Safeguarding and Child Protection Policy (Including Early Years Foundation Stage)

Responsible for policy	
College DSL	Chris MacInnis and Governing Body
Great Walstead School DSL	William Fuller
Review dates	
Policy date	September 2026
Next Review date	September 2027
This policy applies to all staff and students, including EYFS	
Policy reviewed by Board of Governors – July 2026 This safeguarding policy will be reviewed and approved by the governing body on an annual basis to ensure it remains effective and reflects current safeguarding requirements. The policy may also be updated throughout the year, as necessary, in response to new legislation, statutory guidance, local safeguarding arrangements, or other relevant developments. Any significant changes will be communicated promptly to staff and other relevant stakeholders.	

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1. Ardingly safeguarding team

Position	Name	Job Title	Email	Direct number
College DSL and Prevent Lead	Chris MacInnis (SMT)	Safeguarding and Mental Health Lead	Chris.MacInnis@ardingly.com	01444 893244
Deputy DSL (Senior School)	Jo Hayter (SMT)	Deputy Head (Pastoral and Co-Curricular)	Jo.Hayter@ardingly.com	01444 893155
Deputy DSL (Senior School)	Nicola Burns (SMT)	Senior Deputy Head	Nicola.Burns@ardingly.com	01444 893114
Deputy DSL (Lower School)	Ben Appleby (SMT)	Head of Lower School Pastoral	Ben.Appleby@ardingly.com	01444 893184
Deputy DSL (Reception – Year 6)	Georgina Sayers (SMT)	Deputy Head Pastoral	Georgina.Sayers@ardingly.com	01444 893212
Deputy DSL Nursery	James Davis	EYFS Lead	James.Davis@ardingly.com	01444 893300
School Nurse	Becky Dobson	Lead Nurse	Becky.Dobson@ardingly.com	01444 893292
School Nurse	Louise Depinamuller	Mental Health Nurse	Louise.Depinamuller@ardingly.com	01444 893292
Governor Governor	Sophie Bradshaw Madeleine Copin	Safeguarding Governor Deputy Safeguarding Governor	Contact through Clerk to the Governors Sophie.Koziarski@ardingly.com	

Great Walstead safeguarding team

Position	Name	Job Title	Email	Direct number
Great Walstead DSL and Prevent Lead	William Fuller (SLT)	Deputy Head	will.fuller@greatwalstead.co.uk	01444 483528 (ext 206)
Deputy DSL	Charlie Lee	Head of Maths	charlie.lee@greatwalstead.co.uk	01444 483528
Wrap Around Care Supervisor	Emily Setra	Year 2 Class Teacher	emily.setra@greatwalstead.co.uk	01444 483528
The Keep – Holiday Time	Penny Lindfield	Pre-School Leader	penny.lindfield@greatwalstead.co.uk	01444 483528

1.1 External safeguarding contacts

If a child is in immediate danger or is at risk of harm a referral should be made to West Sussex Multi-Agency Integrated Front Door (Formerly MASH) and/or the police immediately. Anyone can make a referral, where referrals are not made by the DSL lead, the DSL should be informed as soon as possible. The Ardingly College DSL will be contactable throughout the school year including weekends, school closures and holidays on **DSL@ardingly.com**. A member of the Great Walstead Safeguarding Team will be contactable throughout the school year and holidays on gw-dsl@greatwalstead.co.uk

West Sussex Multi Agency Integrated Front door	For a child on need or at risk of significant harm	WSChildrenservices@WestSussex.gov.uk	01403 229900 Out of hours 0330 222 6664)
West Sussex Adult Social Care	For adults in need or at risk of significant harm	socialcare@westsussex.gov.uk	01243 642121
The West Sussex Children's Partnership		www.sussexchildprotection.procedures.org.uk/	03302 225296
Local Designated Officer (LADO)	For allegations involving staff or volunteers working at the school	The LADOs for West Sussex are Miriam Williams, Donna Tomlinson and Victoria Williams and contactable via the West Sussex Safeguarding Children partnership (WSSCP) website.	
Safeguarding in Education Team	For a student in need or risk of harm in education	Safeguarding.Education@westsussex.co.uk	03302224030

Office of the Children's Commissioner		Info.request@childrenscommissioner.gsi.gov.uk	020 77838330
Channel (Radicalisation)		prevent@sussex.pnn.police.uk	Telephone 101/ ext. 531355
National Domestic Abuse helpline			0808 2000 247
NSPCC Whistleblowing helpline			0808 800 5000

Within this document the term 'College' includes Ardingly College and Great Walstead School.

2. Policy Statement

Safeguarding children is **everyone's** responsibility. **Everyone** who comes into contact with children and families has a role to play. The College adopts a whole-school safeguarding culture in which safeguarding and child protection underpin all decisions, policies, curriculum delivery and staff behaviour

The College is committed to safeguarding and promoting the welfare of all its students, which comes before all else. This is achieved by taking a child-centred approach, and at all times and considering what is in the best interests of the child. We will also provide a positive, safe and caring environment and one that respects all students and encourages then to talk openly.

This policy is based on the most up-to-date statutory guidance, including Keeping Children Safe in Education (DfE, 2026) and is reviewed annually in line with updates to KCSIE and implemented immediately where required."

2.1 Aims

The aims of child protection and safeguarding at our school are:

• Appropriate action is taken in a timely manner to safeguard and promote student's welfare.

• All staff are aware of their statutory responsibilities with respect to safeguarding.

• Staff are empowered and properly trained in recognising and responding effectively to safeguarding issues.

• To establish an ethos of mutual support amongst all staff, so that any questions and concerns may be shared.

• To ensure all members of staff, registered volunteers and Governors know how to respond to a student who discloses abuse, and the procedure to be followed in appropriately sharing a concern of possible abuse or a disclosure of abuse.

• To ensure that Safeguarding Policy forms a fundamental approach to providing excellent pastoral care to all our students, even those who may be over the age of 18.

2.2 Legislation and statutory guidance

This policy is based on the on the most up to date statutory guidance listed below, and the College will act in accordance with Government legislation, including but not limited to:

Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), the Maintained Schools Governance Guide and Academy Trust Governance Guide and the arrangements agreed and published by our local safeguarding partners.

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 female genital mutilation (FGM) appears to have been carried out on a girl under 18 Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

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, which defines what 'regulated activity' is in relation to children

Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the

European Convention on Human Rights (ECHR)

The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our Governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobia or transphobic bullying; or racial discrimination.

The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare

Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.

Relationships and Sex Education (RSE) and Health Education.

Prevent Duty Guidance 2015, revised 2023

Childcare Regulations 2022 and Childcare Act 2006

Sharing nudes and semi-nudes: advice for education settings working with children and young people 2024

Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings 2023

This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

This policy also complies with our funding agreement and articles of association.

The procedures contained in this policy apply to all staff (for the purpose of this policy, 'staff' includes supply teachers, volunteers and contractors) and Governors.

This policy should be considered alongside other School policies, a list of which can be found later in this policy.

3. Child protection and safeguarding definitions

Safeguarding and promoting the welfare of children are defined for statutory purposes as:

• protecting children from abuse and maltreatment, whether that is within or outside the home, including online.

• preventing harm to children's health or development.

• ensuring that children grow up with the provision of safe and effective care.

• taking action to enable all children and young people to have the best outcomes.

Child protection is defined as part of the safeguarding process. It focuses on protecting individual children identified as suffering from, or likely to suffer, significant harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

Development means physical, intellectual, emotional, social or behavioural development; 'Health' includes physical and mental health.

Ill treatment includes sexual abuse and forms of ill treatment which are not physical and show that the child has suffered in his or her development. Where the question of whether harm suffered by the child is significant turns on the child's health and development, his/her health and development must be compared with that which could reasonably be expected of a similar child." (Sussex Child Protection and Safeguarding Procedures, 2015)

Children includes everyone under the age of 18.

4. Key responsibilities

4.1The Governing Body

The Governing Body takes seriously its responsibility to safeguard and promote the welfare of children in its care and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support children who are, or who may be, suffering harm.

Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development

The Council reviews the College Safeguarding and Child Protection Policy and procedures every year. All deficiencies or weaknesses in child protection arrangements, at any time, are remedied without delay.

They ensure that appropriate induction training for all Governors equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the whole College approach to safeguarding.

Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements

Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:

• Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities for filtering and monitoring are clearly defined, that systems are reviewed regularly, and that appropriate safeguarding reports are provided to Governors

• Reviewing the DfE's filtering and monitoring standards, and discussing with the DSL, IT staff and service providers what needs to be done to support the school in meeting these standards

Make sure:

• The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support

• Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies

• The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place

• The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). **See the Low Levels Concerns Policy**

• That this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

• Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed

• Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate

• Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

There is an appointed link Governor, Sophie Bradshaw, who has responsibility for child protection in the College, including Great Walstead School.

The DSL also reports in person to the Governing Body on all things which are related to the role, giving appropriate statistics as necessary, on a termly basis to the Risk and Safeguarding Committee and annual basis to the Full Council.

4.2 The Head

The Head should ensure that the policies and procedures, adopted by the Governing Body (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

4.3 The Designated Safeguarding Lead (DSL)

Ardingly College has a DSL who is a member of the SMT, and at Great Walstead School is part of the SLT, and they both have overall responsibility for the day to day oversight of the safeguarding and child protection systems in the two schools. Training for DSL should be undertaken at two yearly intervals with updates at least annually. The deputy DSLs are trained to the same level as the DSL and are listed in the table.

4.4 The Role of the DSL

• Refer cases of suspected abuse and neglect to the local authority children's social care as required. All written referrals should be discussed with the DSL unless it is not convenient or appropriate.

• Refer cases to the Channel programme where there is a radicalisation concern as required.

• Support staff who make referrals to local authority children's social care or to the Channel programme.

• Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required.

• Refer cases where a crime may have been committed to the Police as required.

• Act as a point of contact with the key safeguarding partners.

• Liaise with the headteacher to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

• As required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member.

• Liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs, or the named person with oversight for SEN in a College and Senior Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.

• Act as a source of support, advice and expertise for all staff.

• Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.

• Keep detailed, accurate, secure written records of concerns, referrals, discussions, decisions made and reasons for the decisions.

• Coordinate safeguarding action for individual children.

• Coordinate with the safeguarding team regarding incidents reported on CPOMS.

• Support children with a social worker, or 'Children Looked After' maintaining PEP documentation and managing liaison with Virtual Schools, Welfare Call and other agencies.

• Represent and ensure the school is adequately represented at multi-agency safeguarding meetings.

• Oversee the transfer and receipt of child protection and safeguarding files when students leave or join the school.

4.5 Expectations of the DSL

• Understand the assessment process for providing early/family help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.

• Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.

• Ensure each member of staff has access to, and understands, the school's or College's child protection policy and procedures, especially new and part time staff.

• Are alert to the specific needs of children in need, those with special educational needs and young carers.

• Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.

• Understand the importance of information sharing, both within the school and College, and with the key safeguarding partners, other agencies, organisations and practitioners.

• Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.

• Understand and support the school or College with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.

• Have overall responsibility for online safety and know the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or College.

• Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.

• Obtain access to resources and attend any relevant or refresher training courses.

• Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or College may put in place to protect them.

• Ensure the school's or College's child protection policies are known, understood and used appropriately.

• Ensure the College's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with Governing Body regarding this.

• Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the College in this.

• Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

• Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and College leadership staff. Their role could include ensuring that the school or College, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

4.6 Availability of the DSL

During term time the Designated Safeguarding Lead (or a Deputy DSL (DDSL)) should always be available (during school or College hours) for staff in the school or College to discuss any safeguarding concerns. Whilst generally speaking the DSL (or DDSL) would be expected to be available in person, it is a matter for individual schools and Colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone, Teams or other such media is acceptable. Out-of-hours safeguarding arrangements will ensure that a DSL or DDSL can be contacted at all times when children are on site or participating in school activities.

The Safeguarding team are always contactable on **DSL@ardingly.com** for Ardingly College and **gw-dsl@greatwalstead.co.uk** for Great Walstead School.

4.7 All Staff

All members of staff have a responsibility to:

• Provide a safe environment in which children can learn.

• Ensure students feel they are always taken seriously and listened to. They must never be made to feel ashamed, or they are creating a problem by speaking to an adult.

• Be able to identify and act upon indicators that children are, or at risk of developing mental health issues. Be prepared to identify children who may benefit from early/family help.

• Understand the early and family help processes and their role in it.

• Understand the College's safeguarding policies and systems.

• Maintain an attitude that it 'could happen here'.

• Determine how to build a trusted relationship with students which facilitate communication.

• Undertake regular and appropriate training which is regularly updated.

• Be aware of the process of making referrals to children's social care and statutory assessment under the Children Act 1989.

• Know what to do if a child tells them that they are being abused or neglected and understand the impact abuse and neglect can have upon a child.

• Know how to maintain an appropriate level of confidentiality.

• Be aware of the indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection

4.8 Disclosures

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Our school recognises that a student is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the student is likely to feel that the member of staff is in a position of trust. That member of staff must report the disclosure to the DSL immediately. When dealing with additional conversations following the initial disclosure of harmful sexual behaviours, two members of staff will be involved. This may be, for example, the DSL and HoMM or tutor or School Health Centre Nurse at Ardingly College or DSL and DDSL at Great Walstead School.

All staff should always act immediately, never assume someone else will take action. Fears regarding sharing information under the data protection Act 2018 and the GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead.

If a child discloses abuse to a member of staff, the following guidance is offered:

• Receive – listen carefully, take what they say seriously and do not promise confidentiality, but give reassurance that only those who need to know will be told. They may not disclose the whole picture, they may be more comfortable providing the information on a piece meal basis.

• Reassure – stay calm, do not rush them and reassure them that they have done the right thing.

• React – just let the child talk, limit any questioning to the minimum necessary to seek clarification only, strictly avoiding 'leading' the student who has approached you by making suggestions or asking questions that introduce your own ideas about what may have happened.

(Do not ask questions like 'Did he do x to you?', using instead questions of the 'Tell me what has happened' type); Tell the informing student that you will now make sure that the appropriate people are brought in to follow the problem up (these may include a specialist social worker, and that worker may need to involve the police) and inform the DSL IMMEDIATELY.

• Record – write everything down accurately, including date and time and as soon as practically possible inform the DSL and report the incident on the school's safeguarding reporting software, marking it as Safeguarding. Give details of what was said, by whom and in whose presence and then sign and date the document. All reports must be clear, concise, factual, and contemporaneous

If the child uses their own private sexual words, record the actual words used, rather than translating them into 'proper' words.

• Support – using the pastoral system and the Health Centre put support in place for the child and yourself.

Where there is a safeguarding concern, the school will ensure the student's wishes and feelings are taken into account when determining what action to take, and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence.

4.9 Child protection files

The DSL is responsible for ensuring that child protection files are kept up to date. Records should include:

• a clear and comprehensive summary of the concern.

• details of how the concern was followed up and resolved.

• a note of any action taken, decisions reached including the rationale behind them and any outcomes.

• include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program.

All safeguarding records will be clear, concise, factual, and recorded as soon as possible after the event

Where children leave the school or College (including for in-year transfers) the DSL should ensure their child protection file is transferred to the new school or College within 5 business days, in accordance with KCSIE guidelines, to allow the new school to have support in place.

This should be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and Colleges should ensure key staff such as DSL, DDSL's and SENCOs or the named person with oversight for SEN in Colleges, are aware as required.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or College in advance of a child leaving. For example, information that would allow the new school or College to continue supporting victims of abuse and have that support in place for when the child arrives.

4.10 Confidentiality

As a general principle, all matters relating to child protection are confidential and should only be shared on a 'need-to-know' basis.

The Designated Safeguarding Lead will disclose any child protection related information about a child to other members of staff on a need to know basis only which will be recorded using the appropriate school software.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

All staff must be aware that they cannot promise a child to keep secrets.

The intention to refer a child to the local authority' Children's Services will be shared with parents/carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent where there is a good reason to do so. (Para 55 KCSiE 2026)

Timely information sharing is essential to effective safeguarding. 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

The Data Protection Act (DPA) 2018 and UK GDPR 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 be reasonably expected that a practitioner gains consent; or if to gain 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 the sexual violence or sexual harassment:

• There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies

• The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

▪ Parents or carers should normally be informed (unless this would put the victim at greater risk)

▪ The basic safeguarding principle is: 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

▪ Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.

