staff Code of Conduct.

This is not an exhaustive list. Staff who are unsure of whether to complete a neutral notification are at liberty to discuss the matter with a member of the safeguarding team on a no-names basis. However, following such a discussion, should it be felt that the matter reaches the threshold for notification the member of staff will be expected to refer it to the Head in the usual way. If in doubt, a referral should always be made.

Recording Low-level Concerns

All low-level concerns (even those which turn out to be of no concern) will be recorded in writing. The record will set out the details of the concern, the context in which the concern arose and action taken. The name of the individual sharing their concerns will also be noted but if the individual wishes to remain anonymous that will be respected as far as possible. Records are stored securely by the Head

Reviewing Low-level Concerns

The Head will review all LLC records when a new LLC is received so that any patterns of concerning problematic or inappropriate behaviour can be identified. They may identify patterns of behaviour by a particular member of staff, or by a specific type of behaviour across the school. They will consider whether the reported matter is a low-level concern and whether it should be reclassified as an allegation and dealt with as outlined in the Safeguarding Policy. Where there is in any doubt whatsoever about the classification of a reported concern, the Head will seek advice from the Local Authority Designated Officer (LADO) on a no-names basis

The Head will also consider whether the concern also potentially raises misconduct or capability issues – taking advice from HR on a named or no-names basis where necessary – and, if so, refer the matter to HR.

Where there are multiple low-level concerns regarding the same individual these will be kept in chronological order as a running record, and with a timeline alongside. These may be used to demonstrate a pattern of behaviour.

Where a pattern of behaviour is identified in respect of a specific individual, the Head will also consider whether any wider cultural issues are at play that may have enabled the behaviour and/or whether the School should arrange for additional training or a review of any of its policies to reduce the risk of it happening again.

The Head will report to the Proprietor about the implementation of the Low-Level Concerns about Staff Policy and any evidence of its effectiveness, e.g. by including reference to it in safeguarding



reports and providing relevant data. The Proprietor will also review an anonymised sample of low-level concerns at least annually, to ensure that these concerns have been responded to promptly and appropriately.

Data Protection and Confidentiality

The School will always respect the personal data of staff (and others, where they may be identifiable) in implementing the Low-level Concerns about Staff Policy and in keeping records of low-level concerns secure.

The Data Protection Act 2018 includes a specific provision which permits organisations to process even the most sensitive personal data where necessary for the purposes of protecting children from harm. Although sharing of low-level concerns will not always involve legally sensitive categories of data, the safeguarding purpose is the same as that under the School's Safeguarding Policy. All staff are entitled, under data protection law, to ask to see the content of any low-level concern(s) retained by the School under the Low-level Concerns about Staff Policy as it relates to them personally and to make any reasonable objection as to the fairness or accuracy of that content.

For further information, please refer to the School's Data Protection Policy.

Retaining Records of Low-level Concerns

Low-level concerns will be retained securely by the School for as long as deemed relevant and necessary for a safeguarding purpose unless the School is required to disclose by law (for example, where the threshold of an allegation is met in respect of the individual in question). In most cases, any low-level concerns which are held relating to them will be retained at least until the individual leaves the School or for the same duration as that individual's personnel files are kept after leaving the School. Concerns will not be included in any onward reference, except as set in the *References* section below.

References

Only those low-level safeguarding concerns (or groups of concerns) that have met the threshold for referral to the LADO and are therefore substantiated, can be detailed in a reference.



Appendix 8 Low Level Concern Form

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

- is inconsistent with the school’s Code of Conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO.

Remember, a low-level concern is different to an allegation. See the table below for a definition:

Allegation

Behaviour which indicates that an adult who works with children has:

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

Low-Level Concern

Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- Is not consistent with an organisation’s Code of Conduct, and/or
- Relates to their conduct outside of work which, even if not linked with a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children

Appropriate Conduct

Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law.

Low-level concerns or allegations relating to staff must be reported to the Head. Please see the form on the reverse of this sheet.



Low Level Concern Form – for staff to complete

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s).

Please use a separate sheet if necessary. The record should be timed and dated.

Details of CONCERN:

Name of Staff member :	Role :
	Time and Date :



Low Level Concern Form – for Head to complete

This part of the form can be used by the Head to consider and address any unprofessional behaviour and support any individual to correct it at an early stage and to record any subsequent action(s).

Received by :	
At [time] : Date :	
WAS THE STAFF MEMBER SPOKEN TO? [Good practice will require a response]. NO ☐ - Give a brief but valid reason/explanation for not;	
YES ☐ - Please complete detail below - STAFF MEMBER'S RESPONSE TO CONCERN :	
ACTION TAKEN :	
Was advice/guidance sought from the LADO and/or Human Resources? Yes : ☐ No : ☐	
Signed :	Dated :

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the School's Data Protection Policy.