ROEDEAN

POLICY TITLE	**Safeguarding and Child Protection Policy and Procedures**

Policy Area	Safeguarding
Author	Deputy Head: Pastoral
Relevant Statutory Regulations and Guidance	Keeping Children Safe in Education (DfE, 2026) Working Together to Safeguard Children (HM Government, 2026) The Education (Independent School Standards) Regulations (2026) National Minimum Standards for Boarding Schools (2026) Children Act 1989 Children Act 2004 Children and Social Work Act 2017 Safeguarding Vulnerable Groups Act 2006 Data Protection Act 2018 and UK GDPR Equality Act 2010 Revised Prevent Duty Guidance (2023) Martyn's Law (Terrorism Protection of Premises Act 2025)
Senior Team Lead	**Designated Safeguarding Lead / Deputy Head: Pastoral**
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Key school contacts

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Nominated Safeguarding Council Member, Nominated Trustee for Children in Care (CIC) and Previously In Care (PiC) Paul Read	Email: rsc.pr@roedean.co.uk Telephone number: 01273 667666 via Clerk to the Council
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Key external contacts

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Brighton and Hove Multi Agency Safeguarding Hub (MASH) now known as Front Door For Families (FDFF) children's social care department	Telephone number: 07563 420153 01273 290400 Email: EducationSafeguarding@brighton-hove.gov.uk frontdoorforfamilies@brighton-hove.gov.uk Out of hours emergency: 01273 335906 Duty team telephone number: 01273 335905
Brighton & Hove Safeguarding Children Partnership (BHSCP)	Portslade Hub Mile Oak Road Portslade BN41 2PG Telephone number: 01273 292379 Email: frontdoorforfamilies@brighton-hove.gov.uk
FGM reporting - non-emergency police contact number	101
School's Police liaison officer	There is not a single, currently active "Brighton and Hove Police School Liaison Officer"; instead, schools are often served by Safer Schools Officers (SSOs) or Schools Liaison Officers (SLOs) who work within Safer School Partnerships. If a child is in immediate danger, call 999
Prevent partners and advice about extremism Channel Prevent Coordinator Thomas Morvantoone	Telephone: 01273 291115 Email: Channel.Prevent@brighton-hove.gov.uk **Channel Police Practitioner-** PREVENT Telephone number: 101 ext. 550543 Email: thomas.morvantoone@sussex.pnn.police

Local Authority Prevent Lead	**Email:** Channel.Prevent@brighton-hove.gov.uk **Phone:** 01273 291 115 **Non-emergency DfE advice** 020 7340 7264 counter-extremism@education.gsi.gov.uk
UK Safer Internet Centre	0344 381 4772 helpline@saferinternet.org.uk
Independent Listener Carolynn Bain	Telephone number: 07434 655178
NSPCC whistleblowing helpline	Weston House 42 Curtain Road London EC2A 3NH Telephone: 0800 028 0285 Email: help@nspcc.org.uk https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/
Independent Schools Inspectorate (ISI)	020 7600 0100
OFSTED	0300 123 1231
Reporting serious wrongdoing to the Charity Commission	For further guidance see: https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer whistleblowing@charitycommission.gov.uk
Report Abuse in Education helpline	A dedicated helpline for children and young people who have experienced abuse at school, and for worried adults and professionals who need support and guidance, including for non-recent abuse. 0808 800 5000 or email help@nspcc.org.uk

1 Aims

1.1 This is the safeguarding and child protection policy and procedures of Roedean School (**School**).

Child protection is part of safeguarding and focuses on protecting individual children identified as suffering or likely to suffer significant harm or abuse. This includes child protection procedures which detail how to respond to concerns about a child.

1.2 The aims of this policy are as follows:

1.2.1 to actively promote the well-being of pupils to all members of the Roedean community;

1.2.2 to safeguard and promote the welfare of children, staff and others who come into contact with the School and to protect them from harm;

1.2.3 to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and / or allegations of abuse, neglect and / or exploitation;

1.2.4 to ensure every member of staff knows how to report concerns and how they will be investigated, whether they are current or historic in nature;

1.2.5 to ensure staff know and adhere to the School's safeguarding expectations;

1.2.6 to ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role;

1.2.7 to ensure consistent good safeguarding practice throughout the School, to include the promotion of a zero-tolerance approach to child-on-child sexual violence and harassment in which pupils are confident to report it and staff are confident to identify and respond to it; and

1.2.8 to recognise that safeguarding is not solely about responding to concerns but also about preventing harm through a safe culture, preventative education, early identification and intervention, and robust safeguarding systems and practice;

1.2.9 to promote a whole school culture of safety, equality and protection.

1.3 Every student should feel safe and protected from any form of abuse, neglect and exploitation.

1.4 All staff should understand the indicators of abuse, neglect and exploitation and specific safeguarding risks so that they can identify them and report any concerns about children. The indicators and key safeguarding risks for the School community are set out in Appendix 1.

1.5 Members of the School community (to include alumnae) should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively and appropriate action taken.

1.6 Anyone about whom a concern is raised should feel confident that they will be supported and the matter will be handled sensitively and that appropriate action will be taken.

1.7 This policy forms part of the School's whole school approach to promoting child safeguarding and wellbeing, which seeks to involve everyone at the School to ensure that the best interests of pupils underpin and are at the heart of all decisions, systems, processes and policies.

1.8 Although this policy is necessarily detailed, it is important to the School that our safeguarding policies and procedures are transparent, clear and easy to understand for staff, volunteers, pupils, parents and carers. The School welcomes feedback on how we can continue to improve our policies.

1.9 At the heart of the School's wider aims are the values to which all members of the School community aspire: fairness, honesty, respect, tolerance, compassion, and forgiveness. All of which underpin our School aims where we want every pupil to be happy, curious, engaged, creative and independent, confident and compassionate.

1.10 These underpin the School's work, help to protect everyone associated with the School from harm and help to foster an environment where people are working together to safeguard children.

2 Scope and application

2.1 This policy applies to the whole School, and to all pupils, even if they have passed their 18th birthday. For KCSIE and statutory child protection purposes, a child is under 18: for pupils aged 18 or over, the school will continue its safeguarding arrangements while considering whether adult safeguarding, Care Act 2014 or other statutory processes apply.

2.2 This policy applies at all times including where pupils or staff are away from the School, whether they are on school-arranged activities or otherwise, and whether or not the School is open. It will therefore apply out of School hours and in the holidays.

2.3 This policy applies to core School activities and to out of hours and commercial activities.

2.4 In drawing up and effectively implementing this Policy, the School has considered and taken account of: (a) the requirements of a day and boarding school for pupils aged 11 to 18 years who are from a wide range of ethnic backgrounds and cultures; (b) the particular location and features of the school site; and (c) the requirements of a registered charity.

2.5 This policy is designed to address:

2.5.1 the specific statutory obligations on the School to safeguard and promote the welfare of children; and

2.5.2 the School's charity law safeguarding duty to:

(a) provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers;

(b) set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly;

(c) have adequate safeguarding policies, procedures and measures to protect people; and

(d) provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the police, local authority and Charity Commission.

3 Regulatory framework

3.1 This policy has been prepared to meet the School's responsibilities under the following legislation:

3.1.1 The Education (Independent School Standards) Regulations, April 2026;

3.1.2 National Minimum Standards for Boarding Schools (DfE, May 2026);

3.1.3 Education and Skills Act 2008;

3.1.4 The School Attendance (Pupil Registration) (England) Regulations 2024

3.1.5 Children Act 1989;

3.1.6 Children Act 2004;

3.1.7 Safeguarding Vulnerable Groups Act 2006;

3.1.8 Children and Social Work Act 2017;

3.1.9 Data Protection Act 2018 and UK General Data Protection Regulation (**UK GDPR**); Human Rights Act 1998;

3.1.10 Equality Act 2010;

3.1.11 Charities Act 2011.

3.1.12 Information Sharing Duty Statutory Guidance (DfE, September 2026) issued under section 16LA of the Children Act 2004, as amended by the Children's Wellbeing and Schools Act

3.2 This policy has regard to the following guidance and advice:

3.2.1 Statutory guidance:

(a) Keeping children safe in education (DfE, September 2026) (**KCSIE**);

(b) Working together to safeguard children 2026 (HM Government) (**WTSC**);

(c) Working together to improve school attendance (DfE, August 2026)

(d) Revised Prevent duty guidance for England and Wales (HM Government, 2023);

(e) Multi-agency statutory guidance on female genital mutilation (HM Government, July 2020);

(f) Children missing in education (DfE, September 2024);

(g) Relationship and Sex Education (RSE) and Health Education (DfE, updated 2025) (RSHE);

(h) Prevent Multi-Agency Panel Duty guidance: protecting vulnerable people from being drawn into terrorism (HM Government, August 2025);

(i) PACE Code C 2023

(j) Keeping children safe, helping families thrive - GOV.UK (DfE, November 2024)

(k) Teaching Online Safety in Schools (DfE 2023)

(l) UKCIS Guidance on Sharing Nudes and Semi-Nudes (2024)

(m) DfE Cyber Security Standards for Schools (2024)

(n) Martyn's Law (Terrorism Protection of Premises Act 2026)

3.2.2 Non-statutory advice:

(a) What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015);

(b) Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, May 2024);

(c) Behaviour in schools: advice for headteachers and school staff (DfE, February 2024);

(d) Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS, March 2024)

(e) Searching, screening and confiscation (publishing.service.gov.uk) (DfE July 2023)

(f) Teaching online safety in schools (DfE, January 2023);

(g) Generative Artificial Intelligence (AI) in Education and Children's Social Care (DfE, August 2025);

(h) Harmful online challenges and online hoaxes (DfE, February 2021);

(i) Child sexual exploitation: definition and a guide for practitioners' local leaders and decision makers working to protect children from child sexual exploitation (DfE, February 2017);

(j) Virginity testing and hymenoplasty: multi-agency guidance (DHSC, August 2025);

(k) Educate Against Hate (HM Government);

(l) Equality Act 2010: advice for schools (DfE, June 2018);

(m) Student sponsor guidance – Sponsorship duties (UKVI, updated June 2026)

(n) Data protection in schools (DfE, updated July 2026)

(o) Elective Home Education (August 2024)

(p) The Independent School Standards – Guidance for Independent Schools (DfE, April 2026)

(q) Criminal exploitation of children and vulnerable adults: county lines (Home Office, updated October 2023)

(r) Restrictive interventions, including use of reasonable force, in schools: guidance for schools in England (DfE, April 2026).

(s) Safer Recruitment Consortium, February 2022

(t) Using AI in education settings: support materials (DfE, updated May 2026; first published June 2025)

(u) Meeting Digital and Technology Standards in Schools and Colleges: Filtering and Monitoring Standards (DfE, 2026);

(v) Allergy safety in schools - GOV.UK (DfE July 2026)

(w) Suspension and Permanent Exclusion Guidance (DfE 2026)

3.2.3 Charities advice:

(a) Charity Safeguarding and protecting people for charities and trustees (Charity Commission, June 2022);

(b) How to report a serious incident in your charity (Charity Commission, June 2019);

(c) Reporting a serious incident in your charity when it involves a partner (Charity Commission, December 2019);

(d) Report serious wrongdoing at a charity as a worker or volunteer (Charity Commission, June 2019); and

(e) Guidance on reporting safeguarding concerns in a charity (Department for Digital, Culture Media, March 2022).

3.2.4 Brighton & Hove Safeguarding Children Partnership (BHSCP)

Local Protocols - BHSCP

3.3 The following School policies, procedures and resource materials are relevant to this policy:

3.3.1 Code of Conduct for Staff

3.3.2 Code of Conduct for Trustees

3.3.3 ICT Acceptable Use Policy for Staff, Council Members and Volunteers

3.3.4 Whistleblowing Policy

3.3.5 Recruitment and Selection Policy

3.3.6 Handling of DBS Certificate Information Policy

3.3.7 Online Safety Policy

3.3.8 Promoting Good Behaviour Policy

3.3.9 Attendance Policy

3.3.10 Preventing and Tackling Bullying Policy

3.3.11 ICT Acceptable Use Policy for Pupils

3.3.12 Security Policy and Procedures

3.3.13 Risk Assessment Policy for Pupil Welfare

3.3.14 Special Education Needs Learning Disability and Learning Support Policy

3.3.15 Health and Safety Policy

3.3.16 Relationships and Sex Education Policy

3.3.17 Medicines Policy

3.3.18 Guardianship Policy

3.3.19 Missing Pupil Policy

3.3.20 Staff Code of Conduct Policy

3.3.21 Run Hide Tell Policy

3.3.22 Allergy & Anaphylaxis Policy

4 Publication and availability

4.1 This policy is published on the School website.

4.2 This policy is available in hard copy on request.

4.3 A copy of the policy is available for inspection from the School Office during the School day.

4.4 This policy can be made available in large print or other accessible format if required.

4.5 This policy and all policies referred to in it are also available to staff on the School's intranet.

5 Definitions

5.1 Where the following words or phrases are used in this policy:

5.1.1 When KCSIE references '**Proprietor',** at Roedean this is referring to the Council (Board of Trustees) of Roedean School;

5.1.2 References to **working days** mean Monday to Friday, even as a boarding school or when the School is open at weekends, when the School is open during term time.

