



MAIDA VALE SCHOOL

Child Protection and Safeguarding Policy

(including safer recruitment, allegations against staff and low-level concerns)

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Individual Responsible	Toby Fisher, Designated Safeguarding Lead Magnus Bashaarat, Headmaster
Approved by:	Board of Directors

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Key External Contact Details

Role/Organisation	Contact details
Local Authority Designated Officer (LADO)	Aqualma Daniel — Aqualma.Daniel@rbkc.gov.uk
RBKC Children's Social Care	Tel: 020 7361 3013. Out of hours emergency team: 020 7373 2227. Email: socialservices@rbkc.gov.uk
Westminster City Council Children's Social Care	Tel (weekdays 9am–5pm): 020 7641 4000. Outside these hours, Emergency Duty Team: 020 7641 2388. Email: accesstochildrenservices@westminster.gov.uk
Other local authorities	https://www.gov.uk/report-child-abuse-to-local-council
Police (Westminster contacts)	Petros Tsintsios (CLO LGBT+) — petros.tsintsios@met.police.uk; PC Samira Ahmed (Cadet Coordinator) — samira.ahmed@met.police.uk; Samuel Senabulya (Specialist Community Liaison Sergeant) — samuel.senabulya@met.police.uk; Glenn O'Dea (Inspector) — Glenn.S.Odea@met.police.net. Emergency: 999. Non-emergency: 101

Role/Organisation	Contact details
Support and advice about extremism / Prevent	DfE counter-extremism helpline: 020 7340 7264 (not for emergencies). Email: counter.extremism@education.gov.uk
Anti-terrorist hotline	0800 789 321 (emergency: 999)
Channel programme	Referrals made via the DSL through local authority children's social care/Prevent partners
Managing Director (Nominated Safeguarding Director), Gardener Schools	Theo Brehony — theo.brehony@gardenerschools.com
NSPCC Whistleblowing Advice Line	Tel: 0800 028 0285 (Mon–Fri 8am–8pm; weekends 9am–6pm). Email: help@nspcc.org.uk
NSPCC Report Abuse in Education Advice Line	Tel: 0800 136 663. Email: help@nspcc.org.uk
NSPCC Helpline (general safeguarding advice)	Tel: 0808 800 5000
Disclosure and Barring Service (DBS)	Tel: 03000 200 190. Email: customerservices@dbb.gov.uk
Teaching Regulation Agency (TRA)	Tel: 0207 593 5393. Email: TRA.Caseworker@education.gov.uk
Operation Encompass helpline	0204 513 9990 (Mon–Fri, 8:00–13:00, local rate)
Independent Schools Inspectorate (ISI)	Tel: 020 7600 0100. Email: info@isi.net
Forced Marriage Unit	Tel: 020 7008 0151. Email: fmu@fco.gov.uk

Key School Contact Details

Role	Name
Designated Safeguarding Lead (DSL)	Toby Fisher
Deputy Designated Safeguarding Leads (DDSLs)	Dena Deedat, Millie Pocock, Matthew Greenfield, Kate Ware <i>All of the safeguarding team can be contacted through safeguarding@maidavaleschool.com</i>
Headmaster	Magnus Bashaarat

Role	Name
Managing Director (Gardener Schools) — case manager if an allegation is made against the Headmaster	Theo Brehony
Designated teacher for looked-after and previously looked-after children	Toby Fisher
Nominated Safeguarding Director	Theo Brehony

Introduction and Regulatory Framework

This policy applies to Maida Vale School (“the school”). This policy is reviewed and updated annually (as a minimum) and is available to staff, parents and carers via the school office and website.

Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children’s welfare, and that all staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.

Legislation and statutory guidance

This policy has regard to the following guidance and advice:

- *Keeping Children Safe in Education* (September 2026) (“KCSIE”), which incorporates the additional statutory guidance *Disqualification under the Childcare Act 2006* (September 2018) and provides links to various toolkits and additional advice and support.
- *Working Together to Safeguard Children* (March 2026) (“WT”), which refers to the non-statutory advice *Information sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers* (May 2024) and *What to do if you’re worried a child is being abused* (March 2015).
- *Prevent duty guidance: Guidance for specified authorities in England and Wales* (December 2023), supplemented by the briefing note *How social media is used to encourage travel to Syria and Iraq* (July 2015).
- *Relationships Education, Relationships, and Sex Education (RSE) and Health Education* (September 2026).
- *Behaviour in schools* (February 2024).
- *Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities* (2026).
- *Children Missing Education* (September 2025).
- *Digital and technology standards in schools and colleges* (April 2026).
- *After school clubs, community activities, and tuition (safeguarding guidance for providers)* (February 2026).

This policy also takes into account the procedures and practice of Westminster and the Royal Borough of Kensington and Chelsea (RBKC), as part of the multi-agency safeguarding arrangements set up by the three safeguarding partners (the local authority, the integrated care board, and the police).

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils.
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques.
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18.
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012 and the **Crime and Policing Act 2026**), which defines what 'regulated activity' is in relation to children.
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including of a sexual nature, may breach rights under the European Convention on Human Rights (ECHR).
- The Equality Act 2010, and the Public Sector Equality Duty (PSED, something the school has regard to as a matter of good practice).
- The Data Protection Act 2018, the UK GDPR, and the **Data (Use and Access) Act 2025** (together, "data protection laws").
- The Domestic Abuse Act 2021 (as amended by the Victims and Prisoners Act 2024), under which the School is an Operation Encompass partner receiving early alerts from police regarding domestic abuse incidents affecting enrolled pupils.

Equality Act 2010

The school understands and recognises its obligations under the Equality Act 2010 and that it must not discriminate against pupils because of a protected characteristic, including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the school will consider how to support pupils regarding protected characteristics to meet their specific needs and will consider its duty to make reasonable adjustments for disabled pupils.

The school recognises that effective safeguarding is anti-discriminatory and anti-racist, and understands factors — including economic and social circumstances, ethnicity and disability — which can impact on children and families' lives. Staff are alert to the risk of **adultification bias**, where children, particularly Black children, may be perceived as older than they are, which can lead to their needs being poorly understood and opportunities to provide help being missed.

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

Concerns about a child

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

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

Parents are encouraged to raise any concern directly with the school using this policy where they relate to the safety and/or welfare of children. Parents may also raise concerns directly with the DfE if they wish.

Definitions of Child Protection and Safeguarding

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 sets out the different types of abuse in more detail.

Neglect is a form of abuse and is 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.

Making or sharing of nudes or semi-nudes (previously referred to as "sexting" or "youth-produced sexual imagery") is where children share nude or semi-nude images, videos or livestreams. This also includes pseudo-images that are computer-generated or AI-generated and otherwise appear to be a photograph or video.

The term '**Children**' includes everyone under the age of 18.

The following three safeguarding partners are identified in KCSIE (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA).
- Integrated care boards (previously known as clinical commissioning groups) for the LA area.
- The chief officer of police for the LA area.

Victim is a widely understood and recognised term, but the school recognises that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. The school will use whatever term the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, the School will think carefully about what terminology it uses — especially in front of children — as, in some cases, abusive behaviour can be harmful to the perpetrator too. The school will decide on appropriate terminology on a case-by-case basis.

Types and Signs of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label — in most cases, multiple issues overlap, and children can experience more than one type of harm simultaneously. Staff should always be vigilant and raise any concerns with the DSL (or a DDSL). The four main categories of abuse — physical abuse, emotional abuse, sexual abuse and neglect — together with the specific safeguarding issues referred to throughout this policy, are set out in detail at **Appendix 1**.

Please note — in this and subsequent sections, references to “the DSL” mean the DSL or a DDSL.

What staff should do if they have concerns about a child

Staff should be alert to the potential need for early help for a child who, for example: is disabled or has SEND; is a young carer; is bereaved; is showing signs of being drawn into anti-social or criminal behaviour, including gangs, county lines or serious violence; is frequently missing or goes missing from education, care or home; is at risk of modern slavery, trafficking, sexual and/or criminal exploitation; is at risk of being radicalised or exploited; is viewing problematic or inappropriate online content or developing inappropriate relationships online; is in a family circumstance presenting challenges such as substance misuse, adult mental health issues or domestic abuse; is misusing drugs or alcohol; is suffering from mental ill health; has returned home to their family from care; is at risk of so-called ‘honour’-based abuse such as FGM or forced marriage; is a privately fostered child; has a parent or carer in custody; or is persistently absent from school or at risk of, or has been, permanently excluded.

Where possible, speak to the DSL first to agree a course of action. If, in exceptional circumstances, the DSL is not available, this should not delay appropriate action being taken — speak to a member of the senior leadership team and/or take advice from local authority children’s social care, or the NSPCC helpline on 0808 800 5000. Share details of any action taken with the DSL as soon as practically possible.

Figure 1 (below) sets out the procedure to follow.

Figure 1: procedure if you have concerns about a child’s welfare

1. You have concerns about a child.
2. Speak to the DSL.
3. Either: referral not required — the school takes relevant action and monitors locally (if concerns escalate, a referral is made); **or**: you or the DSL make a referral to the local authority’s social care team (and call the police if appropriate).
4. Where a referral is made, within one working day a social worker makes a decision about the type of response required — either the local authority’s social care team takes action and informs the referrer, or no formal assessment is required, in which case the school considers a family help assessment (see below) and accesses other support as appropriate.
5. Staff keep the child’s circumstances under review, and re-refer if appropriate, to ensure circumstances improve. The child’s best interests must always come first at all stages.

