

Safeguarding and Protecting the Welfare of Pupils Policy

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Key external contacts

Local Authority	Oxfordshire		
Schools group	Tudor Hall School		
To report a new concern	MASH - Multi-Agency Safeguarding Hub Out of hours Emergency Duty Team (EDT)	0345 050 7666 0800 833408	mash-childrens@oxfordshire.gov.uk
For general advice	Locality and Community Support Service (LCSS North) LCSS Central Contact	0345 2412703 0345 2412705	LCSS.North@oxfordshire.gov.uk
To report concerns about child sexual exploitation	The Kingfisher Team	01865 309196	
To report concerns about a professional or person in a position of trust	Local Authority Designated Officer (LADO) Jo Lloyd Sandra Barratt Amie Pilcher Education Safeguarding Advisory Team (ESAT) Jo Lloyd Becky Langstone Sophie Kendall	01865 810603	Lado.safeguardingchildren@oxfordshire.gov.uk ESAT.safeguardingchildren@oxfordshire.gov.uk
To report a concern	Safeguarding Vulnerable people from extremism (OSCP)	0345 050 7666	Ask for Oxfordshire Multi-Agency Safeguarding Hub (MASH)
If you fear someone is vulnerable to radicalisation	Oxfordshire MASH (for a child) or the Social and Health Care Team (for an adult)	0345 050 7666	
For non-emergency situations	DfE helpline	020 7340 7264	counter.extremism@education.gov.uk
Police	Non-Emergency Line Emergency	101 999	

Key External Contacts and Mill Hill Education Group Contacts – for All Group Schools

NSPCC Whistleblowing Advice Line	Address: Weston House, 42 Curtain Road, London EC2A 3NH Tel: 0800 028 0285 (08.00 – 20.00 Mon to Fri) Email: help@nspcc.org.uk
NSPCC/Home Office Report Abuse in Schools Helpline	Tel: 0800 136 663 (08.00 – 22.00 Mon to Fri, 09.00 – 18.00 Sat Sun) Email: help@nspcc.org.uk
NSPCC Child Protection Helpline	Tel: 0808 800 5000
Childline	Tel: 0800 1111 www.childline.org.uk
Disclosure and Barring Service	Address: PO Box 181, Darlington DL19FA Tel: 01325 953795 Email: dbsdispatch@dbs.gsi.gov.uk
Teaching Regulation Agency	Address: 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH Tel: 0207 593 5393 Email: misconduct.teacher@education.gov.uk
Ofsted Safeguarding Children	Tel: 08456 404046 Email: whistleblowing@ofsted.gov.uk
Forced Marriage Unit	Tel: 0207 008 0151 Email: fmufco.gov.uk
Reporting FGM	Police: 101
Independent Schools Inspectorate (ISI)	CAP House, Long Lane, London EC1A 9HA Tel: 0207 600 0100; Email: info@isi.net

Governors		Email
Chair of the Court of Governors Safeguarding Governor	Mr Elliot Lipton Mr Nigel Taylor	clerktothegovernors@millhill.org.uk
Executives and Senior Management Team		
Chief Executive Officer (CEO) Director of Finance and Resources Director of Operations Director of Safeguarding Director of Prep Schools	Mr Antony Spencer Mrs Nicky Marlow Mr Sean Ryan Mrs Kelly Alleyne Mr Leon Roberts	CEO@millhill.org.uk nmarlow@millhill.org.uk sean.ryan@millhill.org.uk kelly.alleyne@millhill.group leon.roberts@millhill.group
Out of hours for referring urgent safeguard concerns regarding staff	Contact MASH, and email the Head of the relevant School (as above), CEO and Director of Safeguarding	

Key School Contacts:

	Tudor Hall School
Head	Ms Julie Lodrick headmistress@tudorhallschool.com
Designated Safeguarding Lead (DSL)	Mrs Kate Simlett, Deputy Head Pastoral, DSL and Head of Boarding ksimlett@tudorhallschool.com
Designated Teacher for Looked After Children	Deputy Head Pastoral and DSL
Deputy Designated Safeguarding Leads (DDSLs)	Mrs Kate Hart, Assistant Head Pastoral KHart@tudorhallschool.com Mrs Gilly Cable, Senior Housemistress gcable@tudorhallschool.com

List of Terms/Acronyms

LSCP	Local Safeguarding Children Partnership
CSC	Children's Social Care
DBS	Disclosure and Barring Service
Local Authority Designated Officer (LADO)	The Officer who has overall responsibility at the Local Authority for the oversight of the procedures for dealing with safeguarding allegations against.
DfE	Department for Education
FGM	Female Genital Mutilation
ISSR	Independent School Standards Regulations
KCSIE	Keeping Children Safe in Education
MASA	Multi-Agency Safeguarding Arrangements which have replaced the Local Safeguarding Board
MASH	Multi-Agency Safeguarding Hub
MHEG	Mill Hill Education Group
NMS	National Minimum Standards for Boarding Schools
TRA	Teaching Regulation Agency
RecordMy/MyConcern/CPOMS	RecordMy, MyConcern and CPOMS are the facility where all Staff should lodge a referral to the DSL/DDSL regarding a safeguarding concern relating to a Pupil.
LGBTQIA+	Lesbian, Gay, Bisexual, Trans, Queer, Intersex, Asexual pupils

1. Introduction

Mill Hill Education Group (the 'Group') is the trading name of The Mill Hill School Foundation. It is a group of independent Schools which together educate girls and boys aged 6 months to 19 years. A list of the Schools currently forming part of the Mill Hill School Foundation may be located at the following link: <https://millhilleducationgroup.com/about-us/our-policies-and-reports>

This Policy applies to all Schools in the Foundation, including Early Years Foundation Stage (EYFS) settings. This Policy applies to all Pupils at Foundation Schools and all Staff (whether employed full-time or part-time or contracted or volunteers) working in these Schools, and to the Members of the Court of Governors of Mill Hill School Foundation. The Foundation may employ past Pupils or use past Pupils as volunteers only if more than three years has elapsed since the Pupil left one of the Foundation Schools.

This Policy may be viewed on the website of each of the Foundation Schools. It is available in hard copy or larger print on request to the School Offices. The term 'School' in this Policy shall refer to each of the Foundation Schools, as appropriate.

The Mill Hill School Foundation is a Registered Charity. Both the Mill Hill School Foundation and Mill Hill School Enterprises are Companies Limited by Guarantee, employing both teaching and non-teaching staff. Legal responsibility rests with the Companies acting by the Court of Governors. The Head Teachers have day to day responsibility for the management of the Schools and the care of their Pupils.

Mill Hill School Foundation fully recognises its responsibilities for safeguarding, child protection and protecting the welfare of all its Pupils. Safeguarding refers to measures implemented to protect the health, wellbeing and human rights of children so that they may live free from harm, abuse, neglect and exploitation.

This Policy has regard to:

- The Statutory Guidance issued by the Department for Education (the 'DfE') in Keeping Children Safe in Education (September 2026) ('KCSIE').
- KCSIE incorporates the additional statutory guidance: Disqualification under the Childcare Act 2006 (September 2018).
- This Policy operates in accordance with the London Boroughs of Barnet and Enfield, Hertfordshire, Kent, Oxfordshire and Suffolk County Councils and other locally agreed inter-agency procedures as part of the multi-agency safeguarding arrangements set up by the Local Safeguarding Children Board.

This Policy is compliant with:

- The Prevent Duty Guidance for specified authorities in England and Wales (December 2023). Prevent is supplemented by a Briefing Note – How social media is used to encourage travel to Syria and Iraq (July 2015).

- The Prevent Duty: An introduction for those with safeguarding responsibilities (Sept 2023).
- The Prevent Duty: Departmental Advice for Schools and Childcare Providers (June 2015),
- The Prevent Duty: Guidance for specified authorities in England and Wales (December 2023).
- Channel Duty Guidance: Protecting People Susceptible to Radicalisation (October 2025).
- What to do if you are worried a child is being abused (March 2015),
- The Use of Social Media for On-line Radicalisation (July 2015),
- Mobile phones in schools Guidance for schools on prohibiting the use of mobile phones throughout the school day (Feb 2024).
- Working together to Safeguard Children (2026),
- Bulletin -Working Together to Safeguard Children 2026 – What Independent Schools Need to Know.
- Working together to improve school attendance: Statutory Guidance for maintained schools, academies, independent schools and local authorities (July 2026).
- Keeping children safe in out of school settings (April 2022).
- After school clubs, community activities and tuition. Safeguarding guidance for providers (February 2026).
- Disqualification under the Childcare Act (August 2018),
- Mental Health and Behaviour in Schools (Nov 2018),
- Counselling in Schools; a Blueprint for the Future (February 2016),
- Behaviour in Schools (February 2024).
- Children Missing Education (August 2025).
- Child Sexual Exploitation: Definition and Guide for Practitioners (2017).
- Department for Education (DfE): Digital and Technology Standards in Schools and Colleges (April 2026).
- Department for Education (DfE): Generative Artificial Intelligence in Education (August 2025).
- Department for Education (DfE): Cyber Security: Filtering and Monitoring Standards for Schools (June 2026).
- Department for Education (DfE): Mental Health and Behaviour in Schools Guidance (2018).
- After school clubs, community activities and tuition (safeguarding guidance for providers) (February 2026).
- Department for Education (DfE): Supporting Pupils in Schools with Medical Conditions (September 2026).
- Department for Education (DfE): Allergy Safety in Schools (July 2026).
- GOV.UK: Data Protection in Schools (July 2026).
- NSPCC: Protecting Children from Radicalisation (July 2024).
- The National Minimum Standards for Boarding Schools (April 2026).
- Relationships Education, Sex and Relationships Education (RSE) and Health Education (2021) and July 2025 for implementation September 2026).
- The Independent School Standards Regulations (the 'ISSR') (2014), - Part 3 -Paragraphs 7 and 8.
- Department for Education (DfE) Early Years Foundation Stage: Statutory Framework for Group and School Based Providers (July 2026) ("EYFS Framework").
- The requirements of the Code of Practice published by the Disclosure and Barring Service (the 'DBS')
- The Charity Commission Guidance Safeguarding and protecting people for charities and trustees (June 2022).
- Home Office: Serious Violence Strategy (December 2022).
- Modern Slavery: How to Identify and Support Victims (June 2025).
- Children's Wellbeing and Schools Act (2026).
- Domestic Abuse Act (2021).

- Equality Act 2010.
- Counter-Terrorism and Security Act (2015)
- Homelessness Reduction Act (2017).
- Multi Agency Guidance on FGM (July 2020).
- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (May 2024).

The Group does not distinguish between its Pupils on the grounds of age, in that it does not consider that its child protection responsibilities should end once a Pupil attains the age of 18. Any reference to a 'Child' or 'Pupil' in this Policy or other Foundation Policies includes any Pupil aged 18 years and over. This Policy is to be read and applied in conjunction with other relevant Foundation and School Policies and guidance documents including:

- Acceptable Use of IT Policy/Agreement (Staff and Governors)
- Anti-Bullying Policy
- Child Going Missing from School/School Activities Policy
- Early Years Policy
- Low-Level Concerns about Staff Policy
- Mobile Phone Policy
- Online Safety Policy
- Personal, Social, Health and Economic Education (PSHE) and Relationship and Sex Education (RSE) Policy
- Positive Behaviour Policy
- Recruitment, Selection and Disclosure Policy and Procedure
- Restraint of Pupils Guidance
- Searches Guidance
- Staff Code of Conduct
- Taking, Storing and Using Images of Children Policy
- Whistleblowing Policy
- Mental Health and Wellbeing Guidance
- Photo Consent Guidance

2. Equality Act 2010

The Foundation understands and recognises its obligations under the Equality Act and that all Schools in the Group must not discriminate against Pupils because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding. The Schools will consider how to support Pupils with regard to particular protected characteristics in order to meet their specific needs.

The Schools will also consider their duty to make reasonable adjustments for disabled Pupils. The Schools recognise that effective safeguarding is anti-discriminatory and anti-racist, and understands factors, including economic and social circumstances, ethnicity and disability, which can impact on children and families' lives. Staff are alert to the risk of adultification bias, where children, particularly Black children, may be perceived as older than they are, which can lead to their needs being poorly understood and opportunities to provide help being missed.

All Foundation Schools comply with their legal duties under the Equality Act 2010, including putting special provision in place to support dialogue with children who may not be able to convey their wishes and feelings as they may want to. This might include, for example, those who have communication difficulties and those who do not speak English or for whom English is not their first language. The Group Schools will also consider their duty to make reasonable adjustments for disabled Pupils. The Schools have arrangements for listening to children and providing early help. Further information may be provided by the Designated Safeguarding Lead (DSL) of the respective School. A list of the Designated Safeguarding Leads may be located under Key School Contacts (Individuals) at page 5 of this Policy.

Concerns about a child

The School has a duty to consider at all times the best interests of the Pupil and take action to enable all Pupils to achieve the best outcomes. Safeguarding and Promoting the Welfare of Children is everyone's responsibility. Foundation Schools adopt a 'whole school' approach to safeguarding. This means involving everyone in the School, and ensuring that, safeguarding and child protection are at the forefront and underpin all relevant aspects of process and Policy development.

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

Parent/s/Guardian/s/Carer/s are encouraged to raise any concerns directly with the School, if necessary, using this Safeguarding and Protecting the Welfare of Pupils Policy for concerns about the safety and/or welfare of children. Parents/s/Guardian/s/Carer/s may raise concerns in accordance with the Foundation's Handling Concerns and Complaints from Parents (incl EYFS) Policy.