The start of the school day from Monday to Friday is 08:20 and the school day ends at 17:00. On Fridays, the school day ends at 16:00.

The term dates are published on the School's website. If referrals to an external agency are required outside term time, references to **working days** are to the days on which the relevant external agency is working;

5.1.3 **Safeguarding** is the protection of people from harm.

5.1.4 **Safeguarding and promoting the welfare of children** is defined in WTSC (Working Together to Safeguard Children) and KCSIE (Keeping Children Safe in Education) as:

(a) Providing help and support to meet the needs of children as soon as problems emerge;

(b) protecting children from maltreatment, whether that is within or outside the home, including online;

(c) preventing impairment of children's mental and physical health or development;

(d) ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and

(e) promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, wherever possible and where this is in the best interest of the children;

(f) taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

5.1.5 **CSC** means Children's Social Care and includes, depending on the context, the team based in the local authority where the School is located and, where appropriate, the team based in the local authority where the child is resident.

5.1.6 **DSL** means the School's Designated Safeguarding Lead. References to the DSL include the Deputy DSL (**DDSLS**) where the DSL is unavailable.

5.1.7 **Designated Officer** means designated officer at the Local Authority (often referred to as the LADO). The designated officer(s) has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the three safeguarding partners.

5.1.8 Local Safeguarding Partners means the three safeguarding partners (Local Authority, Integrated Care Systems' (ICSs) and the Chief Officer of Police for an area any part of which falls within the Local Authority area) who make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. The local arrangements relevant to the school can be found in Appendix 6.

5.1.9 References to **harmful sexual behaviour** in this policy refer to problematic, abusive and violent: sexual behaviours expressed by children and young people under the age of 18 years old, or under our care, that are developmentally inappropriate and may cause developmental damage, may be harmful towards self or others, or abusive towards another child, young person or adult.

5.1.10 Artificial Intelligence (AI) refers to technologies capable of generating, manipulating, analysing or responding to content including text, images, audio, video and data. For safeguarding purposes this includes generative AI tools, chatbots, AI companions, deepfakes, synthetic media and automated systems which may be used to exploit, manipulate, groom, harass or deceive children.

5.1.11 Reference to **staff** includes all those who work for or on behalf of the School, regardless of their employment status, including contractors, supply staff, volunteers and Board of Trustees unless otherwise indicated.

5.1.12 Senior Team (**ST**) comprises the Head, Director of Strategy and Innovation, Deputy Head Pastoral and DSL, Deputy Head Academic, Deputy Head Co-curriculum and Outreach, Director of Finance and Operations, Assistant Head Pastoral, Assistant Head Futures and Director of External Relations.

5.1.13 **Professional curiosity** means maintaining an open and questioning mindset, seeking to understand a child's lived experience and not accepting information at face value where safeguarding concerns may exist.

6 Responsibility statement and allocation of tasks: the School's approach to safeguarding leadership

6.1 Roedean's Council has overall responsibility for all matters which are the subject of this policy, including;

6.1.1 legal responsibility to ensure that arrangements are made to safeguard and promote the welfare of pupils at the school, having regard to relevant guidance issued by the Secretary of State;

6.1.2 strategic leadership responsibility for the School's safeguarding arrangements; and

6.1.3 specific responsibilities to facilitate a whole school approach to safeguarding, set out in more detail in Part 2 of KCSIE.

6.2 The Council

6.2.1 appoints a senior Council (Board) level lead on safeguarding matters, whose contact details are set out in the School contacts list at the front of this policy;

6.2.2 ensures that all members of Council receive appropriate safeguarding and child protection training (including online) and information relating to filtering and monitoring, both on induction and thereafter regularly updated. Training should be consistent with KCSIE and Local Safeguarding Partner guidance;

6.2.3 ensures it discharges its legal responsibilities under the Human Rights Act 1998 and the Equality Act 2010, having regard for the implications for safeguarding that such responsibilities can have;

6.2.4 ensures that appropriate arrangements are in place for the whole Board (Council) to discharge their function, including appropriate consideration of safeguarding matters at Board meetings (to monitor, scrutinise and provide assurance to the Safeguarding Lead) including at the Safeguarding Committee and Full Council each term, and a holistic annual review of safeguarding; and

6.2.5 establishes appropriate delegation arrangements at School level, led by the Head and DSL, to enable the School to discharge its safeguarding duties effectively. There is a DSL and DDSLS Safeguarding Meeting once a week and three additional year group-based welfare meetings held once a week.

6.2.6 The Council will receive regular information regarding:

safeguarding themes and trends;
online safety;
child-on-child abuse;
attendance;
mental health;
filtering and monitoring;
emerging safeguarding risks including AI-related harms;
allegations / low level concern themes;
safer recruitment;
safeguarding training compliance;
referrals;
child-on-child abuse.

6.3 To ensure the efficient discharge of its responsibilities under this policy, the Chair of Council has allocated the following tasks:

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	DSL	As required, and at least termly
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	DSL	As required, and at least termly
Seeking input from interested groups (such as pupils, staff, parents) to consider improvements to the School's processes under the policy	DSL	As required, and at least annually
Formal annual review of the School's safeguarding policies and procedures and their implementation.	Chair and Safeguarding Trustee with other Trustees having collective accountability	At least annually (via report from Head & DSL to full Council)
Assessing the adequacy of safeguarding arrangements for those who use or hire premises	Director of Finance and Operations & DSL	Before commencement of arrangement and thereafter at least annually
Overseeing regular letting contracts onsite	Lettings Manager DSL	As required, at least annually

6.4 **Head**

6.4.1 The Head is responsible for the overall management of the School and for the management of concerns and allegations about staff.

6.4.2 The Head ensures that the School's policies and procedures, adopted by the Council and Chair of Council (particularly those concerning referrals of cases of suspected abuse, neglect and exploitation) are understood, and followed by all staff, including volunteers.

6.5 **Designated Safeguarding Lead (DSL)**

6.5.1 The DSL is a senior member of staff on the School's Senior Team with the necessary status and authority to take lead responsibility for all aspects of safeguarding and child protection (including online safety) throughout the School.

(a) The DSL has the time, appropriate status and authority within the school to carry out the duties of the post, and the funding, training, resources and support to enable them to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and / or to support other staff to do so) and to contribute to the assessment of children. The name and contact details of the DSL are set out in the School contacts list at the front of this policy. The main responsibilities of the DSL are set out in Annex C of KCSIE 2026.

6.5.2 The DSL will also liaise with the Head to inform them of issues relating to any police investigations and the statutory requirements for children to have an appropriate adult. The role of the appropriate adult is to safeguard the rights, entitlements and welfare of juveniles to whom the provisions of PACE code c and any other code of practice apply.

6.5.3 The DSL will take lead responsibility for pupils who are looked after children.

6.5.4 The DSL will take lead responsibility for filtering and monitoring systems for IT.

6.5.5 The Assistant Head Pastoral will undertake the role of senior mental health lead and is responsible for developing a holistic approach to promoting and supporting the mental wellbeing of pupils and staff.

6.5.6 If the DSL is unavailable, the activities of the DSL will be carried out by the Deputy DSLs. The DDSLS' details are also set out in the School contacts list at the front of this policy.

7 Specific safeguarding duties in relation to children

7.1 Safeguarding and promoting the welfare of children is **everyone's** responsibility.

7.2 The School is committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people. The School requires everyone who comes into contact with children and their families to share this commitment.

7.2.1 The School will:

(a) understand its role in the safeguarding partner arrangements Local Protocols - BHSCP and operate safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by the Brighton and Hove Safeguarding Children Partnership ('BHSCP'), the key details of which are contained in Appendix 6;

(b) be alert to signs of abuse whether in school, within the child's family or from outside, and take steps to protect individuals from any form of abuse, or neglect whether from an adult or another child;

(c) include opportunities within the curriculum for children to develop the skills they need to recognise, and stay safe from abuse;

(d) promote the systems in place for children to confidentially report abuse, ensuring they know their concerns will be treated seriously, they can safely express their views and give feedback;

(e) take active steps to promote school attendance;

(f) allow staff to determine how best to build trusted relationships with pupils which facilitate communication within the parameters of the staff code of conduct;

(g) deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with appropriate education, child protection and / or welfare plans;

(h) design and operate procedures which, so far as possible, ensure that staff, pupils and others who are innocent are not prejudiced by malicious, false, unsubstantiated or unfounded allegations;

(i) prepare staff to identify children who may benefit from Family Help and encourage the staff to be particularly alert to the potential need for Family Help for children with the indicators listed in KCSIE or WTSC;

(j) be alert to children who are at potentially greater risk of harm including children who need a social worker and children requiring mental health support;

(k) be alert to the needs of pupils with physical or mental health conditions, special educational needs or disabilities, which could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation, and where additional barriers can exist when detecting abuse or neglect;

(l) encourage a culture of listening to pupils and victims of abuse and taking account of their wishes and feelings in any measure put in place and actions taken by the School to protect them; including support from the Pastoral Managers, School Counsellors and the Independent Listener;

(m) operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;

(n) assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;

(o) identify pupils who may be susceptible to radicalisation and know what to do when they are identified;

(p) consider and develop procedures to deal with any other safeguarding issues which may be specific to individual pupils in the School or in the local area. See Appendix 6 - Local arrangements for more details;

(q) ensure that appropriate policies and procedures are in place to ensure the safety, wellbeing and protection from exploitation of the children which it sponsors to study in the UK under the Child Student route, including: ensuring the children's living arrangements meet the requirements of the route; sites at which children are taught or accommodated meet all legally required standards and all staff coming into contact with children have current enhanced Disclosure and Barring Checks; and

(r) ensure this policy applies to all pupils, including boarders. All staff are trained to be aware of the needs of all pupils. House staff and those staff who visit the Houses are especially aware of the vulnerabilities of the pupils who reside there. The Boarding Handbook outlines procedures to enable pupils to be properly cared for. It is also the responsibility of the school to ensure guardian and host family arrangements promote boarders' welfare as per National Minimum Standards for boarding schools. In principle, all staff are mindful of the privilege of their position and the requirement that respect of the privacy of pupils is shown at all times whilst ensuring their safety

(s) Recognise and respond to emerging online threats including AI-generated content, misinformation, disinformation, deepfakes, and image-based abuse, ensuring pupils are educated about these risks and staff are trained to identify and report them.

(t) This includes pupils with medical conditions that may place them at increased risk of significant harm, including severe allergies and anaphylaxis.

(u) Boarding staff will be particularly alert to the following through close observation, education, and regular student feedback and 1:1 meetings :

peer influence within residential settings;
harmful sexual behaviour;
coercive relationships;
online abuse occurring outside school hours;
vulnerability of international pupils;
emotional wellbeing concerns arising during evenings and weekends.

7.3 Staff may follow the School's Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously. The NSPCC Whistleblowing Helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the front of this policy for the relevant contact details). Staff may also report concerns direct to the School's Local Authority or to the Charity Commission if they consider that the School has failed to deal with concerns appropriately.

7.4 The School's preventative safeguarding approach is underpinned by four key principles: safe culture, preventative education, early identification and intervention, and protective systems and practice.

7.5 Where pupils access alternative provision, the School will undertake appropriate safeguarding and quality assurance checks, satisfy itself that safeguarding arrangements are effective and ensure attendance, behaviour, welfare and progress information is regularly reviewed.

7.6 The School recognises that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination. Such experiences may significantly affect a child's welfare, wellbeing, mental health, sense of safety and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and consider such concerns within safeguarding practice where appropriate.

8 Reporting obligations of staff

8.1 Reporting obligations generally

8.1.1 Staff members should maintain an attitude of "**it could happen here**" where safeguarding is concerned. When concerned about the welfare of a pupil, staff members should always act in the **best** interests of the pupil.

8.1.2 Staff should be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful e.g. a child may feel embarrassed, humiliated, or being threatened due to their vulnerability, disability and/or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.

8.1.3 All staff have a duty to:

(a) report any concerns they may have about the safety and / or well-being of pupils;

(b) report any concerns they may have about the safety and / or well-being of other persons associated with the School;

(c) report any safeguarding concerns about staff or anyone else associated with the School; and

(d) follow up on any such reports to ensure that appropriate action is or has been taken.

8.1.4 The procedures for doing so are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to exercise professional curiosity and to speak to the DSL, any member of the Senior Team or directly to children's social care (whether the School's Local Authority or that local to the child's home address) or police in their absence for guidance.

8.1.5 All staff should be aware of indicators of abuse, neglect, exploitation and modern slavery and should report concerns promptly to the DSL.

