



# **WELLESLEY PREP SCHOOL**

## **SAFEGUARDING AND CHILD PROTECTION POLICY**

This policy applies to all parts of Wellesley Prep School including  
The Early Years Foundation Stage and Nursery.

September 2026

Next review date: September 2027

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### 1. INTRODUCTION

Wellesley Prep School recognises its responsibilities for all aspects of safeguarding and child protection and the safety of pupils is always accorded the highest priority.

*Everyone who comes into contact with children and their families (or carers) has a role to play in safeguarding and must ensure that their approach is child*

*centred: this means considering at all times what is in the best interests of the child.*

This policy pays due regard to:

- Keeping Children Safe in Education (KCSIE) (September 2026)
- Working Together to Safeguard Children (WT) (2018 updated Dec 2023)
- The Education (Independent School Standards) Regulations (2014)
- Prevent Duty Guidance (2023 updated 2024)
- Statutory Framework for the Early Years Foundation Stage (2026)
- Advice and guidance from Hampshire Safeguarding Children Partnership

*Note: All references to KCSIE within this policy refer to KCSIE September 2026  
A full list of guidance which has informed this policy may be found in Paragraph 28.*

Other school policies which are integral to the school's overarching approach to safeguarding include but are not limited to:

*Anti-Bullying Policy, Attendance Policy, Behaviour Policy, Digital Usage Policy, First Aid & Administering Medicines Policy, Intimate Care Policy, Low-level Concerns Policy, PSHEE and RSHE Policy, Restrictive Interventions and Reasonable Force Policy, Safer Recruitment Policy, Whistleblowing Policy, Staff Code of Conduct.*

*Our school promotes a safe, healthy, and sustainable environment, recognising that ecological well-being directly impacts pupil welfare, emotional health, and our collective duty to protect children now and in the future.*

Safeguarding and promoting the welfare of children is defined by KCSIE as:

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

Staff must also be aware of pupils encountering significant harm beyond their homes and families, recognising that the different relationships that young people form in their neighbourhoods, schools and online can also feature violence and abuse. This is termed contextual safeguarding.

*Appendix 1 of this policy gives details of some of the types of abuse and safeguarding issues with which staff should be familiar.*

## **2. APPLICATION**

This policy applies to all members of staff and volunteers, is available to parents on request and is published on the school's website. It applies whenever staff or volunteers are working with pupils, including when this is away from the school, for

example on an educational visit. When the word “staff” is used, it applies to all categories of staff including supply and self-employed staff, contractors, governors, volunteers, students, and those on work experience.

### 3. KEY PERSONNEL

| SCHOOL CONTACTS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                            |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| School contact details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 01256882707                                                                                                                                |
| DESIGNATED SAFEGUARDING LEAD (DSL)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Mr Dan Bickford<br>Deputy Head (pastoral)<br><a href="mailto:d.bickford@wellesleyprep.co.uk">d.bickford@wellesleyprep.co.uk</a>            |
| DEPUTY DESIGNATED SAFEGUARDING LEAD                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Mr Angus McDonald<br>Headmaster<br><a href="mailto:a.mcdonald@wellesleyprep.co.uk">a.mcdonald@wellesleyprep.co.uk</a>                      |
| DEPUTY DESIGNATED SAFEGUARDING LEAD (EYFS and Pre Prep)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Miss Becky Gibson-James<br>Head of Prep Prep<br><a href="mailto:b.gibson-james@wellesleyprep.co.uk">b.gibson-james@wellesleyprep.co.uk</a> |
| DEPUTY DESIGNATED SAFEGUARDING LEAD                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Mr Scott Baldwin<br>Assistant Head (wellbeing)<br><a href="mailto:s.baldwin@wellesleyprep.co.uk">s.baldwin@wellesleyprep.co.uk</a>         |
| DEPUTY DESIGNATED SAFEGUARDING LEAD                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Mrs Jo Douglas<br><br>Nursery Manager<br><br><a href="mailto:j.douglas@wellesleyprep.co.uk">j.douglas@wellesleyprep.co.uk</a>              |
| NOMINATED SAFEGUARDING GOVERNOR                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Alan Winter<br><a href="mailto:a.winter@wellesleyprep.co.uk">a.winter@wellesleyprep.co.uk</a>                                              |
| CHAIR OF GOVERNORS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Jim Massey<br><a href="mailto:j.massey@wellesleyprep.co.uk">j.massey@wellesleyprep.co.uk</a>                                               |
| LOCAL AUTHORITY CONTACTS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                            |
| The school follows the local procedures of Hampshire Safeguarding Children Partnership (HSCP).<br><a href="https://hipsprocedures.org.uk/page/contents">https://hipsprocedures.org.uk/page/contents</a>                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                            |
| <b>CONCERNS ABOUT A CHILD</b><br>Concerns about a child must be referred to the Local Authority in which the child resides.<br>For a child living in the school's LA of Hampshire:<br>Referral to Children's Social Care or Early Help should be made by completing an inter-agency referral form through this link<br><a href="https://childrenandfamiliesportal.hants.gov.uk/s4s/FormDetails/FillForm?formId=279">https://childrenandfamiliesportal.hants.gov.uk/s4s/FormDetails/FillForm?formId=279</a><br>Where a child resides outside Hampshire, the DSL will contact the relevant LA by the appropriate means. |                                                                                                                                            |
| If a professional believes that a child may be at risk of significant harm, they should both telephone the MASH (or out of hours children's services) and complete an interagency form. <ul style="list-style-type: none"> <li>Hampshire MASH: 0300 555 1386</li> </ul>                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                            |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>• Out of hours: 0300 555 1373</p> <p><b>If a child is in immediate danger, contact the Police on 999</b></p>                                                                                                                                                                                                                                                                                                                                               |
| <p><b>CONCERNS ABOUT THE CONDUCT OF AN ADULT</b></p> <p>Safeguarding concerns about the conduct of an adult must be made to the Hampshire Local Authority Designated Officer.</p> <p><b>LADO</b></p> <p><b>Tel: 01962 876364</b></p> <p><a href="https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/allegations">https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/allegations</a></p> |
| <p><b>PREVENT</b></p> <p>Concerns about radicalisation of children should be referred using the procedures above.</p> <p>DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: 020 7340 7264 and <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a></p>                                                                                                                      |

#### 4. AIMS

The aims of this policy are:

- a) To ensure staff understand the need to establish and maintain an environment where all pupils feel secure and know they can talk to any adult in school if they are worried
- b) To ensure that effective safeguarding procedures are in place and are followed by all staff in accordance with national guidance and the locally agreed inter-agency procedures of Hampshire SCP.
- c) For all staff to be fully aware and confident of their responsibilities to identify concerns about the welfare of pupils and deal with any disclosures
- d) To ensure staff are aware of the need to record concerns and how to do this effectively
- e) To provide a systematic means of monitoring pupils known or thought to be at risk of harm, as well as support for those pupils
- f) To identify, monitor and support those pupils who may be in need of Family Help including support from other agencies e.g. Child and Adolescent Mental Health Services (CAMHS)
- g) For all staff to be fully aware of the need to report any concerns about the actions of members of staff, volunteers or visitors
- h) To support pupils' development in ways that will foster security, confidence and independence
- i) To be alert to the risks to pupils online and to also ensure, through appropriate filtering and monitoring systems, that they are safeguarded in school from potentially harmful and inappropriate online material (Also see E-Safety Policy)
- j) Include opportunities in the curriculum for personal, social and health education (PSHE) and Relationships & Sex Education for pupils to build resilience and develop the skills they need to recognise and stay safe from abuse, including abuse or exploitation through technology of all kinds. This includes an awareness of extremism and radicalisation.
- k) To promote effective working relationships with other agencies
- l) To ensure that all staff are recruited in accordance with the school's Recruitment Policy and in accordance with statutory guidance

#### 5. DESIGNATED SAFEGUARDING LEAD (DSL)

The school has appointed a Designated Safeguarding Lead (DSL) who is a member of the Senior Leadership Team and four Deputy Designated Safeguarding Leads (DDSL). All have the necessary status, training and authority to be responsible for matters relating to the welfare of pupils, including child protection. In accordance with the Early Years Foundation Stage ("EYFS") statutory framework, the DSL is also responsible for safeguarding in relation to pupils within the EYFS.

### **5.1 RESPONSIBILITIES OF THE DSL**

The main responsibilities of the DSL are:

- a) To promote a culture of safeguarding so the welfare and best interests of children is embedded within all the school's processes and procedures
- b) To coordinate and monitor safeguarding, being the first point of contact for parents, pupils, staff and external agencies
- c) Immediately upon the receipt of any concern, to act upon the report
- d) To work with Family Help services and other safeguarding partners in accordance with local safeguarding arrangements and thresholds.
- e) To understand child protection processes, including Section 17 (child in need) and Section 47 (child suffering, or likely to suffer, significant harm) assessments under the Children's Act (1989) and 'Early Help' processes
- f) To ensure the safeguarding governor is informed about safeguarding concerns including any referrals
- g) To attend case conferences or other multi-agency planning meetings and to contribute to assessments and reports
- h) To be responsible for procedures in the school and to keep detailed, accurate records, including action taken. This includes keeping records for those cases where there is no need to make a referral to any other service
- i) To provide a systematic means of monitoring and supporting pupils known or thought to be at risk of harm or where there are ongoing concerns
- j) To promote the educational achievement and care of any children who are looked after. The DSL will take lead responsibility for any looked-after children.
- k) To ensure all new staff receive induction training in safeguarding and understand their responsibilities
- l) To maintain a regular training programme for all members of the school's staff and volunteers in line with KCSIE and advice from Hampshire SCP
- m) To ensure that all staff have confirmed that they have been provided with a copy of the Safeguarding Policy (i.e., this document), KCSIE and have read and understood them
- n) To ensure that all staff are assisted to understand and discharge their roles and responsibilities as set out in KCSIE and in this policy.
- o) To ensure that when pupils leave the school any child protection information is copied for the new school within 5 days and transferred securely and separately from the main file
- p) To ensure that a record of any safeguarding information is obtained from any previous school or nursery for a new pupil joining the school
- q) To monitor the confidentiality, keeping and storage of records in relation to safeguarding. The school's hard copy records on child protection are kept locked in the Head's office and are separated from routine pupil records. Access is restricted to the Head, DSL and Deputy DSL.