3. Principles and Practice

Safeguarding and Promoting the Welfare of Children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing 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.

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

Mill Hill School Foundation Responsibilities

The Foundation's responsibility to safeguard and promote the welfare of children is of paramount importance. It consequently has a duty to consider at all times the best interests of the child and to take action to enable all children to have the best outcomes. The Foundation is committed to protecting every pupil from any form of abuse, neglect or exploitation whether from an adult or another Pupil in or outside the home or online. All children have equal rights to protection.

The Court of Governors recognises its responsibility for ensuring that Staff are competent to carry out their responsibilities for safeguarding and protecting the welfare of children; creating an environment where Staff feel supported in their safeguarding role and are able to raise concerns; and ensuring that those who work directly with children have regular reviews of their own practice so that they have knowledge, skills and experience which improve over time.

The Governors and Foundation Schools understand their obligations, particularly as regards to diversity, inclusion, prejudicial and discriminatory bullying and sexual violence & harassment in accordance with the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

Foundation Schools must not discriminate against Pupils because of a 'protected characteristic' including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, Foundation Schools will consider how to support Pupils with regard to particular 'protected characteristics' in order to meet their specific needs.

In support of its aim to promote a culture which makes its Schools safe places in which to learn and to live, the Foundation has robust health and safety procedures and promotes safe working practices for those who work with children. It operates clear and supportive Policies for Pupils on alcohol and substance misuse. Where services or activities are provided separately by another body using the Foundation's premises, the Foundation makes all necessary checks with regard to safeguarding and child protection.

The Foundation must ensure that, through the publication of this Policy, and by other means, Parent/s/Guardian/s/Carer/s understand the responsibilities placed on the Schools and Staff for child protection.

This Policy and associated Policies must be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review. Any deficiency that is noted in the Foundation's safeguarding and child protection arrangements must be remedied without delay.

Helping Pupils to Keep Safe

The Foundation is committed to raising Pupils' awareness of safeguarding and child protection issues. At every stage, Pupils are taught through the wider curriculum and at an age-appropriate level how to stay safe, based on what may happen to them not only in School but also beyond it. This includes staying safe online, the dangers of cyberbullying and sexting, and the management of phone internet accessibility.

Pupils will be helped to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation, with particular attention to the safe use of electronic equipment and the

internet. Pupils are also helped to understand the risks posed by those whose use the internet and social media, to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. Appropriate filters and monitoring systems are in place to safeguard Pupils from potentially harmful and inappropriate online material. Pupils are expected to conform to the requirements of the Foundation's Online Safety, Artificial Intelligence (AI), Mobile Phone and Acceptable Use of IT Policies, and the guidance they are given by their respective Schools regarding the acceptable use of technology.

Procedures

The Foundation has clear procedures for identifying and reporting suspected cases of abuse, and for supporting any Pupil who has been abused. There are also procedures to minimise the risk of child-on-child abuse, as well as clear guidance as to how allegations of child-on-child abuse must be dealt with. Types and signs of abuse are listed at Appendix A.

The Foundation follows the inter-agency procedures and local protocols of the Schools' Local Safeguarding Children Partnerships (LSCPs) and Multi Agency Safeguarding Arrangements (MASAs). It works collaboratively with these agencies and other professionals to take immediate action where a Pupil has suffered or is likely to suffer significant harm and to provide additional support for children in need and those with emotional and mental health issues.

Safeguarding incidents and/or behaviours can be associated with factors outside of Foundation Schools and/or can occur between children outside of the Foundation. This is known as contextual safeguarding, which simply means that assessments of Pupils should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. All Staff, but especially the Designated Safeguarding Leads (DSLs) or Deputy Designated Safeguarding Leads (DDSLs) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

Foundation Schools must co-operate readily with the Channel Panel and the Police in providing relevant information in determining whether an individual is vulnerable to being drawn into terrorism or radicalisation.

The Foundation recognises the importance of acting on and referring the early signs of abuse, neglect, exploitation, radicalisation, keeping clear records, listening to the views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction.

Staff

All Staff members must maintain an attitude of '**It does happen here**' in relation to safeguarding. They are expected to be alert to any signs of abuse or need and to recognise the importance of providing early help. When concerned about the welfare of a child, Staff members must always act in the best interests of the child.

All Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent Staff from having a professional curiosity and speaking to the School's Designated Safeguarding Lead (DSL) if they have concerns about a child.

The Foundation recognises the importance of creating an environment where Staff feel able to raise concerns and feel supported in their safeguarding role. It is important that the Foundation and the Schools' Leaders create the right culture and environment so that Staff feel comfortable to discuss concerns regarding matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children. Staff should thus feel able to follow the Foundation's separate Whistleblowing and Low-Level Concerns About Staff Policies to raise concerns about poor or unsafe safeguarding practices, potential failures by the Foundation or its Staff properly to safeguard the welfare of Pupils, or other wrongdoing by Staff in the workplace that does not involve the safeguarding and welfare of children. There must be no retribution or disciplinary sanction taken against a member of Staff for making such a report provided that it is done in good faith.

Safer recruitment is practised in order to check the suitability of all Staff and Governors and others who work with children. Please see the Foundation's Recruitment, Selection and Disclosure Policy for full details. Where Staff from another organisation are working with our Pupils on another site, we must have received assurances that appropriate child protection checks and procedures apply to those Staff.

All visiting speakers, contractors and other visitors who are not fully Disclosure and Barring Service (DBS) checked, will be required to undergo an identity check on arrival and wear a visitor's badge/red lanyard at all times, displayed prominently. A member of Staff will be assigned to supervise any visitors who display a red lanyard. No unsupervised access to Pupils will be permitted for any visitor or contractor.

From 1 September 2026, under the [Crime and Policing Act 2026](#), the "supervision exemption" for volunteers is removed. Unpaid roles involving teaching, training, caring for, or supervising children frequently (more than 3 days in any 30-day period) or overnight are now legally classed as regulated activity, regardless of Staff supervision, requiring an enhanced Disclosure and Barring Service (DBS) check with children's barred list information.

All Staff must comply with the requirements and expectations of the Staff Code of Conduct. Staff should be aware of the importance of making appropriate safeguarding arrangements for one-to-one teaching, for instance extra tuition, instrumental music lessons and sports coaching.

Where Staff have access to confidential information about a Pupil or the Pupil's family, they must access only information that is relevant and must not reveal this information except to those colleagues who have a professional entitlement through their role in relation to the pupil. Further guidance for Staff may be found in the Foundation's Confidentiality Policy.

4. Responding to Concerns

If a member of Staff has any concerns about a child, but there is no risk of immediate harm, the Designated Safeguarding Lead (DSL) must be informed, and s/he must decide what action to take. All

Staff should be prepared to identify children who may benefit from Early Help. If Early Help is appropriate, the Designated Safeguarding Lead (DSL) must liaise with other agencies as appropriate.

In considering a referral, the Designated Safeguarding Lead (DSL) must differentiate between safeguarding children who are in need of additional support from one or more agencies and those who have suffered or are at risk of suffering serious harm. The former should lead to Early Help, inter-agency assessment and intervention using local processes, including the use of the Early Help Assessment, now in use and 'Team Around the Child' (TAC) approaches. In the latter case, a referral must be made to Children's Social Care (CSC) immediately, and in any case within 24 hours. If a crime may have been committed, the Police must be informed from the outset (see [when to call the police: guidance for schools and colleges](#) on www.npcc.police.uk) Anyone may make a referral if necessary: should this be the case, the Designated Safeguarding Lead (DSL) must be informed as soon as possible.

The Local Authority should make a decision within one working day of a referral being made as to the course of action they are taking and should advise the referrer. Where the outcome of a referral is not reported to the referring member of Staff or Designated Safeguarding Lead (DSL) and/or where the child's situation does not appear to be improving, the Designated Safeguarding Lead (DSL) (or the referring member of Staff) must follow this up with Children's Social Care (CSC) and press for reconsideration to ensure that their concerns have been addressed and the child's situation improves. Concerns should always lead to help for the child.

When deciding whether to make a referral, following an allegation or disclosure, the Head and Designated Safeguarding Lead (DSL) should not make their own decision over what appear to be borderline cases, but rather the doubts and concerns should be discussed with the Local Authority Designated Officer (LADO) or Multi-Agency Safeguarding Arrangements (MASA). This may be done without giving names in the first instance.

Based on the perceived level of risk, referral processes, such as Channel Panel or Children's Social Care (CSC), must be used where there are concerns that a child may be drawn into radicalisation or terrorism.

While decisions to support a child about whom there are concerns would normally be taken in consultation with Parent/s/Guardian/s/Carer/s and Pupils, their consent is not required for referrals to statutory agencies such as the Police and Children's Social Care (CSC):. What is in the best interests of the child must always be of overriding importance.

In relation to Channel Panel referrals, the Designated Safeguarding Lead (DSL) must consider seeking the consent of the child and/or their Parent/s/Guardian/s/Carer/s/ when determining what information can be shared. Whether or not consent is sought must be dependent on the circumstances of the case, but may relate to issues such as the health of the individual, law enforcement or protection of the public.

5. What Staff Should Do If A Child Is In Immediate Danger Or Risk Of Harm

If Staff (including Governors, Trainee Teachers, Supply Staff, Agency Staff and Volunteers) believe that a child has been harmed or is in immediate danger or at risk of harm, an

immediate referral to Children's Social Care (CSC) and/or the police should be made. Anyone can make a referral. Referrals will generally be made by the Designated Safeguarding Lead (DSL) following receipt of a report from Staff. However, Staff must feel confident to make a referral themselves if they believe a child is in immediate danger or at risk of harm.

Any such referral must be made immediately and in any event within 24 hours (one working day) of Staff being aware of the risk. Parental/Guardian/Carer consent is not needed for referrals to statutory agencies such as the Police and Children's Social Care (CSC). If anyone other than the Designated Safeguarding Lead (DSL) makes a referral, they should inform the Designated Safeguarding Lead (DSL) as soon as possible that a referral has been made. The Local Authority Social Worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required.

6, Information Sharing

The Foundation and Governors recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with Local Authority Children's Social Care (CSC), the safeguarding partners and other organisations, agencies, and practitioners as required.

Fears regarding sharing information under Data Protection legislation (the Data Protection Act 2018, the UK General Data Protection Regulation and the Data (Use and Access) Act 2025) must not be allowed to stand in the way of safeguarding and promoting the welfare of children. Data protection legislation does not prevent the sharing of information for the purposes of keeping children safe. When deciding what information to share, Staff should consider:

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

Professional judgement should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. Care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk. If in doubt about what information can and should be shared, Staff should speak to the Designated Safeguarding Lead (DSL). The Foundation and Governors will ensure that Staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'.

- Understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of, special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and gaining consent would place a child at risk.
- Not providing Pupils' 'personal data' where the serious harm test is met.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* (May 2024) supports Staff who have to make decisions about sharing information.

All Foundation Schools have appropriate arrangements in place to ensure that safeguarding information is transferred, reviewed and actioned promptly at all transition points, including in-year moves, in line with the statutory guidance. When sharing safeguarding information, the Schools will clearly distinguish current safeguarding concerns and support needs from historic information.

Where a Foundation School receives safeguarding information for Pupils, this will be reviewed by the Designated Safeguarding Lead (DSL) who will take steps to clarify any information that is unclear or incomplete. Where there are issues or concerns this may include a conversation between the Designated Safeguarding Leads (DSLs) at appropriate settings. The Designated Safeguarding Lead (DSL) will ensure that key Staff are aware of any relevant information for new Pupils.

Where a Foundation School receives any information that indicates an incoming Pupil may present a risk to others and/or themselves, the School will assess the risk and put in place a Safety and Support Plan for when the child arrives. Please see the Foundation's Data Protection Policies at the following link: <https://millhilleducationgroup.com/about-us/our-policies-and-reports>

7. What To Do If A Pupil Wishes To Make An Allegation Or Disclosure

Any adult responding to a Pupil who wishes to make an allegation or disclosure must:

- Listen carefully to the Pupil and keep an open mind. They should not display shock or disbelief or form a decision as to whether or not abuse has taken place.
- Reassure the Pupil but not give a guarantee of absolute confidentiality, explaining that they have to pass the information to the Designated Safeguarding Lead (DSL) or another senior person, who must ensure the correct action is taken.
- Not take any action that may jeopardise a Police investigation, such as asking a child leading questions or attempting to investigate the allegation or disclosure.
- Not ask the Pupil to repeat it all to another member of Staff.
- Record only statements and observations, not the adult's 'interpretations' or 'assumptions'.
- Keep a sufficient written record of the conversation. It should include date, time and place, and the essence of what was said and done by whom in whose presence. The record should use names, not initials, and be signed and dated by the person making it. All evidence, for example

scribbled notes, mobile phones containing messages, clothing and computers, should be preserved and safely stored.

- Refer their safeguarding concern to the Designated Safeguarding Leads/ Deputy Safeguarding Leads (DSL/DDSL) of their School, as soon as possible. Referrals to the Designated Safeguarding Lead or Deputy Safeguarding Lead (DSL or DDSL) can be made using the School's Safeguarding Reporting System, or in person. Staff are encouraged to follow up any referral with a conversation with the Designated Safeguarding Lead or Deputy Safeguarding Lead (DSL/DDSL).