8.1.6 Staff should understand that safeguarding concerns do not need to reach statutory intervention thresholds before relevant information may need to be shared with external agencies in accordance with the Information Sharing Duty (September 2026)

8.2 **What to do if staff have a concern about a pupil's welfare**

8.2.1 If staff have **any concern about a pupil's welfare**, they should report their concern to the DSL (or the DDSLSs in the DSL's absence) **immediately**.

(a) The contact details of the DSL and DDSLSs are set out in the contacts list at the front of this policy;

(b) See Appendix 2 for guidance and paragraph 23 below about what to do when receiving a disclosure and recording a concern.

8.2.2 A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support to an emerging problem or to a potentially unmet need or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989.

8.2.3 Teachers must report known cases of female genital mutilation (**FGM**) to the police. See **Appendix 1** for further information about FGM and this reporting duty. All other staff should refer FGM concerns to the DSL.

8.2.4 If the concern involves an **allegation or concern raised about a member of staff**, supply staff, contractors or volunteers this must be reported in accordance with the procedures set out in Appendix 4 and parts 1 and 4 of KCSIE.

8.2.5 **What if the DSL is unavailable?**

(a) The DSL or the DDSLSs should always be available to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns out of School hours (see contact number on Page 3)

(b) If in exceptional circumstances the DSL and DDSLSs are unavailable, staff must not delay taking action. Staff should speak to their Line Manager or a member of the ST and / or advice should be taken from children's social care. Their contact details are set out at the front of this policy.

(c) Where a child is suffering, or is likely to suffer from harm, a referral to children's social care and / or police should be made immediately. Staff should be aware of the process for making referrals direct to children's social care and / or the police in these circumstances. See section 11 below for further details on making a referral.

(d) Any action taken by a member of staff pursuant to this requirement should then be shared with the DSL or DDSLSs, or a member of the ST, as soon as is practically possible.

8.3 **Action by the DSL**

8.3.1 On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the appropriate Local Safeguarding Partners procedures and referral threshold document. Such action may include:

(a) managing any support for the pupil internally via the School's own pastoral support processes, seeking advice from children's social care where required (see 9 below);

(b) undertaking a Family Help assessment (which generally requires parental consent) (see 10 below); or

(c) making a referral for statutory services (see 11 below).

8.3.2 The views of the child will be taken into account when considering the appropriate course of action but will not be determinative.

8.3.3 Where the concern relates to the welfare of a pupil who is aged 18 or over, the DSL will consider whether the concern should be referred to the relevant local authority Adult Social Care/Adult Safeguarding service in accordance with local safeguarding adults procedures.

8.3.4 If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving.

9 Managing support for pupils internally

9.1 The School has a framework for the identification, assessment, management and review of risk to pupil welfare, so that appropriate action can be taken to reduce the risks identified. See section 23 and the School's Risk Assessment Policy for Pupil Welfare or policy where this content is included.

9.2 The School will ensure that appropriate advice and consultation is sought about the management of safeguarding issues, including advice from Children's Social Care (CSC) where necessary.

10 Family Help assessment

10.1 Family Help, also known as early intervention, is support given to a family when a problem first emerges. It can be provided at any stage of a child or young person's life to parents,

children or whole families, and is generally supported by CSC in consultation with the family.

10.2 The School understands that providing Family Help is more effective in promoting the welfare of children than reacting later.

10.3 The School's safeguarding training includes guidance about Family Help processes and prepares all staff to identify children who may benefit from Family Help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges. Staff should be particularly alert to the potential need for Family Help for a child who:

10.3.1 is disabled or has certain health conditions and has specific additional needs;

10.3.2 has special educational needs (whether or not they have a statutory education, health and care plan);

10.3.3 has a mental health need;

10.3.4 is a young carer;

10.3.5 is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;

10.3.6 is frequently missing / goes missing from education, home or care;

10.3.7 is at risk of modern slavery, trafficking sexual or criminal exploitation;

10.3.8 is at risk of being radicalised or exploited;

10.3.9 has a parent or carer in custody, or is affected by parental offending;

10.3.10 is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;

10.3.11 is misusing alcohol or other drugs themselves;

10.3.12 is looked after or has returned home to their family from care;

10.3.13 is at risk of 'honour' based abuse such as Female Genital Mutilation or Forced Marriage;

10.3.14 is a privately fostered child;

10.3.15 is persistently absent from education including persistent absences for part of the school day;

10.3.16 has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit;

10.3.17 are pregnant or young parents;

10.3.18 are on reduced or part-time timetables;

10.3.19 have been repeatedly removed from lessons;

10.3.20 are at risk of suspension, permanent exclusion, or placement in alternative provision.

10.4 A member of staff who considers that a pupil may benefit from Family Help should keep a written record of their concerns and in the first instance discuss this with the DSL (see paragraph 24 below and Appendix 2 for further guidance). The DSL will consider the appropriate action to take in accordance with the child's Safeguarding Children Partners menu of Family Help services and their referral threshold document and will support staff in liaising with parents and other agencies and setting up an inter-agency assessment as appropriate.

10.5 If Family Help is appropriate, staff may be required to support other agencies and professionals in a Family Help assessment and will be supported by the DSL in carrying out this role. In some cases School staff may be required to take a lead role.

10.6 The matter will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the pupil's situation appears to be getting worse or does not appear to be improving.

10.7 The School recognises the introduction of Family Help arrangements through Working Together to Safeguard Children 2026. References within this policy to Family Help should be read alongside Family Help services, which provide coordinated support to children and families when difficulties emerge and before statutory intervention is required.

11 Making a referral Local Protocols - BHSCP

11.1 **Where a child is suffering, or is likely to suffer from harm; a referral to children's social care (and if appropriate the police) should be made immediately.** A member of staff does not need the permission of the DSL to make a referral where they believe a child is at risk of harm, although the DSL should be informed as soon as possible.

11.2 "Harm" is the "ill treatment or impairment of the health or development of a child." Seeing or hearing the ill-treatment of another person is also a form of harm. It can be determined "significant" by "comparing a child's health and development with what might be reasonably expected of a similar child."

11.3 The contact details for the School's Children's Social Care (CSC) team are set out at the front of this policy. Staff should bear in mind that referrals may be required to the School's CSC team and / or the pupil's CSC team.

11.4 Anyone can make contact with CSC to discuss concerns before a referral is made. This includes professionals as well as a child themselves, family members and members of the public. The child's local safeguarding partnership will have a threshold of need framework and guidance which will provide more information which can support decision making in relation to contacting CSC.

11.5 **Statutory assessments**

11.5.1 Children's social care may undertake a statutory assessment under the *Children Act 1989* into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

(a) **Children in need**: *A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.* Children in need may be assessed under section 17 of the Children Act 1989.

(b) **Children suffering or likely to suffer significant harm**: Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if

they have reasonable cause to suspect that *a child is suffering, or is likely to suffer, significant harm*.

11.6 Anybody can make a referral. Staff required to make a direct referral may find helpful the flowchart set out on page 22 of KCSIE and the flowcharts set out in Chapter 1 of WTSC for information about the likely actions and decisions required.

11.7 Parental consent is not required for referrals to statutory agencies, but staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:

11.7.1 personal details of the child including the child's developmental needs;

11.7.2 detailed information about the concern;

11.7.3 information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.

11.8 If the referral is made by telephone, this should be followed up in writing.

11.9 If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

11.10 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the Local Authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.

11.11 Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the child's situation improves, in accordance with the procedures set out in Appendix 6.

12 Allegations against pupils - child on child abuse

12.1 Allegations against pupils should be reported in accordance with the procedures set out in this policy in Appendix 3. If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 of KCSIE 2026

12.2 and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative.

12.3 The safeguarding and support needs of all children involved will be considered individually.

13 Extra-familial harm

13.1 Safeguarding incidents and / or behaviours can be associated with factors outside the School and / or can occur between children outside the School, inside and outside of home and online.

13.2 All staff, including the DSL, should consider the context within which such incidents and / or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare, and should record these appropriately.

13.3 Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.

13.4 Extra-familial harm: all staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be susceptible to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, sexual abuse, serious youth violence and county lines and radicalisation.

14 Risk assessment

14.1 Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

14.2 The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused.

14.3 The Head has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

14.4 Day to day responsibility to carry out risk assessments under this policy/ the Risk Assessment of Pupil Welfare Policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

15 What to do if staff have a safeguarding concern about someone else's welfare

15.1 Staff who have safeguarding concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, should report them.

15.2 In the absence of an express procedure about reporting, staff should report such concerns to their line manager or to the DSL in the first instance.

16 Allegations made and or / concerns raised about staff and others in School

16.1 The School has a policy and procedures for managing allegations made and / or concerns raised about any adult working for, or on behalf of, the School, whether paid or unpaid, or any Other Adult (as defined in paragraph 2.3 of Appendix 4) which may affect the safety and welfare of children.

16.2 The procedures in this policy apply to staff who pose a risk of harm to children or may behave in a way that indicates that they may be unsuitable to work with children. The procedures also apply to low-level concerns that do not meet the harms threshold. The procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, unfounded, false, or unsubstantiated allegations. These procedures are set out in Appendix 4 and follow the guidance in Parts 1 and 4 of KCSIE.

16.3 The School will follow its employment procedures for dealing with any other safeguarding concern raised about staff, involving external agencies as appropriate.

16.4 Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of the School in relation to contact with pupils, parents,

colleagues and any other person who comes into contact with the School. This guidance is contained in the Staff Handbook and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

17 Informing parents

17.1 Parents will normally be kept informed, as appropriate, of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Head, the Designated Officer(s), children's social care, the police and / or the pupil before discussing details with parents.

17.2 In all cases, the DSL will be guided by the Brighton and Hove Safeguarding Children Partnership (BHSCP) referral threshold document. Local Protocols - BHSCP

17.3 See also Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff.

18 Additional reporting

18.1 In addition to the reporting requirements explained above, the School will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

18.1.1 **Health and Safety Executive**

(a) The School is legally required under RIDDOR (Reporting of Injuries, Diseases and Dangerous Incidents Regulations, https://www.hse.gov.uk/riddor/) to report certain incidents to the Health and Safety Executive. Please see the School's Health and Safety Policy for further details about this.

18.1.2 **Charity Commission**

(a) The School is a registered charity and will report all serious incidents to the Charity Commission promptly in accordance with the guidance How to report a serious incident in your charity (Charity Commission, June 2019);

18.1.3 **Disclosure and Barring Service** (**DBS**)

(a) A referral to the DBS will be made promptly if the criteria are met. See Appendix 4, 8.1 for further details.

18.1.4 **Teaching Regulation Agency** (**TRA**)

(a) Separate consideration will be given as to whether a referral to the TRA should be made where a teacher has been dismissed or would have been dismissed if he / she had not resigned. See Appendix 4, 8.2 for more details.

18.1.5 **Insurers**

(a) The Senior Team will consider whether it is necessary to report a safeguarding incident to the relevant insurers and / or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.

(b) Care should be taken to ensure this is done before renewal to ensure that the School complies with its duties under the Insurance Act 2015. If the School is in any doubt with regard to the correct insurer and / or policy

and / or if it is unable to locate the relevant insurer, professional advice should be sought.

18.1.6 **Boarding Schools Association** (**BSA**)

(a) The School will report safeguarding matters to the BSA as required by their Safeguarding Charter.

(b) The School will seek advice from BSA on safeguarding procedures in a pupil's home country and the referral process for pupils whose parents live abroad.

18.1.7 **UK Visas and Immigration**

(a) In the event that a pupil holding a Student or Child Student visa sponsored by the School under the Points Based System goes missing, the School will report to UKVI if the pupil misses ten consecutive expected contact points.

(b) Each time the School's attendance register is completed is treated as a contact point for these purposes.

(c) The report will be made by the School's Level 1 user via the Sponsor Management and in accordance with prevailing UKVI guidance.

19 Safer recruitment and supervision of staff

19.1 The School is committed to practising safer recruitment in checking the suitability of staff (including staff employed by another organisation). See the School's separate Recruitment and Selection policy.

19.2 The School will inform shortlisted candidates that online searches may be done as part of due diligence checks.

19.3 Copies of documents used to verify the successful candidate's identity, right to work and required qualifications will be kept on their personal file by the School.

19.4 The School maintains a single central register of appointments for all staff.

19.5 Volunteers who do not engage in regulated activity will nevertheless receive an appropriate induction, safeguarding information and supervision proportional to their role, responsibilities and level of contact with pupils.

19.6 The School's protocol for ensuring that visiting speakers are suitable and appropriately supervised is set out in the School's separate Security and policy procedures.

The School will determine whether volunteer roles constitute regulated activity in accordance with current statutory guidance and will undertake the appropriate DBS and barred list checks before the volunteer commences duties.

20 Use of mobile technology

20.1 The School's policy on the use of mobile technology, including phones and cameras, in the School, is as follows:

20.1.1 the School's Acceptable use policy for pupils sets out the expectations on pupils from Year 7 to Year 13.

