Safeguarding and Child Protection Policy

This policy applies to the Whole School, including EYFS

Date Revised:	September 2026
Reviewed by:	Safeguarding Governor / Chair of Governors
Responsible Staff Member:	Designated Safeguarding Lead
Date approved by Sam Madden, Safeguarding Governor:	28th September 2026 by Chair of Governors
Review Schedule:	Annually, Autumn and as required
Circulation:	Governors, all staff, parents, contractors, volunteers, school website
Date of most recent inspection:	June 2026
Reported findings relating to safeguarding	The ISI report from June 2026 records: Standards relating to safeguarding are met. All five Standards are met.

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1. Key external contact details

	Telephone No.	Email	Website
Kingston and Richmond Safeguarding Children Partnership	0783 4386459	lscb-support@achievingforchildren.org.uk	Kingston & Richmond LSCB (kingstonandrichmondsafeguardingchildrenpartnership.org.uk)
Local Authority Designated Officer (LADO)	07774 332675	lado@achievingforchildren.org.uk	Managing allegations against adults - Kingston & Richmond LSCB (kingstonandrichmondsafeguardingchildrenpartnership.org.uk)
London Borough of Richmond Single Point of Access Team	Office hours: 020 8547 5008 Our of hours: 020 8770 5000	spa@richmond.gov.uk	www.richmond.gov.uk/single_point_of_access
Support and Advice about Extremism Local Prevent Officer	Police emergency: 999 Police non emergency: 101 Helpline for non emergency advice for staff and Governors: 020 7340 7264 PC: Natalie Harvey Naheem Bashir	extremism@education.gsi.gov.uk Natalie.Harvey@met.police.uk Naheem.bashir@richmondwandsworth.gov.uk	
NSPCC Whistleblowing Advice Line & NSPCC Report Abuse in Education Advice Line	0800 028 0285 (Mon-Fri, 8am-8pm, weekends 9am-6pm)	help@nspcc.org.uk	

Disclosure and Barring Service	03000 200 190	customerservices@dbs.gov.uk	
Teaching Regulation Agency (TRA)	020 7593 5393	tracaseworker@education.gov.uk	
OFSTED Safeguarding Children	0300 123 4666 (Monday-Friday, 8am to 5pm)	enquiries@ofsted.gov.uk	
Independent Schools Inspectorate	020 76000 100	info@isi.net	
Operation Encompass contact	PC Benjamin Styles	Swmailbox-.MASHKingston/Richmond@met.police.uk	

2. Key school contact details

Position	Name	Mobile	Email
Governor responsible for safeguarding	Mr Sam Madden	07816 060219	MaddenS@alleyns.org.uk
Chair of Governors	Mr Antony Phillips	07795 268908	Antony.Phillips@fieldfisher.com
Designated Safeguarding Lead (DSL) inc. EYFS and looked after children	Mr Joe Morris	020 3750 5813	morris@thsboys.org.uk
Deputy Designated Safeguarding Lead (DDSL)	Mrs Anna Patel	020 8392 4841	patel@thsboys.org.uk
EYFS Deputy Designated Safeguarding Lead (DDSL)	Ms Katie Clark	020 3750 5823	clark@thsboys.org.uk
Head	Mr Neill Lunnon	020 8392 4843	head@thsboys.org.uk
SENCO	Mrs Anna Patel	0208 876 3323	patel@thsboys.org.uk
Health and Safety Lead	Mr Lee Digby	07904 946733	digby@thsboys.org.uk
Mental Health Lead	Mr Joe Morris	07863 793061	morris@thsboys.org.uk

3. Introduction and regulatory framework

This policy applies to Tower House School ("the School") which includes the EYFS setting. This policy is reviewed and updated annually (as a minimum) and is available on the School website or from the School office. The safety and welfare of all our pupils at Tower House School is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety.

This policy has regard to the following guidance and advice:

Keeping Children Safe in Education (KCSIE September 2026) ('KCSIE 2026')

- KCSIE incorporates the additional statutory guidance Disqualification under the Childcare Act 2006 (September 2018)

KCSIE also provides links to various toolkits and additional advice and support:

- Working Together to Safeguard Children (March 2026). WT refers to the non-statutory advice: Information sharing: advice for practitioners providing safeguarding services (May 2024)
- Prevent Duty Guidance: for specified authorities in England and Wales (December 2023). Prevent is supplemented by non-statutory advice and a briefing note:
  - The Prevent duty: Departmental advice for schools and childcare providers, June 2015)
  - The use of social media for on-line radicalisation (July 2015)

- Relationships education, relationships, and sex education (RSHE) and health education (September 2025)
- Children's Social Care National Framework (December 2023)
- Behaviour in schools (February 2024)
- Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (August 2024)
- Children Missing Education (September 2025)
- Digital and technology standards in schools and colleges (August 2026)
- Mobile phones in schools (June 2026)
- After school clubs, community activities, and tuition (safeguarding guidance for providers) February 2026.
- The Charity Commission Guidance: Safeguarding and protecting people for charities and trustees (June 2022)

This policy also takes into account the procedures and practice of Richmond local authority as part of the inter-agency safeguarding procedures set up by Kingston and Richmond Safeguarding Children Partnership.

4. Equality act 2010

The School understands and recognises their obligations under the Equality Act and that the school must not discriminate against pupils because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation.

In the context of safeguarding, the School will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. The School will also consider their duty to make reasonable adjustments for disabled pupils.

The School recognises that effective safeguarding is anti-discriminatory and anti-racist, and understands factors, including economic and social circumstances, ethnicity and disability, which can impact on children and families' lives. It promotes an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of its safeguarding responsibilities. Staff are alert to the risk of adultification bias, where children, particularly Black children, may be perceived as older than they are, which can lead to their needs being poorly understood and opportunities to provide help being missed.

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

5. Concerns about a child

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

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

Parents are encouraged to raise any concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may raise concerns directly with the DfE if they wish.

The School has arrangements for listening to children and providing early help which will be advised by the DSL/DDSL (SENDCO) and the mental health lead.

Our support to pupils includes the following:

- Every child from Year 3 upwards has a homework diary which contains guidance on where to turn for advice, including the confidential helpline ChildLine.
- Our notice board displays advice on where pupils can seek help.
- We provide regular lessons to pupils on online safety and ensure that all pupils understand and adhere to the School's guidelines in this area. This includes guidance on educating pupils to stay safe including online safety and online protection. For more details on cyber-bullying please refer to the School's *Anti-Bullying Policy*. Online safety to pupils is taught through lessons, activities and assemblies and our annual online safety week with separate information evenings for parents.
- The DSL shares with parents' regular updates around online safety.

6. Definitions of child protection and safeguarding

Safeguarding and promoting the welfare of children is defined as:

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

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

7. Types and signs of abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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

Abuse can be:

- physical abuse;
- emotional abuse;
- sexual abuse; and/or
- neglect.

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

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

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

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

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

The school's safeguarding partners are Kingston and Richmond Safeguarding Partnership. A full copy of their local procedures can be found kingstonandrichmondsafeguardingchildrenpartnership.org.uk website and SPA: The London Borough of Richmond Single Point of Access: www.richmond.gov.uk/single_point_of_access.

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

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

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

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

10. Information sharing

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

Fears regarding sharing information under data protection laws (the Data Protection Act 2018, the UK General Data Protection Regulation and the Data Use and Access Act 2025) do not prevent the sharing of information to keep children safe.

When deciding what information to share, staff should consider:

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

Professional judgement should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. Care should be taken not to omit information where it may be relevant to understand or managing safeguarding risk.

If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead (DSL).