In the event that a child is at risk of immediate danger, the Staff member receiving the disclosure must ensure that this is communicated to a Designated Safeguarding Lead or Deputy Designated Safeguarding Lead (DSL/DDSL) immediately. This should be done face-to-face or by telephone.

Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of Staff present (preferably one of them being the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead (DSL or DDSL).

The record must be kept securely and handed to the Designated Safeguarding Lead (DSL) unless it involves the Head or a member of Staff, including the Designated Safeguarding Lead (DSL). If the allegation is made against the Designated Safeguarding Lead (DSL) or another member of Staff the record must be handed to the Head of the School. If it involves the Head, the record must be passed directly to the Chief Executive Officer of the Mill Hill School Foundation who must immediately inform the Chair of the Court of Governors. If it involves the Chief Executive Officer, it must be reported to the Chair of the Court of Governors.

8. Early Help, Family Help and Potentially Vulnerable Groups

Early Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Early help is available through universal and community-based services. Support should be given as soon as a problem emerges at any point in a child's life, from the early years through to the teenage years. In the first instance, Staff who consider that a Pupil may benefit from Early Help should discuss this with the School's Designated Safeguarding Lead (DSL). The Designated Safeguarding Lead (DSL) must consider the appropriate action to take in accordance with the Multi-Agency Safeguarding Arrangements (MASA) referral threshold document. The Designated Safeguarding Lead (DSL) must support Staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If Early Help is appropriate, the matter must be kept under review and consideration given to a referral to Children's Social Care (CSC) if the Pupil's situation does not appear to be improving.

Where appropriate, the Designated Safeguarding Lead (DSL) or the Head of the School may consult with the Pupil concerned and his/her Parent/s/Guardian/s/Carer/s regarding a referral to one or more external agencies, such as Children's Social Care (CSC). Once this has been determined for a Pupil, the Designated Safeguarding Lead (DSL) must support the member(s) of Staff involved in liaising with the agencies and setting up an inter-agency assessment as appropriate. This may lead to a written plan to support the Pupil in need being drawn up or an early help assessment being carried out.

Examples of potentially vulnerable groups include Boarders, Pupils with SEND, and Pupils who have 'protected characteristics', and those who have experienced multiple suspensions, at risk of being permanently excluded or on a reduced timetable:

- Staff should be alert to Pupil relationships and the potential for child abuse among Boarders.
- Pupils with SEND may face additional safeguarding challenges, such as assumptions that signs of possible abuse such as behaviour, mood and injury relate to the Pupil's disability without further exploration; that children with SEND can be disproportionately impacted by things like bullying (including prejudice-based bullying) – without outwardly showing any signs; and may have difficulties in cognitive understanding and communicating their concerns about abuse, neglect or exploitation. All Staff need to be alert to the specific needs of these Pupils, including young Carers.
- Children who are LGBTQIA+ can be targeted by other children. In some cases, a Pupil who is perceived by other children to be LGBTQIA+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQIA+. Again, Staff should be alert to any signs or indicators of abuse and should discuss concerns with the Designated Safeguarding Lead (DSL) and/or the Deputy Designated Safeguarding Lead (DDSL) as appropriate.
- Children who are or identify as LGBTQIA+ must be made aware of a safe space and person for them to speak out with and share their concerns.
- Staff should also be aware that the School could consider taking positive action to support Pupils if there was evidence they are being disproportionately subjected to sexual violence or sexual harassment.

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

In order to provide the appropriate support and to keep looked after children safe, the Designated Safeguarding Lead (DSL) of each School must promote the educational achievement of children who are looked after at Foundation Schools. Each Designated Safeguarding Lead (DSL) must have received appropriate training. The appropriate Staff must be provided with all necessary information with regard to a looked after child to ensure the safety of the Pupil.

The SEND Code of Practice is a useful source of information, and support is available from specialist organisations including The Special Educational Needs and Disabilities Information Advice and Support Services (SENDIASS).

9. Child-on-Child Abuse, Including Sexual Violence And Sexual Harassment Between Children.

Child-on-child abuse is abuse by one or more Pupils against another Pupil both inside and outside of school or online. It can manifest itself in many ways and can include but is not limited to:

- Abuse within intimate partner relationships (also known as teenage relationship abuse).
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm.
- Physical assault and harm, or the threat of harm with a weapon
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).

- Sexual harassment, such as sexual comments, which may include misogyny/misandry, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, 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 and typically involves taking a picture under a person's clothing (not necessary 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.
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos including those generated by AI
- Sextortion – individuals being forced into paying money or meeting another financial demand, after a person has threatened to release nude or semi-nude photos of them (this could be a real photo, or a fake image created of the victim by the person threatening its release).
- And initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Foundation Schools must respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the School. The Designated Safeguarding Lead/Deputy Safeguarding Lead (DSL/DDSL (who should have a complete safeguarding picture) must be the most appropriate person to advise on the initial response by the School.

Abusive comments and interactions should never be passed off or dismissed as 'banter' or 'part of growing up'. Nor must harmful sexual behaviours be dismissed as the same or 'just having a laugh' or 'boys being boys', 'girls being girls'. Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. While the gendered nature of child-on-child abuse is recognised (i.e. that it is more likely that girls must be victims and boys' perpetrators), all child-on-child abuse is unacceptable and must be taken seriously. Additionally, the Foundation recognises that not all child-on-child abuse is reported and even if there are no reported cases it may still be occurring, and we should remain vigilant.

For further information regarding sexual abuse, sexual harassment and harmful sexual behaviours, please see the relevant sections in Appendix A.

The Foundation recognises that children with special educational needs and disabilities can be more prone to child-on-child group isolation and more vulnerable to child-on-child abuse than other children and must consider extra pastoral support for those children. The Foundation also recognises that children in residential settings can be particularly vulnerable and is alert to the potential for child-on-child abuse here.

The Foundation takes steps to minimise the risk of child-on-child abuse, including induction and mentoring programmes; clear reporting procedures; a robust Policy promoting positive behaviour; training Pupils in leadership positions and appropriate lessons as part of the School's Personal, Social, Health and Economic Education (PSHE) curriculum and assemblies/tutor periods. It is highly important that all Staff challenge abusive behaviours between Pupils.

Where an allegation of abuse has been made against a Pupil, the Foundation works closely with safeguarding partners, including Police (if appropriate) and Children's Social Care (CSC), acting on their advice to ensure the alleged victim and perpetrator (or all children involved) are supported and protected.

Child on Child abuse is a safeguarding issue for both the victim and alleged perpetrator. In the event of disclosures about child-on-child abuse, all children involved (both victim and perpetrator) must be treated as being at risk and safeguarding procedures in accordance with this Policy must be followed. Both victims and perpetrators must be supported by the Foundation's Counsellors and Pastoral Care Teams. Support from external agencies must be sought, as appropriate.

When there has been a report of sexual violence, the Designated Safeguarding Lead (DSL) must make an immediate Risk and Needs Assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The Designated Safeguarding Lead (DSL) must consider the risks posed to Pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises and School transport.

The Risk and Needs Assessment must also consider:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation must be progressed and any support that they must be offered, but this must need to be balanced with the school's duty and responsibilities to protect other children.
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed.
- The ages of the children involved.
- The developmental stages of the children involved.
- Any power imbalance between the children. Is/are the alleged perpetrator(s) significantly older, more mature and confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.)

That sexual violence and sexual harassment can take place within intimate personal relationships between children.

- The importance of understanding intra familial harms and any necessary support for siblings following incidents.
- Are there ongoing risks to the victim, other children or School Staff.
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- If the alleged perpetrator is to remain in School, are there ongoing risks if other children and Parents/s/Guardian/s/Carer/s were to become aware of the incident.

For those bullying incidents which are not related to sexual violence and sexual harassment (child-on-child abuse), please refer to the Schools' Anti-Bullying Policies for details regarding procedures and protocols that will be followed.

10. Making or Sharing Of Nudes Or Semi-nudes (Including Those Generated By AI)

Making, possessing and distributing sexual photographs and videos of under 18s is a criminal offence. For this purpose, 'making or sharing nudes and semi-nudes' refers to the creation, sending or posting of nude or semi-nude images, videos, or live streams by persons under the age of 18 online. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

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

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

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

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

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

Any direct disclosure by a child will be taken seriously and Staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If Staff are notified or become aware of an incident of sharing of nude or semi-nude images and/or videos including those generated using AI being shared by a Pupil or of a Pupil, they should refer the incident to the Designated Safeguarding Lead (DSL) as soon as possible. All incidents involving the sharing of nude or semi-nude images will receive a safeguarding response, regardless of whether they are consensual or non-consensual. The School will take a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

The Foundation recognises that images of Pupils published by Foundation Schools on their websites, social media channels, or in marketing materials may be vulnerable to misuse, including manipulation using AI tools. The Foundation's approach to obtaining consent for, publishing, and managing Pupil images (including the steps taken to mitigate the risk of AI manipulation of published images) is set out in the Foundation's Photo Consent Guidance, Artificial Intelligence and Acceptable Use Policies for Staff and Pupils. Staff should refer to these Policies for guidance on the publication of Pupil images and should report any concerns about the misuse or manipulation of published images to the Designated Safeguarding Lead (DSL) immediately.

All members of Staff in an education setting have a duty to recognise and refer any incidents involving nude or semi-nude images and/or videos including those generated using AI e.g. deepfakes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

Staff should be aware that incidents involving AI-generated imagery should be treated with the same seriousness as those involving real images. When an incident involving the sharing of nude or semi-nude images comes to the Foundation's attention, the matter should be referred to the Designated Safeguarding Lead (DSL) as soon as possible. The Designated Safeguarding Lead (DSL) will follow the Department for Culture, Media and Sport (DCMS) and the UK Council for Internet Safety ((UKIS) Guidance: Sharing Nudes and semi-nudes: advice for education settings working with children young people (March 2024).

The Designated Safeguarding Lead (DSL) should then hold an initial review meeting with appropriate Staff. The initial review meeting will determine whether a risk assessment should be carried out and if there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process. There should be subsequent interviews. Parent/s/Guardian/s/Carer/s should be involved in the process unless there is good reason to believe that involving Parent/s/Guardian/s/Carer/s would put the child at risk of harm. If at any point in the process there is concern that a child has been or is at risk of being significantly harmed, a referral should be made to Children's Social Care (CSC) and/or the Police immediately. Any decision not to inform the Pupil's Parent/s/Guardian/s/Carer/s should be made in conjunction with other services such as Children's Social Care (CSC) and the Police who will take the lead in deciding when they should be informed. Viewing nude or semi-nude imagery can be distressing for both young people and adults and appropriate emotional support may be required.

An immediate referral to police and/or Children's Social Care (CSC) through the Multi Agency Safeguarding Hub (MASH)or equivalent will be made if any of the following points apply:

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

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

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

Adults should not view nude or semi-nude imagery. Details on searching, deleting and confiscating devices can be found in the Department for Education (DfE) Guidance: Searching, Screening and Confiscation Advice. If a device needs to be seized and passed on to the Police, then it should be confiscated, and the Police should be called; in the meantime, the device should be turned off and placed under lock and key until the Police are able to retrieve it.

11. Training (Induction, Ongoing and Ad Hoc, as required)

With the proviso that, in accordance with KCSIE, the Foundation's Court of Governors must take a proportional risk-based approach with regard to the level of information that is provided in training to permanent and temporary Staff, trainee teachers and volunteers. All Staff must be provided with induction training and annual reviews to provide them with the relevant skills and knowledge to safeguard children effectively, including online. The Foundation provides training via the VVV Platform and School specific inset training days, Oxfordshire Safeguarding training and Staff Meetings.

Training includes:

- This Policy.
- The Staff Code of Conduct.
- The Behaviour and Sanction Policy.
- The Anti-Bullying Policy.
- The Whistleblowing Policy.
- The identity, contact details and role of the DSLs and DDSLs.
- The safeguarding response to children who are absent from education, particularly on repeat occasions and/or for prolonged periods, and what to do in the event a child goes missing during School/School activities.
- The Online Safety Policy, and the Acceptable Use of IT Policy/Agreement (Staff and Governors).
- Part 1 (Safeguarding Information) of KCSIE.
- The use of the School's safeguarding system for making referrals of safeguarding concerns relating to Pupils and on how to manage a report on child-on-child sexual violence or sexual harassment.
- The role and identity of the Designated Safeguarding and Deputy Designated Safeguarding Leads at each Foundation School.
- The safe and effective use of AI including training on identifying and mitigating the key risks associated with AI, including risks to safeguarding, data protection, ethics, and intellectual property. For additional information, Staff should refer to the Department for Education (DfE's) support materials on Generative artificial intelligence in education, developed in partnership with the Chiltern Learning Trust and the Chartered College of Teaching, including Module 3 on safe use.

Governors, Heads and Senior Leadership Teams (SLTs) are required to read KCSIE in its entirety. Heads, SLTs, and Staff who work directly with children must also be required to read Part Five (child-on-child sexual violence and sexual harassment) and Annex B (further information - additional information about specific forms of abuse and safeguarding issues) of KCSIE. From 1 September 2026, Annex A has been removed from KCSIE. All Staff are required to read and understand Part One of the guidance in full.

All Staff must be required to confirm that they have read this Policy and the parts of KCSIE (Sept 2026) as required by their job role.

As soon as practical, all teaching and pastoral care Staff undertake Level 1 Safeguarding Training and Prevent awareness training.