While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

• Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system

• Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved

• Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

4.11 Golden rules for information sharing

The golden rules for information sharing is non-statutory advice that the Government has developed for all front-line practitioners and senior managers working with children, young people, parents and carers who are making decisions about sharing personal information. The advice helps to clarify current legislation around data protection and makes it very clear that information sharing is an essential part of safeguarding. They can be summarised as:

Golden Rules

Obtain consent to share where appropriate

Liaise if the information is inaccurate or unreliable

Don't share more than is necessary

Ensure the information is shared securely and safely

Necessitate the reason for sharing information

Record what information is shared

Unsure? Check with DSL, manager or information sharing specialist

Legitimate reason for sharing information

Establish the requestor's identity

Suspect a breach? Report it immediately

Where possible share with consent of the individual, but remember you may still share information without consent if in your judgement that lack of consent can be overridden in the public interest, for example:

Safeguarding children

Protecting other vulnerable people

Preventing the commission of criminal offences

Bringing offenders to justice

Consider safety and well-being. Base your information sharing decisions on considerations of the safety and well-being of the person and others (immediate family, wider community, national security) who may be affected.

If staff are in any doubt about sharing information, they should speak to the DSL or DDSL. You do not need consent to share if a child is at risk

4.12 Recognising abuse and taking action

Staff, volunteers and Governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

4.13 If a child is suffering or likely to suffer harm, or in immediate danger

The member of staff will report their concerns to the DSL or DDSL via immediate contact, reporting via the school safeguarding alone is not sufficient when a child is at risk of immediate harm

The safeguarding team will assess the information and in all likelihood make a referral to local authority children's social care and/or the police if it is believed a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral**. The DSL or DDSL must be informed of any referrals made by staff and all information to be recorded on the schools safeguarding software.

immediately or within 24 hours if it is not possible to do it immediately. All staff have access to safeguarding reporting software, which is a web based programme which allows the staff member to raise a concern about a pupil as soon as it happens.

The DSL will decide whether the concerns should be referred directly to the local authorities Integrated Front Door (IFD). If the DSL is unsure about whether a referral is required they should contact the local authorities Children's Services teams for advice.

If it is decided to make a referral to the IFD this will be usually be discussed with the parents, unless to do so would place the child at further risk of harm or could impact on a police investigation (the IFD is able to provide advice on this).

The member of staff will make an accurate and detailed recording using the schools safeguarding reporting software (which may be used in any subsequent court proceedings) as soon as possible and on the same day. A body map can be found in this document and in the My Concern software. The dated recording must be a clear, precise, factual account of the

observations. Do not add comments or opinion although observations about a child's demeanour or emotional state may be recorded.

Particular attention will be paid to the attendance and development of any child about whom the school has concerns, or who has been or is subject of a Child Protection Plan.

In the event of a concern raised about a child the school will provide support for the victim and the perpetrator if the perpetrator is a current pupil in school. This support may well be guided by external agencies.

There is a possibility following referral to the IFD of a professional disagreement regarding the outcome or decision made by a worker from another agency. As professionals, we should always be curious about why decisions are made and question if we do not feel this is right and we should feel confident and able to challenge decision making. We have a professional responsibility to promote the best multi-agency safeguarding practice and the process of dealing with professional differences can be found on the local authority's website.

Professional differences regarding decisions relating to Children Looked After should be taken up with their Independent Reviewing Officer (IRO).

4.14 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out further later in this policy.

Any teacher who either:

• Is informed by a girl under 18 that an act of FGM has been carried out on her; or

• Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

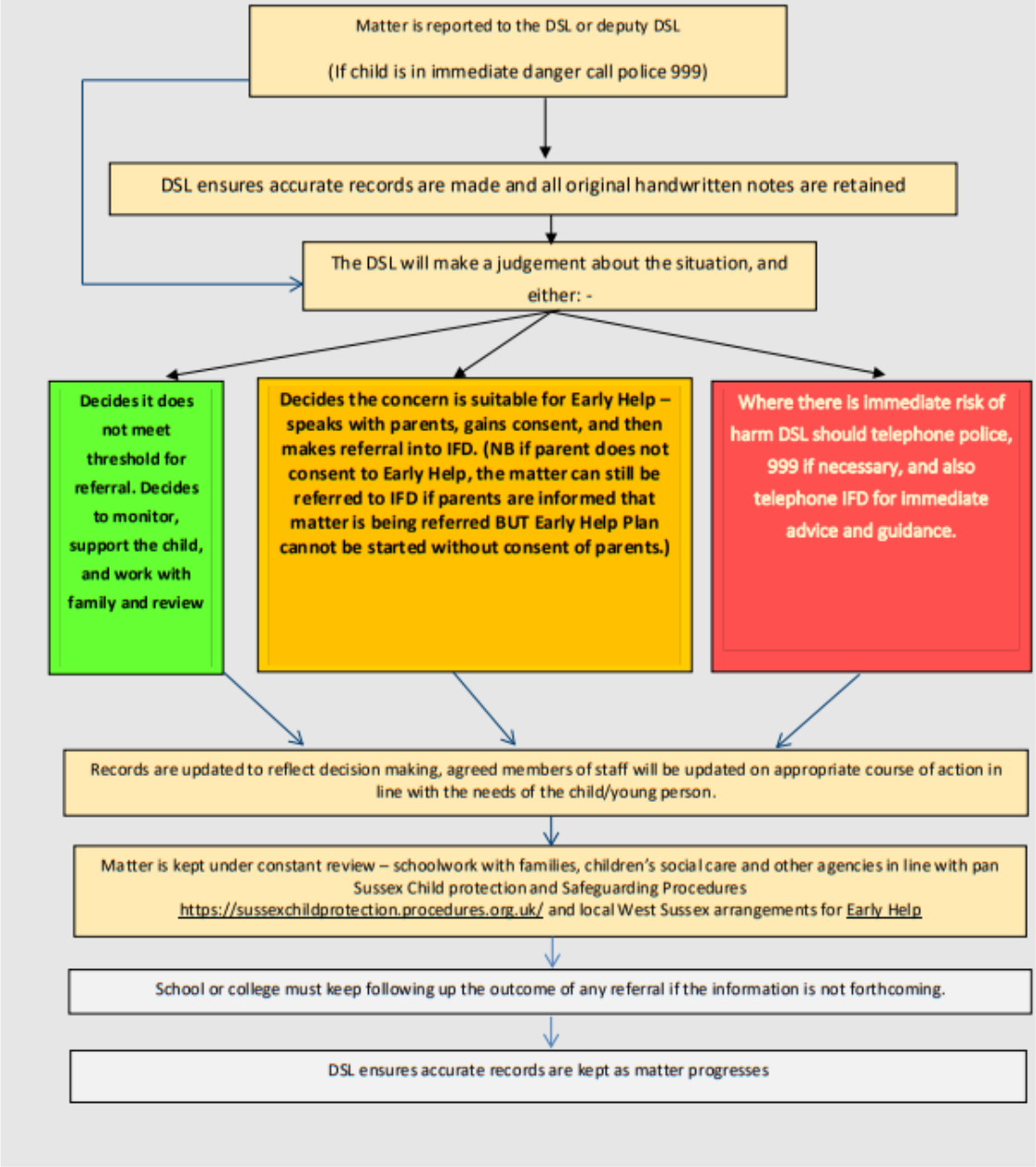
Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is 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 suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

4.15 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.



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, a conversation with a DDSL should take place.

Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

4.16 Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral you must tell the DSL as soon as possible.

The local authority should make a decision within timely manner regarding the referral and what course of action to take. The local authority will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

4.17 Family help assessment

If a family help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an Early Help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

4.18 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, 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. All staff must approach the Deputy Safeguarding Lead In the DSL's absence.

The safeguarding Team will make a referral to local authority children's social care directly, if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and Governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you: Think someone is in immediate danger Think someone may be planning to travel to join an extremist group See or hear something that may be terrorist-related

4.19 If you have a concern about mental health

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.

Staff are alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

Mental health concerns may be an indicator of abuse, neglect or exploitation and should not be treated as standalone. All mental health concerns must be reported to the DSL following the setting's reporting systems in place. Discussions about individual pupil's mental health are raised at a weekly pastoral meeting between the DSL and other appropriate staff.

5. Supporting children:

The College plays a crucial role in preventative education. Preventative education is most effective in the context of a whole-school or College approach that prepares students and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. The College has a clear set of values and standards, upheld and demonstrated throughout all aspects of College life. These will be underpinned by the College's behaviour policy and pastoral support system. In addition, the College plays an active role in:

5.1 Raising Awareness:

The College prides itself on its culture of open and effective communication between all staff and students, and on its excellent pastoral support structures. It prepares all students to make reasoned, informed choices, judgments, and decisions. All students know that there are adults to whom they can turn if they are worried, including their Form tutor or Housemaster (Head of House at Great Walstead), tutor, school counsellor (at Ardingly College), the College Chaplain, the Health centre staff at Ardingly College, Mental Health Lead, DSL along with the Deputy Head - Pastoral and Co-Curricular. At Great Walstead School students may also speak to Section Heads for extra pastoral support.