The governing body will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without the need for consent where there is good reason to do so.
- not providing pupils' personal data in response to a Subject Access Request where the serious harm test under the data protection legislation is met.

11. Receiving a disclosure

If staff receive a disclosure from a child they should:

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

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

12. Wishes of the Child

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

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

In addition we advise not to probe or put words into the child's mouth, to limit questioning to the minimum necessary for clarification, remain calm and 'neutral', be aware of your non-verbal and verbal communication, give the child your full attention, time and privacy, conduct the meeting in a room with the door open and maintaining 'sightlines' to other staff, only ask open-ended questions for clarification purposes, encourage the child to talk spontaneously and reassure the child it is not their fault.

The School manages this ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

In the light of any disclosure made, the DSL/DDSL may decide to initiate an enquiry with the pupil's parents or carers.

During such enquiries the identity of the adult who received the disclosure will not usually be shared, so long as this is practical and does not compromise the welfare of the child.

However, this information may be shared with relevant agencies should the subsequent effective case management require it.

The School supports such pupils by recognising that children who are abused or witness violence may find it difficult to develop a sense of self-worth and to view the world as benevolent and meaningful. They may feel helplessness, humiliation and some sense of self-blame. School may be the only stable, secure and predictable element in the lives of children at risk. Nevertheless, when at school their behaviour may be challenging and defiant or they may be withdrawn and difficult to engage. Some children actually adopt abusive behaviours, and these children must be referred on for appropriate support and intervention.

The School will endeavour to support pupils through:

- Providing a key adult (Joe Morris, Mental Health Lead) to act as wellbeing mentor. This adult with have the appropriate mental health training;
- The content of the curriculum to encourage self-esteem and self- motivation;
- The School ethos which, promotes a positive, supportive and secure environment, and gives pupils a sense of being valued;
- Allowing children to express their views and give feedback via their class teacher or Head of Year or directly to the Deputy Head who is in charge of pastoral care.
- The School's Behaviour and Discipline Policy, which is aimed at supporting vulnerable pupils in the School;
- Ensuring all staff will agree on a consistent approach, which focuses on the behaviour of the offence committed by the child but does not damage the pupil's sense of self-worth;
- Ensuring that the pupil knows that some behaviour is unacceptable but he is valued and not to be blamed for any abuse which has occurred;
- Recognising that children living in a home environment where there is domestic violence, drug or alcohol abuse are vulnerable and in need of support and protection;
- Vigilantly monitoring children's welfare, keeping records and notifying the relevant agencies as soon as there is a recurrence of a concern;

If the DSL believes the child requires additional support from one or more agencies, an Early Help Assessment (EHA) is completed. If the DSL (or Deputy) believes the child has suffered from or is likely to suffer significant harm then the Single Point of Access Team / Police must be informed immediately.

See Appendix 2 and 3 for a flow chart of the procedure / quick guide of safeguarding reporting.

13. Contextual Safeguarding

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

14. Early Help and family help

Early help means the support available to all children and families through universal and community-based services, including schools, health services, and other local provision. Its purpose is to improve resilience and outcomes or to

reduce the chance of problems getting worse. Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

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

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

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

In the first instance, staff identify a pupil who may benefit from early help should discuss this with the School's DSL. The DSL will work with Kingston and Richmond using the London Threshold Document to undertake an assessment. Where the child's needs can be met through universal early help, the DSL will coordinate the School's response and liaise with relevant services. Where a child's needs are more complex and may require a multi-disciplinary Family Help assessment, the DSL will make a referral in accordance with the local authority's referral process. Further guidance can be found in Working Together to Safeguard Children (March 2026) and the Families First Partnership Programme Guide.

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

15. Referral to external agencies

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

16. Record keeping

All concerns, discussions and decisions (including the rationale for those decision) made under these procedures should be recorded in writing by completing a safeguarding concern form, as quickly as possible. This includes instances where referrals were or were not made to another agency, such as children's social care or the Prevent Programme. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome.

The safeguarding concern form contains:

- The child's name; address, date of birth;
- The day, date and time of the observation or the disclosure;
- An objective record of the observation or disclosure;
- The exact words spoken by the child; this will form a vital piece of evidence in any subsequent investigation. Make clear differences between fact, opinion and hearsay.
- The name of the person to whom the concern was reported, with date and time;
- The names of any other person present at the time. Also note how the child presents themselves.

Report the matter to the DSL / DDSL / Single Point of Access Team. If the child is in immediate danger or is at risk of harm a referral should be made to the Single Point of Access Team or the police immediately. Anyone can make a referral.

The record of concern should be signed and dated, kept confidential and stored securely with the DSL who will ensure the file is only accessible to those who need it and is shared in accordance with the guidance set out in Parts one and two of KCSIE 2026.

In line with *Keeping Children Safe in Education (KCSIE)*, all staff are required to record **any** concern relating to a child and report it to the Designated Safeguarding Lead (DSL). No concern is too small to document. All concerns must be entered into the **iSAMS Wellbeing Manager**.

This system enables the DSL and the wider safeguarding team to build a comprehensive picture of a pupil's wellbeing. After reviewing the information, the DSL will determine the appropriate course of action. This may include, but is not limited to:

- No further action
- Follow-up by the Head of Year (HOY)
- Contact with parents or carers
- Escalation to the Single Point of Access (SPA) for a referral

HOYs may continue to add relevant information to the log; however, the DSL retains responsibility for the final review and decision-making.

Where concerns meet the threshold for further safeguarding action, the DSL and safeguarding team will transfer the relevant records, along with any supporting documentation, to **CPOMS**.

If a member of staff has an **immediate** concern about a child's safety or welfare, they must contact the DSL as soon as possible to discuss the matter. Staff should also record the concern on the Wellbeing Manager in accordance with safeguarding procedures.

Record keeping for concerns of a child raised by an external organisation

Where a concern about a child is raised by an **external individual or organisation**—including agencies, clubs, visitors, or members of the public—they must be directed to contact the DSL immediately.

External individuals will also be asked to complete a **Pupil Concern Form** as soon as possible. Contact details and guidance for reporting concerns are available on the school website, within safeguarding policies, on posters displayed around the school, and on the reverse of staff lanyards.

All external concerns and all completed Pupil Concern Forms are given to the DSL who records them on **CPOMS/wellbeing manager**.

17. Responding to specific safeguarding issues

Radicalisation and Prevent

Staff should be aware of the indicators which may signal that children are at risk of radicalisation or being drawn into terrorism and should report any concerns to the School's DSL. A Prevent referral or children's social care may be made depending on the level of risk. If staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or inform the DSL or Contact the Richmond Single Point of Access Team.

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

All teaching staff undertake online Prevent training (see website) to ensure they are aware of real life scenarios of radicalisation. The School's ICT Administrator has visibility of the actions pupils perform via our network. The ICT Administrator sets criteria to flag alerts and monitors online activities of pupils using the applications and hardware detailed below. Interventions are made as appropriate.

The technical details of the filters used by the School are Smoothwall with accreditation from (amongst others) Forrester, CRN and Best Container Security Platform.

Female Genital Mutilation (FGM)

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

Serious violent crime

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

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

Making or sharing nudes and semi-nudes and/or videos (including those generated using AI)

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

The School recognises that images of pupils published by the School on its website, social media channels, or in marketing materials may be vulnerable to misuse, including manipulation using AI tools. The School's approach to obtaining consent for, publishing, and managing pupil images (including the steps taken to mitigate the risk of AI manipulation of published images) is set out in the School's Acceptable Use of Images Policy. Staff should refer to

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

All members of staff in an education setting have a duty to recognise and refer any incidents involving making or sharing nudes and semi-nudes and/or videos including those generated using AI eg deepfakes (often referred to as the sharing of and semi-nudes) and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'making or sharing nudes and semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by persons under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes and/or videos may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

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

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

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

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of making or sharing nudes and semi-nudes and/or videos being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated intimate images and/or videos. Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of making or sharing nudes and semi-nudes and/or videos including those generated using AI being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.