All Staff must undertake regular child protection training in line with guidance from the Local Safeguarding Children Boards. All Staff must receive updates as required, and at least annually.

The Heads, Designated Safeguarding Leads, and Deputy Designated Safeguarding Leads (DSLs/DDSLs) must undergo Advanced Child Safeguarding Training (formerly Level 3) which must be updated at least every two years. The Designated Safeguarding Leads (and all those members of Staff who conduct interviews) must also complete safer recruitment training every three years. The Designated Safeguarding Leads (DSLs) must refresh their knowledge and skills at regular intervals, to enable them to understand and keep up with relevant developments.

All Early Years Foundation Stage (EYFS) Staff are required to attend safeguarding training specifically designed for Staff caring for 0–5-year-olds which must cover all the areas set out in Annex C to the EYFS Statutory Framework: “Criteria for effective safeguarding training.” Training must be renewed every two years by the School.

All Governors receive appropriate safeguarding and child protection training upon their induction, and this training is updated regularly. In addition, those Governors involved in recruitment within the Foundation complete appropriate Safer Recruitment training. The Court of Governors are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, data protection legislation, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for a School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention. Data protection legislation place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. Please refer to the Foundation’s Data Protection Policies which may be located at the following link: <https://millhilleducationgroup.com/about-us/our-policies-and-reports>

Staff must be trained on the need to reassure victims that they must be supported and kept safe, so that no victim must be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and that no victim must ever be made to feel ashamed for making a report.

Senior Pupils at Mill Hill School who are given positions of responsibility are briefed on the appropriate actions to take should they receive allegations of abuse. The Deputy Head (Pastoral) at Mill Hill School is responsible for organising these briefings and ensuring that they occur regularly.

12. The Designated Safeguarding Lead (DSL)

The Court of Governors has appointed a member of Staff of each Foundation’s School’s Senior Leadership Team to be that School’s Designated Safeguarding Lead (DSL). The Designated Safeguarding Lead (DSL) must take lead responsibility for child protection, welfare, online safety (including understanding the filtering and monitoring systems and processes in place in the School) and the prevention of radicalisation. The Designated Safeguarding Lead (DSL) must be given the appropriate status and authority within the Schools to carry out the duties of the post, as well as the additional time, funding, training, resources and support they need to carry out the role effectively.

The Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL) must always be available in School hours to discuss safeguarding concerns about welfare and safeguarding matters. For out of hours/out of term activities, the relevant Designated Safeguarding Lead/Deputy Designated Safeguarding Lead (DSL/DDSL) or the appropriate Multi-Agency Safeguarding Hub (MASH) office (in the Borough where the Pupil lives) should be contacted.

If the Designated Safeguarding Lead (DSL) is unavailable, his/her duties must be carried out by one of the Deputy Designated Safeguarding Leads (DDSLs). In this Policy, reference to the Designated Safeguarding Lead (DSL) includes the Deputy Designated Safeguarding Lead (DDSL) where the Designated Safeguarding Lead (DSL) is unavailable. All the Designated Safeguarding Leads and Deputy Designated Safeguarding Leads (DSLs/DDSLs) form part of the Foundation's Safeguarding Team.

The names and contact details of the Designated Safeguarding Leads (DSLs) and Deputy Designated Safeguarding Leads (DDSLs) are given in Appendix E.

The Designated Safeguarding Lead (DSL) is the first point of contact for Parent/s/Guardian/s/Carer/s, Pupils, teaching and non-teaching Staff and external agencies, such as the Multi-Agency Safeguarding Arrangements (MASA) in all matters of child protection except for allegations against Staff, Volunteers and the Designated Safeguarding Lead (DSL), which must be reported to the Head of the School where the member of Staff, Volunteer or Designated Safeguarding Lead (DSL) is employed. Pupils may ask to speak specifically to either a male or a female Designated Safeguarding Lead/Deputy Designated Safeguarding Lead (DSL/DDSL) and such a request must be accommodated whenever reasonably practicable.

The Designated Safeguarding Lead (DSL) must ensure that there are always appropriate arrangements for listening to children and providing Early Help.

The Designated Safeguarding Lead (DSL) must liaise with the Local Authority and work with partner agencies to seek advice, support and guidance, drawing on multi-agency expertise, knowledge and experience to support a Pupil about whom there are concerns regarding harm, abuse, emotional well-being or other aspects of his or her welfare. The Designated Safeguarding Lead (DSL) must take prompt action where there are concerns that a Pupil may be in need of help, and if a Pupil is suffering or at risk of significant harm, the Designated Safeguarding Lead (DSL) must make an immediate referral to Children's Social Care (CSC) or other agencies, including the Police.

While aspects of the Designated Safeguarding Lead's (DSLs) Job Description may be delegated to a Deputy Designated Safeguarding Lead (DDSL), the Designated Safeguarding Lead (DSL) nonetheless retains overall responsibility for all of them. In brief, these responsibilities cover the following safeguarding areas:

- Managing referrals – for example, to the local safeguarding partners, other relevant agencies, the Channel Programme, the Disclosure and Barring Service (DBS), the Police (as appropriate).
- Working with others - including liaising with the Deputy Designated Safeguarding Leads (DSLs), the Head, the Court of Governors, other School Staff, and the Local Authority Designated Officer (LADO) and the local safeguarding partners.
- Training – their own, and of others - including with regard to the risks associated with online safety for all pupils, and the increased risks which children with SEND may face online.
- Raising awareness – ensuring the Foundation's Safeguarding and Protecting the Welfare of Pupils and associated Policies are known, understood and used appropriately.

- Information sharing - help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a Social Worker, are experiencing, or have experienced, with Teachers and School Senior Leadership Teams.
- The administration of child protection files - information sharing, including transferring files where children leave the School, and when it may be appropriate to share information in advance of a child leaving School.
- Providing support to the Staff in School - supporting and advising Staff and help them feel confident on welfare, safeguarding and child protection matters.
- Understanding the views of children – the Designated Safeguarding Lead (DSL) should encourage a culture of listening to children and taking account of their wishes and feelings, understand the difficulties that children may have in approaching Staff about their circumstances and consider how to build trusted relationships which facilitate communication.
- Keeping detailed, accurate, secure written records of all concerns, discussions and decisions made, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as Local Authority Children's Social Care (CSC) or the Prevent Programme.
- All members of the Safeguarding Teams have received a full job description showing their full responsibilities in detail

13. The Designated Safeguarding Governor

Mr Nigel Taylor is the named Governor delegated by the Court of Governors to take leadership responsibility for safeguarding arrangements including the implementation of this Policy. Working in collaboration with the Foundation's Director of Safeguarding, he is responsible for ensuring that the Foundation contributes to inter-agency working in line with 'Working Together' through effective communication and good co-operation with local agencies. He is also responsible for ensuring there is appropriate oversight of the safeguarding and prevention of radicalisation procedures and their implementation.

In addition, the Governor delegated by the Court, Nigel Taylor, works collaboratively with the Foundation's Director of Safeguarding to ensure the Court of Governors are presented annual safeguarding reviews for each School on the Foundation's Safeguarding Protecting the Welfare of Pupils Policy. and of the efficiency with which the related duties have been discharged. Annual safeguarding reviews must be prepared following consultation with the Heads and Designated Safeguarding Leads from each of the Foundation Schools. It must form part of the Court of Governors' Annual Review of the Foundation's child protection duties, which is undertaken to ensure that all members of the Court of Governors, as part of their legal responsibilities, are satisfied that this Policy and associated Policies are fully appropriate and compliant, and that the related duties have been discharged fully and efficiently.

14. Online Safety and Teaching Pupils How to Keep Safe

The Court of Governors holds online safety and teaching Pupils how to keep safe, as a central theme in their whole setting approach to safeguarding by ensuring that all Pupils are taught about safeguarding, including internet safety (including when Pupils are online at home), through the curriculum, Personal, Social, Health and Economic Education (PSHE) and

Relationships and Sex Education RSE) to help children to adjust their behaviours, both inside and outside of School, in order to reduce risks and build resilience, including to radicalisation and extremism. This includes teaching Pupils about the safe use of electronic equipment and the internet, and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The Foundation recognises that a “one size fits all” approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some children with SEND might be needed.

Filtering and monitoring

The Foundation has appropriate filters and monitoring systems in place to address risks, including in relation to any generative AI tools used with Schools to safeguard Pupils from potentially harmful and inappropriate material online when using the School’s IT systems.

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

The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.

The School ensures compliance with the Department for Education (DfE) ‘Cyber security/filtering and monitoring standards for schools’ by;

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing the effectiveness of the filtering and monitoring provision at least annually. Reviews will be carried out by the Senior Leadership Team member responsible for

filtering and monitoring, with the support of the School's Designated Safeguarding Lead (DSL) and IT support. They will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record is kept of these checks.

- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

Foundation Schools utilise the Department for Education (DfE) 'plan technology for your school' service to self-assess compliance against the filtering and monitoring standards and ensures that any recommendations are incorporated as appropriate. The School ensures that its filtering and monitoring arrangements addresses risks, including in relation to any generative AI tools used within the School.

The School will liaise with Parents/s/Guardian/s/Carer/s to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use.

Parent/s/Guardian/s/Carer/s and will be made aware of what their children are being asked to do online when undertaking remote learning online at home, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

It is essential that Pupils are safeguarded from potentially harmful and inappropriate online material. Their approach to online safety empowers the Foundation to protect and educate Pupils and Staff in their use of technology, with mechanisms in place to identify, intervene in, and escalate any concerns where appropriate.

The Designated Safeguarding Lead (DSL) is acknowledged as having overall responsibility for online safeguarding within each School. The Designated Safeguarding Leads (DSLs) and leadership teams follow the guidance regarding online safety within 'Keeping Children Safe in Education' 2026; and the Department for Education (DfE) guidance outlining how Schools can ensure their Pupils understand how to stay safe and behave online as part of existing curriculum requirements.

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

Use of Artificial Intelligence

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

Foundation Schools will only use AI products that meet the Department for Education (DfE's) Generative AI: product safety expectations and any use of generative AI by Staff or Pupils will be carefully considered and assessed, evaluating the benefits and risks within a School context.

Foundation Schools are alert to the safeguarding risks arising from AI, including but not limited to:

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

Any safeguarding or wellbeing concern arising from the use of AI tools should be reported to the School's Designated Safeguarding Lead immediately, using the procedures set out in this Policy.

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

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

The Designated Safeguarding Lead (DSL) will investigate any AI-related safeguarding concern and determine whether it should be referred to external agencies such as Children's Social Care (CSC) and/or the Police, in accordance with the procedures set out in this Policy.

The Foundation's Artificial Intelligence and Acceptable Use of IT (Pupil and Staff) Policies set out further detail on the Foundation's approach to AI, including approved tools, acceptable use guidelines, academic integrity expectations and data protection arrangements. Staff should refer to these Policies alongside the safeguarding procedures set out in this Policy.

Use of Mobile Phones

The Foundation recognises the specific risks that can be posed by mobile phones and cameras and in accordance with KCSIE 2026 and the Early Years Foundation Stage Statutory Framework; for group and school-based learning 2026. The Foundation has appropriate Policies in place that are shared and

understood by all members of the School communities. Further information reading the specific approaches relating to this can be found in the Foundation's Online Safety and Mobile Phone Policies.

The Foundation is directly responsible for ensuring it has the appropriate level of information security protection procedures, including appropriate filtering and monitoring systems, in place to safeguard our systems, Staff and Pupils. Filtering and monitoring are both important parts of safeguarding Pupils and Staff from potentially harmful and inappropriate online material, but without unreasonably impacting teaching and learning, in line with the Department for Education (DfE [filtering and monitoring standards](#) which were updated in May 2024. The effectiveness of these procedures is reviewed periodically to keep up to date with evolving cyber-crime technologies.

The Foundation reviews the approach to online safety and information security annually, or more often if circumstances dictate.

Foundation Schools use communications with Parent/s/Guardian/s/Carer/s to reinforce the importance of children being safe online. This must include:

- What systems they have in place to filter and monitor online use.
- What they are asking children to do online, including the sites they must be asked to access.
- Who from the School or college (if anyone) their child is going to be interacting with online.

Cyber Security

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

The Foundation's arrangements include maintaining an information asset register, keeping hardware and systems registers up to date, and having a disaster recovery and business continuity plans that address digital technology.

15. Mental Health Support

All Staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day to day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.

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

The Foundation has an important role to play in supporting the mental health and wellbeing of the Pupils, providing systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral pathways to seek professional support.

The Foundation actively supports the mental health and wellbeing of its Pupils. Specifically, Staff can support the fulfilment of 4 key roles:

- Promoting good mental wellbeing and preventing the onset of mental illness.
- Observing Pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one,
- Ensuring early targeted support is provided.
- Liaison with/referral to specialist services where needed.

All Staff should be aware that mental health problems can, in some cases develop into a safeguarding concern. This could include, for example, self-harm, eating disorders, or suicidal ideation. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

If Staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this Policy, and speaking to the School's Designated Safeguarding Lead (DSL). Where support is needed, the Designated Safeguarding Lead (DSL) will consider whether to inform Parent/s/Guardian/s/Carer/s to support the child's wellbeing, where doing so would not place the child at additional risk.

The Designated Safeguarding Lead (DSL) will call 999 if there is immediate danger and NHS 11 for urgent non-emergency mental health support.