20.1.2 all staff should use mobile devices and cameras in accordance with the guidance set out in the staff code of conduct.

20.1.3 parents of all pupils may bring mobile devices onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

20.2 The School allows access to the internet onsite. Appropriate internet safety measures are taken to manage associated risks, including use of filters and monitoring of usage.

20.2.1 the School recognises the increased risks posed by AI-generated content, including deepfakes and synthetic media, which may be used to manipulate, impersonate, or exploit children. Staff are trained to identify and respond to such risks.

20.2.2 the School educates pupils about image-based sexual abuse, including the non-consensual sharing of intimate images, and ensures that all incidents are treated as safeguarding matters.

20.2.3 the School is alert to the risk of online grooming and manipulation, including the use of social media, gaming platforms, and encrypted messaging apps. Pupils are taught how to recognise and report inappropriate contact.

20.2.4 staff must report any concerns about AI-generated abuse, online grooming, or image-based exploitation to the DSL immediately. These concerns will be managed in accordance with the procedures set out in this policy and Appendix 1.

20.3 The School's approach to online safety is set out in the School's Online Safety Policy and ICT Acceptable Use Policy for pupils, staff and Council members and volunteers.

21 Filtering and Monitoring

21.1 The DSL is expected to take lead responsibility for this, and this should be explicit in the role holder's job description.

21.2 All staff should receive training on the expectations, applicable roles and responsibilities relating to filtering and monitoring, including how to identify and respond to emerging online threats.

21.3 The school will follow the recently published guidance on filtering and monitoring – Meeting digital and technology standards in schools and colleges (DfE 2026) by

21.3.1 assigning clear roles and responsibilities for managing filtering and monitoring systems.

21.3.2 reviewing filtering and monitoring provision at least annually, with input from the DSL and IT leads.

21.3.3 The school will take reasonable and proportionate steps to restrict access to harmful and inappropriate content by blocking harmful and inappropriate content including:

- A-I generated abuse
- Deepfakes and synthetic media
- Image-based sexual abuse

- Online grooming and manipulation
- Misinformation and disinformation

21.3.4 Ensuring that filtering does not unreasonably impact teaching and learning, and that monitoring strategies are proportionate and effective.

21.3.5 The School will regularly review emerging technologies and online risks, including generative AI tools, anonymous platforms, encrypted messaging applications and evolving social media environments, ensuring that its filtering, monitoring and educational responses remain proportionate and effective.

22 Training

22.1 The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.

22.2 The level and frequency of training depends on the role of the individual member of staff.

22.3 The School maintains written records of all staff training.

22.4 All training will be carried out in accordance with Brighton & Hove Safeguarding Children Partnership (BHSCP) procedures where possible.

22.5 The School will ensure that all volunteers receive safeguarding information appropriate to their role. This will include the identity of the DSL and DDSLs, how to report a safeguarding concern, the Staff Code of Conduct, whistleblowing procedures and guidance on professional boundaries. The extent of safeguarding training and supervision provided will be determined through an assessment of the nature and frequency of the volunteer's contact with children. Volunteers working in regulated activity or undertaking regular unsupervised roles will be subject to appropriate safer recruitment and vetting checks in accordance with the School's Recruitment and Selection Policy.

22.6 Induction

22.6.1 All staff, including temporary staff and volunteers, will be provided with induction training that includes (and where relevant includes the provision of copies of):

(a) this policy;

(b) the role, identity and contact details of the DSL and their Deputies;

(c) the Promoting Good Behaviour Policy for pupils;

(d) the Promoting Good Behaviour policy, which includes details of the School's policy on cyberbullying and prejudice-based bullying and discriminatory bullying;

(e) the staff Code of Conduct including the Whistleblowing Policy, Staff Social Media Policy and IT Acceptable Use Policy;

(f) the safeguarding response to children who go missing from education;

(g) the School's approach to online safety;

(h) safeguarding training in accordance with Brighton & Hove Safeguarding Children Partnership (BHSCP) procedures including guidance on managing a report of peer-on-peer harmful sexual behaviour;

(i) All staff, including those who do not work directly with children, will read at least Part One of KCSIE 2026 and confirm that they have read and understood it.

(j) appropriate Prevent duty training; and

(k) expectations, applicable roles and responsibilities in relation to filtering and monitoring.

22.6.2 Upon completion of safeguarding induction, each staff member is asked to complete a safeguarding induction form to acknowledge that he / she:

(a) is aware of the identity of the DSL;

(b) knows what to do in the event of hearing a child protection disclosure or allegation, or observing anything which might lead them to suspect that a child is in need or at risk of harm;

(c) understands the School's expectations with regard to appropriate relationships between staff and pupils and to confidentiality, as set out in the School's Staff Code of Conduct;

(d) has received, read and understood the School's Safeguarding policy; and has received, read and understood the guidance in Part 1 of KCSIE (including Annex A or Annex B, where appropriate); and

(e) knows that a log is kept of the above information and is kept securely by HR and reviewed regularly.

22.7 **Safeguarding training**

All staff will receive annual safeguarding training that includes:

22.7.1 (a) Online safety, including risks associated with AI-generated content, deepfakes, and image-based sexual abuse.

(b) Misinformation and disinformation, particularly how these can influence pupils' beliefs, behaviours, and vulnerability to exploitation.

(c) Online grooming and manipulation, including how perpetrators use digital platforms to target children.

(d) RSHE 2025 curriculum updates, including teaching about healthy relationships, consent, and digital boundaries.

(e) Cyber security awareness, in line with DfE's Cyber Security Standards for Schools.

(f) AI companion platforms, deepfake abuse, synthetic sexual imagery and emerging technology safeguarding risks.

(g) Allergy awareness and anaphylaxis response.

(h) Information sharing under the Children's Wellbeing and Schools Act, including understanding the Information Sharing Duty (September 2026), relevance and proportionality, transparency with children and families, information sharing across organisational boundaries and the interaction between safeguarding duties, confidentiality and data protection legislation.

22.7.2 The DSL will ensure that training is responsive to emerging threats and includes practical scenarios, case studies, and role-specific guidance.

22.7.3 Members of the ST (including the Head) and the Nominated Safeguarding Council member (trustee) will receive a copy of this policy and be expected to read all of KCSIE.

22.7.4 The Head and all staff members, including volunteers, will undertake appropriate safeguarding training at least annually and following consultation with the Brighton & Hove Safeguarding Children Partnership (BHSCP). In addition, all staff members will receive informal safeguarding and child protection updates including online safety via email, ebulletins and staff meetings on a regular basis and at least annually.

22.7.5 The School will also ensure that all staff (including new staff as part of their induction) receive appropriate training on online safety, searching pupils for prohibited and banned items and preventing people from becoming drawn into terrorism and extremist views, so as to provide staff with the knowledge and confidence to identify children at risk and to challenge ideas which can be used to legitimise terrorism. Such training will be included as part of all new staff's induction and will be updated as appropriate in line with any BHSCP advice.

22.7.6 The induction and INSET programmes ensure that all staff members understand their responsibilities in being alert to the signs of abuse, their responsibility for referring any concerns to the DSL, and the continuing requirement for safe working practice and appropriate behaviour from all staff. They are also kept informed of any changes to guidelines and/or systems within the School.

22.7.7 Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child on child abuse, harmful sexual behaviour, child criminal and child sexual exploitation, female genital mutilation, cyberbullying, prejudiced-based and discriminatory bullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

22.7.8 All Members of Council (Trustees) receive safeguarding training (including online training) on induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the School's safeguarding policies in place are effective and support a robust whole school approach to safeguarding. This training will be regularly updated.

22.7.9 All members of Council, should read and have regard to at least Parts One and Two of KCSIE 2026 and undertake appropriate safeguarding and child protection training at induction, which will be regularly updated.

22.7.10 The School has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills and experience to safeguard children effectively, including questionnaires, staff meetings and professional development reviews. This includes information on how staff can report concerns occurring out of hours / out of term time and should, where appropriate, refer to the School's risk assessment for out of hours /out of term safeguarding arrangements.

22.7.11 The DSL arranges training for Senior Prefects and Peer Listeners (pupils) who have responsibility within the School community to ensure that they are aware of the School's policies and procedures relating to safeguarding children and young people, and to support the pupils in their roles.

22.7.12 Designated Safeguarding Lead (DSL)

(a) The DSL and DDSLS will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes inter-agency working and Prevent awareness training and will be updated at least every two years, or as required.

(b) In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, see Annex C of KCSIE.

(c) Prevent duty training will be consistent with the Government's Prevent training for schools. See Educate Against Hate (HM Government, 2021) for further details.

22.7.13 Pupil support and teaching pupils about safeguarding

(a) The School recognises that pupils who are in need, abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation or some sense of blame. The School may be the only stable, safe and predictable element in their life. When at school their behaviour may be challenging and defiant or they may appear withdrawn.

(b) The School will endeavour to support pupils through:

(i) The content of the curriculum.

(ii) Its aims and ethos promoting a positive, secure environment and giving the pupils a sense of being valued.

(iii) Ensuring that pupils know that some behaviour is unacceptable and what to do if they have concerns about the behaviour of someone else (be this, for example, another pupil, family member or member of staff).

(iv) Inter-agency liaison with, for example, BHSCP, the police and Children's Social Services where appropriate.

(v) Information sharing, insofar as, if a pupil suffering abuse leaves, their information is transferred to the new school immediately (but separately from the main pupil file) and keyworkers are informed where appropriate.

(c) The School teaches pupils about safeguarding through the curriculum and PSHE. This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about whom they should turn to for help.

(d) Relevant issues will be covered through Relationships and Sex Education as part of the PSHE programme.

(e) The School recognises that a one size fits all approach may not be appropriate for children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

(f) Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through relationships and sex education and PSHE education appropriate to their age and stage of development. It will tackle issues such as: healthy and respectful relationships, boundaries and consent, gender roles, stereotyping, prejudice and equality, body confidence and self-esteem, the sharing of explicit images, self-generated intimate images/videos, including AI-generated/deepfake material, how to recognise abusive relationships, including coercive and controlling behaviour, concepts and laws relating to sexual consent, sexual exploitation, abuse, grooming, harassment, rape, domestic abuse, so-called "honour-based" violence and how to access support, what constitutes sexual harassment and sexual violence and why these are always unacceptable.

(g) Pupils are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled. The School's Concerns and Complaints Procedure for Pupils sets out in writing what pupils should do if they have a worry or complaint.

(h) The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities so that pupils learn how to keep themselves safe on-line and when accessing remote learning. Through the DSL, the Chair of Council has ensured appropriate filtering and monitoring systems are in place (see the Online Safety Policy) and is mindful that this should not lead to unnecessary restrictions on learning.

(i) Schools and colleges are likely to be in regular contact with parents and carers. Those communications should be used to reinforce the importance of children being safe online and parents and carers are likely to find it helpful to understand what systems schools and colleges use to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online.

23 Monitoring and review

23.1 The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the Safeguarding Trustee and Chair of Council as necessary and seeking contributions from staff. The DSL will update the Senior Team regularly on the operation of the School's safeguarding arrangements.

23.2 Any safeguarding incidents at the School will be followed by a review of these procedures by the DSL and a report made to the Chair of Council. Where an incident involves a member of staff, the Designated Officer(s) will be asked to assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses with regards to safeguarding arrangements at any time will be remedied without delay.

23.3 This policy will be updated whenever needed to ensure that it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt.

23.4 This policy and the implementation of these procedures are reviewed regularly by the Education and Safeguarding Committee.

23.5 The Chair of Council will also undertake an annual review of this policy and the School's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. They will also undertake an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks Roedean's pupils face. The Council will collectively receive, challenge and approve the review.

23.6 The DSL will work with the Nominated Safeguarding Trustee to prepare a written report commissioned by the Chair of Council. The written report should address how the School ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled, including lessons learned; and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters. The Chair of Council should also consider independent corroboration, such as:

23.6.1 inspection of records or feedback from external agencies including the Designated Officer(s);

23.6.2 reports of ISI inspections;

23.6.3 the outcome of any relevant complaints, claims or related proceedings; and

23.6.4 press reports.

23.7 The Chair of Council will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy their final approval. Detailed minutes recording the review by the Chair of Council will be made.

24 Record keeping

24.1 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the School. Information should be kept confidential and stored securely. Concerns and referrals will be kept in a separate child protection file for each child. These should include:

24.1.1 a clear and comprehensive summary of the concern;

24.1.2 details of how the concern was followed up and resolved;

24.1.3 a note of any action taken, decisions reached the rationale and the outcome.

24.1.4 Where concerns relate to AI-generated content, manipulated media, deepfakes, image-based abuse or online exploitation, records should clearly identify the nature of the technology involved and any actions taken to preserve evidence safely.

24.2 The information created in connection with this policy may contain personal data. The School's use of this personal data will be in accordance with data protection law. The School has published on its website privacy notices which explain how the School will use personal data.