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

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of

harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process

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

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

If none of the above apply, the School may decide to respond to the incident without involving the police or children's social care. All incidents relating to making or sharing nudes and semi-nudes and/or videos including those generated by AI being shared need to be recorded, whether they have been referred externally or not. The decision to respond to an incident without involving the police or children's social care will only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the School's pastoral support and disciplinary framework. Any decision in this regard will be made by the DSL (or equivalent) with input from the Head. The decision will be made and recorded in line with this Policy and will be based on consideration of the best interests of any child or young person involved. Any decision will take into account proportionality as well as the welfare and protection of any child or young person. The decision will be reviewed throughout the process of responding to the incident. If doubts remain local safeguarding arrangements will be followed.

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

Children absent from education

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

The school's procedures for unauthorised absence and for dealing with children who are absent, repeatedly and/or for prolonged periods, and children missing from education are managed in accordance with the School's *Missing Child Policy* and *Attendance Policy*.

The School will report to the local authority a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

For further details on when the School has a duty to report to the local authority, please see the *Missing Child Policy (including a child missing education) and Procedures when a Child is not Collected on Time and the Attendance Policy.*

When working with the local authority children's services where school absence indicates safeguarding concerns the School will have regard to the statutory DfE guidance 'Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (August 2024) and to the EYFS Statutory Framework for children aged 0-5 years.

For further details please see the Attendance Policy on the school website.

Mental health support

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

The School aims to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our pupils. The School has a PSHE Policy in place and also diarises wellbeing and mental health initiatives across all year groups.

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL. The DSL will call 999 if there is immediate danger and NHS 111 for urgent non emergency mental health support.

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

The school has a full-time member of staff who is the Mental Health Lead for the whole school. The MH Lead runs assemblies on mental health awareness and updates staff regularly at INSET.

Potential mental health issues are recorded on iSAMS wellbeing manager and filed by staff and flagged if there is a potential for concern.

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

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

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

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

18. Concerns about another staff member

The School provides clear and comprehensive guidance about the standards of appropriate behaviour and actions of its staff in the Staff Code of Conduct. All staff are expected to comply with the standards contained within this Code of Conduct at all times.

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

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

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

19. Concerns about safeguarding practices in the School

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'.

Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found in the Staff Handbook.

There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

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

20. Intimate Care

Definition of Intimate Care Intimate care may be defined as any activity required to meet the personal care needs of each individual child. Intimate care may involve washing, touching or carrying out an invasive procedure such as cleaning up after a child has soiled themselves, that most children can carry out for themselves, but with which some are unable to do due to physical disability, special educational needs associated with learning difficulties, medical needs or needs arising from the child's stage of development.

Intimate care may also involve help with drinking, eating, dressing, supervision of a child involved in intimate self-care and toileting. Help may also be needed with changing colostomy bags and other such equipment. It may also require the administration of an insulin injection, EpiPen or rectal medication.

In most cases intimate care will involve procedures to do with personal hygiene and the cleaning of equipment associated with the process. In the case of a specific procedure only a person suitably trained and assessed as competent will undertake the procedure. Any additional training will be provided by the school.

The management of all children with intimate care needs will be carefully planned. The child's welfare and dignity is of paramount importance. Staff will be supported to adapt their practice in relation to the needs of individual children, taking into account their developmental stage. The child will be supported to achieve the highest level of autonomy that is possible given their age and abilities.

Staff will encourage each child to do as much for themselves as they can. This may mean, for example, giving the child responsibility for washing themselves.

Individual intimate care plans will be drawn up for particular children as appropriate to suit the circumstances of the child. Careful consideration will be given to each child's situation to determine how many carers might need to be present when a child is toileted. Where possible one child will be catered for by one trained adult, unless there is a sound reason for having more adults present. If this is the case, the reasons will be clearly documented.

Intimate care arrangements will be discussed with parents/carers on a regular basis and recorded on the child's intimate care plan. The needs and wishes of children and parents will be taken into account wherever possible within the constraints of staffing and equal opportunities legislation.

Working with Parents: Parents should be encouraged and empowered to work with staff to ensure their child's needs are identified, understood and met. This will include involvement with Individual Education Plans (IEPs), Health Care Plans and any other plans which identify the need for intimate care where appropriate. Exchanging information with parents is essential through face-to-face contact, telephone or written correspondence.

20. Arrangements for dealing with child on child abuse (including child on child sexual violence and harassment)
Child on child abuse (including child on child sexual violence and harassment) is abuse by one or more children against another child. It is a safeguarding concern for both the victim and the alleged perpetrator and is preventable. It can happen both inside and outside of school, and online. It can manifest itself in many ways and can include:

- bullying (including cyber bullying, prejudice-based and discriminatory bullying),
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents,
- abuse within intimate partner relationships between children (also known as teenager relationship abuse)
- physical abuse and harm (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm),
- physical assault and harm, or the threat of harm with a weapon
- initiation/hazing type violence and rituals,
- upskirting
- consensual and non-consensual making or sharing nudes and semi-nudes and/or videos including those generated using AI eg deepfakes,
- harmful sexual behaviours, sexual violence and sexual harassment, which may include misogyny/misandry
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- a group of children sexually assaulting or sexually harassing a single child or group of children.

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

Staff will address inappropriate behaviour and challenge such behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future.

The school takes a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys".

Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them. Staff know to report any concerns to the DSL.

The School acknowledges that even if there have been no reported cases of child on child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will

follow once a report has been made. These procedures will be well promoted via posters around school in a format that is easily accessible and easily understood by children.

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

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

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to child on child group isolation or bullying (including prejudice-based bullying). The School will consider extra pastoral support for those children to be provided by Anna Patel (SENCO) who has had mental health first aid training.

The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The School takes the following steps to minimise the risk of child on child abuse by addressing the issue via the PSHE curriculum, year group and whole school workshops. 'Anti-Bullying' Week provides a focus for this work. Class teachers and heads of year regularly review and discuss this issue with their classes, reminding children of the need to speak out and the adults to whom they can turn for help.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm, staff should follow the procedures below rather than the School's anti-bullying and behaviour policies:

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

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL or DDSL who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL or DDSL will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where

a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the **K**ingston and Richmond Safeguarding Partnership and kingstonandrichmondsafeguardingchildrenpartnership.org.uk website and SPA: The London Borough of Richmond Single Point of Access: www.richmond.gov.uk/single_point_of_access.

The School will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (March 2024) when responding to an allegation that making or sharing nudes and semi-nudes and/or videos including those generated using AI have been shared.

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

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

• the victim;
• whether there may have been other victims;
• the alleged perpetrator(s); and
• all the other children (and, if appropriate, staff) at the School especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised.

The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them.

The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).

The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. 74 This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport.

The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

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

The School will keep a written record of all concerns, discussions and decisions made.

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

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour policy.

21. Dealing with safeguarding concerns or allegations made about staff including supply and trainee teachers, volunteers and contractors

These provisions cover EYFS.