Staff should not wait for a formal diagnosis before raising a concern with the Designated Safeguarding Lead. If staff feel that a child is in immediate danger and the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL) is not available, they should call 999 or arrange for them to be taken to A&E immediately by a Parent/S/Guardian/s/Carer/s or other suitable person.

Sport

The Group recognises that sport and physical activities can present unique safeguarding risks. Staff involved in the delivery of sport and physical education should be alert to safeguarding concerns that may arise in these settings, including risks associated with physical contact, changing facilities, one-to-

one coaching, and away fixtures or tours. Some sports may need to be played in single-sex groups from a certain age to ensure children's safety, and where this is the case there must be no exceptions. Sporting activities must be provided in single sex groups where physical safety or competitive fairness is a factor.

Looked After Children

The Foundation ensures that Staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a Local Authority. The School's Designated Safeguarding Lead (DSL) and Director of Safeguarding will provide support and guidance to Staff in relation to looked after children.

Children with a Social Worker (Children in Need and Child Protection Plans)

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

Local Authorities should share the fact a child has a Social Worker, and the Designated Safeguarding Lead (DSL) should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

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

Regulations and Safeguarding Requirements Relating to School Premises

As stipulated in KCSIE, Staff must not allow children into toilets designated for the opposite biological sex. This includes where Staff are responding to requests to support social transition for children who are questioning their gender. The Group will provide separate toilets for boys and girls aged 8 and over, apart from where a mixed-sex toilet is in a room intended for use by one Pupil at a time and is lockable from the inside.

In a situation where a gender-questioning child does not want to use the toilet designated for their biological sex, Designated Safeguarding Leads should consider whether they can provide an alternative toilet facility, without compromising single-sex toilet provision. Designated Safeguarding Leads (DSLs) should keep a clear record of these situations, communicate them appropriately and review them regularly.

When the need arrives for children to change clothing, staff must not allow a child aged 11 years or older at the start of the school year to undress in front of a child of the opposite biological sex.

When responding to a request to support social transition, Staff must not allow a child to access changing rooms designated for the opposite sex. If a gender-questioning child does not want to use the changing rooms and showers designated for their sex, staff should discuss this with the Designated Safeguarding Lead (DSL) and the Designated Safeguarding Lead (DSL) should consider whether they can provide an alternative changing or washing facility without compromising the provision of single-sex facilities. This could be achieved by using a separate fully enclosed room or by using existing facilities at separate times. Designated Safeguarding Lead should keep a clear record of these situations, communicate them appropriately and review them regularly.

16. Educating Pupils About Safeguarding

Schools play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school approach that prepares Pupils for life in modern Britain and creates a culture of non-acceptance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. The Foundation has a clear set of values and standards which are upheld and demonstrated throughout all aspects of School life.

The following programmes must be used to ensure that Pupils develop a clear understanding of safeguarding issues including those involving online safety, of the dangers of radicalisation and of the safeguarding dangers associated with alcohol, bullying, drug-taking, sexual assaults and sexting, and what they may do to play their part in ensuring their welfare and safety and in building resilience against the dangers of radicalisation:

- Personal, Social, Health and Economic Education.
- Relationship and Sex Education (RSE).
- Assemblies / Chapel Services.
- Spiritual, Moral, Social and Cultural Development (SMSC).
- ICT/Computing (Online Safety).

The Schools' curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our Pupils, as well as by a planned programme of evidence-based Relationships and Sex Education (RSE) delivered in regularly timetabled lessons and reinforced throughout the whole curriculum (Relationships Education [for all Primary Pupils] and Relationships and Sex Education [for all Secondary Pupils]). All teaching Staff play a vital role in this process, helping to ensure that all Pupils relate well to one another and feel safe and comfortable within the School. In the teaching of Relationship and Sex Education (RSE), Schools must have regard for the Statutory Guidance from the Department for Education (DfE) and must promote an awareness of the content that is age and stage of development appropriate (especially when considering Pupils with SEND and other vulnerabilities).

The Relational and Sex Education (RSE) Programme tackles issues that are central to our safeguarding approach, such as:

- Healthy and respectful relationships.
- Boundaries and consent.
- Stereotyping, prejudice and equality.

- Body confidence and self-esteem.
- How to recognise an abusive relationship, including coercive and controlling behaviour.
- The concepts of, and laws relating to – sexual consent, sexual exploitation, abuse, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage or female genital mutilation (FGM), and how to access support.
- What constitutes sexual harassment and sexual violence and why these are always unacceptable.

Full details are given in the Personal, Social, Health and Economic Education and Relationship and Sex Education Policies.

17. Children who are Absent from Education

The Foundation recognises that unexplainable and/or persistent absences from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation – particularly County Lines (County Lines is a term used to describe urban gangs and organised criminal networks that export illegal drugs into smaller towns, suburban areas, and rural locations using dedicated mobile phone numbers known as 'deal lines'. Foundation Schools must ensure that its immediate response to persistently absent Pupils is robust, such that it helps prevent them becoming a child missing education in the future. This is particularly important for children known to Children's Social Care (CSC).

DfE guidance on school attendance [Working together to improve school attendance \(updated, effective August 2024\)](#) includes information on how Schools should work with Local Authority Children's Services where School absence indicates safeguarding concerns within the family or in the community.

Foundation Schools must monitor all Pupil absences from School and promptly address concerns about irregular attendance with the Parent/s/Guardian/s/Carer/s.

The relevant School's Designated Safeguarding lead (DSL) must inform the applicable Local Authority (within which the Pupil resides when not at School) of any Pupil who is going to be added to or deleted from the relevant School's admission register for one of a number of stipulated reasons. This assists the Local Authority to fulfil its duty to identify children of compulsory school age who are missing from education and follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, child sexual or criminal exploitation, or radicalisation.

Action must be taken in accordance with the Foundation's Missing Child Policy if any absence of a Pupil from a Foundation School gives rise to a concern about their welfare.

18. Radicalisation and Prevent

The Prevent Duty Guidance for England and Wales (updated 2023) emphasises that the duty to have due regard to the need to prevent children from being drawn into terrorism is an aspect of safeguarding. The Foundation must have due regard to the need to prevent people from becoming terrorists or supporting terrorism, and to the statutory Prevent Duty Guidance issued under Section 29 of the Counterterrorism Security Act 2015.

The Duty sits alongside long-established safeguarding duties on professionals to protect people from a range of other harms, such as substance abuse, involvement in gangs, and physical and sexual exploitation. The duty helps to ensure that children who are susceptible to radicalisation are supported as they would be under safeguarding processes.

The objectives of Prevent are to:

- Tackle the ideological causes of terrorism.
- Intervene early to support people susceptible to radicalisation.
- Enable people who have already engaged in terrorism to disengage and rehabilitate.

Radicalisation is the process by which a person comes to support terrorism and forms of extremism. Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs, including calls for the death of members of the UK armed forces, whether in this country or overseas. For the full Government definition of extremism, see [New definition of extremism \(2024\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/new-definition-of-extremism).

Children and young people continue to make up a significant proportion of Prevent referral cases, and in recent years there have been concerns regarding increased numbers of learners being arrested for terrorism-related offences. Schools are often in a unique position, through interacting with learners on a regular basis, to be able to identify concerning behaviour changes that may indicate they are susceptible to radicalisation.

Schools should not only be alert to violent extremism but also non-violent extremism, including certain divisive or intolerant narratives which can reasonably be linked to terrorism. Please see: Educate Against Hate which provides further information on extremist narratives. (<https://www.educateagainsthate.com/category/school-leaders/advice-and-training-school-leaders/>)

The Department for Education has also published supporting advice for schools and further education settings on managing the risk of radicalisation in their education setting (<https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation>). Compliance with the Prevent duty will reflect existing good practice on safeguarding. For example, it will ensure susceptibility to radicalisation is incorporated into safeguarding training, Policies and Risk Assessments.

The Foundation recognises that the general risks affecting children and young people may vary from area to area and according to their age.

The Foundation aims to build Pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Foundation Schools must provide safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. The Foundation is committed to ensuring appropriate emphasis in its curriculum to promote fundamental British values as an essential aspect to counter radicalisation and enable Staff and Pupils to develop the knowledge and skills to challenge extremist arguments.

Indicators of vulnerability or susceptibility to involvement in extremism may be found in Appendix B.

19. Temporary Accommodation Notification

Where a Foundation School receives a notification from the Local Housing Authority, under the Children's Wellbeing and Schools Act 2026, that a child has been placed in temporary accommodation, the Designated Safeguarding Lead OR Deputy Designated Safeguarding Lead will:

- Assess whether the child's welfare needs have changed and whether additional pastoral, academic or safeguarding support is required.
- Liaise with relevant agencies, including the local Housing Authority and, where appropriate, Local Authority Children's Social Care (CSC), to ensure coordinated support is provided.
- Make a referral to Local Authority Children's Social Care (CSC) where there are concerns that the child has been harmed or is at risk of harm.

This notification does not replace existing safeguarding and welfare duties. Staff who become aware of concerns about a child's welfare arising from homelessness or temporary accommodation should report these to the Designated Safeguarding Lead in accordance with the procedure set out in this Policy.

20. Visiting Speakers

In accordance with the Prevent Statutory Guidance, the Foundation has a protocol to ensure that Visiting Speakers are suitable and appropriately supervised. A Visiting Speaker must be invited only with the permission of a Senior Leader. Formal or informal background information about a Visiting Speaker must be obtained to determine whether to invite and/or permit a speaker to attend the School. For further information, please refer to the Foundation's Visiting Speaker Policy.

Use of Mobile Phones

Personal mobile phones are not allowed to be used in the early years setting and must be locked away at all times. All photographs of children are taken on school cameras or devices and are stored in accordance with the Data Protection Act 2018 and the Foundation's Online Safety Policy.

Screen Use

Each Foundation School with an Early Years Foundation Stage setting has regard to Government guidance on screen use for children in the early years, including the impact of screen time on children's health, development and wellbeing. The School's approach to screen use in the EYFS setting is age appropriate. Staff in the EYFS setting are aware of the risks associated with excessive or inappropriate screen use for young children and take steps to manage and limit children's exposure to screens in line with the guidance

Staff Medication

If a Staff member is taking medication which may affect their ability to care for children, the Staff member should seek medical advice. Staff medication is always safely stowed away out of the reach

of children. Staff are aware that they must declare to either the Head or Deputy Heads if they are taking any medication, which might affect their ability to work with children.

Disqualification from Working in Childcare

It is an offence to employ anyone in connection with its Early Years and Later Years (under-8s) provision who is disqualified, or for a disqualified person to be directly involved in the management of its Early Years and Later Years (under-8s) provision. The Foundation must ensure that those who fall within the scope of the guidance in accordance with the Disqualification under the Childcare Act 2006 are required to complete a self-declaration form confirming that they do not meet any of the criteria for disqualification under the Regulations, as set out in the Foundation's Recruitment, Selection and Disclosure Policy.

A Foundation School must inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

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

Safeguarding Training

The Foundation ensures all Staff working in an Early Years setting are trained in line with the criteria set out in THE Department of Education (DfE) Annex C of the EYFS Foundation Stage Statutory Framework for group and school based providers (July 2026) and are supported to implement the Policy on an ongoing basis.

The Director of Safeguarding and Designated Safeguarding Lead provides support, advice and guidance to all Staff on an ongoing basis, and on specific safeguarding issues that may arise. The Designated Safeguarding Lead attends a training course, consistent with the criteria set out in Annex C of the EYFS Foundation Stage Statutory Framework for group and school-based providers (July 2026).

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

The Designated Safeguarding Lead (DSL) is responsible for liaison with the Local Statutory Children's Services agencies, and with the Local Safeguarding Partners (LSP).

21. Use of School Premises for Non-School Activities

When School facilities/premises are hired out to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular

activities), the Foundation must ensure that they have appropriate arrangements in place to keep children safe. This applies regardless of whether or not the children who attend any of these services or activities are children on the School Roll.

The School therefore seeks assurance that the provider concerned has appropriate Safeguarding and Child Protection Policies and Procedures in place (including inspecting these as needed); and ensures that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. This requirement is included in every Lease or Hire Agreement as a condition of use and occupation of the premises, and failure to comply with this would lead to termination of the Agreement.

The guidance on [Keeping children safe in out-of-school settings](#) details the safeguarding arrangements that the Group expects these providers to have in place.

22. Allegations Against Staff

This **'harms threshold'** section applies where an adult within the School community has behaved in a way that:

- Has harmed a child or may have harmed a child.
- Indicates he/she may pose a risk of harm to a child.
- Has possibly committed a criminal offence against or related to a child.
- Indicates they may not be suitable to work with children. This is termed 'transferable risk' in KCSIE and refers to an incident outside School which did not involve children but could have an impact on their suitability to work with children. For example, a member of Staff is involved in domestic violence at home. No children were involved, but the School must consider what triggered these actions and could a child in the School trigger the same reaction, therefore being put at risk.

Where it is a child who makes the allegation, then the procedures detailed in this Policy (guiding members of Staff in how they should respond to a disclosure from a child) should be followed, with the variations set down below.