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

Make a referral to local authority children’s social care and/or the police immediately if you believe a child is suffering, or is likely to suffer, from harm, or is in immediate danger. Anyone can make a referral. Tell the DSL as soon as possible if you make a referral directly.

As most MVS pupils reside in RBKC or Westminster, the contact details on the Key External Contacts page above are the ones most commonly used. For children residing in other local authority areas, use: <https://www.gov.uk/report-child-abuse-to-local-council>.

Information Sharing

Timely information sharing is essential to effective safeguarding, and fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. Data protection laws (the Data Protection Act 2018, the UK GDPR, and the Data (Use and Access) Act 2025) do not prevent or limit the sharing of information for the purposes of keeping children safe.

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot reasonably be expected that a practitioner gains consent; or gaining consent would place a child at risk.

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests. If a victim asks the school not to tell anyone about sexual violence or sexual harassment, there is no definitive answer, because even where a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies. The DSL will balance the victim's wishes against the duty to protect the victim and other children, bearing in mind that: parents or carers should normally be informed (unless this would put the victim at greater risk); the basic safeguarding principle is that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and rape or penetration with an object and sexual assault are crimes which should be referred to the police (the starting principle of referring to the police remains even where the alleged perpetrator is under the age of criminal responsibility, which is 10).

Staff should do all they reasonably can to protect the anonymity of children involved in any report of sexual violence or sexual harassment and should be alert to the potential impact of social media in spreading rumours or exposing victims' identities. If staff are in any doubt about sharing information, they should speak to the DSL.

Receiving a disclosure

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions. Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so.
- Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may not feel ready, or know how, to tell someone that they are being abused, exploited or neglected; may not recognise their experiences as harmful; or may feel embarrassed, humiliated or threatened. None of this should stop staff from having a 'professional curiosity' and speaking to the DSL if they have concerns about a child.

Wishes of the Child

The school will take the child's wishes and feelings into account, so far as is reasonably practicable, when determining what action to take and what services to provide, and will ensure pupils feel safe and

comfortable coming forward. The school's reporting systems for pupils are well promoted, easily understood and easily accessible, and pupils are made aware that their concerns will be taken seriously and that they can safely express their views.

Contextual Safeguarding

The school recognises that safeguarding risks can arise from outside the home and family, including from within the peer group, in the community, and online. Staff will consider these wider contexts when assessing and responding to a concern about a child.

Early Help and Family Help

If a case is not already supported by local authority children's social care, and an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The school will discuss and agree, with the statutory safeguarding partners, the levels for different types of assessment, including the targeted early help level of Family Help, as part of local arrangements. The DSL will keep any case under constant review and will consider a referral to local authority children's social care if the situation does not seem to be improving.

For RBKC, see: Early help for families | Royal Borough of Kensington and Chelsea. For Westminster, see: Family Information Hub | How to access 'Early Help' services.

Referral to external agencies

If it is appropriate to refer a case to local authority children's social care or the police, the DSL will make the referral or support the referring member of staff to do so. If a member of staff makes a referral directly, they must tell the DSL as soon as possible.

The local authority will decide within one working day of a referral about what course of action to take and will let the referrer know the outcome. The DSL or the person who made the referral must follow up with the local authority if this information is not made available and must ensure outcomes are properly recorded. If the child's situation does not seem to be improving after the referral, the DSL or referrer must follow local escalation procedures to ensure their concerns have been addressed.

Record Keeping

All safeguarding concerns, discussions, decisions made and the rationale for those decisions must be recorded in writing, including instances where referrals were, or were not, made to another agency. If in any doubt about whether to record something, staff should discuss it with the DSL. Records will include a clear and comprehensive summary of the concern, details of how it was followed up and resolved, and a note of any action taken, decisions reached and the outcome.

Concerns and referrals are kept in a separate child protection file for each child, stored securely using the School's My Concern system. Confidential information and records are held securely and are only available to those who have a right or professional need to see them.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file — within 5 days for an in-year transfer, or within the first 5 days of the start of a new term. Where concerns are significant or complex, or social services are involved, the DSL will also speak directly to the DSL of the receiving school.

Responding to Specific Safeguarding Issues

Radicalisation and Prevent

All staff should be aware of the indicators which may signal that children are at risk of radicalisation or being drawn into terrorism and should report any concerns to the DSL. A Prevent referral or referral to children's social care may be made depending on the level of risk. If staff have concerns that there is an immediate or significant risk of a child being drawn into terrorism, they should call 999.

In an emergency, staff should also call 999 or the confidential anti-terrorist hotline on 0800 789 321 if they: think someone is in immediate danger; think someone may be planning to travel to join an extremist group; or see or hear something that may be terrorist related. The DfE also operates a dedicated (non-emergency) helpline on 020 7340 7264, and email counter.extremism@education.gov.uk, for staff and governors to raise concerns about extremism.

Further indicators of radicalisation, and the school's approach to risk assessment, are set out at Appendix 1.

Female Genital Mutilation ("FGM")

Any teacher who is informed by a girl under 18 that FGM has been carried out on her, or who observes physical signs which appear to show that FGM has been carried out on a girl under 18 (and has no reason to believe the act was necessary for medical reasons), must report this to the police personally — this is a mandatory statutory duty. Unless specifically told not to disclose, the teacher should also discuss the case with the DSL and involve local authority children's social care as appropriate.

Any other member of staff who discovers that FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow the school's local safeguarding procedures.

The mandatory reporting duty above does not apply where a pupil is at risk of FGM or FGM is suspected but not known to have been carried out — staff should not examine pupils. Any member of staff who suspects a pupil is at risk of FGM, or that FGM has been carried out, should speak to the DSL and follow the school's local safeguarding procedures. Indicators of FGM having taken place, or of a pupil being at risk, are set out at Appendix 1.

Serious violence and weapons

All staff should be aware of the indicators which may signal that children are at risk from, or involved with, serious violent crime — these may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, and signs of assault or unexplained injuries. If staff have any concerns about a child (as opposed to a child being in immediate danger), they should report this to the DSL as soon as possible. Further details are set out at Appendix 1.

Staff should report any concerns about a child carrying or using a weapon, or expressing intent to do so, to the DSL. The DSL should assess the risk to both the individual pupil and others in the school, considering wider information and concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan and, where relevant, consider action to de-escalate peer conflict.

Where a pupil joins the school and information indicates they have previously carried, threatened with or used a knife or weapon, **the receiving school must assess the risk and put a safety and support plan in place for when the child arrives.**

Making or sharing of nudes and semi-nudes (including where AI-generated)

The school is alert to the safeguarding risks arising from AI in this context, including the generation of deepfake intimate images and the use of AI to create child sexual abuse material. Taking and sharing AI-

generated intimate images of those aged under 18 is a criminal offence, and staff should treat incidents involving AI-generated imagery with the same seriousness as those involving real images.

'Making or sharing of nudes or semi-nudes means the sending or posting of nude or semi-nude images, videos or livestreams by persons under the age of 18 online — via social media, gaming platforms, chat apps, forums, or offline sharing services such as AirDrop. It may happen publicly, in 1:1 messaging, via group chats, or via closed accounts, and images may include more than one child. All incidents involving the sharing of nude or semi-nude images require a safeguarding response, **whether they are consensual or non-consensual**.

If staff become aware of an incident, they must report it to the DSL immediately. Staff must not:

- View, copy, print, share, store or save the imagery themselves, or ask a pupil to share or download it (if imagery has already been viewed by accident, this must be reported to the DSL).
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) involved to disclose information regarding the imagery — this is the DSL's responsibility.
- Share information about the incident with other staff, the pupils involved, or their (or other) parents/carers.
- Say or do anything to blame or shame any young people involved.

The DSL will follow the UKCIS/DfE guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" when responding to a report, including holding an initial review meeting with appropriate staff, carrying out interviews with the children involved (if appropriate), informing parents/carers at an early stage (unless there is good reason to believe this would put the pupil at risk of harm), and carrying out a risk assessment.

The DSL will make an **immediate referral** to police and/or children's social care if:

- The incident involves an adult (where an adult poses as a child to groom or exploit a child, the incident may first present as a child-on-child incident — see Appendix 1 for further information on assessing adult-involved incidents, including sexually motivated and financially motivated ("sextortion") incidents).
- There is reason to believe a young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to SEND).
- The imagery suggests sexual acts unusual for the young person's developmental stage, or violent content.
- The imagery involves sexual acts and any pupil in the images is under 13.
- There is reason to believe a pupil is at immediate risk of harm — for example, presenting as suicidal or self-harming.

If none of the above apply, the DSL — in consultation with the Headmaster — may decide to respond to the incident without involving the police or children's social care. All incidents must be recorded, whether referred externally or not, and the decision will be reviewed throughout the process. This guidance does not apply where an adult over 18 shares images of a person under 18, as this constitutes child sexual abuse and must always be reported to the police as a matter of urgency.

Children absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues, including abuse or neglect, sexual or criminal exploitation, mental health problems, substance abuse, radicalisation, FGM or forced marriage. Particularly at-risk groups are set out at Appendix 1.

The school will follow its procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, and to help prevent the risk of a child going missing from education in the future. This includes

informing the local authority if a child leaves the school without a new school being named and adhering to requirements on sharing information with the local authority when removing a child's name from the admission register at non-standard transition points.

Where reasonably possible, the school will hold more than one emergency contact number for each pupil. The school will report to the relevant local authority any pupil who fails to attend regularly or has been absent without permission for a continuous period of 10 school days or more.

Mental health support

The school has an important role in supporting the mental health and wellbeing of pupils. Mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation.