In addition, information about how children can get support and guidance is displayed in prominent places around the College and schools.

5.2 Supporting Children when sexual violence or sexual Harassment has occurred:

All concerns and reports regarding sexual violence, sexual harassment and harmful sexual behaviour will be taken very seriously and support for victims and instigators, will be implemented through the College's pastoral system. The DSL will liaise with parents or carers, police and local authorities where necessary.

5.3 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

Put systems in place for pupils to confidently report abuse

Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils

Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Pupils have the opportunity to talk their teacher/trusted adult on a daily basis. Information will be given making it clear to the pupils from the start of term that they should report any concerns to them if it is about them or another pupil.

There is information displayed in every teaching room stating who the children can talk to or call if they have a concern or are worried.

All staff will make it clear to the pupils that submitting any concerns is the correct action and that the concerns will be taken seriously and support be given.

All systems will be age-appropriate, accessible and regularly reviewed to ensure they remain effective

5.4 Abuse, Neglect and Exploitation

Recognising abuse is not easy, if you feel that there is a child in need or at risk you must act immediately.

All staff should be aware of indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/College, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.

Any concerns should be reported to the DSL and then the appropriate external agencies will be contacted. For a child in need we would report to the IFD, who offer support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse, or Children's Services as appropriate. If there is a child at risk we would report to children's social care or the police immediately.

5.4.1 Faith based prejudice and harm

Staff should recognise that faith-targeted abuse, including anti-Muslim, antisemitic, anti-Christian, and other religion or belief-based hostility, can have a significant impact on a child's welfare, emotional wellbeing, mental health, identity, and sense of safety. Children who experience such abuse may feel isolated, fearful, distressed, or reluctant to engage in education and support services. Faith-targeted abuse may be perpetrated by other children

and, where this is the case, should be recognised as a form of Child-On-Child abuse. Any incidents, patterns of behaviour, or disclosures relating to faith-based abuse must be taken seriously, responded to promptly, and addressed in line with the College's Child-On-Child abuse procedures and safeguarding processes.

The College and its governing body are committed to promoting an inclusive, anti-discriminatory culture in which diversity is valued and all children are treated with dignity and respect. The College will not tolerate prejudice-based behaviour, including discrimination or harassment related to religion, belief, race, ethnicity, disability, sex, sexual orientation, gender reassignment, or any other protected characteristic. Staff should be vigilant to the indicators and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate. Through education, positive role modelling, effective reporting systems, and proportionate safeguarding responses, the College will work to prevent discriminatory behaviour, support those affected, and foster a safe and inclusive environment for all members of the college community.

5.5 Early Years Foundation Stage

This policy also includes the Early Years Foundation Stage and all the requirements above apply to the DSL and all staff.

Early Years staff and all staff coming into contact with children should be aware of the signs of possible abuse or neglect as identified above. In addition with younger children the following signs may be noted:

• Significant deterioration in a child's wellbeing.

• Children's comments which give cause for concern.

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

The Prep DSL and Nursery DSL will also provide support, advice and guidance to any other staff on an ongoing basis, and on any specific safeguarding issues as required.

5.6 Other concerns

Members of staff are obliged to report any concerns about a child immediately. This should be reported on our safeguarding software, in the first instance, concerns of a safeguarding nature must be categorised as Safeguarding, as this alerts the DSL and deputy DSLs immediately. It is also necessary to follow up verbally with the DSL or Deputy DSLs where a young person's safety is in immediate dangers, or if returning home poses a risk.

5.7 Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors inside and outside the School and can occur between children outside the School. Children can be at risk of abuse or exploitation in situations inside and outside of home and online. Extra-familial harm(s) take a variety of different forms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse),

criminal exploitation, serious youth violence, county lines, and radicalisation and children can be vulnerable to multiple harms. All staff should consider the context within which such incidents and/or behaviours occur. It is important to provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

5.8 Action taken following Concerns Raised

Following a report of a concern to the DSL, the DSL will complete the internal investigations, and decide on one of the following options:

• refer promptly to the local authorities Integrated Front Door who will signpost the most appropriate course of action. This may result in the Police, parents and Children's Social Care becoming involved if the child is at risk of suffering serious harm. Parental consent is not required for referrals to statutory organisations.

• Make contact with parents/carers when appropriate.

• Manage the support for the child internally through the school's pastoral support process.

If a referral to the Police is made, it will be explained to the victim that the law is in place to protect children and young people rather than criminalise them and will be explained in such a way that avoids alarming or distressing them.

If, at any point, there is a risk of immediate serious harm to a child, and the DSL or deputy DSL is already deployed on other safeguarding matters and no other member of SMT are available, then a member of staff may contact the Police or IFD for advice.

5.9 Concerns with regards Children In Need or Children at Risk the following must be adhered to

Children In Need (CIN) – The requirements are to act immediately, report to the DSL who will determine the appropriate response (i.e. IFD Referral, pastoral support, children's social care et.)

Children At Risk (CAR) – The report should go immediately to the DSL, who is required to refer to Children's social care/police if a crime has possibly been committed, immediately or within 24 hours/one day.

5.10 Supporting Vulnerable Students and Students with Protected Characteristics

The College has a legal duty in relation to safeguarding and promoting welfare of children, and particularly those with educational needs and protected characteristics, including disability, sex, sexual orientation, gender reassignment and race. The College will take positive action and make reasonable adjustments for disabled children and young people, including those with long term conditions, this will be done by collaborative support from Learning Support, the Mental Health Lead, the Health Centre, EDI Leads, HoMM, tutor and DSL. At Great Walstead School a collaborative approach for support will be done between Form Teachers, Section Heads, Head of Learning Enhancement and the Deputy Head. Where appropriate the Head may also be involved. When physical accessibility needs to be considered the Head of Maintenance would be included in discussions.

Children with special educational needs, disabilities and very young children can face additional safeguarding challenges, such as communication barriers, cognitive understanding and staff missing indicators of possible abuse. Children with disabilities are 3 times more likely to be abused than their peers.

Staff should be alert to the potential need for early/family help for a child who:

• is disabled and has specific additional needs.

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

• is a young carer.

• has a social worker.

• is looked after, or previously looked after.

• is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.

• is misusing drugs or alcohol themselves.

• is at risk of modern slavery, trafficking or exploitation.

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

• is showing early signs of abuse and/or neglect.

• is at risk of being radicalised or exploited.

• is a privately fostered child.

• is struggling with mental health.

• is potentially showing signs of exploitation.

• Has experienced multiple suspensions, is at risk of being permanently excluded from schools, Colleges and in alternative provision or a student referral unit

• Has a parent or carer in custody, or is affected by parental offending

• Is frequently missing/goes missing from education, home or care

The above are only possible indicators of abuse and not in themselves proof that abuse has occurred.

5.11 Teaching students to keep themselves safe

All students are educated on how to keep themselves safe in the school environment, on-line and when accessing remote learning through the College's PSHE programme and the House system. At Great Walstead School the children are educated through the Learning For Life (L4L) programme which is similar to Ardingly College's PSHE programme. The PSHE and L4L programmes are fully encompassing of the statutory RSE programme. The College's PHSE and Great Walstead School's L4L programme is fully inclusive, age and stage appropriate and includes the following topics (depending on the child's age):

• healthy and respectful relationships.

• boundaries and consent.

• stereotyping, prejudice and equality.

• body confidence and self-esteem.

• how to recognise an abusive relationship, including coercive and controlling behaviour.

• the concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support.

• what constitutes sexual harassment and sexual violence and why these are always unacceptable.

Refer to the College's RSE Policy for more details.

Senior School prefects are given age appropriate advice on dealing with safeguarding issues by the DSL and House Prefects by the Head of Boarding.