- r) To ensure the Safeguarding Policy is reviewed annually in conjunction with the Head and the Governors, such review to include its effectiveness in practice
- s) To ensure the Safeguarding Policy is reviewed in the event of an incident or change in legislation, and that any remediation necessary in policy or procedures is given immediate effect
- t) To be responsible for overseeing online safety in the school with the support of the school's IT manager, including understanding the filtering and monitoring systems in place and conducting an annual audit to ensure effectiveness
- u) To ensure the Safeguarding Policy is available on the school's website
- v) To ensure a termly report is sent to the Safeguarding Governor and the annual Safeguarding Audit is presented to the Governing Board.

## **5.2 DEPUTY DSL(s)**

The Deputy DSLs are trained to the same level as the DSL and in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils, ensuring that the DSL receives copies of all reports and referrals and is fully briefed as soon as possible on his return.

The ultimate lead responsibility for safeguarding and child protection rests with the DSL. This responsibility will not be delegated, except under exceptional circumstances such as long-term absence of the DSL.

During term time, the DSL and/or the Deputy DSLs are available during school hours, either in school, or contactable by telephone, for staff, pupils or parents to discuss any safeguarding concerns. The DSL or a DDSL is also available to provide appropriate support during trips, sports camps or residential trips.

## **6. RESPONSIBILITIES OF STAFF**

**(including supply staff, volunteers and those not working directly with children)**

- a) to provide a safe and supportive learning environment where pupils feel cared for and valued
- b) to read and understand Part One of Keeping Children Safe in Education.
- c) to understand and follow the procedures detailed in the School's Safeguarding Policy and Procedures i.e. this document
- d) to adhere to the school's Staff Code of Conduct and other school policies
- e) to undertake regular safeguarding training, at least annually
- f) to be alert to the signs of abuse, exploitation and neglect, including child-on-child abuse, and to report any concerns to the DSL immediately
- g) to be aware that that even if there are no reports of child-on-child abuse, or any other form of abuse, it does not mean it is not happening, it may just not be being reported.
- w) To understand the child protection process, including Section 17 (child in need) and Section 47 (child suffering, or likely to suffer, significant harm) assessments under the Children's Act (1989) and 'Early Help' processes
- h) to help pupils understand how to keep themselves safe and manage risk
- i) to be alert to absenteeism of any pupils and inform the DSL of any concerns.
- j) to be alert to wider environmental factors that are a threat to a child's safety and/or welfare (Contextual Safeguarding)

- k) to report to the Head any concerns about the conduct of adults, including low level concerns (this includes behaviour outside school that might indicate an individual is unsuitable to work with children)

## **7. RESPONSIBILITIES OF THE HEAD**

- a) To promote an overarching culture of safeguarding so the welfare of children is embedded within all the school's processes and procedures operating with the best interests of the child at their heart.
- b) To have read and understood all parts of KCSIE thereby ensuring that the school's policy and procedures follow statutory guidance.
- c) To ensure that KCSIE Part One and the Safeguarding Policy are understood and implemented effectively by all staff.
- d) To allocate sufficient time, training and resources to enable the DSL and Deputies to carry out their roles effectively.
- e) To ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively in accordance with the school's Whistleblowing procedures.
- f) To ensure pupils are taught about keeping safe, including online
- g) To ensure systems are in place, which are easily understood and easily accessible for pupils to report concerns, including abuse.
- h) To deal with any reports regarding concerns or allegations related to the conduct of adults (this includes behaviour outside of school that might indicate an individual is unsuitable to work with children), including low level concerns
- i) to seek advice and liaise with the Local Authority Designated Officer (LADO) regarding concerns about adults
- j) To undertake training on safer recruitment at regular intervals
- k) To monitor the effectiveness of this policy and its procedures in liaison with the SLT and Governing Body and to remedy any deficiencies immediately.

## **8. RESPONSIBILITIES OF THE GOVERNORS**

- a) To ensure safeguarding and child protection underpin all relevant aspects of process and policy development, and that processes and policies operate with the best interests of pupils at their heart.
- b) To ensure policies, procedures and training in the school are effective and comply with the law at all times
- c) To ensure there is a nominated governor for safeguarding, who takes leadership responsibility at Board level for all safeguarding matters. (Contact details are shown in paragraph 2 on Key Personnel.)
- d) To ensure the nominated governor has the required knowledge, skills and expertise to take leadership responsibility for the school's safeguarding arrangements
- e) To ensure there is an effective Safeguarding Policy in place, which is consistent with statutory guidance and the requirements of Hampshire SCP
- f) To ensure the policy is available publicly on the school website
- g) To ensure comprehensive child protection files are maintained, which show a clear chronology and the reasons for decisions taken
- h) To ensure there are other appropriate policies and procedures in place to safeguard and promote children's welfare including, but not limited to, a Staff Code of Conduct, Anti-bullying Policy, Behaviour Policy, PSHEE and Relationships & Sex Education Policy, Digital Usage Policy.

- i) To ensure there is an effective Staff Code of Conduct (including online conduct) which is implemented throughout the school.
- j) To ensure that the school holds at least two emergency contact numbers for each child.
- k) To ensure that safer recruitment procedures are followed in accordance with KCSIE and recorded in the school's Single Central Record (SCR).
- l) To ensure online safety is integrated into the school's overarching approach to safeguarding
- m) To ensure the school's IT systems have appropriate monitoring and filtering systems installed, to block harmful and inappropriate content without unduly restricting access for educational purposes, and to review the effectiveness at least annually
- n) To ensure that the leadership team and relevant staff have an awareness and understanding of the online safety provisions in place, manage them effectively and know how to escalate concerns when identified.
- o) To have policies and procedures in place relating to the use of cameras and technology within the EYFS.
- p) To review the Safeguarding Policy at least annually, including the effectiveness of procedures and their implementation.

## **9. CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES OR PHYSICAL HEALTH ISSUES**

Staff are made aware that children with special educational needs and/or disabilities as well as other vulnerable groups may be especially at risk of abuse and are also more prone to peer group isolation or bullying. Therefore, extra care must be taken to correctly interpret apparent signs of abuse or neglect, acknowledging that behaviour, mood or injury may relate to possible abuse and not the SEN or disability. Staff must be aware that:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- these children can be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

## **10. WHAT TO DO WHEN THERE ARE CONCERNS ABOUT A CHILD OR IF A CHILD MAKES A DISCLOSURE**

- a) It is important that children receive the right help at the right time to address risks and prevent issues escalating. It is therefore vital that all staff understand their responsibility to:
  - Identify and refer **any concerns** about a child
  - listen to the views of the child
  - keep clear written records

- reassess concerns if the child's situation does not improve
- share information quickly and challenge inaction
- b) Staff see children regularly and know them well, so are in a unique position to observe changes in behaviour, neglect, abuse, emotional distress or failure to thrive. It is important that staff strive to build trusted relationships with children which facilitates communication.
- c) **Staff must 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
  - may feel embarrassed, humiliated, or could be being threatened
  - it is more common for concerns to arise about a child of prep school age through staff observations and general conversation than a direct disclosure
  - there may be a change in a pupil's art or written work which may show signs of confusion or distress.
  - younger pupils may talk about, or demonstrate behaviour, through their play which gives rise to concerns
  - concerns may relate to a parent/carer's interaction with a pupil or issues such as parental alcohol misuse, domestic abuse or mental health

*Staff must maintain a professional curiosity as in many safeguarding cases it is not one major incident which triggers a referral, but a series of seemingly minor events. It is therefore of the utmost importance that all concerns are recorded and reported to the DSL immediately.*

### **10.1 Procedures if staff have a concern about a pupil**

- a) *If a member of staff is concerned about a pupil the matter should be referred to the DSL, or the Deputy in the DSL's absence, immediately.*
- b) Staff may speak directly to the DSL first to discuss their concerns about a pupil or may enter their concern straight on to ISAMS (the school's management system for safeguarding) for attention by the DSL. In either case, reporting a concern must not be delayed and must be reported as soon as possible and always on the same working day. (also see later section on recording concerns)
- c) In all instances, a written record must be made by the member of staff on ISAMS, which all staff have access to.
- d) Any member of staff who cannot access ISAMS for any reason must always contact the DSL directly, and without delay (e.g. visiting club taker or peripatetic music staff, parent volunteers).

### **10.2 Procedures for staff if a pupil discloses information**

The member of staff must:

- **Listen carefully** and keep an open mind. Staff should not take a decision as to whether or not abuse has taken place. Note taking may cause the child to stop talking so it is preferable to focus solely on the child, paying particular attention to the language used so it may be recorded accurately after the conversation is finished.
- **Reassure** the pupil, if they have made a disclosure, that he/she is right to tell

and is not to blame. A pupil must never be given the impression that they are creating a problem by reporting abuse. Nor should a pupil ever be made to feel ashamed for making a report.