When allegations arise, the following protocols should be followed:

- Where an allegation is made against a member of Staff, the member of Staff receiving the allegation must immediately inform the Head of the School in which that member of Staff works who must contact the Designated Safeguarding Lead (DSL). If the Head is absent, the allegation should be passed to whoever is deputising for the Head in his/her absence that day or the Designated Safeguarding Lead (DSL). Where there may be a conflict of interest in reporting an allegation to the Head or the Staff member deputising in their absence, a member of Staff can report the matter to the Chief Executive Officer of the Mill Hill School Foundation, or directly to the Local Authority Designated Officer (LADO).
- Where an allegation is made against the Designated Safeguarding Lead (DSL), the member of Staff receiving the allegation must immediately inform the Head of the relevant School, who must take over the Designated Safeguarding Lead's (DSLs) duties. If the Head is absent, the allegation should be passed directly to the Chief Executive Officer of the Mill Hill School Foundation.
- Where an allegation is made against the Head, the member of Staff receiving the allegation must immediately inform the Chief Executive Officer who must immediately inform the Chair of the Court of Governors (or in his absence the nominated Safeguarding Governor) who must

immediately consult with the Local Authority Designated Officer (LADO) without notifying the Head first.

- Where an allegation is made against the Chief Executive Officer, the member of Staff receiving the allegation must immediately inform the Chair of the Court of Governors (or in his absence the nominated Safeguarding Governor).

In all of the cases mentioned above, the welfare of our Pupils must remain the absolute priority in line with the guidance from KCSIE. As stipulated in KCSIE, the Head or, where the Head is the subject of the allegation, the Chair of the Court of Governors should discuss the allegation immediately with the Local Designated Officer (LADO) in order to consider the nature, content and context of the allegation and agree a course of action.

A referral to the Children's Social Care (CSC) or Police of a child protection allegation or suspicion against a member of Staff or Volunteer at the School must not normally be made where the case is one which, upon the advice of the Local Authority Designated Officer (LADO), can be satisfactorily investigated and dealt with under the School's internal Procedures. In such situations additional support from one or more external agencies should be sought and the Parent/s/Guardian/s/Carer/s should be kept fully informed, as appropriate.

The Local Authority Designated Officer (LADO) should be informed within 24 hours of all allegations that come to the School's attention and appear to meet one or more of the following criteria: that the person is alleged to have behaved in a way that has or may have harmed a Pupil; or possibly committed a criminal offence against or related to a Pupil; or behaved towards a Pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; behaved or may have behaved in a way that indicates that they may not be suitable to work with children.

Where appropriate, the Designated Safeguarding Lead (DSL) must be informed as soon as possible. An allegation may be referred directly to the Police. The Foundation must not undertake its own investigation of allegations without prior consultation with the Local Authority Designated Officer (LADO), or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, discussions with the Local Authority Designated Officer (LADO) can be held informally, and without naming the school or individual.

While the Foundation is not the employer of Supply Teachers or Trainee Teachers, the Foundation must ensure allegations are dealt with following the correct procedures. When there is an allegation relating to a member of Supply Staff provided by an Agency, the Agency must be fully involved in the process. The relevant School must take the lead in any investigation as agencies do not have direct access to the children or other School Staff and are thus not able to collect the facts or liaise with the Local Authority Designated Officer (LADO).

A referral to a Multi-Agency Safeguarding Hub (MASH) or the Police of a child protection allegation or suspicion against a person who is from outside the School and not a member of Staff or Volunteer at the School must be made and the advice of the Multi-Agency Safeguarding Hub (MASH) followed. A complaint or suspicion of abuse involving the identification of someone who may already be engaged in illegal terrorist-related activity must always be referred to Children's Social Care (CSC) and, if appropriate, the Police.

All discussions must be recorded in writing. Any communication with both the individual and the Parent/s/Guardian/s/Carer/s of the child or children must be agreed. General Data Protection Regulation (GDPR) cannot be allowed to stand in the way of safeguarding children.

The Foundation's procedures for dealing with allegations against Staff (including Supply Teachers, Trainee Teachers or Volunteers who work with children, and Contractors) aim to strike a balance between the need to protect children from abuse and the need to protect Staff from false or unfounded allegations. However, when considering its actions the Foundation must consider whether Pupils are at risk or may be at risk, and whether the member of Staff's presence in the School would impede an investigation.

The Foundation must ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course of action, unless there is an objection by Children's Social Care (CSC) or the Police. The Foundation must appoint a named representative to keep the individual informed of the progress of the case and must consider what other support is appropriate for the individual.

Suspension must not be an automatic response to an allegation. The Foundation should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The Foundation must give due weight to the views of the Director of Safeguarding and the Designated Safeguarding Lead (DSL) and the provisions of KCSIE when making a decision about suspension. Where the individual is suspended, the Foundation must ensure they know who their point of contact is in the Foundation and shall provide them with their contact details. Where a member of the Boarding Staff or a member of Staff living in Foundation accommodation is suspended pending investigation, the Foundation must undertake to provide alternative accommodation away from Pupils.

The Foundation must report to the Disclosure and Barring Service (DBS) within one month of leaving the Foundation any person (whether employed, contracted, a volunteer or Pupil) whose services are no longer used because he or she is considered unsuitable to work with children. If any person (whether employed, contracted, a volunteer or Pupil) is dismissed, or resigns, before a disciplinary process is completed the Head should inform the person about the employer's statutory duty to report the case to the Disclosure and Barring Service (DBS) and must consequently inform the Local Authority. If any person (whether employed, contracted, a supply teacher, a volunteer or Pupil) is dismissed, or resigns, and a judgement is made that a disciplinary process would have been instituted if that person had remained in post the Head should similarly inform the person about the employer's statutory duty to report the case to the Disclosure and Barring Service (DBS) and must consequently inform the Local Authority.

If a teacher has been dismissed (or would have been dismissed, had he or she not resigned), following an allegation the Foundation must consider whether to inform the Teaching Regulation Agency (TRA) in accordance with KCSIE guidance.

The Foundation must have regard to the guidance and restriction on the reporting or publishing of allegations made against teachers and make all reasonable effort to maintain confidentiality and guard against unwanted publicity. Subject to this, the Foundation must ensure that Parent/s/Guardian/s/Carer/s are informed as soon as possible and kept informed about the progress of the case, subject to any advice from Children's Social Care (CSC) or the Police. These guidelines

apply up to the point where the accused person is either charged with a crime, or the Department for Education (DfE) or Teaching Regulation Agency (TRA) publish such information.

On conclusion of the case, the Director of Safeguarding and relevant School Designated Safeguarding Lead (DSL) should review the circumstances of the case to determine whether there are any improvements to be made to the Foundation's safeguarding procedures or practices to help prevent similar events in the future.

Allegations found to be malicious must be removed from the individual's Personnel Records. In all other circumstances a written record must be made of the decision and retained on the individual's Personnel File in accordance with KCSIE and a copy must be provided only to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious must not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head must consider whether any disciplinary action is appropriate against a Pupil who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

As part of its whole School approach to safeguarding, the School must ensure that it promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the School (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

The Foundation understands the importance of a positive culture where concerns can be identified and spoken about openly and acknowledges that this is a key element of a strong safeguarding system. Creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable the Group to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the Foundation and School.

Allegations Relating to External Individuals or Organisations That Are Using School Premises

When a School receives an allegation relating to an incident that (may have) happened when an individual was using their school premises for the purposes of running activities for children (community groups, sports associations, extra-curricular activities), the Foundation must follow the Safeguarding Policies and Procedures, including informing the Local Authority Designated Officer (LADO).

Introduction to the Concept and Importance of Sharing Low-Level Concerns

Behaviour which is not consistent with the standards and values of an organisation, and which does not meet the organisational expectations encapsulated in the Foundation's Staff Code of Conduct, needs to be addressed. Such behaviour can exist on a wide spectrum – from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

All Staff need to be informed about and be able to identify concerning, problematic or inappropriate behaviour and understand the importance of sharing concerns when they observe behaviour which violates the Foundation's Staff Code of Conduct.

Low-Level Concerns and Allegations

The term 'low-level' does not mean that a concern is insignificant, it means that the behaviour towards a child does not meet the 'harms threshold' set out as above. 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 Foundation's Staff Code of Conduct, including inappropriate conduct outside of work.
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO).

For full details please see the Foundation's Low-Level Concerns about Staff Policy.

Allegations against a Teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the Local Authority Designated Officer (LADO).

23. Record Keeping

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements Staff should discuss with the Designated Safeguarding Lead (DSL). The Department for Education (DfE) guidance "[Data protection in schools - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/data-protection-in-schools)" helps School Staff and Governors understand how to comply with Data Protection legislation, develop their Data Policies and processes, know what Staff and Pupil data to keep and follow good practices for preventing 'personal data breaches'.

Each Foundation School's records on safeguarding and child protection issues, including the prevention of radicalisation concerning Pupils must be kept on the School's respective safeguarding recording system and any existing paper files must be kept separately from other Pupil records and securely held in the School's Designated Safeguarding Lead's (DSLs) office. Any records or files relating to safeguarding and child protection issues, including prevention of radicalisation must be kept securely with the Head of the relevant School or the Director of Finance and Resources.

Records concerning allegations of abuse must be preserved for the term of the independent Inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for ten years from the date of the allegation if it is longer.

Access to these records must be restricted to the Director of Safeguarding, School Designated Safeguarding Lead (DSL), Head of School, Chief Executive Officer and Deputy Designated Safeguarding Lead (DDSL), and those authorised by the Designated Safeguarding Lead (DSL) or the Head of the School, as and when required.

The records on safeguarding and child protection must be reviewed regularly by the Designated Safeguarding Lead and/or Head of the School to identify patterns of behaviour and must be retained in accordance with the provisions of the Foundation's Retention of Records Policy.

Safeguarding records should be clear, factual, and distinguish between observed concerns, professional opinion, and historic information. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome.

24. Complaints

Any complaint arising from the application of this Policy should be directed in the first instance to the Designated Safeguarding Lead (DSL) at the School concerned. Should the complainant be dissatisfied with the response given then they should follow the Foundation's Handling Concerns and Complaints from Parents (incl EYFS) Policy and Procedures.

Attention is also drawn to the contact details for ISI, NSPCC and Ofsted in the Key External Contacts section which might prove helpful to those with concerns about the conduct of a School.

25. Review

This Policy shall be reviewed annually by the Court of Governors. and/or following any concerns, and/or updates to national guidance or procedures.

Last Review: August 2026

Next Review: August 2027

Signed:

Elliot Lipton
Chair of the Court of Governors

Appendix A: Abuse, Neglect and Exploitation

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

Staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

All Staff, but especially the Designated Safeguarding Leads (and Deputies) (DSLs/DDSLs) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All Staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

In all cases, if Staff are unsure, they should always speak to the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL).

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical, as well as the impact of witnessing the ill-treatment of others. This can be particularly relevant, for example, in relation to the impact of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. They may be abused by an adult or adults or another child or children. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label, and they can often overlap with one another.

Types of Abuse and Neglect

1. Neglect

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

caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

2. Physical Abuse

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

3. Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non- penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non- contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

4. Emotional Abuse

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

Possible Signs of Neglect:

- Change in behaviour.
- Hunger.
- Child appearing 'unkempt'.
- Loss of weight.
- Tiredness.
- Being left alone or unsupervised.
- Inappropriate clothing.
- Poor hygiene.
- Eating more than usual/saving food.
- Poor dental hygiene
- Not meeting a child's medical needs.
- Parent/s/Guardian/s/Carer/s not contactable or unavailable to discuss academic/pastoral needs.

Possible Signs of Physical Abuse

- Unexplained injuries or burns, particularly if they are recurrent.
- Improbable excuses given to explain injuries.
- Refusal to discuss injuries.
- Admission of punishment which appears excessive.
- Fear of Parent/s/Guardian/s/Carer/s being contacted.
- Bald patches.
- Withdrawal from physical contact.
- Arms and legs kept covered in hot weather.
- Fear of returning home.
- Fear of medical help.
- Self-destructive tendencies.
- Aggression towards others.
- Chronic running away.

Possible Signs of Sexual Abuse

Young people may:

- Be chronically depressed.
- Be suicidal.
- Use drugs or drink to excess.
- Self-mutilate, show self-hatred.
- Have unexplained pregnancies.
- Experience memory loss.
- Become anorexic or bulimic.
- Run-away frequently.
- Be inappropriately familiar with others.
- Be fearful about certain people like relatives or friends.
- Assume the role of Parent/Guardian/s/Carer/s in the house to such an extent that they do all the cooking, cleaning, child-minding and taking care of everyone's needs except their own.
- Not allowed to go out on dates or have friends round.
- Have soreness/bleeding in the genital or anal areas or in the throat.
- Find excuses not to go home or to a particular place.
- Have recurring nightmares/be afraid of the dark.
- Be unable to concentrate, seem to be in a world of their own.
- Have a 'friend who has a problem' and then tell about the abuse of the friend.
- Have chronic ailments such as stomach pains and headaches.
- Sexually abuse a child, sibling or friend.
- Exhibit a sudden change in school/work habits, become truant.
- Be withdrawn, isolated or excessively worried.
- Have outbursts of anger or irritability.
- Be fearful of undressing for Physical Education/Games.
- Have unexplained sums of money or gifts.
- Act in a sexually inappropriate way towards adults.

Possible Signs of Emotional Abuse

- Physical, mental and emotional development lags.
- Admission of punishment which appears excessive.
- Over-reaction to mistakes.
- Sudden speech disorders.
- Fear of new situations.
- Inappropriate emotional responses to painful situations.
- Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking).
- Self-mutilation.
- Fear of Parent/s/Guardian/s/Carer/s being contacted.
- extremes of passivity or aggression.
- Drugs/solvent abuse.
- Chronic running away.
- Compulsive stealing.
- Scavenging for food or clothes.