Part of the College's safeguarding measures is to identify and report children susceptible to radicalisation. This is achieved by creating a safe space and a strong PSHE programme that tackles sensitive and controversial issues to ensure all students learn how to keep themselves safe, including online. Staff can discover more about the Channel programme which provides support here: https://www.gov.uk/government/publications/channel-guidance

5.12 Supporting Students' Mental Health

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 student that is also a safeguarding concern, immediate action should be taken by speaking to the DSL, Senior Deputy DSL, or Deputy DSL. We will work with the Mental Health Lead, the Mental Health Nurse and the Pastoral team to provide support. Whilst staff are not trained to diagnose mental health conditions, some have a great deal of experience in this area. Many of the Pastoral team our trained as Mental Health First Aiders (MHFA). The student may benefit from seeing our school counsellor or may be signposted to external agencies.

5.13 Internal Students Supervising Other Students

The College recognises that pupils and students who are enrolled at the College and acting in leadership, mentoring, peer-support, ambassadorial, prefect, or similar roles are not considered members of staff and are therefore not subject to Disclosure and Barring Service (DBS) checks when supervising or supporting the College's own students. Such activities will always take place under the oversight and accountability of appropriately vetted members of staff. Internal student leaders must be suitable for their role, receive appropriate guidance and training, understand the boundaries of their responsibilities, and must not be placed in positions involving unsupervised regulated activity or sole responsibility for safeguarding, welfare, or personal care. The College will ensure that appropriate risk assessments, supervision arrangements, and safeguarding measures are in place to protect all students involved.

Where college students undertake placements, work experience, volunteering, mentoring, or support activities in external organisations, responsibility for determining and undertaking any Disclosure and Barring Service (DBS) checks rests with the host organisation in accordance with the nature of the role and current statutory guidance. The College will work with students and external providers to ensure that appropriate safeguarding arrangements, supervision, and vetting requirements are understood and implemented before the placement commences.

5.14 Supporting Students in Boarding

Children may be particularly vulnerable in residential settings. The requirements are set out in the National Minimum Standards (NMS) for Boarding Schools (May 2022). The College monitors its policies and procedures in order to comply with these standards. All staff are aware of the need to be vigilant in a residential setting and, as appropriate, we will work closely with WSSCP and, where relevant, any local authorities that have placed their children here.

5.15 Supporting students with name changes:

During a time of gender exploration, students can debate the use of name changes, for all informal documentation, commonly called a "known as" name. Ardingly College has a dedicated process for supporting students with name changes, ensuring that a triangle of support is offered between student, parent and school. Please speak to your Housemaster for more information around this.

For legal name changes the College requires an Enrolled Deed Poll document. For more information around gaining this document please follow this link: https://www.gov.uk/change-name-deed-poll/enrola-deed-poll-with-the-courts.

5.16 Gender-Questioning Children:

The College recognises that children who are questioning their gender may be particularly vulnerable and require a sensitive, individualised safeguarding response. We will take a child-centred approach, carefully considering each child's wishes, feelings, age, developmental stage, and overall welfare when determining appropriate support. In line with current KCSIE 2026 expectations, staff will not assume that a child's expressed identity is fixed and will work closely with the Designated Safeguarding Lead (DSL), parents/carers, and external professionals to assess risk and provide support. The College acknowledges that gender-questioning can, in some cases, be associated with broader safeguarding concerns, including mental health needs, social isolation, bullying, or exploitation, and these risks will be considered holistically.

The College will give careful consideration to access to single-sex spaces and facilities, balancing the rights, safety, dignity, and privacy of all pupils. Decisions regarding changing rooms, toilets, boarding accommodation, and sleeping arrangements during trips will be made on a case-by-case basis, following a clear risk assessment led by the DSL and senior leadership. Wherever possible, arrangements will ensure that no child feels unsafe or excluded, including the potential provision of alternative or private facilities where appropriate. The College will ensure compliance with the Equality Act 2010, recognising lawful single-sex exceptions, while prioritising safeguarding above all else.

Staff are trained to respond appropriately, avoiding creating pressure on the child to reach conclusions about their identity, and maintaining professional boundaries. Confidentiality will be carefully managed: while a child's wishes will be respected, information may be shared with parents/carers and other agencies where it is necessary to safeguard the child or others. The College will maintain open and transparent communication, ensuring that all actions are recorded, decisions are clearly justified, and support is regularly reviewed.

5.17 Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis): will meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed

Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

5.18 Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges.

Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils

The potential for pupils with SEN, disabilities or certain health conditions being is proportionally impacted by behaviours such as bullying, without outwardly showing any signs Communication barriers and difficulties in managing or reporting these challenges

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the Director of Learning Support.

5.19 Pupils with a social worker

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

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are 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, it will inform decisions about:

Responding to unauthorised absence or missing education where there are known safeguarding risks

The provision of pastoral and/or academic support

5.20 Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

The school will ensure that staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by a local authority. The DSL, DDSL and Headmaster are the Designated Teachers for Pupils who are looked after. They will ensure that a designated member of staff, such as a class teacher, form tutor or Head of Section, has responsibility for the child's welfare and educational achievement and has up-to-date assessment information relating to each child. We will work with the Local Authority as appropriate.

Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

The DSL has details of children's social workers and relevant virtual school heads

5.21 Child with family member in prison

Children with a family member in prison may be experiencing a range of feelings including loss, anger, sadness, confusion and guilt, particularly if the person in prison is their parent. They may also face conflicting emotions – for example, their parent is still their parent (and they still care about them), but they are in prison because they have done something illegal (so they may also feel guilty).

Children and young people with a family member in prison should be recognised as a group with unique needs. To support those affected, we must find out what they have been told and understand the issues they face. The DSL will meet with the child to create a child centred pastoral plan and create regular check in's with the child's trusted adult.

6. Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of Governors.

The headteacher/chair of Governors will then follow the procedures set out in the **Low-Level Concern Policy,** if appropriate.

All staff are expected to follow the College's Professional Code of Conduct and be prepared to act in accordance with the College's Whistleblowing Policy. If any member of staff, registered volunteer or any person on the school's payroll is suspected then the Head must be informed directly; where possible, arrangements should be followed to resolve cases without delay. If appropriate the Head will ask the DSL to follow up with external agencies. The DSL will report to the Head but if it is felt that the Head is suspected then contact must be made direct with the Chair of the School Council, and without informing the Head. In such cases the Chair is responsible for referring and liaising with the LADO.

If an allegation has been made involving staff or volunteers working at the College the DSL or Head must contact the LADO before any internal investigation begins. The LADO will advise the Head or DSL how to proceed and will agree the level of staff, parent and student communication arrangements. Detailed written records should be made of all discussions. If a member of staff who is resident in College accommodation is suspected, alternative non-College accommodation must be provided pending the investigation. Further details are contained in the Disciplinary Policy. No allegation can be made public and all effort to retain confidentiality should be made. More information can be found in the Dealing with Allegations against Staff Policy. In cases of serious harm, or if a criminal act may have been committed, the police should be informed from the outset. When an allegation relates to a member of supply staff provided by an agency, the agency will be fully involved.

The College will report to the Disclosure and Barring Service (DBS) at www.gov.uk/dbs ,within one month of leaving the College, any person (whether employed, contracted, a volunteer or student) whose services are no longer used because they have caused harm or posed a risk of harming a child. The College will also consider making a referral to the Teacher Regulatory Agency (TRA) where a teacher has been dismissed (or would have been) and a prohibition order may be appropriate. Reasons and further information are given on the TRA website and include 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or 'a conviction for a relevant offence'. Allegations against a teacher who no longer teachers at the College will be referred to the Police.

In the event of allegations against staff/volunteers or suspicions of abuse the College must not initiate an internal investigation. Instead, a referral should be made to the LADO team who will reply within 24 hours with guidance on the type of response required. The Head or the DSL (if instructed to do so) will follow guidance set out by the local authority and consult with the Local Authority Designated Officer (LADO) on 0330 2226450.

It is important that the child concerned does not have to repeat the disclosure to more people than necessary. Where possible the staff member to whom the disclosure was made should remain with the child to offer support, pending advice from the LADO team of the investigative process. No further questioning of the child or any further enquiries should be attempted. Staff should not interview the alleged instigator or take any action that may alert them.

If the concerns/allegations are about the headteacher, concerns should be raised to the Chair of Governors via Sophie.Koziarski@ardingly.com.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

6.1 Low-Level Concerns:

A low-level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold (explained above) or is not otherwise serious enough to consider a referral to the LADO. (KCSIE 2026)

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harm threshold set out below. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

• is inconsistent with the Staff Professional Code of Conduct, including inappropriate conduct outside of work.

• does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

• being over friendly with children.

• having favourites.

• taking photographs of children on their mobile phone.

• engaging with a child on a one-to-one basis in a secluded area or behind a closed door

• humiliating students.