The School's procedures for managing allegations against staff (including the Head and DSL) and volunteers follows KCSIE 2026 and Working Together guidance, and local LADO arrangements and apply when staff, including volunteers and agency staff, have (or alleged to have):

- Behaved in a way that has or may have harmed a child.
- Possibly committed a criminal offence against or relating to a child.
- Behaved towards a child, or children, in such a way that indicates he or she may pose a risk of harm if they worked regularly or closely with children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

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

Allegations against a member of staff who is no longer at the School should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the school will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation.

The School should not undertake their own investigation of the allegations without prior consultation with Richmond LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with Richmond LADO on a no-names basis.

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

1. Allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head. Where the Head is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors (the case manager).

   Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the Chair of Governors and Richmond LADO.

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

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

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

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

    - redeployment within the School so that the individual does not have direct contact with the child or children concerned;
    - providing an assistant to be present when the individual has contact with children;
    - redeploying to alternative work in the School so the individual does not have unsupervised access to children;
    - moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes account of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
    - temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

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

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

6. Where further enquiries are required to enable a decision about how to proceed, the designated officer LADO and case manager should discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation should usually be undertaken. The LADO will provide advice and

guidance to the school to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

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

8. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.

9. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service (DBS) or Teaching Regulation Agency (TRA) should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the DBS any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the TRA and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

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

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

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

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

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of

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

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

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

Please also read the separate *Code of Conduct.*

22. Procedure for managing allegations about supply teachers and contractors

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead, but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

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

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

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

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

23. Safeguarding concerns and allegations about organisations or individuals using school premises

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

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

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

24. Dealing with concerns or allegations that do not meet the harm threshold / low level concerns
A low-level concern is any concern 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; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

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

The School's code of conduct can be found on the All Staff Team. The aim of the code of conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code of conduct at all times.

Staff must share all concerns with the Head without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the Head, it should be shared with the DSL. A form for a low level concern can be found in Appendix 5.

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

If a concern is raised by a third party, the Head will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it. The Head will ultimately be the decision maker.

All low-level concerns will be recorded in writing by the Head. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably

possible. The records will be kept confidential, will be held securely and in compliance with data protection laws. The information will be retained for 10 years or until the individual has left retired, whichever is longer, and filed and kept by the Head.

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

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

Where a low-level concern relates to a person employed by a supply agency or a contractor, staff should share that concern with the Head. The concern will be recorded in accordance with the School's low-level concern, and the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified. If the school is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a more collaborate decision-making approach.

25. Safer recruitment

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

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

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

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the School's *Safer Recruitment and Selection and Disclosures Policy.*

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in our Visiting Speakers Policy.

The School undertakes a risk assessment before agreeing to a visiting speaker being allowed to attend. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers, whilst on the School site, are supervised by a School employee. Visiting speakers will be required to show original current identification document including a photograph such as a passport or photo card driving licence. The School keep a formal register of visiting speakers in line with its Data Protection Policy.

We have procedures for recording the details of visitors to the School. We take security steps to ensure that we have control over who comes into the School so that no unauthorised person has unsupervised access to the children.

26. Management of safeguarding

Mr Joe Morris is the School's Designated Safeguarding Lead (DSL). The DSL's role covers the whole school including the Early Years Foundation Stage.

Mrs Anna Patel, SENCO, and Ms Katie Clark, Head of EYFS, are the Deputy Designated Safeguarding Leads and to whom reports should be made in the absence of the DSL. This ensures there is always the required cover for the role.

The DSL and DDSLs contact details can be found on the Key Contacts page at the start of this policy, and in every room of the school.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School.

The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL will also take lead responsibility for online safety and understanding the filtering and monitoring systems and processes the School have in place. The DSL works with the Safeguarding Governor to review and update the School's safeguarding policy.

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

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

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to the Single Point of Access Team.

During term time, the DSL or DDSLs will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. For out of hours/out of term activities, the School's arrangements are in the first instance to contact Mr Joe Morris, the DSL. The school has robust cover arrangements in place for when the DSL is unavailable, including a shared mailbox or equivalent system to ensure safeguarding concerns are received, monitored and acted upon without delay.

The DSL or Deputy DSL should liaise with the safeguarding partners and work with other agencies in line with WT . " NPCC - When to call the police " can assist the DSL or Deputy DSL understand when they should consider calling the police and what to expect when they do. The DSL or DDSL will also be responsible for liaising with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.

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

Whilst the Head should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

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

The DSL and DDSLs have responsibilities of their safeguarding role as DSL included in their job descriptions.

27. Training
Induction and training are in line with advice from the Kingston and Richmond Safeguarding Children Partnership.

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

- The child protection and safeguarding policy, including the policy and procedures to deal with child on child abuse.
- the role and identity of the DSL and DDSL, including safeguarding children induction at THS.
- the behaviour management policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- The Staff *Code of Conduct*
- The *Staff Handbook* including the whistle blowing procedure, acceptable use of technologies and staff/pupil relationships and communications including the use of social media
- Child protection training in accordance with Kingston and Richmond Safeguarding Children Partnership procedures
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing education;
- the online safety policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- A copy of Part 1 of KCSIE at least, and
- School leaders and staff who work directly with children will also be required to read Annex A of KCSIE (and Part 5 of KCSIE).
- Social media guide which includes online safety
- Low level concerns policy (Appendix 5)

All staff are also required to:

- Read Part One of KCSIE and confirm that they have done so. Each time Part One of KCSIE is updated by the Department for Education, staff will be updated on the changes via email bulletins.
- Understand key information contained in Part One of KCSIE. Each September staff complete a questionnaire detailing understanding of Part One of KCSIE 2026 (school leaders and staff who work directly with children are obliged to read, via TES Develop, and understand Part One and Annex A and B, other staff need only read and understand Part One). This confirms their understanding and that they have read Part One of KCSIE. The DSL talks through changes with staff at the start of the academic year (at INSET). Staff are also emailed in advance with details of changes.
- Receive training in safeguarding and child protection regularly, in line with advice from the Kingston and Richmond Safeguarding Children Partnership.

Training will include:

- Online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring),
- Harmful sexual behaviours (including child on child sexual violence and harassment).
- Racism, faith-based prejudice and other prejudice-based harm as safeguarding concerns, including how to recognise, challenge, address and report such concerns,
- The safe and effective use of AI including training on identifying and mitigating the key risks associated with AI, including risks to safeguarding, data protection, ethics, and intellectual property. The School will draw on the DfE's support materials on Generative and artificial intelligence in education, developed in partnership with Chiltern Learning Trust and the Chartered College of Teaching, including Module 3 safe use.

- Prevent awareness training to equip staff to understand the factors that lead people to support terrorist ideologies or engage in terrorist related activity, be able to recognise susceptibility to terrorism and be aware of what action to take in response including the School's internal Prevent arrangements.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via emails, e-bulletins and staff meetings, at least annually.
- A range of appropriate TES Develop (Educare) Courses around safeguarding, mental health and welfare.

All EYFS staff are required to attend safeguarding training specifically designed for staff caring for 0-5 year olds which must cover all the areas set out in Annex C to the EYFS Statutory Framework: Criteria for effective safeguarding training.

Training must be renewed every two years by either the DSL and external provider or the LA, and all staff are required to attend. EYFS staff are supported to put their training into practice via regular updates and reminders from the DSL and inset training sessions, as well as termly meetings with their line manager (Head of Junior School) which will always include safeguarding as an agenda item.

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

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

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

27.2 The DSL

The DSL receives updated has attended a child protection training course (Level 3) and receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role.

This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children susceptible to radicalisation, recognising and responding to prejudice-based harm including racism and faith-based prejudice, record keeping and promoting a culture of listening to children and training in the Kingston and Richmond Safeguarding Children Partnership's approach to Prevent duties and harmful sexual behaviours; WRAP Awareness Trained (Workshop to Raise Awareness of Prevent).