24.3 All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.

24.4 Insofar as pupil records are concerned:

24.4.1 Staff must record all concerns about a pupil on MyConcern. Guidance on record keeping is set out in Appendix 2.

24.4.2 The DSL will open a safeguarding file following a report to them of a safeguarding concern about a pupil. The DSL will record all discussions with both colleagues and external agencies, decisions made and the reasons for them and detail of the action taken.

24.5 **Information sharing and multi-agency working**

24.5.1 The School will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The School will always act in order to safeguard and promote the welfare of any young person involved.

24.5.2 The School understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people, including their educational outcomes. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of pupils, which is always the School's paramount concern. Schools have clear powers to share, hold and use information for these purposes and the UK GDPR and Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately.

24.5.3 When the School receives a request for safeguarding information (e.g. a subject access request from a parent or a request from the police), the School will carefully consider its response to make sure that any disclosure is in accordance with its obligations under the UK GDPR and Data Protection Act 2018. The School will also have regard to its data protection policies. The School's Data Protection Lead will work with the DSL as appropriate to determine what should be disclosed.

24.5.4 The School will co-operate with children's social care, and where appropriate the police, to ensure that all relevant information is shared for the purposes of Family Help assessments, and assessments and child protection investigations under the Children Act 1989.

24.5.5 Where allegations have been made against staff, the School will consult with the Designated Officer(s) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

24.5.6 While the School will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

24.5.7 It is recommended that staff and Trustees read the DfE Data Protection Guidance for Schools (2024). This sets out how to: comply with the data protection law; develop data policies; understand what staff and pupil data to keep; and prevent personal data breaches.

24.5.8 The School recognises the Information Sharing Duty (September 2026) introduced through the Children's Wellbeing and Schools Act. Where staff hold information relevant to safeguarding or promoting the welfare of a child, the School will ensure that information is shared with appropriate safeguarding partners, agencies and

organisations where it may assist them in carrying out safeguarding or welfare functions, unless a statutory exemption applies. The School recognises that there is no requirement for concerns to meet statutory intervention thresholds before relevant information is shared and that early information sharing may be essential in preventing harm and securing support for children and families.

24.6 Terrorism (Protection of Premises) Act 2025 (Martyn's Law).

25.1 Martyn's Law introduces legal duties for publicly accessible premises, including independent boarding schools, to enhance preparedness against terrorism and serious violence. The law is designed to be proportionate and complements existing safeguarding and emergency planning frameworks. Below details how Martyn's Law is applicable to Roedean. The School will undertake regular exercises and tabletop scenarios to test preparedness for a terrorist incident or hostile threat event and review learning arising from these exercises.

(a) Schools fall under the Standard Tier of the legislation, which applies to premises where it is reasonable to expect 200 or more individuals to be present at any one time.

(b) Notify the Security Industry Authority (SIA) that they are responsible for the premises.

(c) Implement reasonably practicable public protection procedures, including evacuation, invacuation, and lockdown plans.

(d) Ensure staff receive terrorism awareness training, such as the free ACT Awareness e-learning module2.

(e) Where school premises are let to third parties for events (e.g. shows, concerts, or sports tournaments), the school must assess whether the event falls within scope of the Act. If 800 or more attendees are reasonably expected, the event may be subject to Enhanced Tier requirements, and the third-party organiser becomes the responsible person. The School must ensure the letting agreement reflect these responsibilities.

(f) There is a two-year implementation period from April 2025, during which schools are expected to prepare for compliance. Full enforcement is anticipated from April 2027, allowing time for statutory guidance to be published and for the SIA to establish its regulatory role.

(g) Martyn's Law should be embedded within the school's safeguarding and emergency planning systems. The designated safeguarding lead (DSL), site manager, and health and safety coordinator should collaborate to ensure plans are proportionate, effective, and regularly reviewed.

(h) Staff must be trained to recognise and respond to hostile threats. Communication protocols should be clear and rehearsed. Governors, parents, and pupils should be informed of the school's approach to ensure transparency and reassurance.

25 Version control

Date of adoption of this policy	August 2026
Date of last review of this policy	August 2026
Date for next review of this policy	August 2027
Policy owner (ST)	Designated Safeguarding Lead
Policy owner (Chair of Council)	Council (Board of Trustees)

Appendix 1 Forms of abuse, neglect and exploitation and specific safeguarding risks

1 Abuse, neglect and exploitation

1.1 Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).

1.2 Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

2 Definitions of abuse, neglect and exploitation

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

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

2.3 **Emotional abuse**: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying and prejudiced-based or discriminatory 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.

2.4 **Sexual abuse**: involves forcing, causing or inciting a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

2.4.1 Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

2.4.2 Children are more likely to know their abuser than not. Staff should be aware that children under the age of 13 cannot legally consent to sexual activity, and concerns relating to sexual activity involving children should always be considered within safeguarding procedures and assessed in accordance with the law and statutory guidance.

2.4.3 The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education, and all staff should be aware of it. The School's policy and procedures can be found in Appendix 3.

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

3 Signs of abuse

3.1 Possible signs of abuse include, but are not limited to:

3.1.1 the pupil says she has been abused or asks a question or makes a comment which gives rise to that inference;

3.1.2 there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;

3.1.3 the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour;

3.1.4 the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;

3.1.5 the pupil's development is delayed, the pupil loses or gains weight or there is a deterioration in the pupil's general well-being;

3.1.6 the pupil appears neglected, e.g. dirty, hungry, inadequately clothed;

3.1.7 the pupil is reluctant to go home, or has been openly rejected by her parents or carers; and

3.1.8 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

3.2 Mental health problems can also be a sign of abuse, neglect or exploitation. Mental Health as a Safeguarding Concern can include:

3.2.1 self-harm;

3.2.2 suicidal ideation;

3.2.3 suicide planning;

3.2.4 eating disorders;

3.2.5 significant deterioration in mental health.

3.3 Where staff believe a pupil presents an immediate risk to life or serious harm, emergency services should be contacted immediately. Where urgent mental health support is required but there is no immediate danger, NHS 111 Mental Health Services should be considered.

3.4 The Brighton & Hove Safeguarding Children Partnership (BHSCP) can provide advice on the signs of abuse and the DfE advice What to do if you're worried a child is being abused (March 2015) provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

4 Specific safeguarding issues

4.1 Statutory guidance acknowledges the following as specific safeguarding issues:

4.1.1 child abduction and community safety incidents;

4.1.2 children and the court system;

4.1.3 children missing from education (see section 5 below);

4.1.4 children with family members in prison;

4.1.5 child criminal exploitation and child sexual exploitation (see section 7 below);

4.1.6 county lines (see section 8 below);

4.1.7 modern slavery and the national referral mechanism;

4.1.8 cybercrime; (see section 10 below)

4.1.9 domestic abuse (see section 11 below);

4.1.10 homelessness;

4.1.11 so-called "honour-based" abuse (including Female Genital Mutilation and Forced marriage) (see sections 12, 13 and 14 below);

4.1.12 preventing radicalisation (see section 15 below);

4.1.13 child on child abuse (see Appendix 3);

4.1.14 sexual violence and sexual harassment between children in schools and colleges (see Appendix 3);

4.1.15 upskirting (see section 19 below).

4.1.16 AI-generated content and synthetic media

AI-generated content, including deepfakes and synthetic media, may be used to impersonate, harass, or exploit children. This includes fabricated images, videos, or voice recordings that can be used to blackmail, manipulate, or cause reputational harm. Staff should be alert to the possibility that pupils may be targeted or affected by such content and report concerns immediately to the DSL.

4.1.17 Image-based sexual abuse

Image-based sexual abuse includes the non-consensual creation, sharing, or manipulation of intimate images. This may involve threats to share images, coercion to produce them, or the use of technology to alter or distribute content. All incidents must be treated as safeguarding concerns and managed in accordance with the School's procedures for online safety and child-on-child abuse.

4.1.18 Online grooming and manipulation

Grooming and manipulation may occur via social media, gaming platforms, or encrypted messaging apps. Perpetrators may build trust with children to exploit them sexually, emotionally, or financially. Staff should be trained to recognise signs of online grooming, including secrecy, sudden changes in behaviour, or unexplained possessions, and report concerns to the DSL.

4.1.19 AI Companion Platforms and AI-Mediated Relationships

Pupils may use AI companion platforms, chatbots and other conversational AI tools. Whilst these technologies may have legitimate uses, they can also present safeguarding risks. Risks may include exposure to inappropriate content, emotional dependency, unhealthy online relationships, misinformation, harmful advice relating to mental health or wellbeing, and encouragement to keep information from trusted adults.

Staff should remain professionally curious where a pupil appears overly reliant on an AI system, displays changes in behaviour linked to its use, or discloses concerning interactions with an AI platform. Any concerns should be reported to the DSL and managed in accordance with the School's safeguarding procedures.

4.1.20 Misinformation and disinformation

Pupils may be exposed to false or misleading content online that can influence their beliefs, behaviours, or safety. This includes conspiracy theories, harmful challenges, extremist narratives, and health-related misinformation. The School will educate pupils on digital literacy and critical thinking to help them identify and respond to misinformation.

4.2 Further advice and links to guidance on these specific safeguarding issues can be found in Annex A of KCSIE. Staff should be particularly aware of the safeguarding issues set out below.

5 Children who are absent from education for prolonged periods and/or repeated occasions

5.1 Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college'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. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. Further information and support, includes:

- Guidance on school attendance Working together to improve school attendance including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.
- Information regarding schools' duties regarding children missing education, including information schools **must** provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children Missing Education.
- further information for colleges providing education for a child of compulsory school age can be found in: Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges.
- general information and advice for schools and colleges

5.2 Where reasonably possible the School will hold more than one emergency contact for each pupil.

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

5.4 This will assist the Local Authority to:

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

5.4.2 follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation or involvement with serious violent crime.

5.5 The School shall inform the Local Authority of any pupil who:

5.5.1 fails to attend School regularly; or

5.5.2 has been absent without the School's permission for a continuous period of ten school days or more, at such intervals as are agreed between the School and the Local Authority (or in default of such agreement, at intervals determined by the Secretary of State).

6 Elective Home Education (EHE)

6.1 Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we recommend that local authorities, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible. This would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational

needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. Where a child has an Education, Health and Care plan local authorities will need to review the plan, working closely with parents and carers.

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

7.1 Both CSE and CCE are forms of abuse where an individual or group (adult or another child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity:

7.1.1 in exchange for something the victim needs or wants e.g. money, gifts or affection; and / or

7.1.2 for the financial advantage or increased status of the perpetrator or facilitator; and / or

7.1.3 through violence or threat of violence to victims (and their families).

7.2 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, it is important that the child perpetrator is also recognised as a victim.

7.3 CSE and CCE can affect children of any gender and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

7.4 International pupils may be particularly susceptible to trafficking, particularly those who are, or will be, in the UK without their parent(s) a legal guardian, and schools which hold a Child Student sponsor licence may be targeted by traffickers as a means of facilitating a child's entry to the UK for the purposes of CSE or CCE.

7.5 The victim may have been exploited even if the activity appears consensual.

7.6 CCE can include children being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

7.7 Some of the following can be indicators of both CSE and CCE, including children who:

7.7.1 appear with unexplained gifts, money or new possessions;

7.7.2 associate with other young people involved in exploitation;

7.7.3 suffer from changes in emotional well-being;

7.7.4 misuse drugs and alcohol;

7.7.5 go missing for periods of time or regularly come home late; or

7.7.6 regularly miss school or education or do not take part in education.

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

7.9 CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

7.10 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 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). The above CCE indicators can also be indicators of CSE, as can children who:

7.10.1 have older boyfriends or girlfriends; or

7.10.2 suffer from sexually transmitted infections or become pregnant.

8 County lines

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

8.2 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 and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

8.3 A number of the indicators for CSE and CCE as detailed above (and in Annex B of KCSIE) may also be applicable to children involved in county lines.

8.4 Additional reporting duties:

8.4.1 if a child is suspected to be at risk of, or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services / third sector providers who offer support to victims of county lines exploitation;

8.4.2 where a pupil may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism should be considered.

9 Serious violence

9.1 Indicators which may signal children are at risk from, or are involved with serious violence crime may include:

9.1.1 increased absence from school;

9.1.2 a change in friendships or relationships with older individuals or groups;

9.1.3 a significant decline in performance;

9.1.4 signs of self-harm or a significant change in wellbeing or signs of assault or unexplained injuries;

9.1.5 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.

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

9.3 Any concern that a child is carrying, accessing, displaying or expressing intent to use a weapon must be reported immediately to the DSL or DDSL. The School will undertake an immediate risk assessment and consider a safety and support plan, parental involvement and police consultation where necessary.

10 Cybercrime

10.1 Cybercrime is a criminal activity committed using computers and / or the internet. It's broadly categorised as either "cyber-enabled" (crimes that can happen off-line but enabled at scale and speed online e.g. fraud, purchasing of illegal drugs, child sex abuse and exploitation) or "cyber-dependent" (crimes that can only be committed by using a computer).