If staff have a mental health concern about a child that is also a safeguarding concern, they should take immediate action by following the procedures above. If staff have a mental health concern that is not also a safeguarding concern, they should speak to the DSL to agree a course of action. Staff should not wait for a formal diagnosis before raising a concern with the DSL and should call 999 or take a child to A&E immediately if they believe a child is in immediate danger and the DSL is not available.

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

Pupils may need a social worker due to safeguarding or welfare needs. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as creating barriers to attendance, learning, behaviour and mental health.

Where the School is aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes — for example, when responding to unauthorised absence or missing education, or when considering pastoral and/or academic support.

Concerns about another staff member

If staff have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made that such a person poses a risk of harm to children, they should speak to the Headmaster as soon as possible. If the concern relates to the Headmaster, staff should speak to the Managing Director. Where there is a conflict of interest in reporting a concern to the Headmaster, it should be reported directly to the LADO. The Headmaster/Managing Director will then follow the procedures set out below under "Dealing with Safeguarding Concerns or Allegations Made About Staff".

If a concern or allegation does not meet the harm threshold, it should be shared in accordance with the procedure set out below under "Dealing with Concerns or Allegations that Do Not Meet the Harm Threshold / Low-Level Concerns".

Concerns about safeguarding practices in the School

The school aims to ensure there is a culture of safety and an attitude of "it could happen here". Where staff have concerns about poor or unsafe practices, or potential failures in the school's safeguarding systems, these should be raised in accordance with the Gardener Schools whistle-blowing policy. No disciplinary action will be taken against a member of staff for making such a report in good faith.

If staff feel unable to raise an issue with the school, or feel their genuine concerns are not being addressed, they may use other whistle-blowing channels, such as the NSPCC Whistleblowing Advice Line (contact details on the Key External Contacts page).

Child-on-Child Abuse

Child-on-child abuse (including harassment and violence) is abuse by one or more children against another child. It is a safeguarding concern for **both** the victim and the alleged perpetrator, and it is preventable. It can happen inside and outside School, and online, and can manifest as: bullying (including cyber-bullying, prejudice-based and discriminatory bullying); abuse within intimate personal relationships between children (“teenage relationship abuse”); serious physical assault and harm, including the threat of harm with a weapon; initiation/hazing-type violence and rituals; upskirting; the making or sharing of nudes and semi-nudes (whether consensual or non-consensual, including AI-generated imagery); sexual violence and sexual assault; harmful sexual behaviours, including misogyny; and causing someone to engage in sexual activity without consent. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exist on a continuum and may overlap, ranging from harmful sexual behaviour through to serious sexual violence — the school’s response is proportionate to where on that continuum a report sits, and takes full account of the ages and developmental stages of those involved.

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

The school has a **zero-tolerance approach**: abusive comments and interactions will never be passed off as “banter” or “part of growing up”, and harmful sexual behaviours will never be dismissed as “just having a laugh”. Staff will challenge physical behaviours that are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts — dismissing or tolerating such behaviours risks normalising them.

The school acknowledges that even where there are no reported cases of child-on-child abuse, such abuse may still be occurring and simply not being reported and maintains an “it could happen here” attitude. Pupils are made aware of how they can report abuse and of the procedures the school will follow once a report is made, in a format that is well promoted, easily accessible and easily understood.

The school recognises that a first disclosure to a trusted adult may only be the first incident reported and is not necessarily representative of a single incident. Staff will take all reports seriously, regardless of how long it has taken the child to come forward and will act immediately to support a victim who raises a concern.

The school recognises that pupils with SEND or certain health conditions are significantly more likely to be abused by their peers, and can face additional safeguarding challenges, including greater vulnerability to peer isolation or bullying. The school offers extra pastoral support for these pupils, with strong links between the safeguarding team and the SENCO. The school also recognises that certain pupils may face additional barriers to reporting abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- Staff must record the allegation and tell the DSL but must **not** investigate it themselves.
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (the victim(s), the child(ren) against whom the allegation has been made, and any others affected), with a named person for each to talk to if needed. This will include consideration of School transport as a potentially vulnerable place for a victim or alleged perpetrator.
- The DSL will contact CAMHS if appropriate.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary

measures against the alleged perpetrator. The fact that another body is investigating, or has investigated, an incident does not in itself prevent the school reaching its own conclusion and imposing a penalty accordingly, provided this would not prejudice an investigation or subsequent prosecution.

A victim may ask the school not to tell anyone about sexual violence or sexual harassment. The DSL should consider that parents/carers should normally be informed unless doing so would put the victim at greater risk; that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Assault by penetration (for example rape or penetration with an object) will be passed to the police.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment; where there has been a report of sexual harassment, the need for a risk assessment will be considered case-by-case. The assessment will consider the victim, whether there may be other victims, the alleged perpetrator(s), and all other pupils (and staff, where relevant) at the school — including any actions needed to protect them from the alleged perpetrator or from future harm. This may include careful consideration of shared classes, shared use of School premises (including before/after-school activities), and School transport. Risk assessments will be recorded and kept under review.

Victims will never be made to feel ashamed for making a report, nor given the impression that they are creating a problem by doing so. The school will explain, without alarming or distressing the child, that the law exists to protect children rather than to criminalise them. The school will consider intra-familial harms and whether support for siblings is necessary following an incident.

The School will keep a written record of all concerns, discussions and decisions made and will reflect on reported concerns to identify any patterns of concerning behaviour or weaknesses in the school's safeguarding system.

If a report is found to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who made the allegation needs help or may themselves have been a victim and the report was a cry for help — a referral to local authority children's social care may be appropriate in such cases. If a report is shown to be deliberately invented or malicious, the Headmaster will consider whether disciplinary action is appropriate against the individual who made it, in accordance with the school's behaviour policy.

Dealing with Safeguarding Concerns or Allegations made about Staff (including Supply Teachers and Trainee Teachers), Volunteers and Contractors

This section applies to any case in which it is alleged that a current member of staff — including a supply teacher, trainee teacher, volunteer or contractor — has: behaved in a way that has harmed, or may have harmed, a child; possibly committed a criminal offence against or related to a child; behaved towards a child in a way that indicates they may pose a risk of harm to children; or behaved (inside or outside School) in a way that indicates they may not be suitable to work with children. If the School is in any doubt as to whether a concern meets this harm threshold, it will consult the LADO.

The school will deal with any allegation quickly, fairly and consistently, providing effective child protection while also supporting the individual who is the subject of the allegation. A **case manager** will lead any investigation — this will be the Headmaster, or the Managing Director where the Headmaster is the subject of the allegation. If an allegation relates to an incident happening while an individual or organisation was using the school premises to run activities for children, the school will follow these safeguarding procedures and inform the LADO.

Suspension of the accused pending resolution will not be the default position and will only be considered where there is reason to suspect a child (or other children) is at risk of harm, or the case is so serious that there might be grounds for dismissal — and only where there is no reasonable alternative. Alternatives that will be considered include: redeployment so the individual does not have direct contact with the child(ren) concerned; providing an assistant to be present during any contact with children; redeploying the individual so they do not have unsupervised access to children; or moving the child(ren)

concerned to classes where they will not come into contact with the individual (making clear this is not a punishment, and consulting parents/carers).

Definitions for outcomes of allegation investigations:

- **Substantiated** — there is sufficient evidence to prove the allegation.
- **Malicious** — there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the subject of the allegation.
- **False** — there is sufficient evidence to disprove the allegation.
- **Unsubstantiated** — there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).
- **Unfounded** — there is no evidence or proper basis supporting the allegation being made.

Procedure:

1. The case manager conducts basic enquiries in line with local procedures to establish the facts and determine whether there is any foundation to the allegation.
2. The case manager discusses the allegation with the LADO to consider its nature, content and context and agree a course of action, including whether the police and/or children's social care should be involved. (The case manager may, exceptionally, involve the police first — for example, where there is an immediate risk or evidence of a possible criminal offence — notifying the LADO as soon as practicable afterwards.)
3. The accused individual is informed of the concerns and likely course of action as soon as possible after speaking to the LADO (and police/children's social care where relevant), sharing only information agreed with those agencies.
4. Where appropriate, the case manager carefully considers whether suspension is justified or whether alternative arrangements can be put in place, seeking advice from the LADO, police and/or children's social care as appropriate.
5. Where the case manager is concerned about the welfare of other children in the community or the individual's family, they discuss this with the DSL and make a risk assessment, referring to children's social care if necessary.
6. If immediate suspension is considered necessary, the rationale is agreed and recorded with the LADO, including the alternatives considered and rejected. Written confirmation of the suspension is provided to the individual within one working day, along with a named contact and their details.
7. If no further action is to be taken, this decision and its justification are recorded, and the case manager agrees with the LADO what should be communicated, to whom, and by whom.
8. If further action is needed, the case manager takes the steps agreed with the LADO, liaising with the police and/or children's social care as appropriate.
9. The case manager provides effective support to the individual facing the allegation, including a named representative to keep them informed of progress.
10. Parents/carers of the child(ren) involved are informed of the allegation as soon as possible (subject to agreement with local authority children's social care and/or the police) and advised of the requirement to maintain confidentiality while investigations are ongoing.
11. A referral is made to the DBS where it is thought the individual has engaged in conduct that harmed, or is likely to harm, a child, or otherwise poses a risk of harm to a child. Where the individual is a member of teaching staff, the school will also consider referring the matter to the Teaching Regulation Agency (via the DfE's *Check a teacher's record* service) for consideration of a prohibition order.
12. On conclusion of the case, the case manager reviews the circumstances with the LADO to identify any improvements needed to the school's safeguarding procedures or practice.