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

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

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

This includes:

- ✓ DSL attends Termly Independent Schools Safeguarding Forum. These are organised by the Kingston and Richmond Safeguarding Children Partnership and respond to local issues as well as national learning via Serous Case Reviews.
- ✓ DSL attends relevant CPD provided by Richmond & Kingston Children's Social Care
- ✓ DSL has completed an extensive range of CPD offered by EduCare: The Prevent Duty / Preventing Bullying / Introduction to CSE / Safeguarding Young People / Child Protection / Online safety / Preventing Bullying / Neglect / Awareness of child on child Abuse / Sexual Violence & Sexual Harassment between Children & Young People.
- ✓ DSL liaises at least every term with the nominated governor for safeguarding on suitable training.
- ✓ DSL receives weekly & termly online advice regarding online and real world safeguarding issues and advice from eg: Safeguardinginschools.co.uk / UK Internet Centre / National Online safety / NSPCC

The learning as gained above is cascaded through the staff community as appropriate, via email.

The DDSLs are trained to the same level as the DSL. The following staff members are also hold Level 3 safeguarding certificates:

Katie Clark (EYFS)
Christina Harrison
Neill Lunnon (Head)
Jane McCabe (EYFS LSA)
Joe Morris (DSL)
Anna Patel (DDSL)
Ben Peyton
Luke Satterthwaite

28. Oversight of safeguarding, including reviewing policies and procedures

The governing body has designated governors with specific responsibilities for safeguarding and related areas, in order to provide strategic oversight, support and challenge to the School's leadership. These designated roles include:

Safeguarding Governor: Mr Sam Madden is the Nominated Safeguarding Governor. The Safeguarding Governor takes a lead role at board level in championing safeguarding and child protection across the School. Their responsibilities include liaising regularly with the DSL to maintain oversight of safeguarding activity; reviewing and challenging the effectiveness of safeguarding policies and procedures; ensuring that the annual review of this policy is carried out and that safeguarding remains a standing agenda item at governing body meetings; monitoring safeguarding training compliance for staff and governors; and reporting to the full governing body on safeguarding matters at least termly. The Safeguarding Governor receives enhanced safeguarding training to enable them to provide informed strategic challenge and is familiar with the local multi-agency safeguarding arrangements.

SEND Governor: Emma McPhie is the designated SEND Governor. The SEND Governor provides strategic oversight of the School's provision for pupils with special educational needs and disabilities, with particular regard to the additional safeguarding challenges that children with SEND can face. The SEND Governor liaises regularly with the SENCO to ensure that safeguarding considerations are fully integrated into the School's SEND provision and that staff are equipped to recognise and respond to safeguarding concerns involving children with SEND.

All governors with designated safeguarding-related roles receive appropriate induction and ongoing training relevant to their area of responsibility. They work collaboratively to ensure that the governing body maintains effective strategic oversight of safeguarding across the School, and they report to the full governing body on their respective areas at least annually.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, including lessons learnt. The Governor with responsibility for safeguarding and child protection conducts regular audits of policy and practice; 'stress testing' staff knowledge of safeguarding issues and protocols to follow in the event of a concern being raised.

The School draws on the expertise of staff, including the DSL and DDSLs, in shaping the School's safeguarding arrangements and policies by way of staff meetings and inset day safeguarding training.

In addition, the Board of Governors ensures that the School has:

- A DSL for safeguarding and child protection who is a senior teacher and who has undertaken the appropriate training (Mr Joe Morris)
- Child protection policies and procedures which are reviewed annually and made available to parents
- Procedures for dealing with allegations of abuse made against members of staff including allegations made against the Head
- Safer recruitment procedures in line with national guidance
- A training strategy to ensure all staff, including the Head and Governors, receive child protection training, with refresher training at regular intervals in accordance with the Kingston and Richmond Safeguarding Children Partnership requirements

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

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

29. The school's arrangements to fulfil other safeguarding responsibilities

29.1 Teaching children how to keep safe

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

Internet safety is an integral part of the School's curriculum and is embedded in ICT, PSHE and sex and relationships education (SRE). The School works with pupils, parents and carers alerting them to online safety. Safer use of the internet is taught through lessons, activities and assemblies, and parents are encouraged to make use of websites such as The UK Safer Internet Centre.

29.2 Filtering and monitoring

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system. The school systems are: Smoothwall.

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

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

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing the filtering and monitoring provision at least annually. Reviews include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record is kept of these checks.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

The School ensures that its filtering and monitoring arrangements addresses risks, including in relation to any generative AI tools used within the School.

Further detail of the School's policy and procedures in relation to online safety can be found in the School's IT Acceptable Usage Policy (reviewed annually by the Governing Body) which also includes detail on the use of mobile technology in school (and accessing 3G, 4G and 5G technology on school premises) and the School's filtering and monitoring arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the School's systems. The Policies are also included in the pupil's homework diaries.

Staff are equipped with the knowledge to safeguard children online by attending online safety training. This including the four Cs of online safety risk as defined by KCSIE: Content, Contact, Conduct and Commerce.

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

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

The School will only use AI products that meet the DfE's Generative AI: product safety expectations and any use of generative AI by staff or pupils will be carefully considered and assessed, evaluating the benefits and risks within the School's context.

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

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

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

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

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

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

The School's AI Policy sets out further detail on the School's approach to AI, including approved tools, acceptable use guidelines, academic integrity expectations and data protection arrangements. Staff should refer to that policy alongside the safeguarding procedures set out in this policy.

29.4 Use of mobile phones
The School operates as a mobile phone-free environment by default, in accordance with the DfE's guidance. Pupils do not have access to their mobile phones throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime.

The School recognises that notwithstanding the mobile phone ban, children may still have access to the internet via mobile phone networks (i.e. 3G, 4G and 5G), through other personal devices such as smart watches or, where permitted, personal laptops or tablets. The School's filtering and monitoring systems may not apply to content accessed via pupils' personal devices. Where those devices are not connected to the School's network. To mitigate this risk, the School restricting the types of personal devices that pupils may bring into School; and ensuring that any 'bring your own device' (BYOD) arrangements are subject to the School's acceptable use policy and that devices are

configured to comply with the School's filtering requirements before being used on the School premises. Any safeguarding concerns arising from a pupil's use of a personal device should be reported to the DSL immediately.

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

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

29.6 Relationships and Sex Education ("RSE")
The School understands that children and young people need knowledge and skills that will enable them to make informed and ethical decisions about their wellbeing, health and relationships.

The School's Relationships Education /RSE curriculum is delivered as part of a whole school approach to wellbeing and positive relationships that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobic, biphobia, sexual violence / harassment, derogatory behaviour or other forms of physical violence and conflict.

The School focusses on building positive attitudes and skills, promoting healthy norms about relationships, including sexual relationships where relevant and about health. The School's curriculum also addresses online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when where to seek help. The School recognises that discussions about sensitive topics in RSE can lead to increased safeguarding reports. All staff know what to do if they have concerns that a pupil is being neglected or abused, including those who have seen, heard or experienced the effects of domestic abuse.

The School has regard to the DfE's statutory guidance Relationships Education, Relationships and Sex Education (RSE) and Health Education when making arrangements for and teaching RSE. RSE will form part of the School's PSHE programme.

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

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

29.8 Looked After Children
The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by the local authority.

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

29.9 Arrangements for Visiting Speakers
The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to our pupils is to ensure that they can critically assess the information that they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and the British values of democracy.

The School will undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers are expected to understand that where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. The School may request a copy of the visiting speaker's presentation and/or footage in advance of the session being given.