- **Do not promise confidentiality.** Explain that you must make sure that the pupil is safe, and you will need to ask other adults to help you to do this.
- **Do not cross question the pupil.** You must not ask leading questions, that is, a question which suggests its own answer. Let the pupil tell you what he or she wants to and no more. The pupil may be interviewed by a specialist later and too much questioning may prejudice later investigations or cause the child to become anxious and retract his/her information.
- **Be prepared to follow up** with the pupil, but only in conjunction with advice from the DSL.
- **Be aware that** younger pupils may disclose issues of a safeguarding nature in general conversation rather than as a specific disclosure to a member of staff.
- **Do not attempt any examination** or remove a pupil's clothes to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury. It may be possible to observe the pupil during the normal school routine, for example in a physical education (PE) class. If a pupil wants to show you his or her injuries, make sure that a colleague is with you as a witness. Try to arrange for one of you to be the same sex as the pupil
- **Do not attempt to investigate** matters further; your role is to listen, record and report your concerns to the DSL.
- When the pupil has finished talking, make sure that he/she feels secure and, if appropriate, explain what you are going to do next.

*If a concern or disclosure involves technology or online images staff must follow the specific advice in Paragraph 13 of this policy.*

### **10.3 Mechanisms for pupils to report concerns**

The school has a strong pastoral system and promotes an ethos where pupils feel safe to share information about anything that is worrying them.

- a) The School Council provides a 'pupil voice' and encourages pupils to develop the rules and boundaries of acceptable behaviour.
- b) Pupils are encouraged to use the two 'Worry boxes' located in two of the school's buildings to share any concerns that they may have. The boxes are checked regularly. In Pre-Prep, there are personalised versions of this in Pre-Prep classrooms.
- c) There is an annual pupil survey conducted, and results are analysed by senior staff.
- d) There are posters around the school reminding pupils about who they can talk to, and this is also regularly addressed in assemblies and PSHEE lessons. The emphasis is that all staff are here to help.

### **10.4 Support for staff**

The school recognises that staff who have become involved with a pupil who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. The school will support such staff by providing an opportunity to talk through their anxieties with the DSL and will seek further support as appropriate.

The DSL has the support of the safeguarding governor and the Headmaster. There are 12 hours a year of free counselling available to all staff.

Safeguarding summaries are shared with the governors which further enables the DSL to request any further support. The NSPCC helpline is also available if staff have unease about the way a concern is being handled by the school. Staff can call 0800 028 0285 or email [help@nspcc.org](mailto:help@nspcc.org).

### **11. Recording safeguarding concerns**

Abuse and neglect are complex issues and are rarely standalone events; therefore, they require a culture of vigilance, professional insight and respectful challenge, as well as effective recording, reporting and monitoring systems.

- a) Staff have an appropriate level of access to ISAMS which enables them to record concerns. The DSL and Deputy DSL have full access to enable them to record actions and store all safeguarding records securely. Where staff such as Peripatetic teacher does not have direct access to ISAMS, there is a channelling mechanism for those without direct access to ISAMS email the DSL with concerns. The DSL will then report this via ISAMS.
- b) All safeguarding concerns must be recorded on ISAMS, the school's management system for safeguarding.
- c) If the DSL is not available for any reason a Deputy DSL must be contacted to deal with the concern initially.
- d) Regarding any conversations directly with a pupil or overheard, staff must keep a detailed written record of the conversation and concerns arising.
- e) The record should include the date, time and place of the conversation, who was present and what was said by the pupil. The record should use names, not initials, for all references to people.
- f) The record should be specific. Record actual behaviour and language used by a pupil rather than more vague terms such as the child used inappropriate language/behaviour.
- g) Staff should make the record as soon as possible after speaking to the pupil so the pupil is not alarmed by notes being taken and before the conversation is discussed with anyone else. It is important to record as much as can be remembered, using the pupil's own words.
- h) The record should contain facts and information only, taking care to avoid personal opinion.
- i) Notes made of such disclosures or concerns could become part of a statutory assessment by Children's Services and/or part of a criminal investigation so must be completed accurately.
- j) The report must be completed so all the facts known are recorded and so the DSL has a full picture of what has given rise to the concern.
- k) It is important to record all concerns regarding the welfare of pupils, even those which may appear minor. This is because it is common for minor pieces of evidence to emerge over time and build up a pattern. This type of recording also allows information from various members of staff to be collated.
- l) Staff must not investigate further or speak to parents or other staff about concerns. They must contact the DSL who will then determine the next course of action.

### **12. Action by the DSL on receipt of a concern about a child**

- a) On receipt of the safeguarding report, the DSL must record the decisions made and action taken. Action will depend on the nature of the concern. It may include one or more of the following:
  - monitoring the pupil in school
  - a discussion with parents
  - early help intervention from the school and/or another agency
  - referral to Children's Services
  - referral to the LADO
  - report to the police
- b) The DSL is also aware of the requirement, in specific circumstances, for children to have an Appropriate Adult. Further information can be found in the Statutory guidance – Police and Criminal Evidence Act (PACE) Code C 2019
- c) Any new concern or information about a pupil who has active or previous involvement with Children's Services must be passed to the pupil's allocated social worker without delay.
- d) The member(s) of staff making the report will be informed by the DSL of the action taken, although additional information will only be shared with members of staff on a need-to-know basis.
- e) If the pupil's situation does not appear to be improving, the staff member with concerns should request the DSL to re-consider the action taken.

### **13. Preserving evidence (including on electronic devices)**

- a) All evidence (which could include a pupil's work, scribbled notes, iPads, mobile phones containing text messages, computers) must be preserved.
- b) If evidence is found on an electronic device, the device involved should be confiscated and set to flight mode or, if this is not possible, it should be turned off.
- c) Staff must not view images, look for further images, copy or print any images or forward images by email or any other electronic means. This is particularly important if images involving 'nudes' or 'semi-nudes' are found, as to do so is a criminal offence.
- d) If the imagery has already been viewed by accident (e.g. if a pupil has shown it to a member of staff before he/she could ask them not to), this must be reported to the DSL immediately.
- e) Do not delete the imagery or ask the pupil to delete it.
- f) Do not ask the pupil(s) involved in the incident to disclose information regarding the imagery.
- g) Do not share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- h) Do not say or do anything to blame or shame any pupil(s) involved.
- i) Do explain that you need to report it and reassure them that they will receive support and help.
- j) Report the matter to the DSL immediately

Also see: Appendix 1 Paragraph 28

*DfE Searching Screening and Confiscation Advice for schools*

### *UKCIS Education Group Sharing nudes and semi-nudes: advice for education settings working with children and young people.*

Both documents outline how to respond to an incident of nudes and semi-nudes being shared.

#### **14. Child protection records**

- a) Safeguarding records are kept securely on ISAMS, with a copy held the Safeguarding folder within the Management drive of SharePoint and securely on the DSL's drive (this is to ensure ease of transfer to future schools).
- b) There is a clear, detailed chronology for each pupil where concerns have been raised.
- c) Written records are kept of all concerns, whether or not there is a need to refer the matter to Children's Services or another agency.
- d) If a referral to Children's Services is thought to be required, the DSL will usually contact the local authority for advice prior to notifying parents.
- e) All discussions with the local authority along with the decisions made and the reasons for those decisions are recorded in writing on ISAMS and copied into the Safeguarding folder.
- f) Hampshire SCP has its own referral form which must be completed if a referral is made by the DSL. A copy of the referral form sent to the local authority must be retained.
- g) Minutes of any case conferences or discussions with social workers or other professionals involved with the pupil will be retained in the pupil's file in ISAMS and copied into the Safeguarding folder.
- h) If a pupil moves to another school, all child protection records will be transferred securely, within 5 days, to the DSL at the new school and a receipt obtained confirming they have been received. Parental permission is not required for records to be shared with the new school.
- i) On a case-by-case basis the DSL will also consider sharing information proactively with the new school to ensure key staff are aware of the pupil's needs and can have any support in place when the pupil arrives.
- j) Safeguarding records are requested by the school from previous schools/nurseries for any new pupils joining the school.

#### **15. Information sharing**

Further information is available in the HM Government guidance Information Sharing (2024) which should always be consulted if there is any doubt about consent or sharing information.

The guidance states that the most important consideration should be whether sharing information is necessary to safeguard and protect a pupil. ***Data protection legislation and guidance must not be allowed to stand in the way of sharing information to safeguard pupils.***

Information shared should be:

- (a) **Necessary and proportionate** - Any information shared must be proportionate to the need and level of risk.
- (b) **Relevant** - Only information that is relevant to the purposes should be shared with those who need it.
- (c) **Adequate** - Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

- (d) **Accurate** - Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.
- (e) **Timely** - Information should be shared in a timely fashion to reduce the risk of harm.
- (f) **Secure** - Wherever possible, information should be shared in an appropriate, secure way.
- (g) **Record** - Information sharing decisions should be recorded whether or not the decision is taken to share.

## **16. Communication with parents/carers**

- a) All parents are aware from the school's publication of this policy on the school's website that the school has a safeguarding policy and is required to follow statutory guidance in respect of reporting to Children's Services any case of suspected abuse.
- b) From this policy and from notices in the school buildings, parents are made aware of the identities of the DSL and Deputy DSLs with whom they may discuss concerns.
- c) The school works closely with parents and outside agencies to help support pupils and their families; however, it will always prioritise the duty of care to the pupil and will refer concerns if it considers a pupil is/may be at risk of harm or has suffered harm.
- d) The DSL will normally request a meeting with the parents of the pupil about whom there are concerns to discuss the matter. He will explain the reasons for the school's concerns and the course of action the school intends to take.
- e) Referrals to Children's Services or the LADO (or initial advice from either service) do not require prior parental consent. The DSL must act in the best interests of the pupil, even if this results in making a referral against the parents' wishes.
- f) If the DSL believes that notifying parents might in any way exacerbate the problem, increase the risk to the pupil or if there are any other extenuating circumstances, initial advice will be sought from Children's Services prior to notifying the parents. This may result in an immediate referral to Children's Services without parents being notified.
- g) If a decision is made that concerns will not be discussed with the child's parents or carers prior to referral to Children's Services, this will be recorded in the child's safeguarding records with a full explanation of the reason for this decision.
- h) If there is an allegation which involves a member of staff, parents will only be informed after the school has consulted with the LADO and has obtained the LADO's consent.
- i) If a parent has any safeguarding concerns, he/she should contact the school's DSL as soon as possible.