10.2 Cyber-dependent crimes include:

10.2.1 unauthorised access to computers (illegal hacking) e.g. accessing a school's computer network to look for test papers or change grades awarded;

10.2.2 denial of Service (**Dos** or **DDos**) attacks or "booting" - attempts to make a computer, network or website unavailable by overwhelming it with internet traffic; and

10.2.3 making, supplying or obtaining malware (e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans) with intent to commit further offence.

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

10.4 The DSL (or Deputy) should consider referring into the Cyber Choices programme if they have concerns. This is a nationwide programme which intervenes when 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.

11 Domestic abuse

11.1 Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

11.2 Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of this can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

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

11.4 Further advice on identifying children who are affected by domestic abuse and how they can be helped can be found in Annex B of KCSIE. This includes details about Operation Encompass which operates in all police forces across England, helping schools and police work together to provide emotional and practical help to children.

12 So-called "honour-based" abuse

12.1 All forms of so-called "honour-based" abuse are abuse (regardless of motivation) and should be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves additional risk factors such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take. Staff should speak to the DSL if they have any doubts.

12.2 If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

13 Female genital mutilation (FGM)

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

13.2 There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-43 of the Multi-agency statutory guidance on FGM (HM Government, July 2020) (pages 61-63 focus on the role of schools).

13.3 All staff must be aware of the requirement for teachers to 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. The report should be made orally by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils. 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.

13.4 If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance Mandatory reporting of female genital mutilation - procedural information (January 2020) for further details about the duty.

13.5 Guidance published by the Department for Health also provides useful information and support for health professionals which will be taken into account by the School's medical staff. The National FGM Centre has also produced FGM guidance to help schools understand their role in safeguarding girls, engaging parents and teaching about FGM.

14 Forced marriage

14.1 Forced marriage is also a form of so-called "honour-based" abuse. Forcing a person into 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 or 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.

14.2 Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of the Multi-agency guidelines: handling case of forced marriage (HM Government, 2023).

14.3 Staff should speak to the DSL if they have any concerns. Pages 32-36 of the Multi-agency guidelines: handling case of forced marriage (HM Government, 2023) focus on the role of schools in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or fmu@fco.gov.uk for advice and information.

15 Radicalisation and the Prevent duty

15.1 The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

15.2 The School aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

15.3 The School has adopted the government's definitions for the purposes of compliance with the Prevent duty:

15.4 **Extremism:** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- negate or destroy the fundamental rights and freedoms of others; or

- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or

- intentionally create a permissive environment for others to achieve the results in (1) or (2).

The types of behaviour below are indicative of the kind of promotion or advancement which may be relevant to the definition and are an important guide to its application. The further context below is also an essential part of the definition.)

15.5 **Radicalisation:** "*the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups.*"

15.6 **Terrorism**: "*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 made for the purpose of advancing a political, religious or ideological cause*."

15.7 Although there is no single way of identifying an individual who is likely to be susceptible to extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

15.8 It is possible to protect susceptible people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a Prevent referral.

15.9 Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are susceptible to being drawn into terrorism and consider the appropriate support required. An individual's engagement with the programme is entirely voluntary at all stages and an individual will be required to provide their consent before any support is provided. Guidance available at: Prevent Multi-Agency Panel Duty Guidance: protecting vulnerable people from being drawn into terrorism (HM Government, 2025) The DfE and Home Office's briefing note The use of social media for online radicalisation (DfE, July 2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

16 Child on Child abuse

16.1 All staff should be aware that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of school or online.

16.2 All staff must be vigilant about child-on-child abuse due to the nature of the boarding environment.

16.3 The School's policy and procedures for dealing with child-on-child abuse can be found in Appendix 3 below.

17 Online safety

17.1 All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

17.2 It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective, whole school approach to online safety empowers a school to protect and educate pupils, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

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

17.3.1 **content**: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism;

17.3.2 **contact**: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.;

17.3.3 **conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and / or pornography), sharing other explicit images and online bullying; and

17.3.4 **commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If pupils, students or staff are at risk, it should be reported to the Anti-Phishing Working Group.

18 Sharing nudes and semi-nude images and videos

18.1 Consensual and non-consensual sharing of nudes and semi-nude images and / or videos can be signs that children are at risk and also it is illegal.

18.2 "Sharing nudes and semi-nudes" means the taking and sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline e.g. via Apple's AirDrop. This is also known as sexting or youth produced sexual imagery.

18.3 The School treats all incidences of sharing nudes and semi-nude images as safeguarding matters to be actioned in accordance with this policy.

18.4 Members of staff must not intentionally view any nude or semi-nude images or unnecessarily retain intimate images which are reported to them, or copy, print or share the images under any circumstances. In referring any incident of sharing images, members of staff should describe the content of the images as reported to them.

18.5 The DSL may in exceptional circumstances view images with the prior approval of the Head and only where:

18.5.1 it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;

18.5.2 it is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the pupil or parent in making a report; or

18.5.3 a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the school's devices or network.

18.6 Where viewing an image is unavoidable:

18.6.1 viewing should take place on School premises wherever possible;

18.6.2 the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);

18.6.3 a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;

18.6.4 full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;

18.6.5 any member of staff who views an indecent image should be given appropriate support.

18.7 If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.

18.8 If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

18.9 If external agencies do not need to be involved, the School must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.

18.10 If images have been shared online and cannot now be deleted by the person who shared them, the School should consider reporting the images to the relevant web host or service provider (if an option is provided) or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).

18.11 Where a pupil receives unwanted images, the School should advise the pupil and her parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.

18.12 The UK Council for Internet Safety's advice note. Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS, March 2024) contains details of support agencies and provides further information for schools on how to responding to incidents of sharing nudes and semi-nudes, along with when and how to refer incidents to the police.

19 Upskirting

19.1 Upskirting typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission 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 gender can be a victim.

19.2 Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.

19.3 The School will treat incidents of upskirting as a breach of discipline and also as a safeguarding matter under the School's child protection procedures.

19.4 All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to sharing sexual images / sexting.

20 Special educational needs and disabilities or physical health issues

20.1 The School welcomes pupils with special educational needs and disabilities (SEND) and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the School's policy on special educational needs and learning difficulties and disability policy.

20.2 Additional barriers can exist when detecting the abuse or neglect of pupils with SEND or certain mental or physical health conditions that can create additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that:

20.2.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's condition without further exploration;

20.2.2 these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children

20.2.3 the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

20.2.4 communication barriers and difficulties in managing or reporting these challenges

20.2.5 cognitive understanding- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

20.3 The School should consider providing extra pastoral support and attention for these pupils, along with ensuring any appropriate support for communication is in place.

20.4 Staff should not assume that behavioural, emotional or communication changes are solely attributable to a pupil's neurodivergence, diagnosis or disability. Sudden, escalating or person-specific changes should prompt safeguarding consideration and professional curiosity.

21 Allergy Management and Anaphylaxis

21.1 The School recognises that severe allergies and anaphylaxis can present significant risks to a child's health, wellbeing and safety and are therefore an important safeguarding and welfare consideration.

The School will take reasonable steps to identify, assess and manage risks relating to severe allergies and anaphylaxis through appropriate healthcare planning, information sharing, staff training and risk assessment.

Particular consideration will be given to pupils with severe allergies when participating in boarding activities, educational visits, overseas travel, co-curricular activities and events taking place outside the normal school day.

Staff should be aware of pupils with known severe allergies, understand how to access emergency support and medication where required, and report any concerns regarding allergy management or pupil safety to the appropriate members of staff.

The School will work in partnership with parents, healthcare professionals and pupils to ensure that appropriate support arrangements are in place and regularly reviewed. The DSL, Health Centre and educational visits lead will work together to ensure safeguarding considerations relating to severe allergies are appropriately managed.

22 **Looked after children and previously looked after children**

22.1 The Chair of Council ensures that staff have the skills, knowledge and understanding to keep looked after children safe and the information they need in relation to a child's looked after legal status, for example:

22.1.1 whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;

22.1.2 contact arrangements with birth parents or those with parental responsibility;

22.1.3 information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after him / her.

22.2 The DSL maintains these details, including contact details of the child's social worker. See 6.5.3 in the policy for the DSL's role in relation to pupils who are looked after children.

23 **Care leavers**

The DSL maintains details of the Local Authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

24 **Children who are lesbian, gay, bi, or gender questioning**

24.1 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 targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

24.2 LGBT inclusion is taught as part of the statutory relationship's education/ RSE/ PSHE curriculum.

24.3 All staff are aware of these vulnerabilities and the School endeavours to provide a safe space to speak out or share concerns.

25 **Children and the Court System**

25.1 Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

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

25.3 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. This may be useful for some parents and carers.

26 Stalking

26.1 Stalking may be perpetrated in person or online and can involve repeated unwanted contact, monitoring, surveillance, following, intimidation, obsessive behaviour or threats. Staff should be alert to patterns of behaviour that cause fear, alarm or distress and should report concerns to the DSL.

27 Financial Exploitation

27.1 Financial exploitation may include coercing a child to transfer money, share banking details, participate in scams, open accounts, hold money, purchase items, gamble online or facilitate fraud. Increasingly this may occur through social media, gaming platforms or online relationships.

28 Child to Parent Abuse

28.1 Children may also cause significant harm to parents, carers and family members. Child-to-parent abuse can include physical violence, coercive control, intimidation, emotional abuse, financial abuse and damage to property.

Appendix 2 Concerns about a child - guidance for staff

1 **Receiving a disclosure**

1.1 Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.

1.2 Do not ask leading questions, i.e. a question which suggests its own answer. Use "tell me, explain to me, describe to me" (**TED**) questioning. It is particularly important not to continue questioning a pupil if they disclose something which suggests that a criminal offence may have been committed – the Police will need to take the lead on investigating and your questioning might compromise possible criminal proceedings. Reassure the pupil they are being taken seriously and they will be supported and kept safe.

1.3 Do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken.

1.4 Keep a sufficient written record of the conversation (see 2 below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.

1.5 Pass on the record when reporting the concern in accordance with this policy.

2 **Recording a concern**

2.1 Staff must record all concerns in writing as soon as possible.

2.2 Records should clearly distinguish fact, observation, the child's own words, professional judgement and information received from others, and signed and dated, with the name of the signatory clearly printed in writing. Records should include:

2.2.1 the pupil's details: name; date of birth; address and family details;

2.2.2 date and time of the event / concern / conversation;

2.2.3 a clear and comprehensive summary of the event/concern / conversation;

2.2.4 details of how the concern was followed up and resolved;

2.2.5 a note of any action taken and by whom, decisions reached and the outcome; and

2.2.6 the name and position of the person making the record.

2.3 The School uses MyConcern to report and log safeguarding concerns. Instructions of how staff can upload a concern are available on the intranet, in the Staffroom and from the Pastoral Managers' Office. The concern can be added after an initial discussion with the DSL and completed with the DSL where appropriate.

2.4 Staff can record a concern by logging onto their computer, double clicking on the MyConcern icon on their homescreen, logging in using their school email address, and following instructions on the screen.

2.5 Concerns are submitted and then triaged by the Safeguarding team. These are then assigned to the appropriate members of staff.

2.6 The Pastoral team will then monitor and file concerns, as necessary.

3 Use of reasonable force

3.1 There are circumstances when it would be appropriate for staff to use reasonable force to safeguard pupils. "Reasonable" in these circumstances means using no more force than is needed.

3.2 Staff should refer to Appendix 4 of the School's Promoting Good Behaviour Policy and the Staff Code of Conduct for more detailed guidance about the use of reasonable force and refer to the Use of Reasonable Force policy.

Appendix 3 Dealing with allegations of child on child abuse

1 Child on child abuse

1.1 Children of any age can abuse other children, and this can happen inside and / or outside school and / or online. This includes, but is not limited to:

1.1.1 bullying (including cyber-bullying and prejudice-based and discriminatory bullying);

1.1.2 abuse within intimate personal relationships between peers (teenage relationship abuse);

1.1.3 physical abuse such as hitting, kicking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates and / or encourages physical abuse);

1.1.4 sexual violence, such as rape, assault by penetration and sexual assault (including grabbing bottoms, breasts and genitalia under or over clothes, flicking bras, unwanted kisses or embraces) possibly with an online element which encourages sexual violence;

1.1.5 sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

1.1.6 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;

1.1.7 consensual and non-consensual sharing of nude and semi-nude images (also known as "sexting" or "youth produced sexual imagery") means the taking and sending or posting of nude or semi-nude images, videos or lives streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline, for example via Apple's AirDrop;

1.1.8 upskirting, typically involving taking a picture under a person's clothing without their permission, 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; and

1.1.9 initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may include an online element);

1.1.10 AI-generated abuse and synthetic media

Abuse may include the use of AI-generated content such as deepfake images, videos, or voice recordings to impersonate, harass, or exploit another pupil. This may involve the creation or sharing of synthetic sexual content or manipulated media intended to cause harm. Staff must treat any report of AI-generated abuse as a safeguarding concern and report it to the DSL immediately.