Visiting speakers, whilst on the School site, are supervised by a School employee. Visiting speakers will be required to show original current identification document including a photograph such as a passport or photo card driving licence. The School keep a formal register of visiting speakers in line with its Data Protection Policy.

29.10 Arrangements for use of school premises for non-school activities
When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate.

This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

The School will ensure that the DSL or DDSL can be contacted and/or is available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll.

Club providers are provided with a copy of:

- This policy
- Visitors Child Protection and Safeguarding leaflet
- H&S Visitors Guide
- Are given a face to face induction with the DSL

The School will ensure that safeguarding requirements are included in any agreement for use of the school premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement. The school requests hirers to have DBS checks in place and asks for written confirmation of this, and the date they made the check.

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

29.11 Off-site tuition, performances away from school
In addition to the measures above the organising member of staff is responsible for checking safeguarding procedures and appropriate DBS checks as part of the Risk Assessment, carried out prior to the visit. Such Risk

Assessments are checked and reviewed by the Health and Safety Officer and the DSL / DDSL where appropriate. Risk Assessments are a vital part of the Health and Safety procedures undertaken prior to these trips. Our policy for *Educational Visits and Residential Trips* is set out in a separate document. Every risk assessment has a Safeguarding Section included on it.

30. Operation Encompass

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

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

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

The School's DSL and the DDSLs have completed the National Online Operation Encompass Key Adult training. All staff are encouraged undertake the online training. The DSL will provide training for all staff and Governors about Operation Encompass, the prevalence of domestic abuse and the impact of this abuse on children.

We ensure our parents are fully aware that we are an Operation Encompass setting including when a new child joins the School.

The Safeguarding Governor reports on Operation Encompass in the termly report to Governors. All information is anonymised for these reports.

31. **Early years provision safeguarding arrangements**

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

Mobile devices in the Early Years Foundation Stage: The use of mobile devices including those with imaging or sharing capabilities is prohibited.

Deputy Designated Safeguarding Lead for EYFS: Ms Katie Clark, Head of EYFS

Training: Early Years Foundation Stage practitioners are expected to maintain a strong and current safeguarding skillset, and in this setting the EYFS lead takes on the additional responsibility of serving as a Deputy Designated Safeguarding Lead (DDSL). This means they must hold a full and up-to-date Level 3 safeguarding qualification, complete Prevent duty training, and demonstrate confident understanding of online safety risks relevant to young children. Their role also requires a working knowledge of Annex B of *Keeping Children Safe in Education* (KCSIE) 2026, ensuring they can recognise, respond to, and appropriately escalate concerns.

All EYFS staff benefit from regular safeguarding refreshers, but the EYFS lead maintains enhanced, current expertise so they can guide colleagues, model best practice, and ensure that the setting's safeguarding culture remains robust and proactive.

31.1 Disqualification from working in childcare

Where staff work in, or are involved in the management of, the School's early years or provision of care of pupils under the age of eight (including before school and after school clubs), the School will take steps to check whether

those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the school's safer recruitment practices, further details of which can be found in the School's *Safer Recruitment Policy*.

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

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

31.2 Use of mobile phones and cameras

Staff are not permitted under any circumstances to use their personal devices when taking images, videos or other recording of any pupil nor to have any images, videos or other recording of any pupil on their personal devices.

Please read this in conjunction with the Online, Acceptable Use, Staff Code of Conduct and School Trips Policies. Staff who wish to use their personal mobile devices or cameras in school must read and abide by the School's Bring Your Own Device Policy. Staff who act in breach of this may be subject to disciplinary action.

It is good practice at times to record photographic and video images of pupils, or to allow pupils to record images of each other to assist teaching and learning, or to celebrate achievement. Only the school cameras can be used for this purpose, and not personal devices.

All staff, including those in EYFS, therefore adhere to the following code:

- Only use school devices to record images, and only when there is a justifiable need;
- ensure that pupils understand the reason for the recording of the images and how the images will be used and stored;
- ensure that all images recorded are available for scrutiny;
- avoid making recordings in one-to-one situations;
- on admission to the School, parents give consent that images and recordings of their children can be used for legitimate reasons;
- if a photograph is used, the pupils should not be named without direct parental consent; and
- where the School has decided that images should be retained for future use, they should be stored and used only by those authorised to do so.
- Using school tablets that are securely locked via password protection.

31.3 Designated Safeguarding Lead for the EYFS

Mr Joe Morris is the Designated Safeguarding Lead responsible for safeguarding children in the early years setting.

31.4 Duty to notify Ofsted

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

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

The DSL has responsibility to ensure these protocols are upheld. These protocols apply to EYFS.

31.5 Safeguarding training

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

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

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

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

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

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

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

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

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

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

Emotional abuse: The persistent emotional or psychological maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, silencing them or 'making fun' of them. It may include verbal abuse (eg criticism, belittling, name-calling). what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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, causing or inciting a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities

may involve physical contact, such as acts of penetration, whether that is with parts of a person's body or an object. (eg rape or assault by penetration), and non-penetrative acts such as masturbation, kissing, rubbing, and touching over clothing. Sexual abuse 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 as well as offline 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. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuse than not. The sexual abuse by other children is a specific safeguarding issue in education and all staff should be aware of it and their school's policy and procedure for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence regardless of whether they agreed to that activity.

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

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

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

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

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

Harmful sexual behaviour (HSB): Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage. The umbrella term "harmful

sexual behaviour" is widely used in child protection and applies to behaviour occurring online, face-to-face or both. HSB should always be considered within a child protection context. HSB can, in some cases, progress on a continuum. This is consistent with the Hackett Continuum, which distinguishes between developmentally normal, inappropriate, problematic, abusive and violent sexual behaviours.

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

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

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

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

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

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

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

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

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

- children and young people find nudes and semi-nudes and/or videos online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online and use artificial intelligence (AI) to generate a nudes and semi-nudes and/or videos of a young person.

- images created or shared are used to abuse or blackmail peers . Situations could include:
    - children and young people selling nudes and semi-nudes and/or videos of others online
    - children and young people coercing a peer into sharing nudes and semi-nudes and/or videos to blackmail them for money, further images, or force them into illegal activity
    - children and young people hacking a peer's account to share images more widely without consent to publicly shame

    - children and young people create and share a nudes and semi-nudes and/or videos with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them.

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

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

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

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

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

- being male,
- frequent absence from school or permanently excluded from school,
- experienced child maltreatment
- having been involved in committing violence or other offences (such as theft or rebbery)
- having used drugs or alcohol in early adolescence
- having previously been a victim of violence.

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

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

such as mentoring or therapeutic support. Practical guidance on evidenced support is available from the Youth Endowment Fund (YEF) (the "what works" centre for preventing violence. Further guidance for schools includes Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance; The Youth Endowment Fund (YEF) practical guidance for schools and colleges and an accompanying self-assessment tool.

The Home Office and Ministry of Justice's Government Guidance for Child Knife Possession Offences, outlines the Government's expectations when a child is found in possession of a knife or bladed article.

Specific safeguarding issues: safeguarding issues often overlap and can put children at risk of harm. Behaviours linked to drug taking, alcohol misuse, unexplainable and/or persistent absences from education, serious violence, criminal exploitation (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nudes and semi-nudes including those generated using AI eg deepfakes and/or videos put children in danger.

Safeguarding issues can also manifest themselves via child on child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual.

Safeguarding issues can also be linked to, for example, children missing from education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; radicalisation; relationship abuse; and trafficking.

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

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

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion.