## **17. Referrals to Children's Services and/or other agencies**

Referrals about an individual pupil must be made to the Local Authority in which the pupil resides. However, advice may always be obtained from the Children's Services department of the school's LA, regardless of where the pupil resides. The DSL follows the Levels of Need thresholds from Hampshire SCP when decisions are made about making referrals. Available here:

[https://hipsprocedures.org.uk/assets/clients/7/HIOW\\_Thresholds\\_Chart\\_Review\\_Document\\_Sep23.pdf](https://hipsprocedures.org.uk/assets/clients/7/HIOW_Thresholds_Chart_Review_Document_Sep23.pdf)

There are 4 levels.

1. **Universal** - Has needs met within universal provision.
2. **Early Help** - Has additional needs identified within the setting that can be met within identified resources through a single-agency response and partnership working
3. **Targeted Early Help** - Has multiple needs requiring a multi-agency coordinated response.
4. **Children's Social Care (child in need/child in need of protection)** - Has a high level of unmet and complex needs or is in need of protection.

### **17.1 Early/Family Help**

KCSIE 2026 reflects national children's social care reforms and embeds Family Help terminology and referral arrangements.

- a) Early/Family Help means providing support as soon as a problem emerges at any point in a child's life.
- b) Where a child would benefit from coordinated early/family help, an inter-agency assessment will be arranged. Chapter 3 of Working Together to Safeguard Children (Department for Education) provides detailed guidance on the early/family help process.
- c) Additional support systems in school may form part of early/family help strategies, e.g., additional pastoral support, school mentors, support from a counsellor and will feed into Local Authority early help measures as required. Evidence is kept of all early help interventions.
- d) Any pupil may benefit from early/family help, but KCSIE recommends that all staff should be particularly alert to the potential need for early help for a pupil 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
  - is frequently missing/goes missing from care or home
  - is misusing drugs or alcohol
  - is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
  - has returned home to their family from care.
- e) Form tutors have a high profile and conduct regular individual chats to ensure that pupils are aware that staff are available to listen and provide additional in-school support if necessary.
- f) The school also has access to other counselling and support services if needed and all children are made aware of the contact details for ChildLine and friend of the school, Reverend Tara Hellings. The NSPCC hold an assembly annually.

### **17.2 Threshold Levels 3 and 4**

- a) Pupils who meet the threshold of Level 3 or Level 4 will be referred to Children's Services immediately by the DSL.

- b) If there is ever any doubt about whether a referral should be made advice will be sought from Hampshire Children's Services.
- c) The DSL may also take initial advice and discuss matters with other services such as the Education Welfare Officer, CAMHS or the police. Under no circumstances will the situation be left beyond the day that the concern is first raised.
- d) Records of all communications with Children's Services, the LADO or other local authority officers are recorded by the DSL on ISAMS.
- e) The DSL will discuss the concerns with the pupil's parents/carers at the earliest appropriate opportunity (as outlined in paragraph 16 above).
- f) The DSL will assist other agencies to make enquiries into concerns about a pupil's welfare. This will include ensuring that the school is represented at multi-agency meetings, including child protection conferences, and that reports/information about the pupil are provided as required.
- g) In cases of extreme emergency, or if a serious criminal offence appears to have been committed, the police will be contacted immediately.
- h) The referral process outlined is also followed when there are concerns about a pupil who may be at risk of radicalisation.

*The policy of the school requires that all referrals are made by the school's DSL; however, anybody can make a referral and in exceptional circumstances staff may raise concerns directly with Children's Services. If, at any point, there is a risk of immediate serious harm to a pupil a referral should be made to Children's Services or the police on 999 immediately.*

## **18. Safer recruitment**

(see Wellesley Safer Recruitment Policy)

The school follows statutory guidance for the safer recruitment and employment of staff who work with children as set out in Part Three of KCSIE and *Disqualification under the Childcare Act 2006* (September 2018).

Online searches may be conducted on shortlisted candidates in accordance with statutory guidance and safer recruitment procedures.

Staff involved in recruitment receive appropriate training in safer recruitment and this is updated no less than every five years.

## **19. Induction and training**

- a) The DSL is responsible for ensuring that all new members of staff working in school, and any volunteers, receive training on their responsibilities for safeguarding and child protection and on the procedures for recording and referring any concerns. This training takes place prior to the new member of staff starting work with the children.
- b) All staff, including governors are required to sign to confirm they have received training or have read and understood specific documents. The DSL maintains a register for all staff and safeguarding training received.
- c) All newly recruited staff are provided with the following information and given in-house training on safeguarding issues as part of their induction. This includes:
  - Keeping Children Safe in Education, Part One
  - Wellesley Prep Safeguarding Policy
  - Staff Code of Conduct

- E-safety Policy, including an understanding of filtering and monitoring;
  - Whistleblowing Policy
  - Behaviour Policy
  - Anti-bullying Policy
  - Prevent training
  - Procedures on managing children who go missing from education
  - How to report concerns through ISAMS
- d) The school takes a risk-based approach to the level of information provided when training other temporary staff, staff running clubs, contractors and volunteers. As a minimum they will be provided with the school's safeguarding and child protection policy, the staff code of conduct and a copy of Part One of KCSIE.

## **20. Staff Training**

- a) All staff are required to read, at least annually, the Safeguarding Policy (i.e. this policy) and the Staff Code of Conduct and must confirm that they have done so.
- b) All staff are required to read and understand the current guidance for staff in Part One of KCSIE and confirm that they have done so.
- c) Every member of staff receives annual training in safeguarding (including online safety). Refresher training is provided annually at the start of the academic year and on specific issues through the year as required.
- d) All staff complete annual e-Safety and Prevent training (online)
- e) All staff are trained in how to listen, respond to and report any disclosures including those which involve child on child sexual violence or sexual harassment.

### **20.1 DSL Training**

The DSL and Deputy DSL undergo training at a minimum every two years, which includes training in inter-agency working in line with KCSIE. They have updates, at least annually, on specific issues as required.

### **20.2 Training for Governors**

- a) All governors receive safeguarding induction training when joining the school.
- b) The governor responsible for safeguarding and the Chair of Governors have received specific safeguarding training appropriate to their role. They undertake refresher training annually.
- c) Where a governor has received safeguarding training elsewhere, a copy of this is checked by the DSL and kept on record as proof as training.
- d) This training aims to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole-school approach to safeguarding.
- e) All governors complete annual refresher training in safeguarding, including e-Safety and Prevent training (online)
- f) The Governors are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 and the local multi-agency safeguarding arrangements.

## **21. Use of technology, cameras, mobile phones and other devices (including in the EYFS)** (see the school's policy 'Taking, Storing and Using Images')

- a) Staff must not take video footage or photographs of pupils except for school purposes and on school devices.
- b) Any such images must not be placed in the public domain without the permission of the Head and Head of Marketing.
- c) Images are stored securely on a password-protected section of the school intranet. They are deleted when no longer required.
- d) Cameras, mobile phones or other devices are not allowed in any areas where pupils may be washing or changing, nor should photography be used in a manner that may offend or cause upset.
- e) Parents are asked to restrict photography whether on cameras, mobile phones or other devices to major school events published in the school calendar only. General filming in school by parents is never permitted.
- f) Parents should be aware that other parents in the school may object to photographs being taken which, inadvertently or otherwise, include their child; therefore, any images taken must be for personal use only and must not be shared on social media.
- g) Other visitors, volunteers and contractors in school are not permitted to take photographs in any area of the school without specific permission from the Head.
- h) Parents are asked to restrict their general use of mobile phones whilst on the school premises, but we understand that occasionally calls may need to be taken or messages replied to. In these instances, please try to find a 'private' area, away from the children.
- i) Through curriculum and information evenings, as well as other regular parental communication systems, parents are made aware of what their children are asked to do online, including any apps or sites they may be asked to access.
- j) Staff must not use their mobile phones or other personal devices for calls or messaging when engaged with pupils and all devices must be out of sight. This is strictly for school use only, and when required.
- k) The school operates a total ban for pupils on all personal mobile devices (unless children need a mobile for after-school logistics, in which case the phone must be handed to the school office by an adult and kept in the school office for the day) with the Wi-Fi being inaccessible to any user without the appropriate security details.

## **22. Staff Code of Conduct**

The Staff Code of Conduct gives comprehensive, clear guidance on the expected behaviour of all adults in the school. Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by pupils or others and report any conduct by an adult which raises concern. Failure to follow the Staff Code of Conduct is likely to result in disciplinary action being taken. The Staff Code of Conduct can be found in the Staff Handbook.

## **23. Whistleblowing** *(also see the school's Whistleblowing Policy available on the school's website)*

It is recognised that pupils cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise any concerns about school procedures, which may include the attitude or actions of colleagues. All members of the school community have a duty to protect children and should they have concerns they must make these known to the Head.