1.1.11 Image-based sexual abuse

This includes the non-consensual creation, sharing, or manipulation of intimate images, including threats to share such images or coercion to produce them. It may also involve altered or fake images distributed to shame or control a pupil. All incidents must be treated as safeguarding matters and managed in accordance with this policy and Appendix 1.

1.1.12 Online grooming and manipulation

Pupils may be groomed or manipulated by peers or adults online, including through social media, gaming platforms, or encrypted messaging apps. This may involve building trust to exploit the pupil sexually, emotionally, or financially. Staff should be alert to signs such as secrecy, sudden behavioural changes, or unexplained possessions and report concerns to the DSL.

1.1.13 Staff should recognise misogynistic language, attitudes and behaviours as indicators of an unsafe culture. Such behaviours should always be challenged and addressed through safeguarding, educational and disciplinary responses where appropriate. It as an important safeguarding concern linked to child-on-child abuse, harmful sexual behaviour and unhealthy attitudes and relationships.

1.1.14 The School recognises the national focus on Violence Against Women and Girls (VAWG). Through safeguarding, behaviour education, PSHE and pastoral programmes, pupils are taught about respect, consent, gender equality, healthy relationships and the impact of misogynistic attitudes and behaviours.

1.1.15 Bullying, including cyber-bullying, prejudice-based bullying, discriminatory bullying, racism, faith-targeted abuse and other prejudice-based incidents.

2 The School's approach to child-on-child abuse

2.1 Staff understand that, even if there are no reports of child-on-child abuse at the School, it does not mean it is not happening; it may be the case that it is just not being reported. Staff understand the importance of reporting any concerns regarding child on child abuse to the DSL (or the DDSLS in the DSL's absence).

2.2 Such behaviour is never accepted and should be considered as both a safeguarding issue and potentially a disciplinary one. The School will adopt a zero-tolerance approach to abuse. Downplaying certain behaviours (by, for example, dismissing sexual harassment as "banter", "having a laugh" or "part of growing up" can lead to a culture of unacceptable behaviours, an unsafe environment for children and at its worst to a culture that normalises abuse.

2.3 All staff should challenge inappropriate behaviour between pupils and anyone who suffers, witnesses or hears of abuse of any form between pupils is asked to report it in accordance with this policy and / or the school's behaviour and discipline and anti-bullying policies, so that appropriate action can be taken.

2.4 Appropriate action will involve supporting all members of the school community who may be involved as a priority. This may require investigation by the school or other agencies. Until investigations have been undertaken and findings made, the school will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation. This should be undertaken whether or not the

incident is alleged to have occurred at school, or when the pupil involved was under the school's care and whether or not the pupil is under 18, as an issue which may impact pupil welfare. Disciplinary action will follow separately, if appropriate.

3 Sexual violence and sexual harassment (SVSH)

3.1 Where the misconduct may constitute sexual violence (rape, assault by penetration, sexual assault or causing someone to engage in sexual activity without consent) or sexual harassment (unwanted conduct of a sexual nature), it should be reported to the DSL and will be managed in accordance with this policy. SVSH is never acceptable.

3.2 Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware that it is more likely that girls will be the victims of SVSH and more likely it will be perpetrated by boys.

3.3 SVSH can occur between two or more children of any age or sex from primary to secondary stage. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. SVSH exists on a continuum and may overlap. Addressing inappropriate behaviour (even where it seems to be relatively innocuous) can be an important intervention which helps to prevent problematic or abusive behaviour in the future by setting and enforcing clear expectations of behaviour, supporting victims and encouraging them and others to speak out and facilitating targeted support for those demonstrating harmful sexual behaviour.

3.4 The 2021 Ofsted report concluded that whether or not schools are aware of reported instances of SVSH in their community, it is likely to be occurring. The school acknowledges this and that children are likely to report such matters, if at all, to people they trust. All staff are therefore trained to identify signs of abuse and on how to respond to a report.

4 Management of allegations of child-on-child SVSH

4.1 The initial report

4.1.1 The School recognises that it is not easy for children to tell staff about abuse. Staff are trained in signs of abuse and required to look out for them and act upon them; and to respond to all reports of abuse, however they are reported and whether they are made by victims directly or third parties.

4.1.2 The School acknowledges that the initial response is incredibly important and may impact not just the management of that issue, but others of SVSH. Staff are also trained in how to receive a report. Where possible they should be accompanied by the DSL or other member of staff.

4.1.3 Staff should:

(a) listen carefully and respectfully, reassuring the person making the report that they are being taken seriously and offer support without promising confidentiality or making a judgement about its veracity;

(b) where possible staff should ask open questions about whether pupil(s) have been harmed, the nature of the harm or if they may be at risk of harm;

(c) where there is an online element, considering the searching, screening and / or confiscation of devices and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child;

(d) explain the next steps and how the report will be progressed;

(e) make a written record of the report (recording the facts as the child has presented them); and

(f) inform the DSL (orDDSLS) as soon as practically possible, if they are not involved in the initial report and then only share the report with those necessary in order to progress it.

4.2 **DSL's considerations**

4.2.1 Reports of SVSH are often complex and require difficult professional decisions to be made. Further disclosures may follow and the facts may be difficult to establish. These decisions are made on a case-by-case basis taking all of the circumstances into account, in the best interests of the pupils involved. The School's response is led by the DSL who will always have regard to Part 5 of KCSIE 2026 in the management of the issue.

4.3 **School's considerations**

4.3.1 The school will consider:

(a) the victim's wishes in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions made about investigation and support, but their wishes will not always be determinative as the school may have to take action to protect other children;

(b) the nature of the alleged incident (including whether it was a one-off or a sustained pattern), whether a crime may have been committed and whether harmful sexual behaviour has been displayed;

(c) the ages and developmental stages of the children involved and any imbalance between them;

(d) if there is an intimate personal relationship between the children;

(e) whether there are any ongoing risks to those involved;

(f) the time and location of any incident, and any action required to make the location safer; and

(g) the wider context.

4.3.2 Before deciding how best to support and protect those involved the School will undertake immediate risk and needs assessments. These will be undertaken in cases of sexual violence and considered otherwise. Where appropriate, they will be discussed with those involved and their parents. This may involve suspension pending investigation. Risk and needs assessments will be recorded and kept under review in the knowledge that police investigation and criminal proceedings can take several months to

conclude on what, if any, further action is appropriate. The School will make a proportionate response to these matters in light of the circumstances and the factors identified above.

4.3.3 The School will do all it reasonably can to protect the anonymity of children involved in sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

5 Investigations and findings

5.1 The School will record the findings of investigations undertaken by the police and / or the CPS, and if the police decide not to take any further action, will consider whether investigation should be undertaken or commissioned by the School to enable it to determine, whether or not it is likely that the allegations are substantiated, unsubstantiated, unfounded, false or malicious. There may be circumstances whether this is not appropriate, as it may prejudice a possible future investigation, for example if a victim does not currently wish to make a victim statement. In those circumstances the School should consider whether a limited investigation is appropriate. The concerns, discussions, decisions and reasons for these should be recorded.

5.2 The School should continue to support those involved, with reference to the range of support options set out in Part 5 of KCSIE and should also consider whether further referral and / or disciplinary action may be appropriate against either the perpetrator where concerns are substantiated and/ or harmful sexual behaviours identified or the victim where concerns were found to be deliberately invented or malicious.

Appendix 4 Whistleblowing policy and raising allegations and concerns regarding adults in the school

1 Key contact information

1.1 Below is the key contact information you may need to raise an allegation or low-level concern under this policy.

Head Niamh Green	Email: head@roedean.co.uk Telephone number: 01273 667500
Designated Safeguarding Lead (DSL) and Deputy Head: Pastoral Rachel Hart	Email: rjh@roedean.co.uk Telephone number (term time): 01273 667621 Mobile number and holiday contact number: 07796 136879
Chair of Council Nick Hall	Email: rsc.nh@roedean.co.uk Telephone number: 01273 667666 via Clerk to the Council
Nominated Safeguarding Council Member, Nominated Trustee for Children in Care (CIC) and Previously In Care (PiC) Paul Read	Email: rsc.pr@roedean.co.uk Telephone number: 01273 667666 via Clerk to the Council
Designated Officer(s) of the local authority Kay Whitcroft (LADO)	Children, Families & Learning Directorate Portslade Hub Mile Oak Road Portslade BN41 2PG Telephone number: 01273 290400 Mobile number: 07584 217271 LADOenquiries@brighton-hove.gov.uk (mark email as urgent)

2 Purpose and application

2.1 **Purpose:** the School takes safeguarding extremely seriously. It is of paramount importance that we maintain an open and transparent culture in which all concerns about adults are shared promptly, responsibly and with the right person. We recognise the importance of ensuring adults who work with, or otherwise come into contact with children, do so in a way that is consistent with our values, culture and expected standards of behaviour. We also recognise that concerns may arise in several ways and from a number of sources. The purpose of this policy is to provide a framework for all concerns to be raised, recorded and dealt with effectively by the School.

2.2 **Application:** the Policy applies to all adults working in or on behalf of the School (whether on a paid or unpaid basis), including trustees, supply staff, volunteers and contractors (**Staff**).

2.3 **Other adults:** although this policy directly relates to those who work for the School, the School recognises that its safeguarding role extends to the protection of everyone associated with it. Should concerns be raised about people who are not Staff or pupils, then they should be reported to the Head or DSL who will take appropriate action and co-operate with the relevant agencies as appropriate.

2.4 **Statutory guidance:** this policy has regard to the following statutory guidance:

2.4.1 *Keeping children safe in education* (September 2026) (**KCSIE**). Part Four of KCSIE deals with allegations made and concerns raised about staff, supply staff, volunteers and contractors (**Staff**), who are all adults working for, or on behalf of, the School. It distinguishes between two categories of concerns / allegations that can be raised about Staff. These are:

(a) concerns that do not meet the harm threshold, otherwise known as "low-level concerns"; and

(b) allegations that may meet the harm threshold.

2.4.2 *Working together to safeguard children* (March 2026) (**WTSC**), which requires policies to be put in place setting out the process, including timescales for investigation and what support and advice will be available to individuals against whom allegations have been made. WT requires schools to have regard to KCSIE in order to fulfil their duties in respect of safeguarding and promoting the welfare of children.

3 Key Staff duties

3.1 **Staff behaviour:** all Staff must comply with the School's Code of Conduct which sets out appropriate and expected standards of behaviour.

3.2 **Duty to report:** as a member of Staff, you must immediately follow this policy to report **any** concerns you have about the conduct of a member of Staff or any other adult. This includes any concern however it arises, for example behaviour you have witnessed, a concern raised with you by a colleague, pupil, parent or another adult, or as result of checks or information brought to your attention.

3.3 **Duty to self-refer:** you must refer yourself to the Head where, for example, you have found yourself in a situation which could be misinterpreted, which might appear compromising to others, and / or on reflection if you believe you have behaved in such a way that may fall below the standards expected of you.

3.4 **A culture of sharing:** All Staff have a positive obligation to support the School's culture of openness and sharing without fear of reprisal.

4 What needs to be reported?

4.1 **Reporting all concerns:** all concerns must be raised whether they are considered to be "low-level" concerns or conduct which may meet the harm threshold.

4.2 **Low-level concerns:** a low-level concern is any concern, no matter how small, and even if no more than a sense of unease or a "nagging doubt", that a member of Staff may have acted in a way that is inconsistent with expected professional standards and / or the staff Code of Conduct, whether inside or outside work. No concern is too small or minor to raise under this policy.

4.3 **Concerns that meet the harm threshold:** allegations that may meet the harm threshold are those that might indicate a person would pose a risk of harm if they continue to work

in their present position, or in any capacity with children, for example where the individual has:

4.3.1 behaved in a way that has harmed a child, or may have harmed a child; and / or

4.3.2 possibly committed a criminal offence against, or related to, a child; and / or

4.3.3 behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; and / or

4.3.4 behaved, or may have behaved, in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside the School which creates a transferable risk.

4.4 **Definition of Harm:** it is important to understand the types of conduct that may be harmful to children, and to recognise that harm may not be limited to the most obvious types of physical abuse. There is no single legal definition of harm but to assist your understanding of what may amount to "harm" you should consider the following:

4.4.1 the Safeguarding Vulnerable Groups Act 2006 which does not give a definition of harm, encouraging people to apply a "normal, everyday meaning";

4.4.2 the Children Act 1989 defines:

(a) "harm" as "ill-treatment or the impairment of health or development [including, for example, impairment suffered from seeing or hearing the ill-treatment of another]";

(b) "ill-treatment" as including "sexual abuse and forms of ill treatment which are not physical";

(c) "health" as "physical or mental health".

5 How to raise concerns and allegations

5.1 **Raising low-level concerns**: Where you have a low-level concern in respect of any member of Staff, you must report the matter immediately. You must raise this with the Head.