Where the police are involved, the school will, wherever possible, ask them at the start of the investigation to obtain consent from those involved to share statements and evidence with the school's disciplinary process, should this be required later.

Timescales (objectives only, where reasonably practicable): cases that are clearly unsubstantiated or malicious should be resolved within 1 week; where formal disciplinary action is not required, appropriate action should be taken within 3 working days; where a disciplinary hearing is required and can proceed without further investigation, this should be held within 15 working days.

Procedure for managing allegations about supply teachers, trainee teachers and contractors

These procedures also apply to individuals who are not directly employed by the school, such as supply teachers or trainee teachers provided by an agency or training provider. The school will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with the LADO. The school will discuss with the agency/provider whether it is appropriate to suspend the individual or redeploy them while the investigation is carried out and will fully involve the agency/provider — inviting their HR manager or equivalent to meetings and keeping them updated. The school will address information sharing with the agency/provider to ensure any previous concerns known to them are taken into account.

Where an agency dismisses, or ceases to use, a teacher because of serious misconduct — or would have done so had they not left first — the school must consider whether to refer the case to the Secretary of State via the Teaching Regulation Agency.

Safeguarding concerns and allegations about organisations or individuals using school premises

The school may receive an allegation or concern relating to an incident that happened when an individual or organisation was using the school premises to run activities for children (for example, community groups, sports clubs, or after-school providers). As with any safeguarding allegation, the school will follow these policies and procedures, including informing the LADO.

Where services or activities are under the direct supervision or management of School staff, this policy applies directly. Where they are not, the school will seek assurance that the provider has appropriate safeguarding and child protection policies in place (inspecting these as needed) and will ensure arrangements exist for the provider to liaise with the school on safeguarding matters. The school has regard to the DfE's non-statutory guidance *After school clubs, community activities, and tuition (safeguarding guidance for providers)* (February 2026) when assessing any such provider's arrangements. The school will ensure that the DSL or a DDSL can be always contacted the school premises is in use for any activity, whether school or non-school, and that safeguarding requirements are a condition of any lease or hire agreement, with failure to comply leading to termination.

Dealing with Concerns or Allegations that do not meet the Harm Threshold / Low-Level concerns

A **low-level concern** is any concern — no matter how small — that an adult working in or on behalf of the school may have acted in a way that: is inconsistent with the staff code of conduct, including inappropriate conduct outside work; and does not meet the harm threshold described above, or is otherwise not considered serious enough to warrant a referral to the LADO.

A low-level concern does not mean it is insignificant — it may be a low-level concern even if it does no more than give a sense of unease or a “nagging doubt”. Such behaviour exists on a wide spectrum, from the inadvertent or thoughtless through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours). Examples include (but are not limited to): being overly friendly with children; having favourites; taking photographs of children on a personal mobile phone; engaging with a child on a one-to-one basis in a secluded area or behind a closed door; and humiliating pupils.

The school takes all such concerns seriously and recognises that addressing even low-level concerns is important to creating and embedding a culture of openness, trust and transparency in which expected standards of behaviour are constantly lived, monitored and reinforced. Staff are encouraged to share concerns about their own or another member of staff's behaviour, and to **self-refer** where they find

themselves in a situation which may be misinterpreted or which, on reflection, they believe fell below expected professional standards. All concerns will be handled sensitively, proportionately and without automatic disciplinary consequence for raising them in good faith.

Staff must share concerns with the Headmaster without delay, so they can be recorded and dealt with appropriately. Where a low-level concern is raised about the Headmaster, it should be referred to the Managing Director. If a concern is raised via a third party, the Headmaster will collect evidence by speaking to the person who raised it (unless raised anonymously), the individual involved, and any witnesses.

The Headmaster is the ultimate decision-maker in respect of all low-level concerns, though may collaborate with the DSL. If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Headmaster will consult the LADO.

Record keeping. All low-level concerns will be recorded in writing, including the context in which the concern arose, and any action taken and its rationale. Records will be kept confidential, held securely, and always comply with data protection laws. Records will be retained at least until the individual leaves employment at the school.

Low-level concerns will not be included in references unless they relate to issues which would ordinarily be included, such as misconduct or poor performance, or the concern (or pattern of concerns) has since met the threshold for referral to the LADO and been substantiated.

Records will be reviewed periodically so that potential patterns of concerning behaviour can be identified. Where a pattern is identified, the school will decide on a course of action — either through its disciplinary procedures, or where the pattern moves from a concern to meeting the harm threshold, by referring the matter to the LADO. Where a low-level concern relates to a supply teacher, trainee teacher or contractor, their employer/training provider will be notified so that any pattern of behaviour can be identified across settings.

Safer Recruitment

The school is committed to safer recruitment processes that create a culture safeguarding and promoting the welfare of children, while deterring and preventing people who are unsuitable to work with children from applying for, or securing, employment or volunteering opportunities at the school.

Recruitment and selection process

The school ensures that those involved in recruiting and employing staff to work with children have received appropriate safer recruitment training.

Advertising. Job advertisements make clear the school's commitment to safeguarding, that safeguarding checks will be undertaken, the extent to which the role involves contact with children, and whether the role is exempt from the Rehabilitation of Offenders Act 1974 (as amended).

Application forms state that it is an offence to apply for a role if barred from engaging in regulated activity relevant to children and include or link to this policy and the school's policy on the employment of ex-offenders.

Shortlisting involves at least two people and considers any inconsistencies or gaps in employment. Shortlisted candidates are asked to complete a self-declaration of their criminal record (or any information that would make them unsuitable to work with children) and to sign a declaration confirming the information provided is true. The school will also consider carrying out an online search on shortlisted candidates as part of its due diligence and will inform candidates that this may be done.

References and employment history. The school obtains references before interview, does not accept open references, liaises directly with referees and verifies information with them, and (where the referee is school based) asks for the reference to be confirmed by the headteacher/principal as accurate with respect to disciplinary matters. Any inconsistencies are resolved before appointment is confirmed.

Interview and selection. Interviews probe gaps in employment or frequent changes of employer/location and explore any potential areas of concern. All information considered, and decisions made, are recorded.

Regulated activity and pre-appointment vetting checks

The full legal definition of **regulated activity** is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012 and **the Crime and Policing Act 2026**. This includes:

- Teaching, training, instructing, caring for or supervising children, or providing advice or guidance on their physical, emotional or educational wellbeing, or driving a vehicle only for children; or
- Any other paid work at a “specified place” (including a school) with the opportunity for contact with children.

Some activities are **always** regulated activity, regardless of frequency: relevant personal care, and healthcare provided by (or under the supervision of) a healthcare professional.

From 1 September 2026, the Crime and Policing Act 2026 removes the supervision exemption from the definition of regulated activity relating to children. A volunteer who teaches, trains, instructs, cares for or supervises students is therefore engaged in regulated activity, and requires an enhanced DBS disclosure with Children's Barred List information, if they do so frequently or if they meet the period condition, namely:

- once a week or more; or
- on four or more days in any period of 30 days; or
- overnight, meaning at any time between 2.00am and 6.00am with the opportunity for face-to-face contact with students,

and this is now the case whether they are supervised by a member of school staff.

The school will:

- Obtain an enhanced DBS check with children's barred list information for any new volunteer who will be in regulated activity on this basis.
- Check for any direction under section 128 of the Education and Skills Act 2008 for anyone taking part in the management of the school, expressly extended to Governors, SLT and teaching heads of department.
- Review any **existing** volunteers who will newly fall within regulated activity from 1 September 2026 and check their children's barred list status (via an enhanced DBS check with barred list information, or a standalone barred list check where appropriate).
- Where a volunteer does not meet the frequency test above, carry out a written risk assessment (considering the nature of the work, what is known about the volunteer, and whether an enhanced DBS check without barred list information, or a basic DBS check, is appropriate) rather than assuming no check is required. A volunteer for whom no checks have been obtained will never be left unsupervised or allowed to work in regulated activity.

New staff, volunteers and directors

All offers of appointment are conditional until satisfactory completion of pre-employment checks. When appointing new staff, the school will:

- Verify identity.
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those in regulated activity, before or as soon as practicable after appointment (including where using the DBS Update Service — note that individuals can join the Update Service at the point a new DBS check is applied for, or within **30 calendar days of the certificate's issue date**).
- Obtain a separate barred list check if the individual will start in regulated activity before the DBS certificate is available.
- Verify mental and physical fitness to carry out the role.
- Verify right to work in the UK (retaining a copy for the duration of employment and for 2 years afterwards).
- Verify professional qualifications as appropriate, and check for any prohibition from teaching using the DfE's **Check a teacher's record** service (which has replaced the former TRA Employer Access Service).
- Carry out further checks as appropriate for candidates who have lived or worked outside the UK.

Existing staff and volunteers. The School will carry out all relevant checks on an existing member of staff or volunteer as if they were new where: there are concerns about their suitability to work with children; they move from a post that is not regulated activity to one that is (including where this happens automatically as a result of the Crime and Policing Act 2026 changes described above); or there has been a break in service of 12 weeks or more.

Duty to refer. The School will refer to the DBS anyone — whether an employee, contractor, volunteer or trainee — who has harmed, or poses a risk of harm, to a child, where: the individual has engaged in relevant conduct; the individual has received a caution or conviction for a relevant offence; or the “harm test” is satisfied; and the individual has been removed from regulated activity (paid or unpaid), or would have been had they not left.

Agency, supply and trainee staff. The school obtains written notification from any agency or training provider that it has carried out the necessary safer recruitment checks it would otherwise perform itself, and checks that the person presenting for work is the same person on whom checks have been made.