## **24. Allegations against staff**

- a) As part of its overall safeguarding ethos, the school ensures that it promotes an open and transparent culture in which staff feel confident to report all concerns about adults working in the school (including self-employed staff, supply teachers, volunteers and contractors).
- b) All members of staff must follow the Staff Code of Conduct and conduct themselves in a professional manner, both to ensure the safety of pupils and to reduce the risk of any allegation of improper behaviour.
- c) If any allegation of abuse or suspected abuse is made against a member of staff or volunteer, the school will follow the guidance in KCSIE and the procedures of Hampshire SCP.
- d) Allegations that might indicate that a person is unsuitable to work with children are where a person has:
  - behaved in a way that has harmed a child, or may have harmed a child and/or;
  - possibly committed a criminal offence against or related to a child and/or;
  - behaved towards a child or children in a way that indicates he or she may pose a risk of
  - harm to children; and/or
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- e) These procedures relate to all members of all staff, (including the self-employed, supply staff and contractors) governors and volunteers or any other adults who are currently working in the school, regardless of whether the school is where the abuse is alleged to have taken place and regardless of whether it involves pupils at this school. The procedures extend to activities and services delivered by external organisations and individuals using school premises, with appropriate safeguarding assurances sought from organisations operating on school premises, and effective reporting pathways maintained for staff, children and families.

### **24.1 Reporting an allegation or concern**

- a) Staff must never think that abuse by an adult is not possible in this school or immediately disbelieve an accusation against someone who is known well and trusted.
- b) A member of staff receiving an allegation of abuse by another member of staff, or with concerns about another member of staff, should report this immediately to the Head, unless the Head is the one against whom the allegation is made.
- c) An allegation against the Head should be reported to the Safeguarding Governor, Alan Winter, without notifying the Head first.
- d) In the Head's absence, an allegation against a member of staff must be reported to the Safeguarding Governor.
- e) In any instance where there may be a conflict of interest about reporting an allegation or concern to the Head or to the Safeguarding Governor, the LADO should be contacted directly and without hesitation.

- f) Concerns may be reported verbally, directly to the relevant senior member of staff, or by email. Any staff who make a report verbally in the first instance will also be required to make a written record of the information they have disclosed.

## **24.2 Procedures & Informing the Local Authority Designated Officer (LADO)**

- a) If the allegation constitutes a possible serious criminal offence, or in the case of serious harm, or if a pupil is in immediate danger, a referral to Children's Services and/or the police will be made immediately.
- b) An allegation of abuse by an adult will always result in a senior person from the school (as detailed above) contacting the LADO of Hampshire SCP who will advise on the next steps to be taken.
- c) Under no circumstances will the school conduct an investigation without first informing the LADO and seeking advice about the course of action to be taken. Borderline cases will also be discussed and, following discussions, the LADO will advise what further steps should be taken.
- d) There are two aspects to consider when an allegation is made:
  - Look after the welfare of the child - the DSL is responsible for ensuring that the child is not at risk and for referring cases of suspected abuse to Children's Social Care as described earlier.
  - Investigate and support the person subject to the allegation - the case manager (usually the head, unless the head is the subject of the allegation) should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.
- e) The school's aim will be to achieve a quick resolution of the allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation.
- f) The Head will obtain written details of the allegation, signed and dated, from the person who received the allegation or the person who is making the allegation. If a pupil has made an allegation, a written note of what the pupil has said will be made by the member of staff to whom the pupil made the allegation.
- g) The Head will also record any basic information to establish the facts, including dates, times, locations and names of potential witnesses and any CCTV footage.
- h) Any allegation against staff, including those considered borderline, must be reported and discussed with the LADO without delay, and within one working day.
- i) An initial assessment of any allegation referred will be made by the LADO and the Head. They will judge whether there is a need for immediate action, whether the allegation is demonstrably false or whether there has been inappropriate behaviour or poor practice that can be dealt with through the school's usual staff disciplinary procedures.
- j) Where the initial discussion leads to no further action, the case manager and the LADO should:
  - record the decision and justification for it; and
  - agree on what information should be put in writing to the individual concerned and by whom
- k) Where further enquiries are required the LADO and case manager will discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation will normally be undertaken by the

Head. If the nature or complexity of the allegation requires it, the allegation may require an independent investigator.

- l) In the case of a referral and investigation, the Head must ensure, before contacting any interested parties, that there is no objection by the investigating agencies.
- m) Where there are no objections from the investigating agencies, the Head will:
  - inform the person making the allegation and explain the likely course of action
  - ensure the parents of the pupil(s) who is the alleged victim have been informed about the allegation and the likely course of action
  - inform the member of staff against whom the allegation is made and explain the likely course of action
  - keep a written record of the above.
- n) The Head, in consultation with the LADO, will make the decision whether or not to suspend the teacher involved.
- o) If an allegation is made, every effort will be made to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated. The Education Act (2011) prevents the 'publication' of material by any person that may lead to the identification of a teacher who is the subject of an allegation. Parents and carers will also be made aware of the prohibition on reporting or publishing allegations about teachers.
- p) The Head will take advice from the LADO, the Safeguarding Governor and other agencies to agree:
  - Who needs to know and exactly what information can/cannot be shared
  - How to manage speculation and gossip
  - What, if any, information can be given to the wider community to reduce speculation
  - If necessary, how to manage the press.
- q) The school has a duty of care towards its employees and will ensure that effective support is provided for anyone facing an allegation. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support.
- r) The following definitions will be used when determining the outcome of allegation investigations:
  - **Substantiated:** there is sufficient evidence to prove the allegation;
  - **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
  - **False:** there is sufficient evidence to disprove the allegation;
  - **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
  - **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.
- s) Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or are malicious will not be referred to in employer references.
- t) Records concerning allegations of abuse must be preserved until the accused has reached normal pension age or for 10 years from the date of the allegation if longer.

### **24.3 Allegations relating to supply teachers/employees of third party**

The school's procedures for managing allegations against staff above also apply to staff not directly employed by the school, for example, supply teachers provided by an employment agency or business ('the agency'). The school will usually take the lead, but agencies/ third party employers will be notified and should cooperate in any enquiries from the LADO, police and/or Children's Services.

In no circumstances will the school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The school will discuss with the agency whether it is appropriate to suspend the supply teacher and an investigation is carried out but this decision rests with the Head and the LADO.

### **24.4 Referral to the Disclosure & Barring Service (DBS) and Teaching Regulation Agency (TRA)**

If the school ceases to use the services of any person (whether employed, contracted, a volunteer or a student) because that person was considered unsuitable to work with children, a prompt and detailed report will be made to the DBS.

For teaching staff, the school also has a legal responsibility to report the matter to the Teaching Regulation Agency (TRA) which may result in a prohibition order being issued by the Secretary of State for Education, as required by sections 141D and 141E of the Education Act 2002.

A report to the TRA may also be made for additional reasons 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in [Teacher misconduct: the prohibition of teachers](#) (October 2015 updated 2022). Further guidance is published on the [TRA website](#).

## **25. Low Level Concerns**

- a) A low level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and does not appear to meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- b) A member of staff may have doubts about the behaviour of another adult towards a pupil, or another child, or concerns about how their own behaviour might be interpreted.
- c) 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/other device
  - engaging with a child on a 1:1 basis in a secluded area or behind a closed door
  - using inappropriate sexualised, intimidating or offensive language,
  - Email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols

- Any incident where he/she feels that his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk or misinterpretation
- d) Staff must report any low-level concerns whatsoever to the Head or Safeguarding Governor following the procedures as outlined above in Paragraph 24.1.
  - e) Staff are also encouraged, and to feel confident if the need arises, for them to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
  - f) When a low-level concern has been raised by a third party, the head (or safeguarding governor) will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The name of the person making the report will be noted and requests to remain anonymous will be respected as far as reasonably possible.
  - g) The school will also consider if any wider issues in the school enabled the behaviour to occur or contributed to it, and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.
  - h) All low-level concerns will be recorded in writing. The record will include:
    - details of the concern;
    - the context in which it arose;
    - evidence collected by the Head where the concern has been raised via a third party;
    - the decision categorising the type of behaviour;
    - action taken;
    - the rationale for decisions and action taken;
    - the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible)
  - i) Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
  - j) Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harm threshold, in which case it will be referred to the LADO.
  - k) The purpose of low level reporting is to protect both pupils and the staff working with them, and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.
  - l) Low level concerns relating to supply staff and staff employed by a third party will be reported to the agency/employer in order that any patterns of behaviour may be identified.

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

## **26. Non-recent allegations**

- a) Abuse can be reported no matter how long ago it happened.
- b) Where an adult makes an allegation to the school that they were abused as a child, the individual will be advised to report the allegation to the police.
- c) Non-recent allegations made by a child, will be reported to the LADO in line with Hampshire SCP procedures for dealing with non-recent allegations. The LADO will coordinate with Children's Services and the police.

## **27. Oversight by Governors**

- a) Safeguarding is reviewed and discussed at the termly Advisory Board meeting at which the Head is in attendance.
- b) The head or DSL notifies the safeguarding governor about any concerns, respecting confidentiality of the children and families involved.
- c) The Safeguarding Policy is reviewed and ratified at least annually and any changes in legislation given immediate effect.
- d) The SCR is checked by the safeguarding governor every term.

## **28. Statutory Guidance and other documents informing the policy**

This policy pays due regard to the following statutory guidance and other government advice. It also complies with the procedures of Hampshire SCP.