5.2 **Concerns about Staff:** Where you have a concern about the conduct of a member of Staff (other than the Head), whether this is a low-level concern or an allegation of harm that may meet the harm threshold, you must raise this immediately with the Head.

5.3 **Concerns involving the Head and conflicts of interest:** where you identify a concern about the Head, you must report the matter immediately to the Chair of Council without first notifying the Head. Where there is a conflict of interest in raising the concern with the Head you must report the concern directly to the Local Authority Designated Officer (**LADO**), without first notifying the Head. Details of the LADO can be found at the start of this policy.

5.4 **Concerns involving Council:** where you identify a concern about a Council member, you must report the matter immediately to the Chair of Council or the Nominated Safeguarding Trustee. If either the Chair of Council or the Nominated Safeguarding Trustee is the subject of an allegation, you must report the matter to the other.

5.5 **Reports to the DSL:** If it is not possible for you to make a report to the Head or Chair of Council or Nominated Safeguarding Trustee, you must instead immediately make a report to the DSL. The DSL will take action in accordance with these procedures and will as soon

as possible inform the Head or, where appropriate, the Chair of Council and the Nominated Safeguarding Trustee.

6 The School's response to concerns and allegations

6.1 **Appropriate action:** the School will ensure that appropriate action is taken to address concerns that are raised under this policy.

6.2 **Assessing concerns**: The Head (or, if the concern relates to the Head, the Chair of Council or the Nominated Safeguarding Trustee) will determine whether the concerns raised are low-level or potentially meet the harm threshold. The Head and DSL, the Chair of Council and the Nominated Safeguarding Trustee have all been trained to assess concerns, and to record and address them appropriately.

6.3 **Low-level concerns:** If the School determines the concern is a low-level concern, then the School will address the concern as appropriate. This will usually involve making the individual aware of the concern against them, undertaking any investigation that may be required and may include giving management guidance and advice or invoking the School's capability or disciplinary procedures.

6.4 **Borderline cases:** the Head (or, if the concern relates to the Head, the Chair of Council or the Nominated Safeguarding Trustee) may take advice from the LADO in borderline cases in order to establish whether the concern is a low-level concern or an allegation that potentially meets the harm threshold. This may include conducting an initial "no names" conversation with the LADO about whether the harm threshold is met.

6.5 **Referral:** where the Head (or, if the concern relates to the Head) the Chair of Council considers the concerns raised potentially meet the harm threshold, the Head (or, if the concern relates to the Head) the Chair of Council will make a report to the LADO before further action is taken. The Head (or, if the concern relates to the Head) the Chair of Council may also seek advice from the LADO as appropriate. Where a LADO referral is appropriate, this will be made within one working day of the allegation being reported in accordance with this policy.

6.6 **Responding to an allegation that may meet the harm threshold:** where an allegation is made that may meet the harm threshold, the School will take advice from and co-operate with the LADO, the police, and any other external body that may be involved in the response to the allegation. The School will follow its internal procedures in order to investigate and respond to the allegation when it is appropriate to do so and will keep the LADO informed of the action it is taking.

6.7 **Case Manager:** where an investigation is deemed necessary into an allegation of conduct that may meet the harm threshold, a "Case Manager" will be appointed by the School to lead the investigation. The Case Manager will be either the Head or a person with appropriate authority appointed by the Head. Where the Head is the subject of an allegation, the Case Manager will usually be either the Nominated Safeguarding Trustee **OR** Chair of Council.

7 Disclosure of information about concerns and allegations

7.1 **Informing the individual of a concern:** the School will in most cases inform the individual concerned about any low-level concern that is raised about them.

7.2 **Informing the individual of an allegation where appropriate:** the Case Manager will consult with the LADO in order to agree if and when it is appropriate to inform the individual of the allegation.

7.3 **Communication and support for the individual subject to an allegation:** if and when it is appropriate to inform the individual of the allegation against them, the Case Manager will also offer appropriate pastoral support and will keep the individual informed of the timescales for the investigation under this procedure and the factors which may affect it. In all cases, the investigation will be concluded as soon as reasonably practicable.

7.4 **Informing the child's parents / carers where appropriate:** the Case Manager will agree with the LADO when and how the parents or carers of the child / children involved will be informed of the allegation if they do not already know of it. The Case Manager will also agree with the LADO what information shall be shared with the parents / carers of the child / children as the case progresses. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

7.5 **Reporting restrictions:** the School is mindful of and will comply with the reporting restrictions under section 141 Education Act 2002 which prevent the identification of a teacher who is the subject of such an allegation in certain circumstances.

7.6 **Involvement of external agencies:** where the LADO(s) advises that a strategy discussion is needed, or the police or children's social care need to be involved, the Case Manager will not inform the individual subject to the allegation, or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

7.7 **Concerns about supply staff and contractors:** where a concern / allegation has been made in respect of a member of supply staff or a contractor, the concern / allegation may be notified to their employer. Where a Case Manager has been appointed to investigate an allegation, the Case Manager will consult with the LADO before sharing any information with the individual's employer.

8 Referrals to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency

8.1 **Report to the DBS:** the School is under a legal duty to make a referral to the DBS where a member of Staff is removed by the School from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child. The DBS will then consider whether to impose sanctions which may restrict or prevent that person from working with children in future.

8.2 **Report to the Teaching Regulation Agency:** if a teacher is dismissed because they are found to have committed serious misconduct, or their conduct has breached the Teachers' Standards, or they resign prior to dismissal on such grounds, the School will also make a referral to the Teaching Regulation Agency. The Teaching Regulation Agency will consider whether to impose a prohibition order on that person which prevents them from undertaking teaching work in future.

9 Record keeping

9.1 **Records of low-level concerns:** low-level concerns will be recorded in writing. The record of the concern will be retained so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed. Records of low-level concerns that have been addressed with an individual will usually be kept on the individual's personnel file. In addition, all low-level concerns, including those that have not been addressed formally under the School's procedures, will also be stored securely in a central file (**Concerns and Allegations Record**).

9.2 **Recording low-level concerns:** the Concerns and Allegations Record will set out the name of the individual involved (if an individual is named), a brief description of the concern and the context in which it arose, any investigation that has been carried out, and the

outcome / result of the investigation into the concern. The name of the individual who has raised the concern should also be noted. Where that individual wishes to remain anonymous the School will try to accommodate this as far as reasonably possible but cannot guarantee anonymity in all circumstances.

9.3 **Records of allegations that may meet the harm threshold:** details of allegations that may meet the harm threshold will be recorded both on the individual's personnel file and the Concerns and Allegations Record. The individual's personnel file and the Concerns and Allegations Record will include a summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken in response to the allegation.

9.4 **Storage and security of Concerns and Allegations Record:** the Concerns and Allegations Record will be stored in a password protected file accessible by the Head, the Chair of Council, the Nominated Safeguarding Trustee and the DSL only. The log will be reviewed by the Chair of Council and/or the Nominated Safeguarding Trustee termly, or as required.

9.5 **Malicious or false low-level concerns and allegations:** details of low-level concerns and allegations found to be malicious or false will be removed from personnel records and the Concerns and Allegations Record.

9.6 **Retention of records:** in line with the School's information and records retention policy, information stored on staff personnel files about low-level concerns and allegations that may meet the harm threshold, and the Concerns and Allegations Record, will be retained by the School indefinitely. The School may in future be required to produce this information if it is notified of an allegation of historic abuse relating to a current or former member of staff, if a former member of staff is accused of committing safeguarding offences elsewhere or if a former member of staff is the subject of safeguarding allegations arising elsewhere.

10 References

10.1 **Low-level concerns:** low-level concerns will not be disclosed in a reference unless they were addressed formally and resulted in a sanction under the School's disciplinary or capability policies and procedures and it is otherwise appropriate to disclose them.

10.2 **Allegations that meet the harm threshold:** allegations that meet the harm threshold will be disclosed in a reference if the allegation was found to be substantiated (including any cases in which any disciplinary sanction has expired). The School will not disclose information about allegations that were found to be false, unfounded, unsubstantiated, or malicious.

11 Questions

11.1 **Contact:** please contact the Deputy Head: Pastoral & DSL if you have any questions about this policy.

Appendix 5 Charity Safeguarding procedures

1 Charity Safeguarding duties

1.1 As trustees of a charity, the members of the School Council, which is the governing body of the School, acknowledge in addition to their statutory duties to safeguard and protect children and adults at risk, they have a duty to take reasonable steps to protect everyone associated with the charity from harm, abuse or mistreatment. This protection of the people involved in the charity is central to its culture. The full extent of these additional Safeguarding duties is set out in the Charity Commission guidance: Safeguarding and Protecting People for Charities and Trustees. This guidance lists risks to be aware of, including discrimination, health and safety, cyber abuse and data breaches.

1.2 The contents of the School's Safeguarding and data protection suites of policies, the staff handbook and the Health and Safety Policy set out how many concerns about these issues will be handled. If anyone has any Safeguarding concerns which have caused or may cause harm to anyone associated with the charity which are not expressly covered by those or other School policies, they should contact the Deputy Head: Pastoral and DSL or the Nominated Safeguarding Trustee without delay.

1.3 The Trustees fulfil these duties by:

1.3.1 leading by example and promoting a fair, inclusive and positive culture, ensuring that everyone involved with the charity feels able to report any concerns they may have, confident that they will be heard and responded to;

1.3.2 setting and regularly (at least annually) reviewing the suitability of policies and procedures to ensure they remain fit for purpose and that they are followed in practice;

1.3.3 establishing appropriate delegation arrangements for the effective governance and management of safeguarding matters within the charity;

1.3.4 exercising proper oversight of the management of individual Safeguarding matters and a review of the performance of the charity's Safeguarding function, including consultation with stakeholders and appropriate trend analysis;

1.3.5 being quick to respond to concerns, to carry out appropriate investigations and take necessary action;

1.3.6 being open and transparent and not ignoring harm or downplaying failures;

1.3.7 managing conflicts of interest and / or loyalty

1.3.8 ensuring that staff receive training in Safeguarding at a level which is commensurate with their role;

1.3.9 having clear recruitment and contracting processes and ensuring that proper due diligence is undertaken on the suitability of:

(a) (with regard to differing processes for international staff);

(b) partner organisations;

(c) contractors; and

(d) beneficiaries.

1.3.10 ensuring that clear processes are in place relating to checks required where there are changes to the School structure or individual roles;

1.3.11 oversees the appropriateness of agreements with other third parties (whether those who provide services to the Charity or directly to its beneficiaries (including pupils)) covering the relationship, their respective roles and monitoring and reporting requirements;

1.3.12 exercising proper oversight of the Charity's online operations, adequately managing risk and ensuring that online services are suitable for users

1.3.13 overseeing the review of its premises and security arrangements for third party use to ensure appropriate measures are in place to keep people safe; and ensure that there are arrangements in place for the provider to liaise with the school or college on these matters where appropriate; ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. (Keeping children safe in out-of school settings) (DfE 2023)

1.3.14 ensuring the effectiveness of their safeguarding policies and procedures, including informing the LADO should the School receive an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running non-school activities.

1.3.15 reviewing any grant-making undertaken to ensure appropriate policies and procedures are in place;

1.3.16 implementing suitable reporting and monitoring processes in place for any work overseas;

1.3.17 set out risks and how it will manage them in a risk register; and

1.3.18 allocating sufficient funds for the effective management of Safeguarding and arranging appropriate insurance cover.

Ensuring a sufficient level of oversight of the charity's operations to manage risk and report any incidents which materially affect the charity's operations, finances, people or reputation can be reported to the Charity Commission in line with How to report a serious incident in your charity (Charity Commission, June 2019).]

Appendix 6 Local arrangements

Local Protocols - BHSCP:

1 **The local inter-agency guidance and procedures of Brighton and Hove Safeguarding Children Partnership ('BHSCP') (**www.bhscp.org.uk**)**

Comprehensive guidance from the Brighton and Hove Safeguarding Partnership is available on thresholds of need- summary guidance is available at Thresholds - BHSCP

2 **Local key risks/priorities**

- Absence truancy from school
- Poor relationships
- Language or communication difficulties
- Difficulty in achieving in education
- Poor self esteem
- Early signs of drug or alcohol misuse
- Low-level emotional or behavioural issues
- Young carers
- Bullying
- Parent conflict and risk of breakdown

However a comprehensive list is available at Thresholds - BHSCP

3 **Family Help Menu**

Guidance states that if a child is in need of Family Help schools should consider commencement of Family Help and Strengthening Families Assessment and consider a Pastoral Support Plan

4 **Full details on local thresholds are available at** Thresholds - BHSCP

5 **Referrals to the Local Authority are to be made through** www.brighton-hove.gov.uk/frontdoorforfamilies or 01273 290400

6 **Escalation procedures**

Dispute resolution and escalation protocol is available at Escalation-Policy.pdf (bhscp.org.uk)

The BHSCP complaints procedure is available at B&H LSCB AWAYDAY PROGRAMME (bhscp.org.uk)