Contractors. Any contractor (or contractor's employee) working at the school will have had the appropriate level of DBS check — an enhanced check with barred list information for those in regulated activity, or an enhanced check without barred list information for others with an opportunity for regular contact with children. The school obtains the DBS check for self-employed contractors, or — where a self-employed individual has already obtained their own check — will request to see the certificate and ensure it is at the level required. Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances, and the identity of all contractors and their staff is checked on arrival.

Directors (Governors). All directors have an enhanced DBS check without barred list information, or with barred list information if working in regulated activity.

Visitors. All visitors are required to verify their identity to the satisfaction of staff and to sign in using the InVentry system. Visitors for a professional purpose (such as educational psychologists) will be asked to show photo ID and their DBS certificate, or the sending organisation will provide prior written confirmation of an appropriate DBS check. All other visitors, including visiting speakers, are always accompanied by a member of staff, and the school will not invite a speaker known to disseminate extremist views.

Pupils staying with host families. Where the School arranges for pupils to be cared for by a host family to which they are not related (for example on a foreign exchange visit), it will request enhanced DBS checks with barred list information for those hosting. Where hosting is organised overseas and equivalent checks are not available, the school will work with partner schools abroad to ensure comparable assurances are undertaken prior to the visit.

Trainee/student teachers. Where trainees are salaried by the school, all necessary checks are carried out directly. Where trainees are fee-funded, the school obtains written confirmation from the training

provider that necessary checks have been carried out and the trainee has been judged suitable to work with children.

Record keeping. All checks are recorded on the school's single central record (SCR), with copies held (where appropriate) in individuals' personnel files. Certificate copies are not kept for longer than 6 months, though a record that vetting took place, its result and the recruitment decision is retained.

The Designated Safeguarding Lead (DSL)

The School's DSL is **Toby Fisher**, a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the school, including online safety and understanding the school's filtering and monitoring processes.

The DSL's Deputies (DDSLs) are **Dena Deedat, Matthew Greenfield, Millie Pocock and Kate Ware**, who act as cover when the DSL is absent and are the people to whom reports should be made in that event, ensuring cover is always available. The DSL and DDSLs' contact details are on the Key School Contacts page above. All of the team can be contacted through the dedicated shared inbox: **safeguarding@maidavaleschool.com**

During term time, the DSL (or a DDSL) will be available during school hours for staff to discuss safeguarding concerns. The school has robust cover arrangements in place for when the DSL is unavailable, including a shared confidential mailbox, to ensure safeguarding concerns are received, monitored and acted upon without delay. Appropriate cover is also provided for out-of-school and out-of-term activities.

The DSL's responsibilities include: providing advice and support to staff on child welfare and protection matters; taking part in strategy discussions and inter-agency meetings, or supporting other staff to do so; contributing to assessments of children; referring suspected cases to the relevant body (local authority children's social care, Channel, the DBS and/or police), and supporting staff who make referrals directly; having a good understanding of harmful sexual behaviour and of the School's filtering and monitoring systems; and ensuring staff have appropriate Prevent training and induction. The DSL also keeps the Headmaster informed of any issues; liaises with local authority case managers and the LADO; and is confident about what local specialist support is available for children involved in sexual violence or sexual harassment (as both victims and alleged perpetrators), and how to access it.

The DSL liaises with the three safeguarding partners and works with other agencies in line with *Working Together to Safeguard Children*, drawing on the NPCC guidance "*When to call the police: guidance for schools and colleges*" where helpful. The DSL is also responsible for liaising with the school's pastoral/mental health support arrangements where safeguarding concerns are linked to mental health.

Full details of the DSL's role are set out at Annex B of KCSIE. This responsibility rests with the DSL and should not be delegated, though the Headmaster is responsible for ensuring policies and procedures are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent and supported.

The Board of Directors (Governors)

The board will:

- Facilitate a whole-school approach to safeguarding, ensuring it is at the forefront of, and underpins, all relevant process and policy development.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headmaster to account for its implementation.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the PSED, something the school has regard to as a matter of good practice), data protection laws, and the local multi-agency safeguarding arrangements.

- Appoint a senior board-level lead to monitor the effectiveness of this policy — Mr Theo Brehony, Nominated Safeguarding Director.
- Ensure all staff undergo safeguarding and child protection training, including online safety, regularly updated and in line with advice from the safeguarding partners.
- Ensure the School has appropriate filtering and monitoring systems and reviews their effectiveness — making sure leadership and staff are aware of the provisions in place and their roles and responsibilities and discuss with IT staff and providers what is needed to meet the DfE's standards.
- Ensure the DSL has appropriate status, authority, time, funding, training, resources and support.
- Ensure the School has procedures to manage safeguarding concerns or allegations that do not meet the harm threshold (low-level concerns) about staff, including supply staff, trainee teachers, volunteers and contractors.
- Ensure this policy reflects that pupils with SEND, or certain medical or physical health conditions, can face additional barriers to abuse or neglect being recognised.

Where another body provides services or activities on the school's premises, the board will seek assurance that appropriate safeguarding policies are in place (inspecting these if needed), ensure arrangements for the provider to liaise with the school, and make safeguarding requirements a condition of use of the premises, with failure to comply leading to termination of the agreement.

The Managing Director will act as the case manager in the event of an allegation of abuse against the Headmaster. All directors will read KCSIE in its entirety.

The Headmaster

The Headmaster is responsible for implementing this policy, including: ensuring staff (including temporary staff, trainee teachers and volunteers) are informed of the School's safeguarding systems as part of induction and understand the procedures in this policy, particularly on referrals of suspected abuse or neglect; communicating this policy to parents/carers when their child joins the School and via the School website; ensuring the DSL has appropriate time, funding, training and resources, and that adequate cover is always available; acting as case manager for allegations against another member of staff or volunteer, where appropriate; and making decisions regarding all low-level concerns (in collaboration with the DSL where helpful).

Training

All Staff

All staff, including those who do not work with children, must read Part One of the latest version of Keeping Children Safe in Education (KCSIE).

All new staff, including trainee teachers, receive induction training that includes: this child protection and safeguarding policy (including the procedures for dealing with child-on-child abuse); the role and identity of the DSL and DDSs; the behaviour policy; the staff code of conduct, including whistle-blowing procedures and the acceptable use of technology; the safeguarding response to children absent from education; the online safety policy, including filtering and monitoring roles and responsibilities; and at least Part One of KCSIE.

All staff will:

- Read and understand Part One of KCSIE, and review this at least annually, signing a declaration each academic year that they have done so.
- Reinforce the importance of online safety when communicating with parents and carers, including making them aware of what children are asked to do online.

- Provide a safe space for pupils who are LGBTQ+ to speak out and share concerns.
- Receive training in safeguarding and child protection regularly, in line with advice from the three safeguarding partners, including: online safety (filtering and monitoring roles and responsibilities); harmful sexual behaviours (including child-on-child sexual violence and harassment); the safe and effective use of AI, including identifying and mitigating risks to safeguarding, data protection, ethics and intellectual property, drawing on the DfE's Generative AI in Education support materials; and Prevent awareness training.
- Receive regular informal updates, at least annually (for example via emails, e-bulletins and staff meetings).

Contractors provided through a similar contract, and volunteers where applicable, also receive appropriate safeguarding training.

DSL(s)

The DSL and DDSLs undertake child protection and safeguarding training at least every two years, in line with the criteria in Annex B of KCSIE and update their knowledge and skills at least annually (for example, through e-bulletins, meeting other DSLs, or reading and digesting safeguarding developments). This includes local inter-agency working protocols, supporting children in need, identifying children susceptible to radicalisation, record keeping, and promoting a culture of listening to children.

The DSL(s) also receive additional training specifically on **AI-related safeguarding risks**, including the creation and sharing of AI-generated intimate imagery, the potential for AI tools to facilitate grooming or exploitation, and the application of the school's filtering and monitoring arrangements to generative AI — reviewed and updated at least annually given how quickly this area evolves.

The DSL, or any other designated Prevent lead, undertakes more in-depth Prevent awareness training, including on extremist and terrorist ideologies, updated at least every two years.

Recruitment — interview panels

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training, covering at a minimum the contents of KCSIE and in line with local safeguarding procedures.

Directors (Governors)

All directors receive training on safeguarding and child protection (including online safety) at induction, regularly updated, to ensure they can provide strategic challenge and are assured that safeguarding policies and procedures are effective. As the Managing Director may act as case manager for an allegation against the Headmaster, they receive specific training on managing allegations for this purpose.

Oversight of Safeguarding, including arrangements for reviewing Policies and Procedures

This policy is reviewed annually by the Headmaster and, at every review, approved by the Directors.

The governing board designates a governor with specific board-level responsibility for safeguarding, to provide strategic oversight, support and challenge to the school's leadership — liaising regularly with the DSL, reviewing and challenging the effectiveness of safeguarding policies and procedures, ensuring the annual review of this policy is carried out, monitoring staff and governor training compliance, and reporting to the full governing body at least termly.

The school considers reviewing safeguarding practice a matter of everyday concern, reflecting on the effectiveness of procedures and their implementation, including lessons learnt from any substantiated allegations, and draws on the expertise of the DSL(s) in shaping the school's safeguarding arrangements and policies. The school's safeguarding policies and procedures are transparent, clear and easy to understand for staff, pupils, parents and carers.

Teaching children how to keep safe

The school ensures all pupils are taught about safeguarding, including online safety, through the curriculum and its Individuals in Society (IS) programme, to help pupils adjust their behaviours, inside and outside School, to reduce risks and build resilience — including to radicalisation and extremism. This includes teaching about the safe use of electronic equipment, the internet and social media, and the risks posed by those who use them to bully, groom, abuse or radicalise others. The school recognises that a “one size fits all” approach may not suit all pupils, and that a more personalised approach may be needed for more vulnerable pupils, victims of abuse, and some pupils with SEND. Internet safety, including safety online at home, is embedded across the curriculum and within PSHE/RSE.

This programme covers, among other things: healthy and respectful relationships; boundaries and consent; stereotyping, prejudice and equality; body confidence and self-esteem; recognising an abusive relationship (including coercive and controlling behaviour); the concepts of, and laws relating to, sexual consent, exploitation, abuse, grooming, coercion, harassment, rape or penetration with an object, domestic abuse, so-called honour-based violence (including forced marriage and FGM), and how to access support; and what constitutes sexual harassment and sexual violence and why they are always unacceptable.

Filtering and monitoring

The school has appropriate filtering and monitoring systems in place to safeguard pupils from potentially harmful and inappropriate material online when using the School's IT systems. These systems aim to reduce content risk (for example pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation and conspiracy theories), contact risk (including generative AI applications that simulate harmful interaction, and adults posing as children or young adults to groom or exploit), commerce risk (online gambling, phishing, financial scams), and conduct risk (including the making or sharing of self-generated intimate images, including AI-generated imagery, and online bullying).

The school recognises that pupils have unrestricted access to the internet via mobile phone networks (3G/4G/5G), meaning they may share images, harass peers, or view harmful content while at School undetected via personal devices not connected to the school's filtered network.

The School ensures compliance with the DfE's cyber security/filtering and monitoring standards by: identifying and assigning roles and responsibilities for managing filtering and monitoring systems; **reviewing the filtering and monitoring provision at least once every academic year**, with reviews carried out by the SLT member responsible for filtering and monitoring, supported by the DSL and IT support, including checks that filtering is working appropriately on all internet-connected devices in all relevant locations, with a record kept of these checks; blocking harmful and inappropriate content without unreasonably impacting teaching and learning; and having effective monitoring strategies that meet the School's safeguarding needs. The school's filtering and monitoring arrangements address risks arising from any generative AI tools used within the school.

The school will liaise with parents to reinforce the importance of pupils being safe online, and the systems the school uses to filter and monitor online use, including what pupils are asked to do online and who they will be interacting with.

Use of artificial intelligence (AI)

The school recognises that artificial intelligence, including generative AI, presents both significant opportunities and safeguarding risks in education. The school is committed to ensuring AI is used safely, ethically and transparently, and in a manner aligned with its safeguarding obligations. The school's approach to AI safeguarding is embedded within the existing provisions of this policy, including filtering and monitoring, online safety, training, and responding to specific safeguarding issues.

The school will only use AI products that meet the DfE's *Generative AI: product safety expectations*, and any use of generative AI by staff or pupils is carefully considered and assessed, weighing benefits and risks in the school's context. The school is alert to safeguarding risks arising from AI, including but not limited to: the generation of deepfake images and AI-generated intimate imagery; the potential for AI chatbots to produce harmful, inaccurate or age-inappropriate content; the risk of "cognitive offloading", where pupils defer their critical thinking to AI tools; and the use of AI to facilitate grooming, exploitation, or the creation of child sexual abuse material.

Any safeguarding or wellbeing concern arising from the use of AI tools — including a pupil creating, sharing or being the subject of AI-generated intimate imagery; a pupil being exposed to harmful or age-inappropriate AI-generated content; a pupil's personal data being compromised through an AI tool; a pupil's interaction with an AI chatbot causing concern for their welfare; or a member of staff using AI in a way that may compromise pupil safety or data security — must be reported to the DSL immediately, who will investigate and determine whether external referral is needed.

The school's arrangements for obtaining consent for, publishing and managing pupil images (including steps to mitigate the risk of AI manipulation of published images) are set out in the School's Privacy Policy. Staff should report any concerns about the misuse or manipulation of published pupil images to the DSL immediately.

Use of mobile phones

The school is a **mobile phone-free environment**. Students use Yondr pouches to lock away their phones for the entirety of the school day, in accordance with DfE guidance and the School's Student Phone Policy and Guidance.

The school recognises that, notwithstanding this policy, pupils may still have access to the internet via mobile phone networks, or through other personal devices such as smart watches, which may not be covered by the school's filtering and monitoring systems. Any safeguarding concern arising from a pupil's use of a personal device should be reported to the DSL immediately.

Cyber security

The school recognises that cyber security is a safeguarding concern — if a child's sensitive data is compromised by a cyber-attack, their safety and wellbeing is put at risk. The school takes measures to protect pupils' personal information in line with the DfE's *Cyber security standards for schools and colleges* and *Digital and technology standards in schools and colleges* (April 2026), including maintaining an information asset register and hardware/systems registers, and having a disaster recovery and business continuity plan that addresses digital technology. The school is working towards meeting the six-core digital and technology standards by 2030.

Relationships Education and Relationships and Sex Education ("RSE")

The School's Individuals in Society (IS) curriculum is delivered as part of a whole-school approach to wellbeing and positive relationships, preparing pupils for life in modern Britain and creating a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia, transphobia, sexual violence/harassment and other derogatory behaviour or physical violence and conflict. It builds positive attitudes and skills, promotes healthy norms about relationships and health (including mental health), and addresses online harms such as image-sharing, deepfakes, pornography and misogynistic influencers, and where to seek help.

The school recognises that discussions about sensitive topics in RSE can lead to increased safeguarding reports, and all staff know what to do if they have concerns that a pupil is being neglected or abused, including those who have witnessed the effects of domestic abuse. The school has regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* and proactively consults parents in the development and review of this provision.

Sport

The school recognises that sport and physical activity can present unique safeguarding risks, including those associated with physical contact, changing facilities, one-to-one coaching, and off-site fixtures or tours. This applies whether sport is delivered by the school's own PE staff, by external coaches or clubs using the school's facilities, on away fixtures at other schools or venues, or through contracted sports providers.

The school will:

- Ensure any external sports coach, club or contracted provider engaging with pupils on School premises or at School-organised fixtures has appropriate safeguarding checks and policies in place, satisfying itself of this before the arrangement begins and reviewing it periodically.
- Have regard to the relevant provisions of KCSIE and to guidance issued by the national governing bodies of the sports concerned, and by relevant professional associations.
- Ensure appropriate supervision arrangements are in place for changing facilities and one-to-one coaching, and that staff and coaches understand and follow the school's code of conduct in these settings.
- Ensure that off-site fixtures and tours are subject to appropriate risk assessment, including safeguarding considerations around travel, overnight stays (where applicable) and supervision ratios.
- Ensure that any safeguarding concern arising from sport — whether involving School staff, an external coach, contracted provider, or another pupil — is reported to the DSL in accordance with this policy.

Looked after and previously looked after children

The school ensures staff have the skills, knowledge and understanding to keep looked-after and previously looked-after children safe. Appropriate staff have relevant information about a child's looked-after legal status, contact arrangements, and care arrangements, and the DSL holds details of children's social workers and relevant virtual school heads.

The Heads of Year take the lead, where appropriate, on promoting the educational achievement of looked-after and previously looked-after children, working closely with the DSL to ensure safeguarding concerns are quickly and effectively addressed, and with virtual school heads to promote educational achievement.

Arrangements for visiting speakers

The school has clear protocols for ensuring that visiting speakers are appropriately supervised and suitable. The school's responsibility to pupils is to ensure they can critically assess the value of information received, and that it aligns with the school's ethos and values and with British values of democracy.

The school undertakes a risk assessment before agreeing to a visiting speaker attending, taking into account any vetting requirements appropriate in the circumstances, which may include a DBS check. Visiting speakers are expected to actively promote (and at no point undermine) democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs; the school may request a copy of a speaker's presentation or footage in advance. Visiting speakers are supervised by a school employee at all times while on site and are required to show original identification with a photograph on arrival.

Arrangements for use of School premises for non-school activities

Where services or activities on School premises are provided under the direct supervision or management of School staff, this policy applies to any safeguarding concerns or allegations. Where they are not, the school seeks assurance that the individual or organisation has appropriate safeguarding and child protection policies in place (inspecting these as needed) and ensures arrangements for the provider to liaise with the school, regardless of whether the children attending are on the school roll.

The school ensures that the DSL or a DDSL can be contacted, and is available at all times whether the premises are in use, whether for school or non-school activity. Safeguarding requirements are included as a condition of any lease or hire agreement, and failure to comply will lead to termination. The school has regard to the DfE's non-statutory guidance *After school clubs, community activities, and tuition (safeguarding guidance for providers)* (February 2026) when assessing providers' arrangements.

Operation Encompass

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

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

The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information. The DSL and DDSLs are encouraged to complete the National Online Operation Encompass Key Adult training, and the DSL provides training for staff and Governors about Operation Encompass and the impact of domestic abuse on children. Parents are made aware that the school is an Operation Encompass setting, including when a new child joins.

Notification of children in temporary accommodation

Local housing authorities are required to notify the school where a child on roll is placed in temporary accommodation. The notification is received by the DSL (or a Deputy DSL in the DSL's absence) through the same confidential route as Operation Encompass notifications, using the shared safeguarding mailbox, so that it is received, recorded and acted upon without delay. The same cover arrangements apply during School holidays and out of hours.

A notification is not, in itself, a referral, and does not mean that a child is at risk. It is information the school would not otherwise have, and its purpose is to allow the school to understand a change in a child's circumstances and adjust its support accordingly. On receiving a notification, the DSL will:

- record it on My Concern, in line with all other confidential safeguarding information;
- consider what it means for the child in practical terms — the journey to School and the effect on attendance and punctuality, whether there is anywhere to do prep, access to equipment, uniform, a device and the internet, whether meals are affected, and whether the child has moved away from friends, clubs or family;
- consider the effect on any siblings at the school;
- brief the child's Personal Tutor and Head of Year on a need-to-know basis, so that the child is not sanctioned under the Behaviour or Attendance Policies for something arising from their housing situation;

- consider whether the family would benefit from family help, and whether a referral to children's social care is required, having regard to the indicators of homelessness set out at Appendix 1;
- make contact with the family sensitively, recognising that they may not know the school has been told, and may find the subject difficult to raise; and
- keep the position under review, since temporary accommodation is often not stable and a child may move more than once.

Staff should be alert to the fact that a child in temporary accommodation may be reluctant to explain lateness, missing equipment or incomplete prep, and may not want their circumstances known to their peers. Any concern of this kind should be raised with the DSL rather than dealt with as a behaviour matter.

Where the school becomes aware by any other route that a child may be homeless or at risk of homelessness, the DSL will act in the same way and will not wait for a notification.

Alternative Provision

The school does not currently place pupils with alternative provision and that, if it did, it would remain responsible for their safeguarding and would have regard to the *National standards for non-school alternative provision*.

Links with Other Policies

This policy links to the following policies and procedures: Behaviour; Staff code of conduct; Complaints; Health and safety; Attendance; Online safety; Student Phone Policy and Guidance; Equality; RSHE Relationships, Sex and Health Education; First aid; Curriculum; Designated teacher for looked-after and previously looked-after children; Privacy notices; Whistle-blowing (Gardener Schools); Anti-Bullying; IT acceptable use.

Appendix 1 — Signs and Types of Abuse and Specific Safeguarding Issues

All school staff should be aware that abuse, neglect, exploitation and safeguarding issues rarely standalone — they often overlap, and a child can experience more than one type of harm simultaneously. Staff should always be vigilant and raise any concerns with the DSL (or a DDSL).

Types of abuse

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on their emotional development. Some level of emotional abuse is involved in all types of maltreatment, though it may also occur alone. It may involve: conveying to a child that they are worthless, unloved or inadequate; not giving a child the opportunity to express their views, or deliberately silencing them or “making fun” of how they communicate; **verbal abuse, including persistent criticism, belittling and name-calling**; age or developmentally inappropriate expectations, including overprotection and limitation of exploration and learning; seeing or hearing the ill-treatment of another, including **child-to-parent or child-to-carer abuse**; and serious bullying (including cyber-bullying), causing children to feel frequently frightened or in danger.

Sexual abuse involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. This can include 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 — and non-contact activities, such as involving children in looking at or producing sexual images, watching sexual activity, encouraging children to behave in sexually inappropriate ways, or grooming a child (including online) in preparation for abuse. Sexual abuse can be committed by an individual or an organised network, and most sexual abuse is committed by individuals known to the victim; it is not solely perpetrated by adult males, as women and other children can also commit acts of sexual abuse.

Neglect is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in serious impairment of health or development. It may occur during pregnancy as a result of maternal substance misuse, and after birth may involve a parent or carer failing to: provide adequate food, clothing and shelter; protect a child from physical and emotional harm or danger; ensure adequate supervision; or ensure access to appropriate medical care.

Child criminal exploitation (CCE)

CCE is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants and/or for the advantage of the perpetrator, and/or through violence or the threat of violence. It can be perpetrated by males or females, adults or children, and range from a one-off occurrence to complex organised abuse — it can be committed or facilitated by an organised network or

gang, and victims may identify as part of that group. It may constitute modern slavery, and the victim can be exploited even where the activity appears consensual; victims may be criminalised for actions taken under coercion. Examples include children forced to work in cannabis factories, move drugs or money (county lines), shoplift, or threaten other young people.

Indicators can include a child: appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; suffering changes in emotional wellbeing; misusing drugs or alcohol; going missing for periods or regularly returning home late; or regularly missing school or not taking part in education.

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the advantage of the perpetrator, with or without violence or threats. As with CCE, it can be a one-off occurrence or complex organised abuse, and the victim can be exploited even where the activity appears consensual — children may not understand they are being abused and may believe they are in a loving, consensual relationship. CSE can involve physical contact and non-contact activity, and can happen online — for example, being persuaded to share sexually explicit images or take part in sexual activity via webcam.

In addition to the CCE indicators above, indicators of CSE can include a child having an older boyfriend/girlfriend or suffering from sexually transmitted infections or becoming pregnant.

Adult-involved sharing of nudes and semi-nudes

All adult-involved incidents are child sexual abuse offences and must be referred to police/social care immediately — but as these can initially present as child-on-child incidents, it may be difficult to assess adult involvement at first.

Sexually motivated incidents: an adult offender obtains images directly from a child online, sometimes posing as a child themselves to build trust, often grooming via social media, chatrooms or gaming platforms before moving to a private or encrypted app. Once an image is shared, the offender may blackmail the child into sending more by threatening to release it. Potential signs include a child being: contacted by an unfamiliar account appearing to be another child; quickly engaged in explicit communication; moved from a public to a private/encrypted platform; coerced or pressured into sexual activity; offered money or gaming credits; or threatened/blackmailed into further activity.

Financially motivated incidents (“sextortion”): usually carried out by organised crime groups overseas, motivated by profit rather than sexual gratification. Offenders may groom or coerce a child into sending images, use stolen images from a hacked account, or use AI-generated images, then demand payment or use of the victim’s bank account for money laundering. Signs include a child being contacted by an unfamiliar or hacked account, quickly engaged in explicit communication, moved to a private platform, pressured into sharing images, told they have been hacked, or blackmailed into sending money.

Domestic abuse

The Domestic Abuse Act 2021 introduces a statutory definition of domestic abuse recognising children as victims in their own right where they see, hear or experience its effects. The definition captures ex-partners and family members, and behaviours including physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, and psychological or emotional abuse (including so-called “honour” abuse, forced marriage and FGM). Types include intimate partner violence, abuse by family members, teenage relationship abuse, and child/adolescent-to-parent violence. Anyone can be a victim, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background.

Exposure to domestic abuse can have a serious, long-lasting emotional and psychological impact on children, affecting health, wellbeing, development and ability to learn. Young people may also experience domestic abuse within their own intimate relationships (“teenage relationship abuse”), which should be

responded to through child safeguarding procedures regardless of whether it meets the statutory definition (which requires both parties to be 16 or over).

Homelessness

Being homeless, or at risk of homelessness, presents a real risk to a child's welfare. Indicators can include household debt, rent arrears, domestic abuse, anti-social behaviour, or a family being asked to leave a property. The DSL and DDSs are aware of contact details and referral routes into the local housing authority. Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

The school may also learn of a family's housing situation through the statutory notification made by the local housing authority when a child is placed in temporary accommodation. The school's response to such a notification is set out in the body of this policy under "Notification of children in temporary accommodation". Indicators that a family may be in temporary or unstable accommodation include a change of address at short notice, a child arriving tired or unwashed, a sudden deterioration in punctuality or attendance, prep not being completed, a child reluctant to give an address or to have friends visit, and equipment, kit or uniform going missing or not being replaced.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called honour-based abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of a family and/or community, including FGM, forced marriage, and practices such as breast ironing, and often involves a wider network of family or community pressure with multiple perpetrators. All forms of HBA are abuse and will be handled and escalated as such.

Indicators that FGM has already occurred include: a pupil confiding that FGM has taken place; a family member disclosing this; a girl having difficulty walking, sitting or standing; spending longer than normal in the bathroom; frequent urinary, menstrual or stomach problems; avoiding physical exercise or PE; prolonged or repeated absence; increased emotional/psychological needs; or talking about pain or discomfort between her legs.

Indicators that a pupil may be at risk of FGM include: a family history of practising FGM (the biggest risk factor); FGM being known to be practised in the girl's community or country of origin; a parent expressing concern that FGM may be carried out; a girl having a mother, older sibling or cousin who has undergone FGM; talking about a "special procedure" or a long holiday to a country where the practice is prevalent; requesting help because she suspects she is at immediate risk; or being unexpectedly absent from school.

Forced marriage is a marriage entered into without the full and free consent of one or both parties, where violence, threats or coercion is used — it is a crime, as is causing a child under 18 to marry even without violence, threats or coercion. Staff are aware of the "one chance" rule — there may be only one opportunity to speak to a potential victim and save them. If a member of staff suspects a pupil is being forced into marriage, they should speak to the pupil in a secure, private place, then report to the DSL, who will activate local safeguarding procedures, refer the case to the LADO, and may seek advice from the Forced Marriage Unit.

Radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence. Signs that a pupil is being radicalised can include: refusal to engage with, or becoming abusive towards, peers who are different; becoming susceptible to conspiracy theories and feelings of persecution; changes in friendship groups and appearance; rejecting previously-enjoyed activities; converting to a new religion; isolating themselves from family and friends; talking as if from a scripted speech; a sudden disrespectful attitude towards others; increased secretiveness around internet use; expressing sympathy for extremist ideologies; or being in contact with extremist recruiters. These signs can also be part of normal teenage

behaviour — staff should have confidence in their instincts and seek advice if something feels wrong and should always take action if worried.

Serious violence

Indicators that a child may be at risk from, or involved with, serious violent crime include: increased absence from School; changes in friendships or relationships with older individuals or groups; significant decline in performance; signs of self-harm or a significant change in wellbeing; and signs of assault or unexplained injuries. Risk factors include having been frequently absent or excluded from school, having experienced child maltreatment, and prior involvement in offending.

Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur between children of any age or sex, through a group assaulting or harassing a single child, and both online and face to face. They exist on a continuum, from harmful sexual behaviour through to serious sexual violence, and may overlap. Victims will likely find the experience stressful and distressing, which is likely to be worse where the alleged perpetrator attends the same School.

Staff should reassure victims that the law exists to protect them, not criminalise them; regularly review decisions and update policies with lessons learnt; look out for patterns of concerning behaviour; consider wider cultural issues that may have enabled inappropriate behaviour; and remain alert to the challenges of detecting signs that a child has experienced sexual violence. Evidence shows that girls, pupils with SEND, and LGBTQ+ pupils are potentially at greater risk. Staff should challenge inappropriate behaviours and make clear that sexual violence and harassment is never an inevitable part of growing up, including physical behaviours such as grabbing bottoms, breasts or genitalia, or lifting up skirts.

Children who are absent from School

A child being absent from School, particularly repeatedly, can be a warning sign of abuse, neglect, sexual or criminal exploitation (including county lines), mental health problems, substance abuse, radicalisation, FGM or honour/faith-based abuse, or forced marriage. Staff must follow the school's procedures for dealing with children who are absent, particularly persistently or for prolonged periods. The school will inform the local authority of any pupil added to or removed from the admission register at non-standard transition points and will inform the local authority of any pupil who fails to attend regularly, or is absent without permission for 10 school days or more.

Safeguarding children with SEND, disabilities or health conditions

Pupils with SEND or certain health conditions can face additional safeguarding challenges, including: assumptions that indicators of possible abuse relate to the child's condition without further exploration; greater prevalence of peer group isolation or bullying, including prejudice-based bullying; disproportionate impact from bullying without outwardly showing signs; communication barriers; and cognitive understanding difficulties, such as being unable to distinguish fact from fiction in online content. The school offers extra pastoral support for these pupils, with strong links between the safeguarding team and the SENCO.

Safeguarding children with medical conditions

While having a medical condition does not in itself indicate a child is at greater safeguarding risk, when clinical incidents occur, healthcare professionals should work with the DSL to consider whether a safeguarding duty is triggered. The school will work collaboratively with healthcare professionals to ensure any safeguarding concerns arising from a child's medical condition are identified and addressed promptly.

Young carers

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

Pupils who are lesbian, gay, bisexual or gender questioning

A pupil being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, but such pupils — and those perceived to be LGB, whether or not they are — can be vulnerable to discriminatory bullying. The school considers how to address such vulnerabilities and takes steps to prevent bullying, including appropriate sanctions.

Children who are questioning their gender

This section applies where a child expresses discomfort with their sex, questions their gender, or asks the school to change how they are addressed or treated. It reflects Part Two of *Keeping Children Safe in Education 2026*, which sets out a documented decision-making process for schools.

The School's starting position

A child questioning their gender is not a safeguarding concern, and the school does not treat it as evidence that something is wrong at home or elsewhere. It is, however, a matter in which the school will always involve the DSL, because such children may have complex mental health or psychosocial needs, may be experiencing distress arising from something else entirely, and may be at greater risk of bullying.

The school will not initiate or encourage social transition. Nor will it obstruct a child or treat them unkindly. Its role is to take time to understand the child's experience, to be professionally curious about the full range of what may be going on for them, and to reach a considered decision about any request, having weighed the interests of that child, of other children and of the wider school community.

What staff must do

- Any request from a child to be addressed by a different name or pronoun, to use different facilities, to wear different uniform, or to be treated differently in any way connected with gender, must be referred to the DSL **before** any change is made or agreed. No member of staff may agree to such a change independently, however informal the request appears.
- Where a child confides in a member of staff about how they are feeling but does not ask for anything to change, the member of staff should speak to the DSL. There is generally no reason to breach the child's confidence unless a safeguarding concern arises. The DSL will decide what, if anything, follows.
- Staff must not tell a child that the school will keep such a matter from their parents and must not agree to use a different name or pronoun "only in this lesson" or "only when their parents are not around". Arrangements of that kind place the child and the member of staff in a difficult position and are not permitted.
- Staff must not affirm or dismiss. Both are interventions.

Involving parents

Parents will be involved as a matter of priority in most cases, and their views carry significant weight. Parents will only not be involved in the rare circumstances where involving them would place the child at greater risk of harm than not involving them. That decision is taken by the DSL, not by the member of staff who received the request and is recorded with reasons and kept under review.

Where a child asks that their parents not be told, the DSL will explore the reasons with the child, will consider whether those reasons disclose a safeguarding concern in their own right, and will support the child in telling their parents wherever that is the right outcome.

Where parents are separated, or where there is a disagreement between them, the arrangements in the Separated Parents Policy apply. Staff must not become the route by which one parent learns of a request made through the other; the DSL decides how and by whom parents are informed.

The decision-making process

Where a request is made, the DSL will lead a documented process which considers:

- the child's age, maturity and understanding, and how long they have felt this way;
- the child's wider circumstances, including any SEND, mental health need, experience of bullying, family circumstances, bereavement, family separation, abuse or online influence;
- the views of the child's parents;
- the views of the child;
- the impact of the requested change on the child, including whether it is likely to be in their best interests over time;
- the impact on other children, particularly in relation to single-sex facilities, changing, sport and residential accommodation;
- whether the request can be accommodated in whole, in part, or not at all, and what alternatives exist;
- the school's obligations under the Equality Act 2010, the Human Rights Act 1998 and its safeguarding duties; and
- any advice from external agencies where the child is known to them.

Decisions are made case by case. Nothing agreed for one child creates a precedent for another. Any decision is provisional, kept under review, and may be revisited as circumstances change. The decision, the reasons for it, who took it and who was consulted are recorded on My Concern.

The legal framework

The school's obligations in this area interact and are not always aligned. The school will comply with all of them.

- Under the **Equality Act 2010**, the school must not discriminate against, harass or victimise a child because of gender reassignment, sex, sexual orientation, disability, religion or belief, or any other protected characteristic. Gender reassignment is a protected characteristic, and a child does not need a diagnosis or any medical treatment to have it. Equally, the Act permits, and in places requires, the provision of separate single-sex facilities and separate sport and providing them is not discrimination.
- Under the **Human Rights Act 1998**, the school will have regard to the child's right to respect for private and family life (Article 8), the rights of parents in the education of their children (Article 2 of the First Protocol), and the rights to privacy, dignity and safety of all children.
- Under the **Education (Independent School Standards) Regulations 2014** the school must provide suitable separate toilet and washing facilities and must ensure that children aged 11 and over do not undress in the presence of a child of the opposite sex.

Specific arrangements

Names and pronouns. A change of registered name is a separate matter, governed by the Separated Parents Policy, and requires the consent of everyone with parental responsibility or an order of the court. A request to be known by a different name or set of pronouns is considered through the process above; it is not agreed automatically, and it is not refused automatically. No child or member of staff will be compelled to use a particular pronoun, and nobody will be sanctioned or subjected to detriment for using a child's registered name or the pronouns of their sex in good faith. Deliberate and persistent use of a name or pronoun to humiliate a child is bullying and is dealt with under the Anti-Bullying Policy.

Toilets and changing rooms. The school provides separate single-sex facilities, and access to them is based on biological sex. A child will not use facilities designated for the opposite sex. Where a child does not wish to use the facility designated for their sex, the school will consider whether a suitable alternative — for example a single-occupancy lockable facility — can be provided, without compromising the provision of single-sex facilities or the safety, privacy, comfort or dignity of that child or of others. Any such arrangement is agreed with the DSL, recorded and reviewed. Fuller detail is in the Supervision of Students Policy.

Uniform. The school's uniform is set out in the Behaviour Policy as a list of permitted items available to any student. Requests connected with gender are considered through the process above.

PE, games and sport. Sport is organised by sex where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy, or the reverse. Where single-sex grouping is necessary for the safety of participants, there are no exceptions, and safety is not balanced against other considerations. This is a matter of fairness and physical safety and is not open to individual arrangement.

Residential visits and overnight accommodation. Sleeping accommodation on residential visits is single sex and is allocated by sex. Where a child would find that distressing, the school will consider whether a suitable alternative can be provided without compromising the privacy, dignity or safety of other children. The arrangement is agreed with the DSL and the Educational Visits Coordinator before the visit is approved, and parents are informed. Further details are in the Educational Visits Policy.

Bullying and support

Children who are questioning their gender, and children perceived to be, can be vulnerable to bullying. The school's zero-tolerance approach applies, and incidents are recorded as prejudice-based incidents under the Anti-Bullying Policy. The school will also consider whether a child needs pastoral or mental health support, whether from within school or externally, whatever decision is reached on any request.

Staff and confidentiality

Information about a child questioning their gender is confidential safeguarding information and is shared on a need-to-know basis only. Staff who need to know in order to implement an agreed arrangement will be told what they need and no more. Records are held on My Concern.

Checking the identity and suitability of visitors

All visitors are required to verify their identity to the satisfaction of staff, sign in using the InVentry system, and wear a visitor's badge. Visitors for a professional purpose will be asked to show photo ID and their DBS certificate (or the sending organisation will confirm in writing that an appropriate check has been carried out). All other visitors, including visiting speakers, are always accompanied by a member of staff. The school will not invite in any speaker known to disseminate extremist views and will carry out appropriate checks to ensure that no individual or organisation using School facilities seeks to disseminate extremist views or radicalise pupils or staff.