1. Keeping Children Safe in Education (September 2026)
2. Working Together to Safeguard Children (WT) (2018 updated 2023)
3. The Education (Independent School Standards) Regulations (2014)
4. 'Working Together to Improve School Attendance' (2024)
5. HM Gov advice 'What to do if you're worried a child is being abused' (March 2015)
6. Safer Recruitment Consortium 'Guidance for safe working practice for those working with children and young people in education settings' (February 2022)
7. DfE guidance 'Teaching online safety in school' (January 2023)
8. Mental health and behaviour in schools: departmental advice (November 2018)
9. When to call the police, non-statutory guidance from the National Police Chiefs' Council
10. DfE advice 'Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (May 2024)
11. DfE Statutory Guidance "Relationships Education, Relationships and Sex Education (RSE) and Health Education" (2019 updated 2021)
12. DfE Searching Screening and Confiscation Advice for schools
13. UKCIS Education Group: Sharing nudes and semi-nudes: advice for education settings working with children and young people (March 2024)
14. Designated teacher for looked after children (February 2018)
15. Statutory Framework for the Early Years Foundation Stage (2026)
16. DfE statutory guidance 'Children missing education' (September 2025)

17. DfE Statutory Guidance Restrictive Interventions, including the use of reasonable force in schools (April 2026)
18. Disqualification under the Childcare Act 2006 (September 2018)
19. Counselling in schools: a blueprint for the future (February 2016)
20. DfE's Searching Screening and Confiscation Advice
21. Prevent Duty Guidance for England and Wales (2023 updated 2024)
22. The use of social media for on-line radicalisation (July 2015)
23. Equality Act 2010: advice for schools (updated 2018)
24. Promoting the education of children with a social worker: Virtual School Head role extension (March 2024)
25. Police and Criminal Evidence Act (PACE) Code C 2019

## APPENDIX 1

### Categories of abuse and Specific Safeguarding Issues

#### **1. Definitions**

All school staff should be aware that abuse, neglect, exploitation and other 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. Exercising professional curiosity and knowing what to look for is vital for early identification so staff are able to identify cases of children who may be in need of help or protection.

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

*The school adopts a preventative approach to harmful behaviours associated with misogyny, sexual harassment, harmful gender stereotypes and violence against women and girls.*

*The school will respond sensitively and lawfully to children who are questioning their gender, ensuring safeguarding concerns and welfare considerations remain paramount.*

It is important that all staff are aware of the signs of abuse. The following information on signs of abuse is intended as a guide only; signs listed in one category may apply equally to another, as behaviours can be very interlinked. Any concerns, whether they are listed below or not, should be brought to the attention

of the DSL immediately. The following signs are not conclusive evidence but may be a warning, particularly if a pupil exhibits several signs or a pattern emerges. It is important to remember that there may also be explanations, other than abuse, for a pupil showing such signs. It is important to understand that our youngest children (especially those in EYFS) — who may not yet have the words to express worry, fear, or discomfort — are still able to communicate when they feel unsafe or unhappy. We use the Key Person policy and know our children individually, we look for subtle changes in behaviour such as being less chatty, eating more or less, unusual phrases etc.

The main categories of abuse outlined in KCSIE, are

- (a) Physical abuse
- (b) Emotional abuse (including domestic abuse)
- (c) Sexual abuse
- (d) Neglect.

## **2. Risk factors**

In an abusive relationship the child may

- (a) appear frightened or wary of the parent/s or other adult
- (b) act in a way that is inappropriate to her/his age and development, although full account needs to be taken of different patterns of development and different ethnic groups.

The parent or carer may

- (a) persistently avoid child health promotion services and treatment of the child's episodic illnesses
- (b) have unrealistic expectations of the child
- (c) frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- (d) be absent or misusing substances
- (e) persistently refuse to allow access on home visits
- (f) be involved in domestic violence.

Staff should be alert to changes in a pupil's behaviour if there is a new carer (e.g., nanny or au pair) in the pupil's home.

## **3. Recognising signs of physical abuse**

Physical abuse 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.

The following are often regarded as indicators of concern:

- (a) an explanation which is inconsistent with an injury
- (b) several different explanations provided for an injury
- (c) unexplained delay in seeking treatment
- (d) the parents/carers are uninterested or undisturbed by an accident or injury
- (e) parents are absent without good reason when their child is presented for treatment
- (f) repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury)
- (g) family use of different doctors and A&E departments
- (h) reluctance to give information or mention previous injuries
- (i) two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)

- (j) repeated or multiple bruising on the Head or on parts of the body unlikely to be injured accidentally
- (k) variation in colour, possibly indicating injuries caused at different times
- (l) the outline of an object used, e.g., marks from a belt or a hairbrush, or of a handprint
- (m) bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- (n) bruising around the face
- (o) grasp marks on small children
- (p) bruising on the arms, buttocks and thighs may be an indicator of sexual abuse
- (q) bite marks
- (r) circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- (s) scalds that have a line indicating immersion or poured liquid (a child getting into hot water of his/her own accord will struggle to get out and cause splash marks)
- (t) scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath
- (u) medical attention is sought after a period of delay when a fracture has caused symptoms such as swelling, pain or loss of movement.

#### **4. Recognising signs of emotional abuse**

Another form of abuse is 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 he or she is worthless or unloved, inadequate, or valued only insofar as meeting the needs of another person. It may include not giving the child opportunities to express his or her views, deliberately silencing the child or 'making fun' of what he or she says or how the child communicates. It may feature age or developmentally inappropriate expectations being imposed on the 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, including domestic violence. It may involve serious bullying (including cyberbullying), causing the child frequently to feel frightened or in danger, or the exploitation or corruption of the child. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse may also indicate the presence of other forms of abuse.

The following may be indicators of emotional abuse:

- (a) developmental delay
- (b) abnormal attachment between a child and parent/carer, e.g., excessive anxiety on the part of either
- (c) indiscriminate attachment or failure to attach
- (d) aggressive behaviour towards others
- (e) scape-goated within the family
- (f) frozen watchfulness, particularly in pre-school children
- (g) low self-esteem and lack of confidence
- (h) withdrawn or seen as a "loner" – difficulty relating to others
- (i) reverting to younger behaviour

- (j) depression, withdrawal
- (k) fear of academic failure or 'getting things wrong'.

For further information on bullying, including cyber bullying, please see the school's Anti-bullying Policy.

## **5. Recognising signs of sexual abuse**

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 the 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 (including via the internet). Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (see KCSIE).

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about, and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child makes a disclosure. There may be no physical signs and indications are more likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are

- (a) inappropriate sexualised conduct
- (b) sexually explicit behaviour, play or conversation, inappropriate to the pupil's age
- (c) continual and inappropriate or excessive masturbation
- (d) self-harm (including eating disorders), self-mutilation and suicide attempts
- (e) involvement in prostitution or indiscriminate choice of sexual partners
- (f) an anxious unwillingness to remove clothes, e.g., for sports events (but this may be related to cultural norms or physical difficulties).

Some physical indicators associated with this form of abuse are

- (a) pain or itching of genital area
- (b) blood on underclothes
- (c) pregnancy in a younger girl where the identity of the father is not disclosed
- (d) physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.

Staff should also be aware of the possibility of sexual exploitation.

## **6. Signs of neglect**

Neglect may be defined as 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 because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to

- (a) provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- (b) protect a child from physical and emotional harm or danger

- (c) ensure adequate supervision (including the use of inadequate caregivers)
- (d) ensure access to appropriate medical care or treatment.
- (e) be responsive to a child's basic emotional needs.

The following may be indicative of neglect of a child:

- (a) the child is dirty, smelly, poorly clothed or appears underfed
- (b) the child has lingering illnesses which are not attended to
- (c) there is a marked deterioration in schoolwork
- (d) the child exhibits significant changes in behaviour, aggressive behaviour, severe tantrums
- (e) an air of 'detachment' or a 'don't care' attitude
- (f) overly compliant behaviour
- (g) a child who is reluctant to go home or is kept away from school for no apparent reason
- (h) 'tummy pains' with no medical reason
- (i) running away from home, suicide attempts
- (j) extreme anger, sadness or depression
- (k) child left with adults who are intoxicated or violent
- (l) child left alone for excessive periods
- (m) child thrives away from the home environment.

## **7. Affluent neglect**

Staff should also be aware of the impact of affluent neglect, which refers to the neglect experienced by children in more wealthy families. This can be difficult to identify, as the type of neglect experienced by children in these circumstances is often emotional.

Parents may work very long hours or be absent for extended periods, leaving children in the care of paid carers. This can create an emotional disconnect and leave children feeling isolated and lonely, with their emotional needs unfulfilled by their parents. Affluent parents may also subject their children to a high amount of pressure to succeed academically, or in other pursuits such as sport or music, which can lead to psychological and emotional problems.

Absent parents may also have little knowledge of what their children are doing. This can lead to increased risks with children who may spend long periods online or at an older age have the financial means to facilitate drug abuse and the independence to engage in harmful sexual activity.

## **8. Specific safeguarding issues**

Further safeguarding issues of which staff should be aware are detailed below. Extensive guidance on a wide variety of specific issues can be found in KCSIE and in other guidance listed at the end of this policy.

- Child abduction and community safety incidents
- children missing from education – *also see Attendance Policy*
- children and the court system
- Children missing from education
- Children with family members in prison
- child criminal exploitation (CCE) (including county lines/gangs) & child sexual exploitation (CSE)
- domestic abuse
- fabricated or induced illness
- Homelessness
- so-called 'honour based' abuse, female genital mutilation (FGM) and forced marriage

- mental health
- E Safety, Online behaviour and cybercrime
- child-on-child abuse including:
  - Nudes/semi-nudes, youth produced sexual imagery
  - sexual violence and sexual harassment
  - upskirting
  - child sexual behaviour
- private fostering
- Preventing radicalisation (including Channel)

Guidance and practical support on specific safeguarding issues or concerns will be sought where necessary by the DSL.

The DSL will ensure that staff are aware of specific issues including, but not limited to: child-on-child abuse; sexual violence and sexual harassment; online abuse, including imagery; domestic abuse; parents affected by drug or alcohol abuse; child sexual exploitation, female genital mutilation; fabricated or induced illness; children missing education; preventing radicalisation; mental health

### **9. 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.

### **10. 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 available on the gov.uk website.

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

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

### **11. Children who go missing from education** (also see Attendance Policy)

Persistent absence, severe absence and patterns of non-attendance will be considered potential safeguarding indicators and investigated appropriately.