Group-based child sexual exploitation: Group-based is defined as two or more individuals (whether identified or not) who are known to (or associated with) one another and are known to be involved in or to facilitate the sexual exploitation of children. Being involved in the sexual exploitation of children includes, for example, introducing them to other individuals for the purpose of exploitation, trafficking a child for the purpose of sexual exploitation, taking payment for sexual activities with a child, or allowing their property to be used for sexual activities with a child. This can be perpetrated within or beyond the family, by both children and adults, and groups can be organised or loosely linked.

The below CCE indicators can also be indicators of CSE, as can:
• children who have older boyfriends or girlfriends, and
• children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "Child sexual exploitation: guide for practitioners".
CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

The Children's Society and Home Office has also published guidance on Preventing Child Sexual Exploitation.

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

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

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

It is not possible for a child to give informed consent to engage in criminal or other exploitative activity, and they cannot give consent to be exploited, abused or trafficked.

Some of the following can be indicators of CCE:

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

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

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

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

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

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

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

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

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

Modern Slavery: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "Modern slavery: how to identify and support victims (June 2025)".

Cybercrime: is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer). Cyber-dependent crimes include:
• unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded;
• denial of Service (Dos or DdoS) attacks or ‘booting’. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
• making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.
Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of

committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

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

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

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

- significant changes in behaviour
- ongoing difficulty sleeping
- withdrawing from social situations
- not wanting to do things they usually like, 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, education staff are well placed to identify these and other potential warning signs. In doing so they can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention.

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

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

More information can be found in the Mental health and behaviour in schools guidance. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children.

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

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

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

There is a statutory duty on teachers to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the

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

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

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

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

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

Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.

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

There is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. However, it is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism.

As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be susceptible of radicalisation and act proportionately, which may include making a referral to the Prevent referral.

Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales especially paragraphs 141-210, which are specifically concerned with education. Staff should contact the DSL or DDSL, who should be aware of the local procedures in place, before making a Prevent referral.

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

Special Educational Needs and/or Disabilities (SEND) or pupils with certain health conditions: Pupils with SEND or certain health conditions can face additional safeguarding challenges. These Children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

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

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

Safeguarding children with medical conditions: Whilst having a medical condition may not indicate that a child is at greater safeguarding risk, when clinical incidents occur, healthcare professionals should work with the DSL to consider whether a safeguarding duty is triggered. The School will work collaboratively with healthcare professionals to ensure that any safeguarding concerns arising from a child's medical condition are identified and addressed promptly.

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

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

Children who are questioning their gender: When supporting a gender questioning child, the School will not initiate any action. The School will take time to understand the thoughts and feelings of children who are questioning their gender and be appropriately professionally curious about the full range of the child's experiences.
Staff should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying. In making decisions about supporting social transitions, staff will comply with their distinct but interacting obligations under safeguarding legislation and equality and human rights law. The DSL will be involved in all cases where a child is questioning their gender. Parents will be involved in the vast majority of cases unless a documented specific safeguarding risk exists.

The School complies with its obligations under the Education (Independent School Standards) Regulations 2014 regarding the provision of toilets and washing facilities. The School does not permit children to use toilets designated

for the opposite biological sex. The School has regard to the provisions set out in Part two of KCSIE regarding single-sex spaces, changing rooms, and (where applicable) boarding and residential accommodation.

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

Domestic abuse: The Domestic Abuse Act 2021 introduces a statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, and psychological , emotional, or other abuse such as 'honour' abuse, faith- or belief-based abuse, forced marriage, female genital mutilation or reproductive coercion, harassment and stalking . Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

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

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

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

Domestic abuse may lead to other safeguarding concerns and should therefore be managed under this policy. The school is part of Operation Encompass and both the DSL and DDSL are on the email list to receive regular updates.

Staff can contact Operation Compass on 020 4513 9990 for advice in respect of children who have experienced domestic abuse.

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

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

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

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

Children who are absent from school: The School's full procedures for dealing with children who are absent from education, including persistently or for prolonged periods staff are referred to the section 'Children absent from education' in the main body of this policy. A child being absent from school is a potential indicator of a range of safeguarding issues such as abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, honour or faith based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who are absent, particularly persistently or for prolonged periods.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

a) fulfil its duty to identify children of compulsory school age who are missing from education; and

b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, exploitation or radicalisation.

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

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

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

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

As children get older and are granted more independence (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. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org

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

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

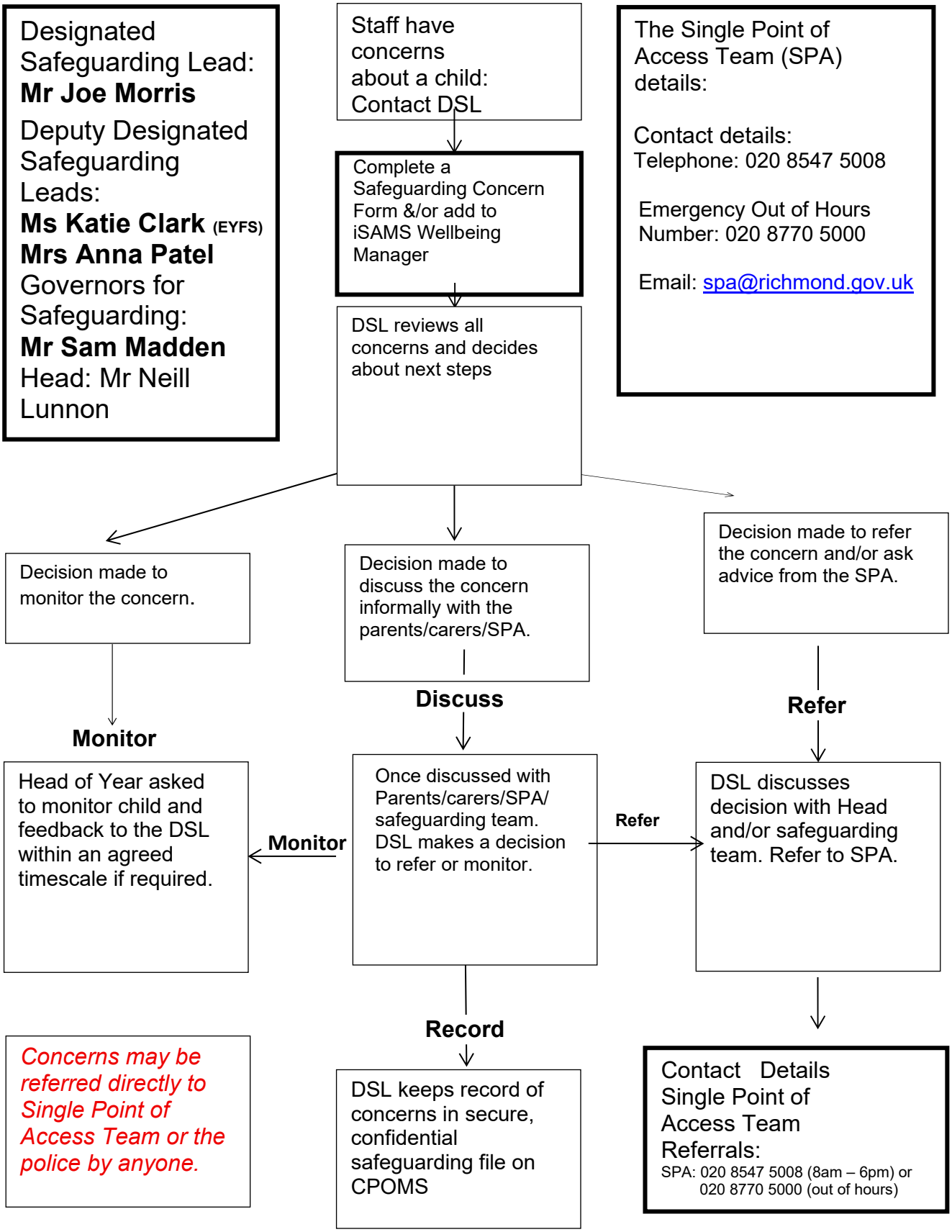
Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution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

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

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

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

APPENDIX 2 - PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD FLOWCHART (INCLUDING REFERRALS TO CHILDREN'S SOCIAL CARE)



APPENDIX 3 – QUICK GUIDE SAFEGUARDING REPORTING

Tower House Safeguarding Reporting

A quick guide for all adults working in school

In an emergency dial 999. Request Ambulance / Police / Fire Brigade as necessary.