The College promotes a culture where staff feel confident to self-report concerns and are supported in doing so if they have found themselves in a circumstance or situation that might invite question or comment.

Low level concerns should be reported to the Senior Deputy Head or the DSL, and recorded in writing, including:

• name of individual reporting concerns

• details of concern

• context in which concern arose

• action taken.

If the concern is about the DSL or a member of the Safeguarding team, it should be raised with the Head.

All low-level concerns will be recorded, even where no action is taken, to identify patterns of behaviour that may indicate risk. All concerns will be dealt with as outlined in the **School's Low-Level Concern Policy**.

6.2 Safer Recruitment

We are committed to ensuring we develop a safe culture and that all steps are taken to recruit staff, volunteers and Governors who are safe to work with our students and staff. We observe safeguards for the selection and appointment of staff in accordance with Part 3 of KCSIE 2026 and WTSC 2023. In order to adopt a rigorous recruitment procedure, as articulated in the College's Recruitment Policy to ensure all children are safe.

Ardingly College reserve the right to perform online public searches for shortlisted candidates, as part of our due diligence checks, as directed by KCSIE 2026.

6.3 Training of Staff

All staff have an annual Safeguarding update at the beginning of the school year in the Whole Staff INSET, which also includes developing their understanding of the signs and indicators of abuse and further updates are given throughout the year, through announcements, emails and INSET sessions. In the annual update all staff receive an annual update of the changes in KCSIE and other safeguarding related issues and must read and understand KCSIE Part one or Annex A and all College leaders and those working directly with children must read and understand Part 1 and Annex B.

All staff must (at Ardingly College only in **bold**, at Great Walstead School only in *italics*):

- attend the annual update training.
- have regard for Prevent duty on radicalisation following the Prevent Duty Guidance 2015;
- follow the College or Great Walstead School's procedures in conjunction with the current College or School's policies contained within the Staff Handbook – with particular attention to the Professional Code of Conduct for staff.
- ensure to make sure that selected senior students know the procedures when dealing with allegations of abuse: children and young people often tell other young people rather than staff or other adults, about abuse.
- ***Sign the register of attendance for the INSET training in September.***
- *Refresh the safeguard training in January by completing the Educare course on child protection and safeguarding which included child-on-child sexual violence and sexual harassment.*
- **take a questionnaire to ensure relevant information has been read, with records maintained by HR.**

- **attend training to manage a report of child-on-child sexual violence and sexual harassment.**

6.4 Safeguarding responsibilities for externals clients hiring our facilities

To comply with KCSIE 2026, Ardingly College will ensure that all external clients hiring our school facilities are working in accordance with Keeping children safe in out-of-school settings 2022 guidance, along with the College's Safeguarding and Child Protection Policy. This ensures that external providers understand best practice for creating a safe environment for children in their care and gives parents and carers confidence that their child is in a safe activity or learning environment.

7.0 Recognition of students aged 18 or over.

Ardingly College strives to keep all students safe whilst present on our campus, or protect themselves from harm while off school site. It is important to recognise that this policy is primary built around the government document Keeping Children Safe In Education. This document discusses policy and procedure linked to protecting children, thus students that are aged under the age of 18. As a student turns 18, they transition into adult safeguarding and fall under alternative guidance around GDPR, safeguarding and mental health support.

As part of our care for adult learners, we recognise their additional rights in relation to information sharing and avenues of support, but we believe it is key that in emergency situations we would still contact a student's parent of carer. The following scenarios would prompt a call to a student's parent, carer or suitable alternative emergency contact, with or without the student's express consent.

This list is illustrative, not exhaustive:

- When a student has disclosed or is displaying symptoms of serious physical or mental ill health, or where there are concerns about behaviour which may indicate a serious and/or immediate risk to their or another person's physical or mental safety.
- When a student has been involved in an accident or has suffered a serious physical injury, including an episode of self-harm
- A student has attended or been admitted to hospital for non-routine treatment
- A student has an ongoing illness, and they appear to be significantly deteriorating
- When a student is the victim of a crime and/or when the student is suspected of being involved in criminal activity
- When a student cannot be located/ is believed to be a 'missing person'
- When a student ceases to engage with their studies and/or professional support and is not responding to attempts to contact them

The College may also pass contact details and relevant information to external parties if we believe there is an immediate risk to the physical or mental safety of a student or another person. This can include the police, emergency services or NHS staff within hospitals and/or mental health services.

For all non emergency situations, we will work closely with the student to help them understand the need to share concerns with parents/carers, to ensure that students are kept safe during non-school times.

Appendix 1 – Definitions of significant Harm

Definitions of Abuse

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

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and their school or Colleges policy and procedures for dealing with it.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may

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

Responding to reports of abuse

All school and College staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

The warning signs and symptoms of child abuse and neglect can vary from child to child. Children also develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign does not automatically mean a child is being abused.

Signs of abuse:

All School staff members should be aware of the signs of abuse, neglect, and radicalisation so that they are able to identify cases of children who may be in need of help or protection. The following may help staff to be aware of possible signs of abuse - There are further sources of information such as What to do if you're worried a child is being abused and the NSPCC website. However, such lists are not exhaustive -

if staff members are unsure, they should always seek advice and report concerns even where signs/indicators are not present.

Physical Abuse

- Unexplained injuries/burns
- Untreated injuries
- Bruises/abrasion around the face
- Bi-lateral injuries e.g. two bruised eyes
- Bite marks
- Bruising abrasions to lips, cheeks, outer ear

Emotional Abuse

- Excessive overreaction to mistakes
- Continual self-deprecation

- Excessive rocking, thumb sucking, hair twisting
- Extreme compliance/aggression
- Drug, alcohol, and substance misuse
- Significant peer relationship difficulties

Sexual Abuse

- Sexual awareness inappropriate to child's age, including provocative sexual behaviour
- Self-harm
- Pregnancy
- Sexually transmitted diseases
- Sudden changes in behaviour or School performance
- Fear of undressing for gym
- Depression/withdrawal
- Drug, alcohol, substance abuse

Neglect

- Constant hunger, tiredness and/or poor personal hygiene
- Untreated medical problems
- Destructive tendencies
- Social isolation
- Poor self-esteem and/or relationship with peers
- Excessive rocking, hair twisting, thumb sucking

Other indicators are:

- Children absent from education
- Child Exploitation (CSE, CCE, Honour based violence, County Lines, FGM – this must be reported

to the Police if the student is under the age of 18.)

- Radicalisation
- Mental Health Problems

Behaviours that put children in danger:

- drug taking
- alcohol abuse
- self-harm

• truanting

• cyber bullying

• Sexting (Sending Nudes and Semi Nudes)

Child on child abuse:

Children can abuse other children; this is generally referred to as child-on-child abuse and it can happen both inside and outside of school and online, and all cases will be treated equally seriously. All staff should be aware that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place. All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. All staff should be clear as to the College's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'just having a laugh' or 'part of growing up'. It should be made clear that all child-on-child abuse is unacceptable, and The College has a zero tolerance rule and all cases will be taken seriously.

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature:

• bullying (including cyberbullying).

• abuse in an intimate personal relationship between children (teenage relationship abuse.)

• physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.

• gender-based abuse.

• sexual violence, such as rape, assault by penetration and sexual assault.

• sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.

• causing someone to engage in sexual activity without consent.

• upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. All incidents of upskirting must be reported to the police. Sending Nudes and Semi Nudes – consensual and non-consensual.

• initiation/hazing type violence and rituals.

The College seeks to minimise the risk of child-on-child abuse through the PSHE programme, Behaviour and Conduct Policy, Anti-Bullying Policy and Cyber Bullying Policy.

A bullying incident should be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

All staff must be aware that children with SEN or protected characteristics, are not in itself an inherent risk factor for harm, but they can and more likely will, be targeted by other children, specifically isolation and bullying and often without outwardly showing any signs.

All staff should immediately report any concerns of child-on-child abuse to the DSL, Deputy Head Pastoral and Co-Curricular or Senior Deputy Head.

Sexual violence and sexual harassment between children in schools and Colleges:

Part 5 of KCSIE, incorporates the standalone guidance on Sexual Violence and Sexual Harassment.

Sexual violence and sexual harassment can occur between two children of any age and sex. All staff should maintain an attitude of 'it can happen here'. We will respond appropriately to all reports and concerns about Sexual violence and/or sexual harassment both online and offline, inside and outside school. 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 It may occur in school, out of school, face to face and online (both physically and verbally) and is never acceptable. Online incidents can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation.