- a) All pupils are recorded on the school's admission register and their attendance is recorded in the daily attendance register. Staff must be aware that repeated absence may be an indicator of can be a potential indicator of abuse or neglect and repeated absence must be brought to the attention of the DSL.
- b) All unexplained absences will be followed up in accordance with the Attendance, Absence and Registration Policy.
- c) The local authority is informed of any child whose name is added to or deleted from the admission register at a non-standard transition point, i.e.

joining the school other than in Reception in September or leaving at any time other than the end of the summer term of Year 8 in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended).

- d) If a pupil leaves the school then, whether there are any concerns about that pupil or not, the school will seek to obtain, for inclusion in the return the name of the future school, the expected date of the child's first day there, and, if applicable, the family's new home address and the date on which the family will be moving to it. If there are concerns about a pupil, and a parent refuses to supply the information, this may result in a report to Children's Services.
- e) The school will inform the local authority of any pupil who fails to attend school regularly or who has been absent without the school's permission for a continuous period of ten days or more.
- f) If a pupil who has current involvement with Children's Services is absent from the school the normal procedure of a first day call to the home will be followed. The pupil's social worker must be informed of all absences promptly, and immediately.
- g) When a pupil moves to another school, the DSL must inform the receiving school without delay that child protection records exist or not. Within 5 days the original records must be passed on either by hand or sent securely. Duplicate records must be retained. Duplicate records should be kept securely until the pupil reaches the age of 25 years.
- h) The school holds contact details for both parents (unless a parent is deceased, or a parent has no parental responsibility for the child) and two emergency contact numbers.

## **12. Children with family members in prison**

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

## **13. Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Victims can be exploited even when the sexual activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

The school is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

There are three main types of child sexual exploitation:

- **Inappropriate relationships:**  
Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.
- **Boyfriend:** Abuser grooms victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.
- **Organised exploitation and trafficking:** Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL. If a child is in immediate danger the police should be called on 999.

#### **14. Child Criminal Exploitation (CCE) including gangs and County Lines**

CCE is also a form of abuse and involves taking advantage of an imbalance in power to coerce, manipulate or deceive a child into criminal activity.

Criminal exploitation of children is a typical feature of county lines criminal activity where children and young people are recruited to transport drugs. Key identifying features of involvement in county lines are when children are missing.

Staff should be aware of the key indicators of children being sexually or criminally exploited which can include:

- going missing for periods of time or regularly coming home late;
- regularly missing school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse;
- displaying inappropriate sexualised behaviour.

#### **15. Domestic abuse**

Domestic abuse includes any incident or pattern of incidents of controlling, coercive, threatening behaviours, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Exposure to domestic abuse and/or violence can have serious, long lasting emotional and psychological impact on children. The school should be mindful that children can often blame themselves for the abuse or may have had to leave the family home because of the abuse. Domestic abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

### **16. Operation Encompass**

When police are called to an incident of domestic abuse and there is a child(ren) in the household the police will usually inform the DSL in school before the child(ren) arrives at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable appropriate support to be given to the child.

### **17. 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 into 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.

### **18. So called 'honour based' abuse**

HBA is a collection of practices, which are used to control behaviour and exert power within families to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that an individual has shamed the family and/or community by breaking their honour code this includes Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

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

There is a statutory duty on teachers to personally report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e., where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18, teachers should follow the school's local safeguarding procedures.

### **19. Female Genital Mutilation**

Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is a form of child abuse and is illegal in the UK. A pupil may have difficulty walking, sitting or standing and may even look uncomfortable. A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating. There may be prolonged or repeated

absences from school and/or noticeable behaviour changes (e.g., withdrawal or depression) on the pupil's return.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHCE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

## **20. Mandatory Reporting of FGM**

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. This will usually come from a disclosure. Under no circumstances should school staff physically examine pupils.

The duty applies to the individual who becomes aware of the case to make a report directly to the Police by dialling 101. The report should be made immediately. The duty to report should not be transferred to the DSL, however the DSL must be informed. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including by dialling 999 if appropriate.

## **21. Forced Marriage**

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. A forced marriage is not the same as an arranged marriage which is common in many cultures. Forcing a person into a marriage is a crime in England and Wales.

## **22. Mental health**

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

Early intervention to identify issues and provide effective support is crucial. The school's role in supporting and promoting mental health and wellbeing can be summarised as:

- **Prevention:** the creation of a safe, calm school environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stresses of life effectively. This includes teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities.
- **Identification:** recognising emerging issues as early and accurately as possible
- **Early support:** helping pupils to access early support and intervention
- **Access to specialist support:** working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

When the school suspects that a pupil is having mental health difficulties, support will be put in place, using a graduated response process.

1. an assessment to establish a clear analysis of the pupil's needs;
2. a plan to set out how the pupil will be supported;
3. action to provide that support
4. regular reviews to assess the effectiveness of the provision

Adverse Childhood Experiences (ACEs) and other events may also have an impact on pupils. These include:

- loss or separation – resulting from death, parental separation, divorce, hospitalisation
- loss of friendships (especially in adolescence)
- family conflict or breakdown that may result in the child having to live elsewhere, being taken into care or adopted, deployment of parents in armed forces families
- life changes – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school
- traumatic experiences such as abuse, neglect, domestic violence, bullying, violence, accidents or injuries
- other traumatic incidents such as a natural disasters or terrorist attacks

Where children experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders.

Mental health professionals have classified these as:

- emotional disorders - phobias, anxiety states and depression
- conduct disorders - stealing, defiance, fire-setting, aggression and anti-social behaviour
- hyperkinetic disorders - disturbance of activity and attention
- developmental disorders - delay in acquiring certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive developmental disorders
- attachment disorders - children who are markedly distressed or socially impaired because of an extremely abnormal pattern of attachment to parents or major care givers
- Trauma disorders, such as post-traumatic stress disorder, because of traumatic experiences or persistent periods of abuse and neglect
- other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic-depressive disorder

Only appropriately trained professionals can make a diagnosis of a mental health problem. School staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have any concerns about the mental health of a child, they should report this to the DSL immediately following the procedures outlined in this policy. More information can be found in the *DfE 'Mental Health and Behaviour in Schools'* guidance

**23. Child-on-child abuse (including harassment and violence)** (see also Anti-bullying policy, Behaviour Policy, RSHE Policy)

It should be noted that a child is anyone under the age of 18.

- a) Children are also vulnerable to abuse by other children. The school has a zero-tolerance approach to such abuse, and it will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Staff must always challenge such behaviours.
- b) Any child can be vulnerable to child-on-child abuse and staff should be alert to signs of such abuse amongst all children. However, individual and situational factors can increase a child's vulnerability to abuse. For example, children who are more likely to follow others and/or who are socially isolated may be more vulnerable, as may pupils with SEND or certain medical conditions.
- c) Children who identify as lesbian, gay, bisexual, questioning their gender (LGBT+) can also be targeted. In some cases, a pupil who is perceived to be LGBT+ (whether they are or not) can be just as vulnerable as children who identify as LGBT+.
- d) Risks can be compounded where children who are LGBT+ lack a trusted adult with whom they can be open. Staff will endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share any concerns with members of staff.
- e) All children involved whether victim or perpetrator will be treated as "at risk" and supported. The school recognises the gendered nature of child-on-child abuse and that it is more likely that girls will be victims and that boys will be perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously.
- f) Staff are made aware that child-on-child abuse may happen inside or outside school or online and that even if there are no reports in the school it does not mean child-on-child abuse is not happening, it may be the case that it is just not being reported. A member of staff receiving an allegation of abuse by a pupil, or with concerns about a pupil, should report this immediately to the DSL following the reporting procedures outlined above.
- g) Child on child abuse is most likely to include, but may not be limited to:
  - bullying (including cyberbullying, prejudice-based and discriminatory bullying)
  - abuse in intimate personal relationships between children
  - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
  - sexual violence and sexual harassment (see below and KCSIE)
  - Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
  - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
  - upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission
  - initiation/hazing type violence and rituals.

Through safeguarding training and anti-bullying training, staff will be made aware of the harm caused by child-on-child abuse and will follow the school's Behaviour Policy, Anti-bullying Policy and safeguarding procedures as appropriate. It may be appropriate to regard a young person's behaviour as abusive if:

- there is a large difference in power (for example age, size, ability, development) between the young people concerned;
- the perpetrator has repeatedly tried to harm one or more other children;
- there are concerns about the intention of the alleged perpetrator;
- there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'

The DSL will not undertake any enquiry or investigation where a case is referred to Children's Services or the police. The initial assessment of any allegation will be made by Children's Services and the DSL to judge whether there is a need for immediate action to protect the pupils involved, whether the allegation is demonstrably false or whether there has been inappropriate behaviour that can be dealt with through the school's usual disciplinary procedures. The DSL will lead enquiries at school level if agreed with the relevant investigating agencies.

The DSL will inform the parents of the pupil making the allegation and explain the likely course of action. If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.

The DSL will ensure the parents of the pupil who is the alleged perpetrator are informed about the allegation and the likely course of action. If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.

The necessary support and any required sanctions following child-on-child abuse will be determined on a case-by-case basis.

The Head will make the decision whether or not to suspend or exclude the pupil(s) involved.

The DSL will keep a written record of all conversations with parents and other professionals and any decisions made.

The management of pupils with harmful behaviour (including sexually harmful behaviour) can be complex. The school will follow guidance and work with other relevant agencies to support perpetrators and to maintain the safety of the whole school community.

Appropriate support in school, and from outside agencies if applicable, will also be put in place for any victims or any other pupil affected. The support offered in these circumstances will be determined on a case-by-case basis depending on the circumstances.

If pupils are found to have made malicious allegations, appropriate sanctions will be applied, which could include temporary or permanent exclusion.

## **24. Strategies to reduce the risk of child-on-child abuse**

- a) Preventative strategies for child-on-child abuse are regularly considered.
- b) The school has an ethos where pupils feel safe to share information about anything that is upsetting them, and any derogatory language or behaviour is always challenged by staff.
- c) There is a strong and positive pastoral care system enhanced by the curricula of PSHE, RSHE, RE and IT. This provides pupils with a variety of opportunities to learn about appropriate behaviours and to talk things through and explore disputes, concerns or difficulties.
- d) The School Council provides a 'pupil voice' and encourages pupils to develop and understand the rules and boundaries of acceptable behaviour.
- e) The children are made aware of the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other

people, especially children, young people and vulnerable adults. This is also covered in the Speak Out and Stay Safe course, provided by NSPCC.

## **25. Prejudiced Behaviour**

Pupils may also display hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities, special educational needs, medical conditions, ethnic, cultural and religious backgrounds, gender, home life and sexual identity. These factors can make it more difficult for a child to report abuse.

The school recognises that children may experience prejudice-based harm, including racism, faith-based prejudice and other discriminatory behaviour. Such incidents may adversely affect a child's welfare, wellbeing, mental health and sense of safety and will be considered within safeguarding procedures. Where appropriate, incidents will be recorded, investigated and referred to the DSL in accordance with this policy.

## **26. Child on child abuse which involves sexual violence and sexual harassment**

- a) The school also has a zero-tolerance approach to any form sexual violence and sexual harassment; it is never acceptable and will not be tolerated.
- b) Sexual violence and sexual harassment can occur between children or groups of children of any age and sex, and within intimate personal relationships between young people. It can also occur online.
- c) It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.
- d) A victim must never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or any other form of abuse. Nor should a victim ever be made to feel ashamed for making a report.
- e) Staff should follow the processes outlined in this policy when dealing with any report of sexual violence or sexual harassment, including those that have happened outside the school and/or online.
- f) A child displaying harmful sexual behaviour may also be an indication that they are a victim of abuse themselves.
- g) When responding to a report of sexual violence the DSL will decide on the response following the advice in Section 5 of KCSIE. This will include
  - Initial response - considering the needs of both victim(s) and alleged perpetrator(s).
  - Record Keeping
  - Risk Assessment
  - Consideration of most appropriate response: internal management, early help, referral to
  - Children's Social Care and/or referral to the Police.
  - Ongoing response – safeguarding and support for all parties
- h) The DSL will not undertake any investigation where it is decided a case must be referred to Children's Services or the police. The initial assessment will be made by Children's Services and the DSL to judge whether there is a need for

immediate action to protect the pupils involved. The DSL will lead enquiries at school level if agreed with the relevant investigating agencies.

- i) The DSL will inform the parents of the pupil making the allegation and the alleged perpetrator and will explain the course of action. If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.
- j) The DSL will keep a written record of all conversations with parents and other professionals and any decisions made.
- k) The management of pupils with harmful behaviour (including sexually harmful behaviour) can be complex. The school will follow guidance and work with other relevant agencies to support perpetrators and to maintain the safety of the whole school community.
- l) Any sanctions required following a report of child-on-child abuse will be determined on a case-by-case basis.
- m) Appropriate support in school, and from outside agencies if applicable, will also be put in place for any victims or any other pupil affected. The support offered in these circumstances will be determined on a case-by-case basis depending on the circumstances.

## **27. E-safety and online behaviour**

(also see IT Policy and advice documents listed in KCSIE)

- a) The school adopts a whole school approach to online safety which seeks to reduce risk as far as possible without depriving pupils of the significant benefits provided by technology and the internet.
- b) Computing and PSHE lessons are used to help pupils to understand and avoid the risks associated with 'online activity'. Every year group is taught about e-Safety which covers blocking, removing contacts from 'buddy lists', use of social media and sharing personal data. Rules regarding Responsible Internet Use are clearly displayed.
- c) The breadth of issues classified within online safety is considerable, but can be categorised into four main areas of risk:
  - **content:** being exposed to illegal, inappropriate or harmful material
  - **contact:** being subjected to harmful online interaction with other users
  - **conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
  - **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams
- d) The school's Staff Code of Conduct and Digital Usage Policy explain the responsibilities of staff in relation to keeping pupils safe online.
- e) The school does all it reasonably can to limit the pupil's exposure to the above risks in school. It has sophisticated filters and monitoring systems in place, which are designed to protect them online without imposing unreasonable restrictions and preventing pupils benefitting from the wealth of resources available online.
- f) Pupils also receive guidance on the safe use of the internet and are educated about the risk of online harm (including anti-bullying) primarily through their Computing and PSHCE lessons.

- g) Cyber-bullying by pupils, via texts, direct messages, social media or email, will be treated as seriously as any other type of bullying and will be managed through the school's anti-bullying policy and procedures.
- h) Social networking sites and other apps can be sources of risk of inappropriate and harmful behaviour. This includes the risks related to harmful online challenges and hoaxes.
- i) Staff will be alert to risks associated with generative artificial intelligence, deepfakes, AI-generated imagery, misinformation and disinformation.
- j) If staff suspect that a pupil may be at risk of or suffering from online harm, they should follow the reporting procedures set out in this policy.

## **28. Youth produced sexual imagery, nudes/semi-nudes, sexting, upskirting**

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute inappropriate imagery (nudes, semi-nudes, sexting) in the form of photos and videos, including those created using AI. Such imagery involving anyone under the age of 18 is illegal.

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

If a member of staff becomes aware of an incident involving inappropriate material (whether this has taken place in or out of school) they should follow the safeguarding procedures and report it to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view images, delete images or look for further images. They should not copy or print images, nor forward images by email or any other electronic means.

Parents will be informed at an early stage of inappropriate online behaviour, unless there is reason to believe that involving parents would put the pupil at risk of harm.

If there is concern a young person has been harmed or is at risk of harm a referral will be made to Children's Services, or the police following the procedures as outlined above.

## **29. Sexual behaviour by children**

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation.

Developmental sexual activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with

each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent. Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Children's sexual behaviour is usually categorised by professionals using the following 'traffic light' approach:

**Green** behaviours reflect safe and healthy sexual development. They are:

- i. Displayed between children or young people of similar age or developmental ability
- ii. Reflective of natural curiosity, experimentation, consensual activities and positive choices

**Amber** behaviours have the potential to be outside safe and healthy development. They may be:

- i. Unusual for that particular child or young person
- ii. Of potential concern due to age or developmental differences
- iii. Of potential concern due to activity type, frequency, duration or the context in which they occur.

Amber behaviours signal the need to make a report to the DSL.

**Red** behaviours are outside safe and healthy behaviour. They may be:

- i. Excessive, secretive, compulsive, coercive, degrading or threatening
- ii. Involving significant age, developmental or power differences
- iii. Of concern due to the activity type, frequency, duration or the context in which they occur.

Red behaviours would indicate a need for referral to Children's Services.

### **30. Preventing Radicalisation**

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This is known as the 'Prevent Duty'. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of the school's safeguarding approach.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

### **31. Recognising Extremism**

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups

- out of character changes in dress, behaviour and child relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

Visiting speakers are always vetted and staff must obtain permission from the Head for any speakers to visit the school.

### **32. Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable 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 vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment.

### **33. Private Fostering**

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. However, where a member of staff becomes aware that a child may be in a private fostering arrangement, they must notify the DSL immediately.

### **34. Fabricated Illness**

Fabricated or induced illness is a condition whereby a child has suffered, or is likely to suffer, significant harm through the deliberate action of their parent and which is attributed by the parent to another cause.

There are three main ways of the parent fabricating (making up or lying about) or inducing illness in a child:

- Fabrication of signs and symptoms, including fabrication of past medical history;
- Fabrication of signs and symptoms and falsification of hospital charts, records, letters and documents and specimens of bodily fluid
- Induction of illness by a variety of means

Further information may be found at

[https://www.londonsafeguardingchildrenprocedures.co.uk/fab\\_ind\\_ill.html?zoom\\_highlight=fabricated](https://www.londonsafeguardingchildrenprocedures.co.uk/fab_ind_ill.html?zoom_highlight=fabricated)

### 35 Operation Encompass,

Wellesley Prep School takes part in **Operation Encompass**, a nationally recognised safeguarding partnership between schools and the police.

Operation Encompass ensures that schools are informed, before the start of the next school day, when a child may have been present at or affected by a police-attended domestic abuse incident. The purpose of this early notification is to enable schools to offer timely, sensitive and appropriate support to children who may be experiencing worry or distress.

When such an incident occurs, the police share **only the child's name** with the school via a secure system. No further details about the incident are provided. At Wellesley, this information is received confidentially by our **Designated Safeguarding Lead (DSL)**, Mr Bickford, who has been specially trained in Operation Encompass procedures. This allows us to ensure that the child is supported at school, should they need it, while maintaining privacy and discretion.

The **Domestic Abuse Act 2021** recognises that children who experience domestic abuse are victims in their own right. Our involvement in Operation Encompass reflects our ongoing commitment to safeguarding, wellbeing and pastoral care for every child.

If you have any questions or would like further information, please do not hesitate to contact **Mr Bickford, Designated Safeguarding Lead**, who will be happy to discuss this with you in confidence.

### 36 Alternative Provision

Where the school places a pupil in alternative provision or another off-site educational setting, the school retains overall responsibility for safeguarding and promoting the welfare of that pupil. The Designated Safeguarding Lead will ensure that appropriate safeguarding arrangements are in place, information is shared as necessary, attendance and welfare are monitored, and any safeguarding concerns are communicated promptly between all relevant parties. The school will work closely with providers to ensure pupils are safe and receive appropriate support.