If you suspect a child is at risk of harm:

Immediately alert **Joe Morris (DSL)** on 020 3750 5813

Anna Patel (DDSL) on 0208 83924841 or 02083924841 or Katie Clark (DDSL) 020 3750 5823 or Neill Lunnon (Head) 020 8392 4843

OR if you cannot contact any DSL and you suspect the child is at immediate risk: **Alert**

London Borough of Richmond

Single Point of Access: 020 8547 5008

Out of Hours: 020 8770 5000

If you have a concern about the behaviour of an adult

Report the concern to the **Head** (020 8876 3323). In his absence, report to the **Chair of Governors** (Antony Phillips): 07795 268908. If neither is available report to DSL: 020 37505813.

If the concern relates to the **Head**, inform the Chair of Governors or DSL.

Concerns about the behaviour of an adult **must** also be reported to Richmond Local Authority Designated Officer (LADO): (**07774 332675**) (LADO@achievingforchildren.org.uk)

Please refer to the THS Safeguarding & Child Protection Policy on the Website for detailed guidance.

Safeguarding is the responsibility of every adult in the Tower House community.

Revised: Feb 2026

APPENDIX 4 - OTHER RELATED POLICIES AND DOCUMENTS

Anti-Bullying Policy
Attendance Policy
Behaviour and Pupil Management Policy
Bring Your Own Device Policy (BYOD)
Data Protection Policy
Whole School Missing Child Policy
Low level concern policy
Restraint Policy
Staff Code of Conduct
Staff Handbook
Social Medical Policy (within the Staff Handbook)
Whistle Blowing Policy (within the Staff Handbook)
Safeguarding Risk Assessment
Use of AI Policy

APPENDIX 5 - RECORD OF CONCERN

Child's Name :
Child's DOB :
Date, Day and Time of concern :
Your account of the concern :
Additional information : (your opinion, context of concern/disclosure)
Your signature :
Your position in school :
Date and time of this recording :
Action and response of DSL/Alternate Safeguarding Lead Name: …….. Date:……..

APPENDIX 6 - LOW LEVEL CONCERNS FORM AND CLARITY ON LOW LEVEL CONCERNS

LOW LEVEL CONCERNS FORM

This form can be used to share any concern with the Headteacher and/or DSL, no matter how small or seemingly insignificant, 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/or in a way that on first glance does not appear to meet the allegation of 'harm' threshold.
This form can be used for self-referral.

Low Level Concern Form	
Name	
Role	
Date and time of completing this form	
Details of individual (including yourself for self-reporting) whom the concern is about	
Name	
Role	
Detail of concern	
Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?	
Details of any children or young people involved	
Name	

For use by Headmaster/DSL upon receipt of the concern	
Date and time concern received	
Signature	
Role	

Was the staff member spoken to: (If no, please give a reason why. If yes, please state staff members response).	
Actions to be taken and follow up	
Was Advice/Guidance sought from LADO	

Allegation

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

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to 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 to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Appropriate Conduct

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

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the School's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with School's Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.

APPENDIX 8 - TABLE OF SUBSTANTIVE CHANGES

Where	Change	Date
Key School Contact Details Page 3	Mr J Morris is responsible for looked after children	From November 2017
Throughout	NCTL replaced by Teaching Regulation Authority TRA	September 2018
Throughout	Chair of Governors replaced by Acting Chair of Governors, Alex Wilson	September 2018
Throughout	KCSIE 2016 to KCSIE 2018 Working Together 2015 to Working Together 2018	September 2018
Throughout	Richmond Safeguarding Children Board threshold document replaced by Multi-agency Threshold Document 2018	September 2018
Page 11	Behaviour towards a child indicates the child would pose a risk to *may* pose a risk	September 2018
Page 12	Allegations proven to be found 'unfounded' included in text	September 2018
Page 15	Common Assessment Framework replaced by Early Help Assessment	September 2018
Page 18 and 19	Reference to 'by association requirement if you live in the same household as someone disqualified' removed	September 2018
Section 6 amended	To include more detail on child on child sexual violence and how to manage it	September 2018
Throughout	KCSIE 2018 updated to KCSIE 2019	September 2019
Throughout	LSCB renamed Kingston and Richmond Safeguarding Children Partnership	September 2019
Section 2	Joe Morris now H&S Officer	September 2019
Section 4	Radicalisation added as a form of abuse	September 2019
Section 5	Paragraph regarding the non-disclosure of staff identity during a disclosure added.	September 2019
Section 5.6	Section on Serious Violence added	September 2019
Section 6	Details of Upskirting, sexting and initiation/hazing included as forms of child on child abuse. Paragraph stating imagery of	September 2019

	sexting should not be viewed by investigating staff included.	
Section 12	Reference to Teaching Online Safety in Schools, June 2019 added	September 2019
Throughout	Cyber bullying reference in Anti bullying policy, not in a separate policy	January 2020
Throughout	Updates to reflect amendments in updated KCSIE September 2020	September 2020
Throughout	Updates to reflect amendments in updated KCSIE 2022	September 2021
Low Level Concerns	Go to the Head initially	February 2022
Throughout	Reference to KCSIE Sept 2022	September 2022
Throughout	Peer on peer changed to child on child	September 2022
Throughout	Change to Chair of Governors Change to governor with responsibility for child protection and safeguarding. Change from Designated Officer to LADO	September 2022
	Safeguarding quick guide added as appendix 3 Contacting the Police Link to Safeguarding risk assessment. Wellbeing / Mental Health Lead signposted	January 2023
Throughout	Updated to reflect amendments in updated KCSIE 2023 and include: an updated link to 'Behaviour in schools' guidance; new text added to raise awareness of the existing expectation for relevant staff to understand filtering and monitoring; new text added to make clear staff training should include understanding roles and responsibilities in relation to filtering and monitoring;	September 2023

	updated to reference keeping children safe in out-of-school settings; clarification provided on the difference between children missing education and children absent from education. Update on guidance for after school clubs	
Throughout	Change of Head/DDSL to Mr Neill Lunnon	
Throughout	Changes to reflect new KCSIE 2024 guidance	
Throughout	New safeguarding governor	Autumn 2024
Low Level Concerns form app 6	Updated Form	May 2025
Throughout	KCSIE 2025 changes made throughout	September 2025
EYFS additions NL removed as DDSL, KC added as DDSL. New landline numbers added that go through to mobiles Recording processes added	Clause 7	January 2026
Working Together 2026 version referenced	Throughout	June 2026
KCSIE 2026 referenced and updates made in relation to it	Throughout	Ready for Sept 2026
1st September changes to KCSIE updated throughout Reference to neutral notification policy removed throughout	Throughout	September 2026

Tower House School is committed to safeguarding the welfare of children and expects all staff and volunteers to share this commitment