Other Situations that Can Lead to Abuse

Staff need to be aware that the following situations can lead to abuse, neglect and exploitation:

Child Abduction and Community Safety Incidents

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

Child Criminal Exploitation (CCE)

Child Criminal Exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child, through violence or the threat of violence, into criminal activity in exchange for something the victim needs or wants, or for the financial gain or other advantage of the perpetrator or facilitator. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact: it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, (see County Lines below) forced to shoplift or pickpocket or to threaten other young people.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons

such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

Some of the following can be indicators of Child Criminal Exploitation:

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

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

Child Sexual Exploitation (CSE)

Child Sexual Exploitation involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Child Sexual Exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups.

What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from other children to have sex, sexual bullying including cyberbullying and grooming.

Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child Sexual Exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation: unexplained gifts or new possessions; association with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections or becoming pregnant; changes in emotional well-being; misuse of drugs and alcohol; going missing for periods of time or regularly coming home late; and is persistently absent from education, including persistent absences for part of the school day. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Group-based Child Sexual Exploitation

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

The Child Sexual Exploitation (CSE) indicators can also be indicators of Child Criminal Exploitation (CCE):

- Children who have older boyfriends or girlfriends.
- Children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The Department for Education (DfE) has published guidance on this entitled “Child sexual exploitation: guide for practitioners”. The Children’s Society and Home Office has also published guidance on Preventing Child Sexual Exploitation.

Child Sexual Exploitation (CSE) may occur alone or may overlap with Child Criminal Exploitation (CCE), and/or County Lines, as well as other forms of abuse.

County Lines and the National referral Mechanism

County lines is a term used to describe gangs and organized criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using designated phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders must often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools. Children are often recruited to move drugs and money between locations.

One of the ways of identifying potential involvement in county lines are episodes when the child goes missing (both from home and school) and may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, staff should follow the safeguarding referral procedure set out in this policy. The DSL must refer to local services/third sector providers who offer support to victims of county lines exploitation.

Children in the Court System

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

Children who are Absent from Education

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

Children with Family Members in Prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. 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

CyberCrime

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

- Unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded.
- Denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources.
- Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

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

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: [Cyber Choices](#), ['NPCC- When to call the Police'](#), and [National Cyber Security Centre - NCSC.GOV.UK](#)

Domestic Abuse

Domestic abuse is one of the most prevalent forms of abuse, with Women's Aid estimating that 160,000 children are currently living in households where domestic abuse is taking place. This is likely to be an underestimate, however, with much abuse remaining hidden and not coming to the attention of services. The Domestic Abuse Act 2021 introduced a statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse.

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

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

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

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

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the

age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Domestic abuse may lead to other safeguarding concerns and should therefore be managed under this Policy.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safe Young Lives: Young people and domestic abuse | Safelives](#)
 - [Domestic abuse: specialist sources of support](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
 - [Home : Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)

Operation Encompass

Section 20 of the Victims and Prisoners Act 2024 introduced a new provision into Part 3 of the Domestic Abuse Act 2021 under Section 49A, placing a statutory duty on Police Forces in England and Wales to notify a child's educational setting if they have reasonable grounds to believe a child may be the victim of domestic abuse. [Operation Encompass](#) helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, it is now mandatory for the police to inform the key adult (usually the Designated Safeguarding Lead (or a Deputy Designated Safeguarding Lead)) in School as soon as is reasonably practicable. This ensures that the School has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the Police and/or Schools should make a referral to Local Authority Children's Social Care (CSC) if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Designated Safeguarding Lead (DSL) (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. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English Councils so that everyone who is homeless or at risk of homelessness must have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases School Staff must be considering homelessness in the context of children who live with their families, and intervention must be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and must require a different level of intervention and support. Children's social care must be the lead agency for these children, and the Designated Safeguarding Lead (DSL) (or a Deputies) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16- and 17-year-olds who may be homeless and/or require accommodation: [here](#).

Mental Health

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

More information can be found in the Department for Education : [Mental health and behaviour in schools guidance](#) and the Foundation's Mental Health Guidance. Public Health England. has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Every Mind Matters](#) for links to all materials and lesson plans.

Modern Slavery and the National Referral Mechanism (NRM)

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

Sexual Violence and Sexual Harassment Between Children In School

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Detailed advice is available in Part five of KCSIE.

Serious Violence

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

- Increased absence from School.
- A change in friendships or relationships with older individuals or groups.
- A significant decline in performance.
- Signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

- Being male.
- Having been frequently absent or permanently excluded from School.
- Having experienced child maltreatment and having been involved in offending, such as theft or robbery.

A fuller list of risk factors can be found in the Home Office's [Serious Violence Strategy](#).

So-called 'Honour'-Based Abuse (HBA), Female Genital Mutilation (FGM) and Forced Marriage

Honour Based Abuse

So-called Honour Based Abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including forced marriage, Female Genital Mutilation (FGM) and practices such as breast ironing. All staff must be alert to possible indicators of HBA. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Female Genital Mutilation (FGM)

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of FGM, or having already suffered FGM. Victims of FGM are likely to come from a community that is known to practise FGM. Some indicators that a girl has already been subjected to FGM are as follows: difficulty walking, sitting or standing and even looking uncomfortable; frequent urinary, menstrual or stomach problems or spending longer than normal in the bathroom due to difficulties urinating; prolonged or repeated absences from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on the Pupil's return; and reluctance to undergo medical examination.

All teachers and healthcare professionals have **a statutory duty to report to the Police** where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out in a girl under 18. Those failing to report such cases must face disciplinary sanctions. It must be rare for teachers to see visual evidence, and they should not be examining Pupils. Teachers must personally report to the Police cases where they discover that an act of FGM appears to have been carried out.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM.

Indications that a girl has already been subjected to FGM:

- 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.
- A Pupil is reluctant to undergo medical examination.

If Staff have a concern that a Pupil may be at risk of FGM, they should speak to the Designated Safeguarding Lead {or Deputy Designated Safeguarding Lead} who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care (CSC).

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

Forced Marriage

Forcing any person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. There are a range of potential indicators that a child may

be at risk of forced marriage, details of which can be found on pages 13-14 of the multi-agency guidelines: 'Handling Cases of Forced Marriage'. Group staff can also contact the Forced Marriage Unit if they need advice or information.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Special Educational Needs and/or Disabilities (SEND), or Pupils with Certain Health Conditions

Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

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

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

Safeguarding Children with Medical Conditions

The fact that there has been an incident relating to the management of a child's medical condition or allergy would not in itself warrant a referral to local safeguarding partners. The Designated Safeguarding Lead will consider a safeguarding referral where an incident highlights concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to the School, or where they are repeatedly sent without essential medication, thereby putting the child at

risk. The School will work collaboratively with healthcare professionals to ensure that any safeguarding concerns arising from a child's medical condition are identified and addressed promptly.

Further information can be found in the Department for Education (DfE): statutory guidance on supporting Pupils at School with Medical Conditions. and Allergy safety in schools.

Young Carers

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

Children who are Lesbian, Gay or Bisexual

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

Children Who Are Questioning Their Gender

When supporting a gender questioning child, the School will not initiate any action. The School will take time to understand the thoughts and feelings of children who are questioning their gender and be appropriately professionally curious about the full range of the child's experiences.

Staff should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying. In making decisions about supporting social transitions, Staff will comply with their distinct but interacting obligations under safeguarding legislation and equality and human rights law. The Designated Safeguarding Lead (DSL) will be involved in all cases where a child is questioning their gender.

Staff will not adopt any changes relating to social transition unless a decision has been made by School and a child's Parent/s/Guardian/s/Carer/s have been involved. Parent/s/Guardian/s/Carer/s will be involved in the vast majority of cases. In the rare circumstances where involving Parent/s/Guardian/s/Carer/s would constitute a greater risk to the child than not involving them, the Director of Safeguarding and the Designated Safeguarding Lead (DSL) will determine what action is

needed to safeguard the child, before the Parent/s/Guardian/s/Carer/s are contacted or any decisions are taken.

The Foundation complies with its obligations under the Education (Independent School Standards) Regulations 2014 regarding the provision of toilets and washing facilities. All Foundation Schools do not permit children to use toilets designated for the opposite biological sex. The School has regard to the provisions set out in Part two of KCSIE regarding single-sex spaces, changing rooms, and (where applicable) boarding and residential accommodation.

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

Appendix B: Prevent: Indicators of Susceptibility To Involvement in Extremism

Vulnerability: carries a sense of weakness and exposure to something attacking you.

Susceptibility: implies an aspect of repetition over time and falling victim to conditions.

These terms can be interchangeable in some cases, but not all.

A list of indicators is given below to assist professionals to understand and identify factors that could suggest a child, young person or their family may be vulnerable, and therefore susceptible to, or involved with extremism. The Channel Duty Guidance: 'Protecting People Susceptible to Radicalisation' (2023) also contains guidance on the indicators of susceptibility to involvement in extremism. See: [Channel Duty Guidance: Protecting people susceptible to radicalisation \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidance/protecting-people-susceptible-to-radicalisation). The Department for Education (DfE) briefing note 'The Use of Social Media for Online Radicalisation (2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

The NSPCC advises that the following may constitute indicators that a child is supporting an extreme ideology or being radicalised:

- Isolating themselves from family and friends.
- Talking as if from a scripted speech.
- Unwillingness or inability to discuss their views.
- A sudden disrespectful attitude towards others.
- Increased levels of anger.
- Increased secretiveness, especially around internet use.

[Protecting children from radicalisation | NSPCC.](#)

The list of indicators is not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable people/young people experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity and vulnerability, which determines their susceptibility to extremism.

The NSPCC says: 'It might be something; it might be nothing. There's no harm in talking it through' and offer confidential help and advice via their Helpline on 0808 800 5000, and Childline on 0800 1111.

For full details re the Vulnerability Assessment Framework used by the Channel to guide decisions about whether someone needs support to address the risks of their becoming drawn into extremism/terrorism, please see Annex B of the Channel Guidance 2023 (link above).

INDICATORS (not an exhaustive list)

Vulnerability

- Identity Crisis: distance from cultural/religious heritage; uncomfortable with their place in the society around them.
- Personal Crisis: family tensions; sense of isolation; adolescence; low self-esteem; dissociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.

- Personal Circumstances: migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations: perceptions of injustice; feeling of failure; rejection of civic life.
- Criminality: experience of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups.

Access to Extremism/Extremist Influences

- Reason to believe that the child associates with those known to be involved in extremism – either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate (e.g. the child is a friend or family member of someone believed to be linked with extremist activity).
- Evidence to suggest that the child is accessing the internet for the purpose of extremist activity (e.g. use of closed network groups, access to or distribution of extremist material, contacting associates covertly via Skype/email etc.).
- Reason to believe that the child has been or might to be involved with extremist/military training camps/locations.
- Possession or actively seeking to possess and/or distribute extremist literature or other media material likely to incite racial religious hatred or acts of violence.
- Sympathy with or support for illegal/illicit groups: e.g. propaganda distribution, fundraising, attending meetings.
- Support for groups which are not illegal/illicit but have links to extremist activity.

Experiences, Behaviours and Influences

- Child, social, family or faith group rejection.
- Evidence of extremist ideological, political or religious influence on the child from within or outside UK.
- International events in areas of conflict and civil unrest having a personal impact on the child resulting in a noticeable change in behaviour; many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying) and it is important to differentiate them from those that sympathise with or support extremist activity.
- A significant shift in the child's behaviour or outward appearance that suggests a new social/political or religious influence.
- Conflict with family over religious beliefs or lifestyle or dress choices.
- Vocal support of terrorist attacks; either verbally or in their written work.
- Witness to or the perpetrator or victim of racial or religious hate crime or sectarianism.

Travel

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?.
- Has the child/ young person travelled for extended periods of time to international locations known to be associated with extremism?.
- Has the child/ young person employed any methods to disguise their true identity? Has the child/young person used documents or cover to support this?.

Social Factors

- Experience of poverty, disadvantage, discrimination or social exclusion.
- A displayed lack of affinity or understanding for others, or social isolation from child groups.
- Displayed identity conflict and confusion not normally associated with youth development.
- Mental health problem or special educational needs or difficulties.
- A simplistic or flawed understanding of religion or politics.
- A history of crime, including episodes in prison.
- A foreign national, refugee or individual awaiting a decision on their immigration/national status.
- Insecure, conflicted or absent family relationships.
- Experience of any trauma in their lives, particularly trauma associated with war or sectarian conflict.
- Evidence that a significant adult or other person in the child's life has extremist view or sympathies.

More Critical Risk Factors Could Include

- Being in contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites, especially those with a social networking element.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Significant changes to appearance and/or behaviour.
- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills.
- Using insulting or derogatory names or labels for another group.
- Speaking about the imminence of harm from the other group and the importance of action now.
- Expressing attitudes that justify offending on behalf of the group, cause or ideology.
- Condoning or supporting violence or harm towards others.
- Plotting or conspiring with others.

Appendix C: Designated Safeguarding Lead – Job Description

The Designated Safeguarding Lead (DSL) has lead responsibility for safeguarding and child protection (including online safety). The DSL will provide advice and support to other staff on child welfare and child protection matters, take part in strategy discussions and inter-agency meetings, and/or support other staff to do so, and contribute to the assessment of children.