It is important that all victims are taken seriously and both parties (where College students) are offered appropriate support and kept safe. It is important to recognise that girls are more likely to be the victims of sexual violence and that boys are more likely to be the instigators. Staff should be aware that some groups are potentially more at risk, evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

• making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

• not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys".

• challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras, pulling down trousers and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged instigator(s) attends the same school or College. Children who have experienced sexual violence display a very wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. Staff should remain alert to the possible challenges of detecting those signs and show sensitivity to the needs of the child (e.g. about attendance in lessons) irrespective of how overt the child's distress is.

Sexual violence:

It is important that school and College staff are aware of sexual violence and the fact children can, and sometimes do, abuse their other children in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

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

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

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

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

Consent:

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. It is important that consent is gained without fear of punishment or coercion. When someone is incapacitated due to substance misuse, they cannot legally consent to any sexual activity. Incapacitated doesn't just mean 'unconscious', but can apply too if, for example, the person has been sick from substance misuse, is having trouble standing up, is acting very out of character or can't walk properly. Having sex with someone when they have not explicitly consented, for example because they have consumed a lot of alcohol, can cause mental and physical trauma.

Sexual harassment:

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

• sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.

• sexual "jokes" or taunting.

• physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and Colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim).

• displaying pictures, photos or drawings of a sexual nature.

• Upskirting.

• online sexual harassment.

Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

• consensual and non-consensual sharing of nude and semi-nude images and videos.

• sharing of unwanted explicit content.

• sexualised online bullying.

• unwanted sexual comments and messages, including, on social media.

• sexual exploitation; coercion and threats.

• coercing others into sharing images of themselves or performing acts they're not comfortable with online.

All staff must report and respond appropriately to Sexual harassment (as set out above), as it creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

When responding to concerns related to child-on-child sexual violence or sexual harassment we will follow guidance outlined in KCSIE 2026 Part 5.

Harmful Sexual Behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context. When considering HSB, both ages and the stages of development of the children are critical factors.

Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential specialist support and advice on HSB is available from the specialist sexual violence sector and sources are listed in Annex B in KCSIE.

HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in

the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that all staff report concerns of a child displaying HSB to the DSL so that they are offered appropriate support through the College's pastoral system. Students can also be supported to access external agencies such as Childline, The Mix, LifeCentre or The Lucy Faithfull Foundation's "Shore Space", a confidential chat service to assist young people who are concerned about their own or someone else's sexual thoughts or behaviour.

Sharing Nudes and Semi Nudes (Sexting):

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

• View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL).

• Delete the imagery or ask the student to delete it.

• Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).

• Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers.

• Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the student(s) that they will receive support and help from the DSL.

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

• Whether there is an immediate risk to student(s).

• If a referral needs to be made to the police and/or children's social care.

• in all cases, images or videos should not be viewed. You should never copy, print or share sexual images of a child or young person (Childnet, 2016; UKCCIS, 2017a and 2017b).

• You should only search devices if the child is at immediate risk of harm. The Department for Education (DfE) provides guidance for head teachers, staff and governing bodies in England on searching electronic devices (DfE, 2020).

• What further information is required to decide on the best response.

• Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown).

• Whether immediate action should be taken to delete or remove images or videos from devices or online services.

• Any relevant facts about the students involved which would influence risk assessment.

• If there is a need to contact another school, College, setting or individual.

• Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved).

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

• The incident involves an adult.

• There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs).

• What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.

• The imagery involves sexual acts and any student in the images or videos is under 13.

• The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self harming).

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Allegations regarding child-on-child abuse (including sexual violence and/or harassment):

Child-on-child abuse is abuse by one or more students against another student bullying behaviour is damaging and may lead to abuse; there is also the possibility that relationships between students are abusive and that both instigator and victim might be 'at risk'. Students and staff should be alert to these possibilities and where there is reasonable cause to suspect a child is suffering they should refer to the DSL verbally or report on schools safeguarding software marking as 'Safeguarding'. Allegations of child-on-child abuse with be investigated following relevant guidance. Victims, instigators and any other student affected by child-on child abuse will be supported in College through the pastoral team, tutors, house staff and the Health centre.

The safety and the well-being of the victim(s) is paramount and therefore the first priority is to ensure the safety of the victim(s) – physical safety or emotional well-being – and minimise the possibility of further abuse. Police may be informed at the outset of any harmful sexual behaviours, such as grabbing bottoms, breasts and genitalia, which are potentially criminal in nature. Rape, assault by penetration and sexual assaults will be passed to the Police.

Careful consideration will be given to the appropriate response to any report of child on child sexual violence and/or sexual harassment. Where there has been a report of sexual

harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence should consider:

• The victim.

• Whether there may have been other victims.

• The alleged instigator.

• The other children (and, if appropriate staff) at the College.

• Time and location of the incident and any action required to make the location safer.

For sexual violence and sexual harassment also consider account the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children involved, any power imbalance between the children, for example the instigator is older, more mature, confident and well-known social standing. Whether the incident is a one-off or sustained pattern, that sexual violence and sexual harassment can take place within intimate personal relationships between children, the importance of understanding intra familial harms and any necessary support for siblings following incidents, the on-going risks present and other related issues and the wider context.

Risk assessments will be recorded and kept under review. In relation to a report of a sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. This may necessitate separating the instigator and victim from any classes they share. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor would a victim ever be made to feel ashamed for making a report. The school's anti bullying and behaviour policies deal with the vast majority of issues arising between children in the school and, in most cases, the procedures outlined in those policies will suffice.

However, there may be cases where the serious nature of the abuse or the persistent and prolonged nature of the abuse, requires further intervention or the involvement of other agencies. If the DSL decides to make a referral to the IFD and/or report to the police against a victim's wishes, the reasons should be explained to the child and appropriate specialist support offered. This may be in the form of school counsellors or specialist external agencies. Referrals can be made by any member of staff with appropriate training. All matters that would require Early Intervention, Family help or Social care referrals should be agreed in DSL/DDSL meetings.

All details of any allegation will be investigated and dealt with, in addition, records of events will be logged and filed with the DSL.

Appendix 2 - Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues, this includes misinformation, disinformation (including fake news) and conspiracy theories

To address this, our School aims to:

Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and Governors. To assist with safeguarding procedures, filtering and monitoring technology is often supported with Generative AI products. As a school we ensure that our filtering and monitoring systems fall within the DfE's Generative AI: product safety expectations.

The DfE expects that Generative AI products must:

- effectively and reliably prevent access to harmful and inappropriate content by users;
- maintain robust activity logs, either by the Generative AI product itself or additional technology;
- be secured against malicious use or expose to harm;
- prioritise transparency and child safety in its design and be operated with accountability; and
- respect data protection and intellectual property laws.

Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

Set clear guidelines for the use of mobile phones for the whole school community

Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks we will:

Educate pupils about online safety as part of our curriculum. For example:

• The safe use of social media, the internet and technology

• Keeping personal information private

• How to recognise unacceptable behaviour online

• How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyberbullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year

Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

• Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present

• Staff do not take pictures or recordings of pupils on their personal phones or cameras

Make all pupils, parents/carers, staff, volunteers and Governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems

Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

Safe use of mobile devices in EYFS

All of the above conditions and expectations apply to staff working in or visiting EYFS, however, due to the very young age of the children in this part of the school additional rules must apply, particularly with regard to mobile phones or other devices that may record images.

Young children invest a great deal of trust in adults, particularly those in positions of authority, and are unlikely to question their actions even if the actions make the child feel uncomfortable or unhappy.

Very young children may not have the understanding to know when something is inappropriate or the vocabulary to express their concerns. It is therefore very important that we have in place mechanisms to protect them.

No member of staff in the EYFS area of the school should have their mobile phone out or in use during the working day (i.e. when children are still on site)

Mobile phones should be stored out of sight of the children and only accessed during recognised break times in an area where there are no children, such as the staffroom.

Staff, parents or pupils visiting the school and any other visitors to the site should keep any mobile devices out of sight and not use them in the presence of children. No parent should be using a personal mobile device or phone within any area used by children to record images.

Staff MUST challenge anyone they see doing so and report the incident to the Early Years Co-coordinator or Head of Pre-Prep as soon as possible. Here we recognise that events such as Sports Day and concerts are very special in a child's life. Parents may take photographs or video recordings of these occasions to celebrate their child's, but only with express permission of the Head Teacher. However, videos and images involving children other than their own should not be uploaded to the internet, including social media. Any recordings and photographs should be for private use only.

The school provides staff with cameras and devices for the recording of images of children and only these devices may be used for this purpose.

Under no circumstances should personal mobiles, personal devices or other mobile devices be used to take images of children.

Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

Our School recognises that AI has many uses but has the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real, staff are trained to recognise and respond to these risks.".. Staff should not use the school name and that of any pupils or staff when using any AI programme. If personal and/or sensitive data is entered into an unauthorised generative AI tool, the school will treat this as a data breach, and will follow the personal data breach procedure outlined in the Data Protection Policy.

Our School will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying and/or behaviour policy.

Deepfakes, Digitally Manipulated Images and Safeguarding

The College recognises that the creation, sharing or use of deepfakes and digitally manipulated images or videos presents a significant and emerging safeguarding risk. These technologies can be used to create realistic but false representations of individuals, including pupils and staff,

and may be used to facilitate bullying, harassment, coercion, sexual exploitation or reputational harm. The College takes a zero-tolerance approach to any misuse of such technology.

Deepfake-related incidents will be treated as a serious safeguarding concern, particularly where they involve sexualised content, exploitation, intimidation, or harm to a child's dignity, wellbeing or safety. All staff are expected to be vigilant to indicators of misuse, including sudden distress linked to online activity, reports of manipulated images, or coercion involving digital material, and must report concerns immediately in line with safeguarding procedures.

The College will respond to incidents in accordance with KCSIE 2026 expectations, including:

- treating victims with sensitivity and taking their concerns seriously
- assessing risk and implementing appropriate safeguarding and pastoral support
- considering whether to involve external agencies, including children's social care, the police, or online safety specialists
- ensuring that harmful content is reported and removed wherever possible

The College also recognises that such technology may be used in peer-on-peer abuse, including the creation or sharing of sexually explicit or humiliating content. These behaviours will be addressed in line with the College's child-on-child abuse procedures and behaviour policy.

Preventative education will be delivered through the curriculum, including online safety and Relationships and Sex Education (RSE), to ensure pupils understand:

- the risks associated with deepfakes and manipulated media
- the legal and ethical implications of creating or sharing such content
- how to report concerns and seek help

Staff receive regular training to ensure they understand emerging risks linked to artificial intelligence and digital technologies. The College will maintain appropriate filtering and monitoring systems and regularly review these in light of evolving threats.

For further guidance please see the College Artificial Intelligence Policy

Related safeguarding policies:

This Policy to be read in conjunction with:

Staff Professional Code of Conduct Recruitment policy

KCSIE part one Annex A

Whistleblowing Policy

Low Level Concerns Policy

Acceptable Use of ICT & Social Media Policy

Cyberbullying Policy

Anti-bullying Policy

Missing or Absent Student and Attendance

Policy Mental Health and Well-being Policy

Behaviour and Conduct Policy

Visiting Speaker Policy Disciplinary Policy

Dealing with Allegations against Staff policy Staff Handbook

RSE Policy Safer Recruitment Policy and Procedure

Whole College Artificial Intelligence Policy

Appendix 3 - Other safeguarding issues

Child abduction and community safety incidents:

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

Child Criminal Exploitation (CCE):

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) 'may involve an exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the instigator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:

• children who appear with unexplained gifts or new possessions;

• children who associate with other young people involved in exploitation;

• children who suffer from changes in emotional well-being;

• children who misuse drugs and alcohol;

• children who go missing for periods of time or regularly come home late; and

• children who regularly miss school or education or do not take part in education.

Child Sexual Exploitation (CSE):

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the instigator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

• children who have older boyfriends or girlfriends; and

• children who suffer from sexually transmitted infections or become pregnant.

County lines:

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, student referral units, special educational needs schools, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

• go missing from school or home and are subsequently found in areas away from their own.

• have been the victim or instigator of serious violence (e.g. knife crime).

• are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs.

• are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.

• are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity.

• owe a 'debt bond' to their exploiters.

• have their bank accounts used to facilitate drug dealing.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Children and the court system:

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children absent from education:

All staff should be aware that children who are absent, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child being absent in future. Staff should be aware of their school's or College's unauthorised absence and children absent from education procedures.

Children with family members in prison:

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

Cybercrime:

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

• unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded.

• 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources.

• making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Domestic abuse:

The Domestic Abuse Act 2021 (Part 1) defined domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other, including where they see, hear or experience its effects' in relation to domestic abuse:

• physical or sexual abuse,

• violent or threatening behaviour,

• controlling or coercive behaviour,

• economic abuse (adverse effect of the victim to acquire, use or maintain money or other property, or obtain goods or services); and

• psychological, emotional or other abuse

People are 'personally connected' when they are or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse, and they are related to the abusive person.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247

Operation Encompass:

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day.

This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

FGM:

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

FGM mandatory reporting duty for teachers: Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or College's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

Forced marriage:

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some instigators use perceived cultural practices as a way to coerce a person into marriage. Schools and Colleges can play an important role in safeguarding children from forced marriage.

Homelessness:

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

Mental health:

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education. Further information can be found in our Mental Health and Well-being Policy

Modern Slavery and the National Referral Mechanism:

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.

Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Preventing radicalisation:

Children are susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or Colleges' safeguarding approach.

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

1. negate or destroy the fundamental rights and freedoms of others; or

2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and

democratic rights; or

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

• Radicalisation refers to the process by which a person legitimises support for, or use of, terrorist violence'

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

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology.

Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people who are susceptible to radicalisation into terrorism' and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral. Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised. Further information and a list of such indicators can be found at Radicalisation and Extremism

The College's Designated Safeguarding Lead (and any deputies) should be aware of local procedures for making a Prevent referral.

The Prevent duty:

All schools and Colleges are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the Prevent duty.

Channel:

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are susceptible to being drawn into terrorism and consider the appropriate support required. A representative from the school or College may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Sexual violence and sexual harassment between children in schools and Colleges:

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into Colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing.

This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged instigator(s) attends the same school or College. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim

should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Detailed advice is available in Part five of this guidance.

Serious Violence:

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

• increased absence from school.

• a change in friendships or relationships with older individuals or groups.

• a significant decline in performance.

• signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries

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

The likelihood of involvement in serious violence may be increased by factors such as:

• being male

• having been frequently absent or permanently excluded from school

• having experienced child maltreatment and having been involved in offending, such as theft or robbery

Sharing Nudes and semi-nude images

While sharing photos and videos online and via smartphones is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives, there are risks associated with the production and distribution of sexual and explicit images both in terms of the law (Protection of Children Act 1978, as amended by the Sexual Offences Act 2003 and the guidance issued March 2024 , Sharing Nudes and Semi-nudes) and in relation to the possible effects on a child's wellbeing if imagery of this nature is shared beyond their control. This guidance separates incidents of those under 18 sharing nude or semi-nude images into two broad areas: 1 - aggravated and 2 - experimental.

Aggravated can be sub-categorised into the following areas:

• An adult is involved.

• Youth only and there is an intent to harm – for example used to threaten or exploitation, Youth only and reckless misuse – for example sharing images widely without consent but no intent to harm.

Experimental can be sub-categorised into

• Where images have been shared within a romantic context.

• Where young people share images of themselves with others for sexual attention.

• Another reason.

In certain circumstances the DSL may have to refer an incident of this nature to the police, but Schools are not obliged to do this in all cases, as referenced in Sharing Nudes and Semi-Nudes, UKCCIS 2020.

Staff should refer to the DSL any incidents where it is thought that explicit or sexual images of young people may have been made, distributed or be in the possession of a student. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences and staff should take any direct disclosure very seriously. Staff must not request to view the imagery but should confiscate a device which contains suspected imagery and pass this on to the DSL.

The DSL, with input from the Head, will follow the guidance set out including conducting an initial review meeting and considering, in certain circumstances, immediate referral to police or children's social care.

Where referral to outside agencies is not considered necessary, the DSL will work with appropriate pastoral staff such as the Housemaster/Mistress, Form Tutor and School Counsellor and, in most cases the child's parents, acting in the best interests of the student and to ensure that they are safeguarded, supported and educated.

The sharing of sexual imagery of people under 18 by adults constitutes child sexual abuse and such cases would always be referred to the police.

So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage):

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple instigators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions: If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since

31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

Upskirting:

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a persons clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim. Any incident of upskirting must be reported to the police.