Key Interfaces: External Agencies, whole staff, pupils and parents, guardians and carers

Staff Reports: Deputy Designated Safeguarding Leads

The role includes, but is not limited to, the following specific areas of responsibility:

Availability

During term time the DSL (or a Deputy) will always be available for staff in the School to discuss any safeguarding concerns. The DSL (or a Deputy) will be, where possible, available in person. However, if they are not available in person, they can be contacted via telephone, the concern reported on CPOMS or a member of SBG alerted.

Managing referrals

The DSL is responsible for:

- Referring cases of suspected abuse and neglect to the local authority children's social care as required and supporting staff who make referrals to local authority children's social care;
- Referring cases to the channel programme where there is a radicalisation concern as required and supporting staff who make referrals to the channel programme;
- Referring cases where a person is dismissed or left due to risk/harm to a child to the disclosure and barring service as required; and
- Referring cases where a crime may have been committed to the Police as required.

Working with others

- The DSL is responsible for acting as a source of support, advice and expertise for all staff;
- Acting as a point of contact with the safeguarding partners;
- Liaising with the Headmistress to inform her of issues, especially ongoing enquiries under section 47 of the 'Children Act' 1989 and police investigations;
- As required, liaising with the 'case manager' and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- Liaising with staff (especially teachers, pastoral support staff including House staff, school nurses, IT and the Learning Support Department and the Designated Lead for Mental Health and Wellbeing on matters of safety, mental health, safeguarding and welfare (including online and digital safety) and, when deciding whether to make a referral, liaising with relevant agencies so children's needs are considered holistically; and
- Promoting supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- Working with the Headmistress and Deputy Head, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children

in need are experiencing, or have experienced, and identifying the impact that these might be having on children's attendance, engagement and achievement at school;

- Ensuring that relevant staff know who in the School's cohort of children have or have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
- Supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still lasting impact on children's educational outcomes.

Information sharing and managing the child protection file

The DSL is responsible for:

- Ensuring that child protection files are kept up to date and that information is kept confidential and stored securely;
- Ensuring records include:
 - A clear and comprehensive summary of the concern;
 - Details of how the concern was followed up and resolved;
 - A note of any action taken, decisions reached and the outcome;
- Ensuring the file (physical or online) is accessed only by those who need to see it and, where the file or content within it is shared, this happens in line with information sharing advice as set out in part one and part two of KCSIE (2026);
- Ensuring that when pupils leave the School their child protection file is:
 - Transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of the new term;
 - Transferred separately from the main pupil file, ensuring secure transit, and obtaining a confirmation of receipt.
- Considering whether it is appropriate to share information with the new school in advance of a child leaving, which may allow the new school to continue support and have support in place for when the child arrives.

Raising Awareness

The DSL is responsible for:

- Ensuring each member of staff has access to, and understands, the School's child protection policy and procedures, especially new and part-time staff;
- Ensuring the School's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, including regular reports to the education & welfare committee regarding this;
- Ensuring the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this; and
- Linking with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements;
- Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children who have or have had a social worker, are experiencing, with teaching staff and Strategic Business Group (SBG).

Training, knowledge and skills

The DSL (and DDSLs) will undergo training, updated every two years, to provide them with the knowledge and skills required to carry out the role.

The DSL must keep up to date with all changes in legislation and government guidance to ensure she:

- Understands the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- Has a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Understands the importance of the role the DSL has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- Understands the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- Is alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- Understands relevant data protection legislation and regulations, especially the '*Data Protection Act*' 2018 and the general data protection regulations;
- Understands the importance of information sharing within the School and with the safeguarding partners, other agencies, organisations and practitioners;
- Understands and supports the School with regards to the requirements of the prevent duty and is able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Understands the unique risks associated with online safety and is confident in the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- Recognises the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and has the capability to support send children to stay safe online;
- Obtains access to resources and attends any relevant or refresher training courses; and
- Encourages a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them;
- In addition to formal training set out above, refreshes knowledge and skills at regular intervals as required, for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments, to understand and keep up with any developments relevant to the role;
- The DSL will also have regard for the requirements of the inspection framework as set out by ISI to ensure that safeguarding procedures meet the standards required.

Online safety

The DSL is responsible for:

- Acting as the main point of contact on all online safety issues;
- Ensuring relevant policies are in place to mitigate or handle online safety concerns;
- Recording online safety incidents and actions taken;
- Ensuring the School community understands what safe and appropriate online behaviour is and that there will be sanctions for misusing the internet;

- Liaising with SBG and technical staff to ensure appropriate filtering and monitoring systems are in place on school devices, understanding the processes in place and regularly reviewing the effectiveness of these processes;
- Liaising with the data protection officer to ensure online safety policies align with current legislation;
- Implementing online safety training for all teaching staff and those who have pastoral responsibilities;
- Actively encouraging positive online behaviour;
- Ensuring online safety education is embedded throughout the curriculum and empowering children to keep themselves and others safe online;
- Refreshing training at regular intervals, at least annually, and keeping up to date with current research, legislation and trends.

Providing support to staff

The DSL is responsible for:

- Supporting and advising staff to help them feel confident on welfare, safeguarding and child protection matters;
- Ensuring that staff are supported during the referrals processes; and
- Supporting staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

The DSL is responsible for:

- Encouraging a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the School may put in place to protect them; and
- Understanding the difficulties that children may have in approaching staff about their circumstances and considering how to build trusted relationships which facilitate communication.

Holding and sharing information

The DSL is responsible for:

- Understanding the critical importance of information sharing, both within the School and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- Understanding relevant data protection legislation and regulations, especially the '*Data Protection Act*' 2018 and the UK general data protection regulation (UK GDPR); and
- Keeping detailed, accurate, secure written records of concerns and referrals and understanding the purpose of this record-keeping.

Appendix D: Low Level Concerns Policy

1. INTRODUCTION

- 1.1 Tudor Hall operates a safeguarding culture and ethos in which the values and expected behaviours of staff are set out in the Staff *'Code of Conduct'*. These should be demonstrated, monitored, and reinforced by all staff.
- 1.2 The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the allegation threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- 1.3 We do all we can to ensure that all adults living and working at Tudor Hall are confident and clear about expected behaviours of themselves and their colleagues, the delineation of professional boundaries and reporting lines.
- 1.4 We promote a culture of trust, awareness and positive values in which staff can recognise concerning or inappropriate behaviour, either in themselves or in other adults.
- 1.5 We empower staff to share their concerns, whether about their own or a colleague's behaviour, with the Headmistress, and help staff to interpret the sharing of a concern as a neutral act.
- 1.6 We address unprofessional behaviour swiftly and help staff to correct such behaviour at an early stage.

2. DEFINITION OF A LOW-LEVEL CONCERN

- 2.1 A low-level concern is any concern, no matter how small, and even if no more than a 'nagging doubt' which can include:
 - 2.1.1 an adult may have acted in a manner inconsistent with either the School's *'Code of Conduct'* or the *'Safeguarding Policy'*, or
 - 2.1.2 even if not linked to a particular act or omission, a sense of unease as to the adult's behaviour, particularly towards or around children.

3. SPECTRUM OF BEHAVIOUR

Appropriate Conduct

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

Low-Level Concern

Any concern, no matter how small, even if no more than a 'nagging doubt', that an adult may have acted in a manner which:

- is not consistent with an organisation's Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Allegation

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

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children

4. REPORTING LOW-LEVEL CONCERNS

- 4.1 It is important that staff feel comfortable and are clear about, the concept of low-level concerns and that they do not need to be able to determine in each case whether their concern is a low-level concern or if in fact, it is serious enough to consider a referral to the LADO or meets the threshold of an allegation.
- 4.2 Reporting of a low-level concern is a neutral act and the Headmistress (or in the case of a concern regarding the Headmistress, the Chair of Governors) will determine how best to deal with the matter.
- 4.3 Where a staff member has a low-level concern about a member of staff, it should be reported to the Headmistress who will determine the next course of action.
- 4.4 Where the low-level concern raised is about the Headmistress, it should be reported to the Chair of Governors.
- 4.5 Members of staff can self-refer if they find themselves in a situation which could be misinterpreted or might appear compromising to others or if they have behaved in a manner, on reflection, they consider falls below the standard set out in the Code of Conduct.

5. RESPONSE TO THE LOW-LEVEL CONCERN

- 5.1 On receipt of a report of a low-level concern, the Headmistress will speak with the member of staff who has raised the concern, review the nature of the concern, and give consideration as to whether any concerns have been raised about the individual in the past.
- 5.2 Where the concern is regarded as a Safeguarding issue, the School's "Safeguarding and Protecting the Welfare of Children Policy" and procedures come into action.
- 5.3 If the concern is established as low-level, it will be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from any potential false allegations or misunderstanding.
- 5.4 The Headmistress will decide who would be the most appropriate person in the School to deal with the matter. This would normally be the line manager of the individual about whom the concerns have been raised.
- 5.5 Most low-level concerns, by their very nature, are likely to be minor. Some will not give rise to any on-going concern and accordingly will not require any further action. Others will be most appropriately dealt with by means of management guidance and/or training.
- 5.6 In many cases, a low-level concern will simply require a values-based conversation with the individual about whom the concern has been raised to help maintain a positive professional relationship with the member of staff concerned.
- 5.7 Any such conversation should be recorded and should include being clear with the individual why their behaviour is inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that and being clear about the consequences if they fail to reach the required standard or repeat the inappropriate behaviour. On some occasions, ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual and regularly reviewed with them may also be appropriate.
- 5.8 The Headmistress may determine that some low-level concerns are matters of misconduct or poor performance, in which case, the relevant disciplinary grievance or whistleblowing procedures will be followed. If there is any doubt, the Headmistress will seek advice, including from the LADO, where appropriate.

6. THE ROLE OF STAFF

- 6.1 Staff are encouraged to report any concerns they have within 48 hours of them first becoming a concern.
- 6.2 If the staff member who raises the concern does not wish to be named, then the School will respect that person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example, where it is necessary in order to carry out a fair disciplinary investigation) and for this reason, anonymity will never be promised to

members of staff who report low-level concerns. Where possible, staff are encouraged to consent to be named as this will help to create a culture of openness and transparency.

6.3 Staff are given the option of either discussing their low-level concern verbally or providing a written summary of it on the '*Low-Level Concerns Reporting Form*' (see **Appendix 1**). Where the low-level concern is provided verbally, the Headmistress will make a record of the conversation on a '*Low-Level Concerns Reporting Form*', either contemporaneously or immediately following the discussion.

6.4 Unless exceptional circumstances apply (for example, providing a copy would create a real risk of harm to any adult or child), the member of staff about whom the concern has been raised should be asked if they would like to see a copy of the record made on conclusion of the case.

7. RECORD KEEPING

7.1 All records of low-level concerns will be retained in a central low-level concerns file which will remain confidential and kept securely in the Headmistress's office with access limited to the Headmistress, Designated Safeguarding Lead (DSL), and Safeguarding Governor.

7.2 Although the record of the low-level concern should be placed in a central file, some concerns may also involve issues of misconduct or poor performance, or they may trigger a procedure such as a grievance or whistleblowing. Where these issues would ordinarily require a record to be made and retained on the staff member's personnel file, this should be done in the normal way, in addition to the low-level concerns record.

7.3 When a low-level concern is re-classified as a safeguarding concern/allegation, all records of low-level concerns relating to that individual are kept in the central low-level concerns file at Tudor Hall and can only be accessed by the Headmistress. The record of concern is required to be a clear and comprehensive summary of all allegations (except those which are found to have been malicious), details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, to be kept as a record within the low-level concerns file and securely kept in a lockable cabinet. A copy will be provided to the person concerned.

7.4 Low-level concerns should not be referred to in references unless they relate to issues which would ordinarily be included in a reference such as, for example, misconduct or consistent poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.

7.5 The DSL and the Headmistress will review the low-level concerns file periodically to ensure that concerns are being dealt with appropriately and that any patterns of concerning behaviour are identified. A record of these reviews should be made.

8. THE ROLE OF THE GOVERNORS

- 8.1 The DSL should regularly inform the Governing Body about the implementation of the low-level concerns policy and any evidence as to its effectiveness annually in the DSL's Safeguarding Report.
- 8.2 The Governing Body will also review an anonymised sample of low-level concerns at regular intervals in order to ensure that these concerns have been responded to appropriately.

9. LOW LEVEL CONCERN THRESHOLD

- 9.1 If a staff member has more than 3 low level concerns logged against their name, they will be asked to attend a meeting with the Headmistress to discuss the nature of the concerns, whether support needs to be put in place or the concerns need to be escalated.

Reviewed by DSL: August 2026

Updated by DSL: April 2026

Reviewed by DSL: August 2025

Reviewed by DSL: September 2024

Approved by Education & Welfare Committee: May 2022

Written by Headmistress: April 2022

Appendix 1: Low Level Concerns Form

Please use this form to share any concern, no matter how small, and even if no more than a 'nagging doubt' that an adult may have acted in a manner which:

- Is not consistent with Tudor Hall's Code of Conduct, and/or
- Relates to their conduct outside of work, even if not linked to a particular act or omission, has caused a sense of unease about the adult's suitability to work with children.

You should provide a concise record, including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible, of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

The record should be signed, timed and dated.

Details of Concern

Name of staff member:

Department and Role:

Signed:

Time and Date:

Received by:

At (time):

On (date):

Action taken (specify):

Signed:

Time and Date: