Est. 1859

THE ORATORY PREP SCHOOL

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Child Protection (Safeguarding) Policy

This policy applies all pupils in the school, including in the EYFS

Date Reviewed	July 2026
Annual review	July 2027
Bellevue Safeguarding Governor	Steven Wade
Education Directors with Safeguarding Responsibility	David Williams
Head	Will May
Designated Safeguarding Lead (DSL)	James Baker
Deputy DSL (DDSL) - EYFS	Megan Jones
Deputy DSL (DDSL) - Pre Prep	Laura Wowk
Deputy DSL (DDSL) - Prep	Chris Sizer
Deputy DSL (DDSL) - Boarding	Leanne Spencer

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The Oratory Prep School
Child Protection (Safeguarding) Policy

1. Introduction

The Oratory Prep School (The OPS or the School) fully recognises its responsibilities for Child Protection. Every pupil should feel safe and protected from any form of abuse. This is defined in this policy as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

This policy applies to all teaching and non-teaching staff and volunteers, is available on the school's website and is available to parents on request. It applies to all areas of the school including Early Years (EYFS).

The governors and proprietors will ensure they facilitate a whole school or college approach to safeguarding. Thus ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

Where there is a safeguarding concern, the governors, proprietors and school or college leaders will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems will be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

This policy has been written in accordance with:

i. the DfE guidance document 'Keeping Children Safe in Education' (KCSIE September 2026), the updated guidance provided in the document 'Working Together to Safeguard Children' (March 2026) (WTSC) and 'Early years and later years (under-8's) childcare - Disqualification under the Childcare Act 2006' (March 2015), as amended in August 2018 and 'Working together to Improve Attendance' (July 2026)

ii. Locally agreed inter-agency procedures; the school will participate as appropriate in 'common assessment framework' (CAF) or the 'team around the child' (TAC) approaches, or a 'co-ordinated offer of universal services and community based early help' or or the targeted early help level of Family Help, in accordance with WTSC 2026. Where universal services and community based early help or the targeted early help level of Family Help is 'acting on and referring early signs of abuse, neglect, exploitation and radicalisation including support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse'.

Edit (ii) as appropriate for the authority's provision in your area.

iii. The school recognises the importance of universal services and community based early help or or the targeted early help level of Family Help in school (see section 4, Procedures) and the difference between a concern and a child in immediate danger; in each case the DSL will work in accordance with WTSC 2026 and the LSCB guidance in regard to thresholds and protocols for assessment and support.

Safeguarding Statement

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interest of the child. Anyone can make a referral, which will usually be to the school's DSL, but can be directly to Children's Social Care, if necessary.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy 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.

(KCSIE Sept 2026, p8)

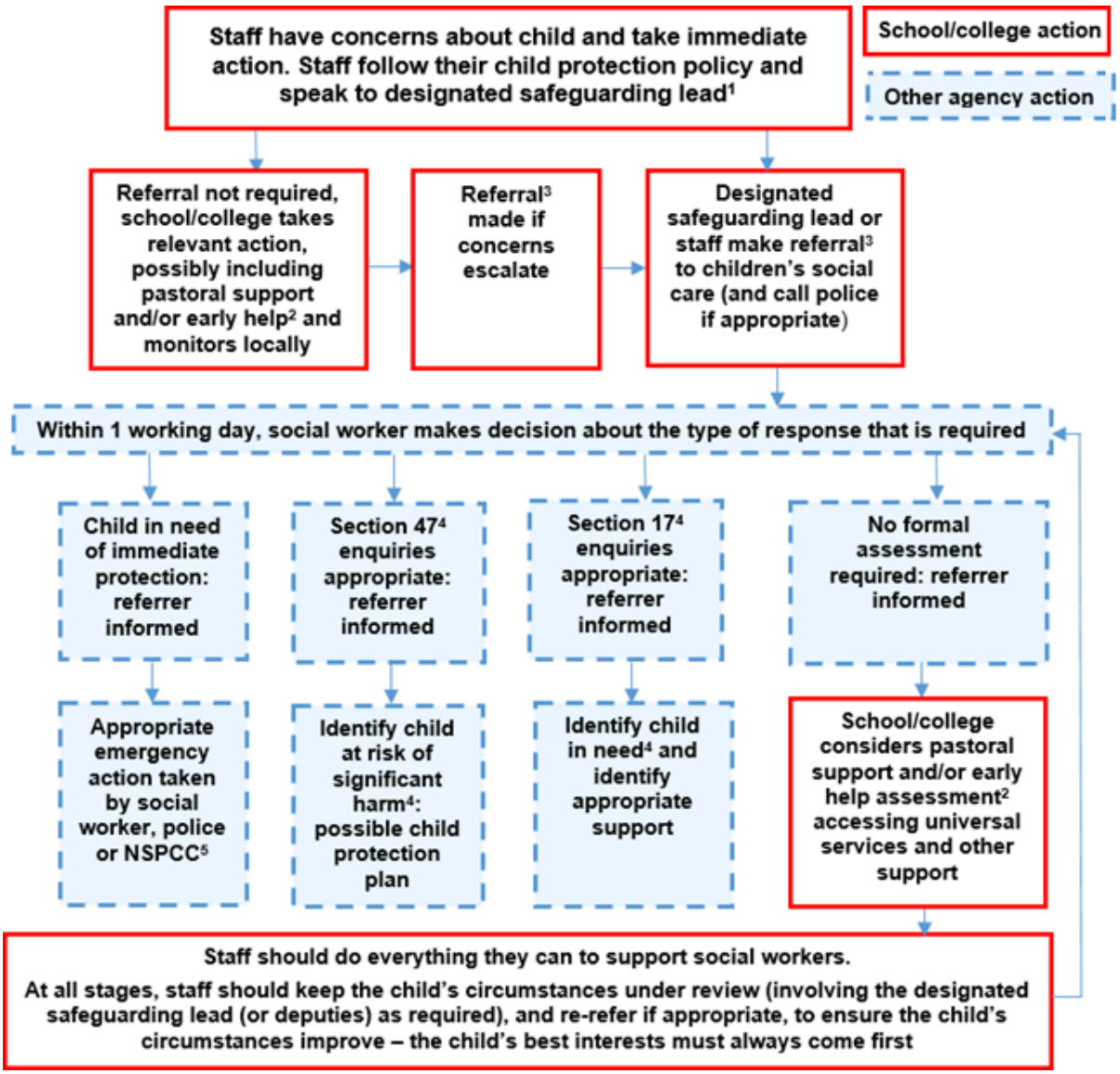
All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened this could be due to their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

The school aims to:

- Ensure safe recruitment practices in checking the suitability of staff and volunteers to work with children.
- Raise awareness of child protection issues and equip children with the skills needed to keep them safe.
- Raise awareness of the potential for Sexual violence and sexual harassment between children in schools and colleges.
- Develop and implement procedures for identifying and reporting cases or suspected cases of abuse.
- Support a pupil who has been abused in accordance with his or her agreed child protection plan.
- Maintain a safe environment in which children can learn and develop.
- Communicate readily with LSCB whenever an allegation or disclosure of abuse has been made.

The school endeavours to provide a strongly supportive pastoral environment, in which children have a range of adults to whom they can turn, should they have a concern. These include the class teacher, tutor and school nurse. Details of helplines are also available.

Governors (Education Directors) are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.



1. In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance;
2. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of **Working Together to Safeguard Children** provides detailed guidance on the early help process;
3. Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of **Working Together to Safeguard Children**;
4. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of **Working Together to Safeguard Children**;
5. This could include applying for an Emergency Protection Order (EPO).

2. SAFE RECRUITMENT

The OPS recognises the importance of following recruitment and selection procedures on the appointment of employees and volunteers which help to deter, reject or identify people who might abuse children, or are otherwise unsuited to work with them. Recruitment procedures are carried out in accordance with guidance given in 'KCSIE (September 2026)', the school should also consider the ICO guidance here when developing recruitment processes.

To ensure safer recruitment, the procedures are designed to:

- Scrutinise applicants
- Verify identity. (Best practice is with the use of birth certificates (where available) to check identity). Further identification checking guidelines can be found here
- Verify academic or vocational qualifications
- Obtain professional and character references
- Check previous employment history
- Ensure that a candidate has the health and physical capacity for the job
- Incorporate a face-to-face interview
- Include a barred list and Disclosure and Barring Services (DBS) check that can be accessed via the TRA's prohibition, restriction and barred list checks. See Teacher Record Check
- Applicants from overseas must be subject to a DBS check and also include an overseas check equivalent to the DBS check for staff appointed directly from overseas see Page 90 KCSIE 2026
- Where a school or college allows an individual to start work in regulated activity relating to children before the DBS certificate is available, it should ensure that the individual is appropriately supervised and that they carry out all other checks, including a separate children's barred list check.
- Separate barred list checks must only be carried out in the following circumstances:
  • for newly appointed staff or volunteers who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks have been carried out) see Page 77 KCSIE, or
  • where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks as per paragraph have been carried out).
- Verify the applicant's right to work in the UK
- Include a prohibition order check (for those who undertake 'teaching work'*) and also an EEA prohibition check for staff appointed to do teaching work from the EEA other than England (see Safer Recruitment guidelines and checklist for further detail)
- Include a prohibition from management check using this link to Section 128 check (For any staff taking up a management position in an independent school, academy, or in a free school as an employee; a trustee of an academy or free school trust; a governor or member of a proprietor body of an independent school; or a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibility.
- Include, when required, a self-declaration in respect of the Childcare Disqualification Regulations.
- An online search of shortlisted candidates will be carried out and those candidates must be told that this will happen.

The school ensures safe recruitment practices are carried out and that key staff have undertaken safer recruitment training, this needs to be renewed every five years. All interview panels will include at least one person who has undertaken such training.

Existing staff and volunteers
There are limited circumstances where schools and colleges will need to carry out new checks on existing staff or volunteers. These are when:

- an individual working or volunteering at the school or college moves from a post that was not regulated activity with children into work which is considered to be regulated activity with children. In such circumstances, the relevant checks for that regulated activity must be carried out
- there has been a break in service of 12 weeks or more
- there are concerns about an individual's suitability to work with children.

* 'Teaching work': a definition is provided in The Teachers' Disciplinary (England) Regulations 2012 and cited at paragraph 234 in the ISI Regulatory Handbook. The school will judge each appointment on a case-by-case basis to determine whether the role includes 'teaching work'.

These procedures apply to all adults who may undertake a regulated activity (unsupervised) with the children in either a paid or voluntary capacity and any other staff where KCSIE requires checks to be undertaken. The school will verify that child protection checks and procedures listed above have been successfully undertaken for all staff employed by another organisation and who work with the school's pupils either at the school or on another site. This applies, for example, to staff at a swimming pool or an outward bound activity centre and to visiting staff running activities or undertaking sports coaching, even where such staff are paid directly by the parents.

It is the responsibility of those who work or volunteer at the school, or with the school's pupils at a different venue, to inform the head immediately if, during the time of their engagement with the school, their circumstances change in such a way that they become disqualified from working in childcare, prohibited from teaching or in any other way barred from working with children.

Contractors and Visitors

Schools and colleges receive a range of visitors. These include professionals such as educational psychologists, social workers, and other education-related practitioners, as well as educational visitors like guest speakers or performers. They may also host individuals connected to the site, including contractors working on the building or grounds, children's family members, or others attending school events such as sports days.

The OPS will obtain written notification from any agency, or third party organisation, that they have carried out the same checks as the school or college would otherwise perform on any individual who will be working at the school or college (or who will be providing education on the school or college's behalf, including through online delivery).

If an individual working at The Oratory Prep School is self-employed, the school will either obtain the DBS check, or request to see the certificate if the self-employed person has obtained their own check and ensure that the DBS check is at the level required by the school.

Schools and colleges should not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day.

Adults who supervise children on work experience

Schools and colleges organising work experience placements should ensure that the placement provider has policies and procedures in place to protect children from harm. Health and safety expectations for employers hosting young people on work experience can be found here:
Young people at work: https://www.hse.gov.uk/young-workers/employer/index.htm. Schools and colleges are not able to request that a work experience provider obtains an enhanced DBS check with children's barred list information for staff supervising children aged 16 to 17 on work experience. A

Children staying with host families (homestay)

Children may be provided with care and accommodation by a host family to whom they are not related. This might happen, for example, as part of a foreign exchange visit or sports tour, often described as 'homestay' arrangements. In circumstances where a school or college arranges for a visiting child to be provided with care and accommodation in the UK (including where they engage a company to make those arrangements) in the home of a family to which the child is not related the responsible adults will be engaging in regulated activity for the period of the stay and the school will obtain a DBS enhanced certificate with children's barred list information. Where the child's parent(s) or a student themselves arranges their own homestay, this would be a private arrangement therefore the school or college would not be the regulated activity provider.

Homestay – suitability of adults in host families abroad. The schools cannot obtain criminality information from the DBS about adults who provide homestays abroad. The school will liaise with partner schools abroad, to establish a shared understanding of, and agreement to the arrangements in place for the visit. Parents will be made be aware of the agreed arrangement. Pupils should understand who to contact during a homestay should an emergency occur, or a situation arise which makes them feel uncomfortable.

3. Awareness of Child Protection Issues

We recognise that, because of their day-to-day contact with children, staff at the school are well placed to observe the outward signs of abuse. The Oratory Prep School will therefore

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to
- Ensure that children know there are adults in the school whom they can approach if they are worried or in difficulty
- Ensure that staff recognise the school's duties both to children in need and to children at risk of harm
- Include in the curriculum activities and opportunities for RSHE/PSHE which equip children with the skills they need to stay safe from abuse and develop realistic attitudes to the responsibilities of adult life. Within this, the school will take account of the current RSE guidance and that for September 2026.
- Ensure that all staff have received the appropriate information and training with regard to their safeguarding duties
- Ensure that approaches and policies are communicated to parents

Staff Information and Training
The school will

- Ensure that all staff have read and understand at least part 1 of KCSIE (September 2026); the understanding of staff will be secured by the following measures undertaken by the school
- Safeguarding Induction Training which talks new staff through the content in a level of depth appropriate and proportionate to the person and their role
- INSET Training
- Reminders in Staff Meetings
- Other means of probing understanding, such as the safeguarding governors' interviews with random staff at the annual Safeguarding Review
- Ensure that all staff read Part 1 of KSCIE 2026 which deal with types of abuse and matters such as children missing education, child criminal exploitation (CCE), Child Sexual Exploitation (CSE), radicalisation, county lines and honour based abuse (including Female Genital Mutilation and Forced Marriage) and Annex A
- Ensure that temporary and voluntary staff who work with children are made aware of the arrangements, based on a risk based approach – whereby the school assesses the level of detail with which such staff should be provided. In addition, all new staff and volunteers will receive training as part of their induction process, which will include an explanation of the systems to support Safeguarding. To ensure best practice, the DSLs for child protection will receive appropriate training, including in inter-agency working, every two years, supplemented by informal updates as required, but at least annually in accordance with locally agreed procedures and the requirements of KCSIE 2026 Annex B.

In order to ensure that new staff are fully aware of their duties regarding safeguarding, as part of the induction training for all staff, they will receive an explanation of:

- This safeguarding policy
- The staff code of conduct/behaviour policy
- The behaviour policy for pupils
- The school's safeguarding response to children missing education
- The role and identity of the DSL, and Deputy DSLs
- The school's approach to online safety, including knowing their role and responsibilities in relation to filtering and monitoring with reference to the policy for the Appropriate and Safe Use of Technology; including the Internet and AI

Additionally, at induction, staff must be provided with a copy of

- This safeguarding policy
- The staff code of conduct/behaviour policy (see 10, below in this policy)
- The Children Missing Education policy (contained within Appendix 1 of this policy)
- The role of the DSL and DDSL(s) (contained within this policy)
- KCSIE (September 2026)
- The whistle-blowing policy

4. THE DSL

The school has appointed an experienced and suitably qualified member of staff who is the member of the Senior Leadership Team as DSL to be responsible for matters relating to child protection and welfare. To ensure continuity of safeguarding responsibilities, the school will implement robust cover arrangements for periods when the designated safeguarding lead is

unavailable due to illness, leave, or other circumstances. This includes training DDSLs to deputise alongside arrangements including a confidential shared mailbox or equivalent system to ensure that safeguarding concerns are received, monitored, and acted upon without delay.

The DSL and DDSLs develop a complete safeguarding picture and are the most appropriate people to advise on the response to safeguarding concerns. The responsibilities of the DSL and DDSLs are provided in job descriptions specific to this aspect of their school role. (School to ensure that the DSL's full job description, as a minimum, includes all matters covered in KCSIE September 2026 Annex B. They include;

- Being conversant with LSCB procedures and the role of other agencies.
- Following the school's safeguarding & child protection policies and co-ordinating child protection procedures in the school.
- Being the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of child protection.
- Consulting with the Safeguarding in Education Team or Social Care, or LADO, as appropriate, on issues if an allegation or suspicion occurs and liaising with the various child protection agencies where appropriate.
- The DSL should use NPCC- When to call the police to help them understand when they should consider calling the police and what to expect when they do.
- Keeping the head informed of all actions unless the head is the subject of a complaint. In this situation, the DSL should consult with the Safeguarding Governor, relevant Education Director or proprietor.
- Co-operating with any police and LADO investigations.
- Liaising with the head, Safeguarding Governor and relevant Education Director regarding training for all who work at the school on child protection issues.
- Attending appropriate higher level training every two years supplemented by informal updates as required, but at least annually.
- Undertaking training to facilitate the recognition of the additional risks that children with SEND face online, for example, from online bullying, grooming and radicalisation and ensure confidence in the capability to support SEND children to stay safe online".
- Keeping appropriate records, sharing these with agencies as and when appropriate. Data protection considerations must not be a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm.
- Having a role in the oversight of the school's e-safety provision, the teaching of online safety and the quality of the school's filtering and monitoring, as outlined in the policy for the Appropriate and Safe Use of Technology; including the Internet and AI
- The DSL must have details of any social worker linked to a child in the school.
- Supporting staff.
- Ensuring that child protection files and stored, managed and shared in a secure and appropriate manner
- Take responsibility, when a child leaves the school, for ensuring that the child protection file is transferred securely to the new school as soon as possible and obtaining confirmation of receipt. Such a transfer of information should be separate from the main pupil file. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives. Such files should be sent to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of a new term As a

recipient of a child protection file from a previous school, the DSL must ensure that key staff, including the SENCO, are made aware as required.

- The DSL should liaise with the headteacher to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- Safeguarding partners should publish a local threshold document which includes the process for the local universal services and community based early help assessment or the targeted early help level of Family Help assessment or the targeted early help level of Family Help and the type and level of universal services and community based early help services or or the targeted early help level of Family Help to be provided, and DSLs (and their deputies) will need to familiarise themselves with this document.
- The DSL has responsibility for "understanding the systems and processes in place" as part of their remit.
- be able to keep 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

5. PROCEDURES

The school will follow the procedures set out by LSCB and take account of guidance issued by the Department for Education (DfE), as noted above. Links to these documents can be found in Appendix 2, Guidance from KCSIE 2026, Part 4, section 1 states that procedures should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers 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 he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children, by showing transferable risk in another context e.g. mistreatment of vulnerable people in a care home.

Concern about a Child

Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child. If staff have any concerns about a child's welfare, they should act on them immediately. See page 6 for a flow chart setting out the process for staff when they have concerns about a child.

If staff have a concern, they should speak to the designated safeguarding lead (or a deputy) and make a written record of their concern.

Options will then include:

- managing any support for the child internally via the school's pastoral support processes, including considering where doing so does not place the child at additional risk, whether the designated safeguarding lead (or a deputy) should inform parents or carers to further support the child's wellbeing,
- undertaking a family help assessment, or

- making a referral to statutory services.

For children in need, a referral will be made to Children's Social Care and for children at risk, a referral will be made to Children's Social Care immediately. They have a duty to respond. Staff should also be alert to any child who may benefit from an universal services and community based early help assessment, or the targeted early help level of Family Help, and be aware of the process of assessment. The DSL has responsibility to take the lead in matters of an universal services and community based early help assessment or the targeted early help level of Family Help.

Schools and colleges should be alert to the needs of specific groups of children whose needs may impact on attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure these groups of children receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services. In particular, staff should be alert to the potential need for an universal services and community based early help assessment or or the targeted early help level of Family Help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and;
- is a privately fostered child.

Detailed information on universal services and community based early help and the targeted early help level of Family Help can be found in Chapter 1 of WTSC 2026.

Concern about a Member of Staff

The school has processes and procedures in place to manage any safeguarding concern or allegation (no matter how small) about staff members (including supply staff, trainee teachers, volunteers, and contractors. If staff have a safeguarding concern or an allegation of harming

or posing a risk of harm to children is made about another member of staff (including supply staff, trainee teachers, volunteers, and contractors), then:

- this should be referred to the headteacher, who will consider whether an onward referral to the LADO is required,
- where there is a concern/allegation about the headteacher or principal, this will be referred to the Safeguarding Governor, who will consider whether an onward referral to the LADO is required

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, trainee teachers, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the school's low-level concerns policy.

Any referral will be made to the LADO within one working day. Other agencies may be contacted, such as the child protection unit of the police (CPU) or the NSPCC, in accordance with the procedures published by LSCB. If a crime has been committed, the matter will be reported to the police and, in cases of serious harm, the police will be informed from the outset.

Following Up

When following up incidents, disclosures or allegations, staff will consider the welfare of all children. Where it is deemed necessary to speak with pupils, those involved will be offered the option of having another adult present. Where allegations are of a serious nature, parents or guardians will routinely be invited to attend, unless the allegation is of a nature where their presence may cause greater upset or jeopardise any possible police action.

Record keeping of Procedures

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely in line with the school Data Protection Policy and Privacy Notices. It is good practice to keep concerns and referrals in a separate child protection file for each child. Where record keeping includes the details of staff the school should also consider the ICO guidance here when developing recruitment processes.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; (noting the date, event and action taken)
- a note of any action taken, decisions reached and the outcome.
- If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

On making a referral, the school can expect the local authority to make a decision within one working day about the type of response that is required, letting the referrer know the outcome. This will include determining whether:

- the child requires immediate protection and urgent action is required
- the child is in need, and should be assessed under section 17
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47
- any services are required by the child and family and what type of services; and
- further specialist assessments are required in order to help the local authority to decide what further action to take.

The school should follow the matter up with the local authority if information is not forthcoming. For further information on action to be taken in relation to safeguarding concerns staff can refer to the flowchart on page 27 of KCSIE 2026.

Use of school or college premises for non-school/college activities
Where the school hires or rents out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the school, under the direct supervision or management of their school, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The school will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The school should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

The school may receive an allegation relating to an incident that happened when an individual or organisation was using their premises for the purposes of running activities for children. As with any safeguarding allegation, the school should follow their safeguarding policies and procedures, including informing the LADO

6. Safe Environment
The school maintains and operates practices which promote this policy and which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations. In this respect, the school acknowledges the updated guidance provided in Part 4 of the DfE document KCSIE (September 2026). In order to meet the aims of this policy, the school has the following measures in place:

- Reviews of Safeguarding through the proprietorial governance
- Staff training and Induction; ensuring that DSL and DDSL have appropriate training, guidance and time to fulfil their roles and that the staff body as a whole understand their roles and responsibilities in regard to safeguarding policy and process
- ensuring that parents have an understanding of the responsibility placed on the school and staff in relation to safeguarding and child protection, by publishing appropriate policies on the school's website.
- developing effective links with relevant agencies and cooperating as required with their enquiries regarding child protection matters; particularly its role in working with the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls) within the local authority area).
- ensures that the duty of care towards pupils and staff is promoted, by raising awareness of illegal, unsafe and unwise behaviour and assists staff to monitor their own standards and practice.
- a culture that ensures every suggestion and complaint of abuse is dealt with appropriately and in accordance with this policy

The school will not undertake its own investigations of allegations without prior consultation with the LADO(s), or in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, discussions with the LADO(s) can be held informally and without naming the school or individual.

In addition the school

- takes all practicable steps to ensure that school activities and premises are as safe and secure as circumstances permit, by assessing risk, ensure appropriate security at all points of access and maintaining records
- has a culture of safety and reflective practice, where staff are valued and concerns can be raised, including about poor or unsafe practice and potential failures in the school's safeguarding regime.
- operates robust and sensible health and safety and fire protection procedures.
- operates a robust and sensible approach to using technology including the use of the internet, devices, generative AI, as well as cybersecurity and filtering/monitoring
- is alert to the medical needs of all children (particularly those with specific requirements).
- has a readily available and widely understood whistleblowing policy
- will monitor the movements on and off-site of visitors on all occasions, including those where unknown visitors may be on site
- will have due regard to data security as outlined by the Data Protection Act 2018 the UK General Data Protection Regulation (GDPR) and the Data (Use and Access) Act 2025, with the specific arrangements for 'safeguarding children at risk' and where the harm test is met

A person satisfies the harm test if they may harm a child or vulnerable adult or put them at risk of harm. It is something a person may do to cause harm or pose a risk of harm to a child or vulnerable adult.) Where in doubt schools should seek independent legal advice.

Premises - Toilets, Showers and Changing Areas

School arrangements take into account their safeguarding obligations and ensure the provision of appropriate facilities for girls and boys that do not compromise their safety, comfort, privacy or dignity.

The school provides

- provides separate toilets for boys and girls aged 8 and over (apart from where individual toilets are in a room that can be locked from the inside, intended for use by one pupil at a time).
- provides mixed-sex toilets these are in the form of individual, lockable rooms which open directly onto public areas
- changing accommodation and showers suitable for the pupils they are provided for, having regard to pupils ages, numbers, and sex and any special requirements
- It will provide suitable changing accommodation and showers for pupils who are aged 11 years or over at the start of the school year.
-

The school will not allow

- children into toilets designated for the opposite biological sex.
- 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.

This includes where schools are responding to a request to support any degree of social transition for children who are questioning their gender.

If a gender-questioning child does not want to use the toilet, changing area or shower facilities designated for their biological sex, the school will consider an alternative arrangement, without compromising the provision of single-sex facilities. This could be a fully enclosed room – for use by one child at a time that can be secured from the inside – or by allowing access to facilities at an alternative time. These alternative arrangements will not compromise the safety, comfort, privacy or dignity of the child, or of any other children. The school will keep a clear record of these situations, ensure they are communicated appropriately, and review them regularly.

7. Supporting All Pupils including Pupils at risk

The School understand that we play a crucial role in preventative education and understand that it is most effective in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. We have a clear set of values and standards, upheld and demonstrated throughout all aspects of school life.

Curriculum and Content
Sport
The school will take into account their safeguarding obligations towards children and the importance of ensuring sport is safe and fair. Further information is available in the Curriculum and Equal Opportunities Policies.

RSHE
Schools will include in the curriculum material that will help children develop realistic attitudes to the responsibilities of adult life through a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Within this the school will take account of the RSE guidance for September 2026. It tackles at an age-appropriate stages issues such as:
looking after their physical and mental health a curriculum that promotes body confidence, self-esteem and self-motivation

healthy and respectful relationships - Recognise and be assertive to help resist pressure from others staying safe from abuse including how to recognise an abusive relationship, including coercive and controlling behaviour

staying safe online and ensuring students are aware of how to use AI (Artificial Intelligence) safely.

Recognise and manage risks in different situations and then decide how to behave responsibly including understanding boundaries and consent

stereotyping, prejudice and equality to prevent discrimination and promote respect for people with protected characteristics

what constitutes sexual harassment and sexual violence and why these are always unacceptable together with the concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support

Judge what kind of physical contact is acceptable and unacceptable.

understand the law on child on child abuse (including harassment and violence) is there to protect them rather than criminalise them.

Within this there will be careful vetting of the visiting speakers to ensure that the content of what they intend to say is appropriate in relation to the school's ethos and fundamental British values.

Mental Health; Pastoral Culture and Systems

- The school understands that it has an important role to play in supporting the mental health and wellbeing of their pupils.
- All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The Mental Health and Behaviour in Schools guidance sets out how schools and colleges can help prevent mental health problems by promoting resilience, the government has published advice and guidance on Preventing and Tackling Bullying, Mental Health and Behaviour in School
- The school behaviour policy, which is aimed at supporting vulnerable pupils in the school. The school will ensure that the pupil knows that some behaviour is unacceptable and that they are valued and not to be blamed for any abuse which has occurred.
- Liaison with other agencies who support the pupil such as Social Services, Child and Adult Mental Health Service, Education Welfare Service and Educational Psychology Service.
- Close monitoring of attendance, identifying patterns and concerns relating to children missing from school.
- Drawing up a child protection plan, in consultation with other agencies, if appropriate, to identify strategies to assist a child.
- Keeping records and notifying the Safeguarding in Education Team or Social Care, as appropriate, as soon as there is a recurrence of a concern.
- The appropriate transfer of information to the next school or setting when a pupil on the child protection register leaves the school. If the school does not know where the pupil has moved to, the LA Designated Officer will be contacted as soon as possible.
- the school will contribute to inter-agency working as per *Working Together to Safeguard Children 2023* e.g. by contributing towards an inter-agency assessment, in accordance with the Children Act 1989, to ensure a co-ordinated offer of universal services and community based early help or the targeted early help level of Family Help when additional needs of children are identified, or to conduct, a Section 17 or Section 47 assessment.

Mental Health & Wellbeing

- We utilise an integrated, whole school approach to build resilience and prevent mental health difficulties. While all staff are responsible for observing and supporting pupil wellbeing, our designated Mental Health Lead works alongside the DSL team to embed these social and emotional wellbeing strategies across the curriculum.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Where accessible, staff and the Mental Health Lead will actively utilise our allocated Mental Health Support Team (MHST).
- Education staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. By identifying potential warning signs, education staff can identify children who may be struggling and offer support and vital early intervention.

- If staff have a concern about a child's mental health that is also a safeguarding concern, they should follow their child protection policy and speak to their designated safeguarding lead or deputy.
- When a pupil requires targeted mental health support, there will be an assessment whether to inform parents or carers to help support the child's wellbeing. This communication must only take place if the DSL team confirms that doing so will not place the child at any additional safeguarding risk.
- If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

www.gov.uk/guidance/promoting-and-supporting-mental-health-and-wellbeing-in-schools-and-colleges

Potentially Vulnerable Groups of Pupils

Abuse can happen to anyone, and all children and young people must be protected from abuse. Research shows that some children and young people are more vulnerable; being part of a vulnerable group doesn't automatically mean a child will experience abuse or neglect. Not having any of them is also not a guarantee that a child will never be harmed. It is important to understand risk and vulnerability factors so that extra support can be provided to keep children safe.

This involves ensuring that staff have

- the appropriate information to support the child; including family background details and contacts for any key workers
- understand their duties with regard to accessing and sharing information in the context of safeguarding
- know how to work with other agencies in support of safeguarding
- training that allows staff to fulfil their role

Staff should be vigilant in relation to the bulleted points above, reporting any concerns to the DSL. And should consider these for children including the vulnerable groups identified below

Pupils Groups

- Children who need a social worker - Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse and/or neglect and/or exploitation and/or 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. The school will hold information about the child's legal care status and responsible people including details of the child's social worker. who should assist in decisions, education and promoting welfare The school has appointed DSL as designated teacher for looked after children. The school will provide appropriate training for such a role.
- Special Educational Needs or Disabilities (SEND). Additional barriers may include assumptions that indicators of possible abuse such as behaviour, mood or injury relate to the child's disability without further exploration, they may be disproportionately impacted by behaviours such as bullying, without showing outward signs and be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children . Children with SEND may be unable to communicate instances of possible

abuse as a consequence of issues in relation to communication barriers, their ability to recognise behaviours and abuse and cognitive understanding of fact and fiction in relation to online behaviours. Any reports of abuse involving children with SEND will, therefore, require close liaison with the designated safeguarding lead (or a deputy) and the special educational needs coordinator (SENCO) or the named person with oversight for SEND. The school's behaviour and anti-bullying policies make specific reference to dealing appropriately with SEND. The school will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place. Further information can be found in Appendix 3

- Pupils with Mental Health support needs or living with parents who have mental health issues may, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Children who are lesbian, gay, bisexual A child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who
- are. Risks can be compounded where children lack a trusted adult with whom they can be open. The school and staff will seek to reduce the additional barriers faced, and provide a safe space for pupils to speak out or share their concerns with members of staff. The school will address vulnerabilities as part of its curriculum, behaviour and anti-bullying policies.
- Children who are questioning their gender - young children also go through a period of questioning their gender, for the majority this will not continue into adulthood, while a small proportion may continue to question their gender and this feeling may intensify into puberty. 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. The school is 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.
- Looked after or previously looked after children, and care leavers - The most common reason for children becoming looked after is as a result of abuse and/or neglect. The school will hold information about the child's legal care status and responsible people including details of the child's social worker. who should assist in decisions, education and promoting welfare The school has appointed the DSL as designated teacher for looked after children. The school will provide appropriate training for such a role.
- Children subject or witness to abuse or violence may find it difficult to develop a sense of self-worth and to view the world as benevolent and meaningful. They may feel helplessness, humiliation and some sense of self-blame. The school may be the only stable, secure and predictable element in the lives of children at risk. However, when at school their behaviour may be challenging and defiant and they may be withdrawn.
- Children whose carers have substance abuse issues staff should consider the impact at home, as well as how this might make the child behave within school settings. The issue may impact risk with regard to travel to and from school, as well as patterns of attendance and lateness.
- Children absent from education staff should be mindful of patterns of absence, this may be a consequence of wider issues within the child's life - potentially related to vulnerabilities linked to the categories above.

- Children with medical conditions - Management of a child or young person's medical condition (including allergies) would not in itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an incident highlighted a 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 a school, college or setting, or where they are repeatedly sent to school without essential medication, thereby putting the individual at risk. Further information is provided in our statutory guidance on Supporting Pupils at School with Medical Conditions and Allergy Safety in Schools.

8. In the event of a Disclosure or Allegation by a Child
THE FOLLOWING WILL BE CONSIDERED

a) Initial complaint
A member of staff suspecting, or hearing a complaint of, abuse:

- Must listen carefully to the child and keep an open mind.
- Must not take a decision as to whether or not abuse has taken place.
- Must not ask leading questions, that is, a question which suggests its own answer. "Use the TED Questions" formula below.
- Must reassure the child but not give a guarantee of absolute confidentiality.
- Must explain the need to pass the information to a DSL, who will ensure that the correct action is taken.
- Must keep a sufficient written record of the conversation. The record must include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials.
- Must keep the record secure and hand it to the DSL.

TED Questions:
Tell me about this
Explain what happened
Describe this to me

Staff should remember that the priority is to protect the child;

- Take the matter seriously
- React calmly and listen carefully
- Observe but do not judge
- Don't stop the child who is freely recalling significant events
- Reassure the child that he or she has done the right thing in telling you
- Indicate the action you will take and make it clear that you will have to tell the DSL (you cannot promise confidentiality - no secrets)
- If the child comes back to talk at a later stage, don't comment or advise; ensure that you listen, record and reassure the child.

As a member of staff, it is essential to remember not to:

- Drag the child to the DSL – this could be interpreted as abusive in itself
- Contact the parents yourself
- Interrogate the child or ask leading questions
- Speak to anyone about whom allegations are made, including colleagues

- Promise confidentiality
- Ask a child outright if he or she or others have suffered abuse
- Criticise the alleged perpetrator.

b) Preserving evidence
All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be safeguarded and preserved.

c) Reporting
A member of staff needs only reasonable cause for concern in order to act. One sentence from the child, indicating abuse or non-accidental injury, provides staff with reasonable grounds and is sufficient for them to act. This may also apply if clear information comes from a sibling or another adult. However, as many of the signs of child abuse are also commonly associated with other medical, social or psychological problems, a member of staff may naturally wish to discuss some initial concerns with the DSL. All suspicion or complaints of abuse must be reported only to the DSL, or if it involves the DSL, to the DDSL, who will liaise with the head, (unless the head is the subject of the suspicion or complaint).

d) Action by the DSL
The DSL will contact the Safeguarding in Education Team if he or she believes a child may be in need or at risk of significant harm and may follow this up with a written referral to Social Care. If appropriate, the child may well be told what action is being taken and what will happen next. Allegations against someone in a position of trust are the only cases that must be reported to the LADO. If there is room for doubt as to whether a referral should be made, the DSL may consult with appropriate professionals on an informal basis.

The DSL's options for action include:

- managing any support for the child internally via the school or college's own pastoral support processes. The DSL will generally lead the liaison with other agencies and set up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in carrying out this assessment, in some cases acting as the lead practitioner. Further guidance on effective assessment of the need for Family Help can be found in Working Together to Safeguard Children
- a universal services and community based early help assessment or
- the targeted early help level of Family Help; qualified lead practitioners (i.e. not a social worker) may lead assessments before statutory intervention and can continue to lead work with families up to and including section 17
- a referral for statutory services, for example, as the child might be in need, is in need, or suffering or likely to suffer harm

Action taken may also include:

- Sharing information with the head, safeguarding governor, schools director or DDSL
- Contacting the parents or carers
- Calling an internal pastoral meeting to discuss the situation – all appropriate persons would be invited (*e.g. form tutor, head of pastoral care, school nurse*). At this point a pastoral care plan may be instigated.

The action to be taken will take into account:

- The OPS's Child Protection (Safeguarding) Policy.
- The procedures published by LSCB

- The nature and seriousness of the suspicion or complaint. Any complaint involving serious harm or a serious criminal offence will always be referred to the Safeguarding in Education Team, the LADO (if the person under suspicion is in a position of trust) and the police without further investigation within the school.
- The wishes of the pupil, who has complained, provided that the pupil is of sufficient understanding and maturity and properly informed. However, there may be times, if the pupil is suffering or is at a risk of suffering significant harm, when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes. The welfare of the child is paramount.
- The wishes of parents, provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances.
- Any concern from the DSL that disclosing information to parents would put a child at risk. In this case, he or she will take further advice from the relevant professionals before making a decision to disclose.
- Duties of confidentiality, so far as applicable.
- The lawful rights and interests of the school community as a whole including its employees and its insurers.

e) Referral guidelines
When deciding whether to make a referral, following an allegation or suspicion of abuse, the head and 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 Safeguarding in Education Team or Social Care. This may be done tentatively and without giving names in the first instance.
What appears trivial at first can later be revealed to be much more serious, and an allegation of child abuse or neglect may lead to a criminal investigation. Thus the school should not do anything that may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate the allegations of abuse. However, if sufficient concern develops that a child may be suffering or is at risk of suffering significant harm, a referral will be made without delay.

Contact will be made with theSafeguarding in Education Team or Social Care within 24 hours of a disclosure being made. If the initial referral is made by telephone, the DSL will confirm the referral in writing within 24 hours of the initial telephone call. If no response or acknowledgment is received within three working days, the DSL will contact the Safeguarding in Education Team or Social Care.

Unsubstantiated, unfounded, false or malicious reports
If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the school or college, should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy, or through the appropriate section of the employment manual.

f) Allegations against adults - including the Head, staff , volunteers and adults not directly employed by the school

When dealing with allegations against the head, staff, supply staff or volunteers, the school aims to strike a balance between the need to protect children from abuse and the need to protect the head, staff, supply staff and volunteers from false or unfounded allegations. When deciding on whether to proceed the school should take note of the Harm Test.

The school will follow the guidance in Part 4 of KCSIE (September 2026).

Part 4 of KCSIE is now separated into two sections.

Section One includes detailed guidance on allegations which meet the harms threshold, and:

Section Two includes guidance for low level concerns. Even those concerns which do not meet the harms threshold should be shared with the right person and recorded and dealt with appropriately.

Handling Allegations

Suspension will not be an automatic response to an allegation. Full consideration will be given to all the options, subject to the need to ensure the safety and welfare of the pupil or pupils concerned and the need for a full and fair investigation. Where an allegation or complaint is made against the head, the staff member will report to and consult immediately with the Safeguarding Governor, relevant Education Director and/or proprietor, according to availability. This will be done without consultation with the head. The Safeguarding Governor or relevant Education Director will make immediate contact with the LADO.

Where an allegation or complaint is made against staff, volunteers or the DSL, the head will be informed or, in his/her absence, the Safeguarding Governor, relevant Education Director and/or proprietor.

If a decision is taken that a member of staff is suspended during the investigation the school recognises that this does not infer guilt. Under these circumstances any suspension is a 'neutral' act and no action should be viewed as an expression of opinion or judgement.

In the event of an allegation or complaint resulting in a member of staff being required not to come to school, because of suspension or other arrangements, where the school provides on-site accommodation for such a member of staff, he or she would be required to live off-site during this time. If it were not possible for offsite accommodation to be sourced by the member of staff, then the school would ensure suitable accommodation is provided.

In the event of any person (in any capacity, whether employed, contracted, a volunteer or student) leaving the school as a result of their being considered unsuitable to work with children, or who has harmed or poses a risk of harm to children, the school will report this to the Disclosure and Barring Service (DBS) promptly, within one working week. This applies equally to anyone who would have been removed from the school had he or she not left earlier. The school recognises that the proprietors of independent schools have a legal duty to respond to requests from the DBS for information they hold already, but do not have to find it from other sources.

A referral will be made to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons for such a referral include situations where the member of staff has been dismissed for unacceptable professional conduct, conduct that may bring the

profession into disrepute or a conviction, at any time, for a relevant offence. The school need only take this action if the matter has not been reported to the Disclosure and Barring Service; all matters reported to the DBS will be shared with TRA. A referral to the DBS would be undertaken on the advice of LSCB or LADO. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in 'Teacher misconduct: the prohibition of teachers (October 2015)'. Further guidance is published on the TRA website.

The school will follow the guidance in Part 4 of the DfE document KCSIE (September 2026) to ensure that:

- Procedures are applied with common sense and judgement (whereas before schools had to follow the required procedures closely)
- Allegations found to be malicious are removed from personnel records (whereas before all allegations had to be retained)
- Records are kept of all other allegations but any that are not substantiated, are unfounded or malicious should not be referred to in employer references (whereas before details of all allegations had to be passed on in references).

Further detail with regards to the procedures for dealing with allegations of abuse against staff are available from the School.

- Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency

Allegation against someone not directly employed by the school

Where an allegation is made against an individual not directly employed by the school, and where its disciplinary procedures do not fully apply, the school will ensure allegations are dealt with properly, including liaison with the LADO to establish a suitable outcome. Schools should seek the support of governance to establish appropriate steps. The agency responsible for the individual should be involved, although the school should lead, and ensure that the individual subject to the allegation receives appropriate support, either through union or colleague representation. The support of the LADO should be assisted to advise on information sharing. The school should ensure that agencies and their staff are aware of the procedures for managing allegations.

g) Low-level concerns

As part of our whole school approach to safeguarding, we ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

We work hard to create a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. This should:

- encourage an open and transparent culture
- enable us to identify inappropriate, problematic or concerning 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 school.

The term 'low-level' concern does not mean that it is insignificant. 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 or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

Low level concerns about a member of staff should be reported to the head, or a member of the senior leadership team. Staff are also encouraged to self-refer where, for instance, they have found themselves in a situation which could be misinterpreted, or on reflection feel they may have compromised the School's expected professional standards. Reports about supply staff and contractors will be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

The Head will investigate the concern, speaking to the person who raised the concern, the individual involved, and any witnesses. The action to be taken will be determined by and proportionate to the nature of the incident, whether the report can be substantiated and whether any pattern of behaviour appears to be emerging. Support will be offered where appropriate and where needed to enable the member of staff in question to correct their behaviour in future.

The Head must record all low level concerns in writing, including details of:

- The concern,
- The context of the report,
- The name of the individual sharing the concern (requests for anonymity should be respected as far as reasonably possible);
- Action taken and the rationale for this

h) Allegations against pupils (including child on child abuse (including harassment and violence))

All staff should be aware that children can abuse other children (often referred to as child on child abuse). And that it can happen both inside and outside of school or college and online. All staff should be clear as to the school or college's policy and procedures with regard to

child-on-child abuse, and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. It is important that all staff recognise the indicators and signs of child on child abuse (including harassment and violence) and know how to identify it and respond to reports.

All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child on child abuse (including harassment and violence) they should speak to their designated safeguarding lead (or deputy), whether these concerns are thought to have taken place on or off-site. Sexual violence and harassment can occur between two children of any age and sex. Staff working with children are advised to maintain an attitude of "it could happen here". they should speak to their designated safeguarding lead (or a deputy). As part of this, schools should also try to be alert to when children might be at highest risk around the school day (for example immediately after school).

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, misogyny, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

There should be a recognition that for some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously. All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

child on child abuse (including harassment and violence) is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers (also known as teenage relationship abuse);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- serious physical assault and harm, or the threat of harm with a weapon,

harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry. Part five of this guidance sets out how schools and colleges should respond to reports of this nature,

- 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;
- consensual and non-consensual making and sharing of nudes and semi nudes images, including those generated by AI, advice on which can be seen below https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview

- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; 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).

All staff should be clear as to the school's or college's policy and procedures with regards to child on child abuse (including harassment and violence) and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

The school's procedures in relation to child-on-child abuse follow the DfE advice to adopt a "whole school" approach, involving all staff, pupils, governors and parents, as part of the school's broad approach to safeguarding. Central to such an approach are
(i) staff training so that staff know what to do if they have a concern about a child
(ii) a planned curriculum and extra-curricular programme, including assemblies, which takes a preventative approach through the setting of values and standards and the promotion of the fundamental British values, notably in this context, of respect and tolerance. Through the wider curriculum, including Relationships Education (Primary), Relationships and Sex Education (Secondary) and Personal, Social and Health Education, the school aims to provide pupils with an understanding appropriate to their age and stage of development of issues such as:

- healthy and respectful relationships
- what respectful behaviour looks like
- consent
- gender roles, stereotyping, equality
- body confidence and self-esteem
- prejudiced behaviour
- that sexual violence and sexual harassment are always wrong
- addressing cultures of sexual harassment.

Within this the school will take account of the current RSE guidance, which comes into force on September 2026.

Sexual Violence and Sexual Harassment between children
With regard to sexual violence and sexual harassment, the school pays due regard to Part 5 of KCSIE (September 2026). The school holds and promotes a clear view that sexual violence and sexual harassment are never acceptable and will not be tolerated. Research shows that it is more likely that girls will be the victims of sexual violence or harassment and more likely that boys are the perpetrators. Children with SEND are three times more likely to be abused than their peers. Such behaviour must be challenged, since it is normalised by being dismissed or tolerated.
Definitions:
In this context, *sexual violence* is as defined in the Sexual Offences Act 2003. *Sexual harassment* is defined as unwanted conduct of a sexual nature that can occur online and offline. Sexual harassment is likely to:

- violate a child's dignity
- make him or her feel intimidated, degraded or humiliated
- create a hostile, offensive or sexualised environment.

Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. It can include:

- sexual comments, (such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names)
- sexual "jokes" or taunting
- physical behaviour, (such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature
- online sexual harassment, (which may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence). It may include:
    - non-consensual sharing of sexual images and videos*.
    - sexualised online bullying
    - unwanted sexual comments and messages (including on social media)
    - sexual exploitation (coercion and threats).
- upskirting; this is now a criminal offence, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003, and has the following categories:

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

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

- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. (NOTE - Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).

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

Consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice:

- a child under the age of 13 can never consent to any sexual activity,
- the age of consent is 16,
- and
- sexual intercourse without consent is rape

* UK Council for Child Internet Safety (UKCIS) provides detailed advice for schools on the making and sharing of nude and semi nude images (sexting) (refer to links in Appendix 2).

Harmful Sexual Behaviour (HSB)

Harmful Sexual Behaviour describes online or offline sexual conduct that goes beyond what is normal and developmentally expected. This behavior ranges from inappropriate or problematic to explicitly abusive and violent. It must always be managed within a child protection context. When assessing these behaviors, a child's age and developmental stage are critical indicators. For instance, sexual behavior between children is generally considered harmful if there is a significant age gap, typically more than two years, or if a developmental power imbalance exists.

The school adopts a zero tolerance approach to HSB. Failing to challenge inappropriate actions creates an unsafe environment, risks normalising abuse, and deters victims from reporting incidents. We recognize that HSB, sexual harassment, and sexual violence can occur even without formal reports. Because misogyny and casual harassment often escalate into more severe abuse, staff must immediately challenge behaviors that may be criminal in nature, such as upskirting, lifting clothing, or unwanted touching. Furthermore, any incident involving the sharing of nude or semi-nude images, whether framed as consensual or non-consensual, demands an immediate safeguarding response. This response will always be proportionate to the children's ages, vulnerabilities, and any presence of coercion.

Victim Vulnerabilities and Targeted Support
Experiencing HSB is deeply distressing and frequently damages a pupil's educational attainment, particularly if they share a site with the alleged perpetrator. While any child can be affected, statistically, girls are significantly more likely to be victims of sexual harassment and violence, predominantly perpetrated by boys. Additionally, children with disabilities face a vastly elevated risk, being three times more likely to experience abuse than their peers. All victims must be explicitly reassured that their disclosures are taken seriously, and that they will be protected and supported.

Managing Perpetrators and Early Intervention
Children who exhibit HSB frequently have their own histories of trauma, maltreatment, or abuse, meaning they require robust therapeutic and safeguarding support alongside disciplinary measures. The Designated Safeguarding Lead (DSL) and deputies maintain specialized training in HSB to embed preventative education and manage these complex dynamics effectively. Early intervention at the first sign of problematic behavior is vital to break the continuum of abuse.

Report of Sexual Violence or Harassment
A member of staff who receives a report of sexual violence or sexual harassment will take action in line with the standard guidance for dealing with disclosures, as identified in this policy.

As with all concerns about the welfare of a child, all staff should act in the best interests of the child.

A pupil reporting sexual violence or sexual harassment will be offered support and every effort will be made to ensure that his or her education is not disrupted. The child making the report will be reassured, supported, taken seriously and kept safe. He or she should never be given the impression that reporting causes a problem, or be made to feel ashamed for making a report. In some cases, a third party, such as a friend, rather than the victim, may make the report. In such cases the same procedures will be followed, and it is important that the school understands why the victim has chosen not to make the report personally. Children may not find it easy to tell staff about abuse. Children can show signs or act in ways that they hope adults will notice and react to, or staff may overhear a conversation. If staff have any concerns about welfare, they should act on them immediately rather than wait to be told.

Handling a Report of Sexual Violence or Harassment
Reports of sexual violence and sexual harassment are likely to be complex, requiring difficult professional decisions to be made, often quickly and under pressure. Staff are provided with training to facilitate a calm and considered response to any concern.In overseeing the management of the concern, the DSL will consider, in line with overall safeguarding guidance, whether a referral should be made to children's social care and, where a crime may have been committed, will make a referral to the police. Full details of Handling a Report of Sexual Violence or Harassment can be found in Appendix 2 of this document and on pages 123-238 of KCSIE 2026

9) Suspected Harm from Outside the School
A member of staff who suspects that a pupil is suffering harm from outside the school should seek information from the child with tact and sympathy using "open" and not leading questions (see TED questions, in a), above). A sufficient record should be made of the conversation and given to the DSL for child protection.

Domestic Abuse
Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Under the statutory definition, 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". That abuse can be, but is not limited to, psychological, physical, sexual, financial, emotional and coercive or controlling behaviour. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent or caregiver abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

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

paragraphs 55-61 of KCSIE 2026 should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass
Operation Encompass is a mandatory information-sharing protocol between police forces and education settings across England and Wales. The police must notify a child's school or college if there are reasonable grounds to believe a child is a victim of domestic abuse. This applies to all pupils aged 4 to 17, regardless of whether they were physically present during the incident. This protocol places no new operational responsibilities on schools.

Extra-Familial Harm
Staff must remain highly vigilant to safeguarding risks that occur outside the home or school environment, or between peers. Children can be vulnerable to multiple overlapping external harms, including:

- Child sexual exploitation (CSE) and peer-on-peer sexual harassment.
- Teenage relationship abuse (including stalking, physical, or emotional abuse).
- Criminal and financial exploitation (e.g., county lines and gang involvement).
- Serious youth violence and radicalization.

11) Staff Code of Conduct and Safeguarding

This section outlines the schools position on several areas where the actions of staff support safeguarding and prevent in the context of their individual and collective practice. Further detail on all of these areas can be found in the Employment Manual Appendices 2-8

- Appendix 2 - Protecting children from abuse, exploitation or neglect - provides an overview duties of staff in relation to this policy
- Appendix 3 - Guidance on Staff / pupil relationships - includes principles of good practice, as well as consideration of steps that staff should take in different contexts to safeguard pupils and themselves both within school and beyond, and legal duties of care with regard to pupil staff relationships
- Appendix 4 - Communication with pupils and former pupils (including the use of technology) - outlines good practice with regard to continuing professional communication with pupils, information sharing and appropriate online behaviour. This should be read in conjunction with the Appropriate Use of Technology policy
- Appendix 5 - Photographs and videos - specific reference to the using of electronic devices for this, again should be read in conjunction with the Appropriate Use of Technology policy, which includes mobile phones
- Appendix 6 - The use of force or physical restraint, obligations with regard to this area and should be read in conjunction with 'The Behaviour Policy' and 'Physical Restraint Policy'
- Appendix 7 - Physical Contact with Pupils; provides guidance on where physical contact will, may and should not occur should be read in conjunction with 'The Behaviour Policy' and 'Physical Restraint Policy'
- Appendix 8 - Childcare Disqualification - advises as to the duties of the school under the 2006 Childcare Act and the Childcare Regulations 2018, and the duty of staff to inform their employer if they are aware of an offence by themselves or another member of staff that may result in a childcare disqualification.

With regard to Childcare Disqualification Regulations.

Staff will sign the Annual Declaration. The school will a) inform relevant staff and volunteers about the legislation, b) gather sufficient and accurate information about whether any member of staff in a relevant childcare setting is disqualified, and c) keep a record on the Single Central Register, including the date disqualification checks were completed. If a person is found to be disqualified, he or she will not be able to continue working in a role covered by the regulations. If appropriate, the school will consider a transfer to other duties. The school will inform Ofsted (and copy to ISI) if satisfied that a person working in a relevant setting falls within one of the disqualification criteria.

12. Radicalisation and Extremism; the Prevent Strategy

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

- Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.
- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

The school is committed to supporting the 'Prevent' strategy in relation to radicalisation and extremism. It works to prevent children being drawn into supporting extremist ideas and terrorist ideology and to help them develop resilience to radicalisation. The Bellevue Safeguarding Governor is the governance committee's 'Prevent lead person' and the DSL is the nominated member of staff to be the 'Prevent lead person' in school.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include the DSL or deputy making a referral to the Channel programme.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals are first assessed by police and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. Whilst the referral is being assessed, should any further or new information come to light, this should also be passed to police. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided. The designated

safeguarding lead (or a deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse, incidents that may indicate concerns about serious violence or harmful behaviours and/or details of those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

Channel guidance can be found here Further information on the Prevent duty can be found via the link in Appendix 3.

The school undertakes the following measures in relation to the 'Prevent Strategy':

- 'Prevent' is considered carefully as part of the school's safeguarding procedures
- All staff and volunteers undertake training in respect of 'Prevent'
- The DSL undertakes a higher level of 'Prevent' training in order to support staff, engage effectively with external agencies and follow reporting and information sharing protocols appropriately
- 'Prevent' is considered carefully in the appointment of new staff, volunteers and contractors and in the admitting of visitors and visiting speakers to the school
- 'Prevent' is a topic for governance, staff and SLT meetings
- There is a clear referral route through the DSL to 'Channel'
- The school strongly promotes fundamental British values in curricular and extra-curricular activities and the promotion of the school's ethos and aims.
- The school will work as required with other agencies, including the LADO, LSCB, Children's Services and 'Channel' with regard to the 'Prevent' agenda
- Computer systems have appropriate levels of filtering to ensure, insofar as is possible, that terrorist and extremist material is suitably controlled
- The school provides internet safety training for pupils, parents and staff and pupils are strongly supported to enable them to use the internet safely
- PSHE lessons, assemblies and other areas of the curriculum and extra-curricular programme include topics to help develop pupils' resilience to radicalisation.

Vetting Visiting Speakers

The school is aware of the potential risk to children through exposure to views of visiting speakers whose presentations may include material of an extremist nature or which contradicts the school's commitment to provide pupils with a balance of opposing political views. Accordingly, the school undertakes a range of measures to vet the content of presentations by visiting speakers. The level of checking will be determined by an assessment of the likely level of risk and may include the following measures;

- The visiting speaker will be asked to provide assurance that the content of the presentation does not include material of a radicalising or extremist nature and is not in any other way inappropriate for the pupils involved.
- Presentations, such a Powerpoint, will be required in advance and will be checked by the member of staff responsible and discussed with the speaker
- Visiting speakers will always be accompanied. A member of staff will attend presentations to pupils and will be prepared to intervene, should the content stray from agreed expectations
- An appropriate level of checks, including an identity check, will be undertaken on visiting speakers, particularly any not previously known to the school. Most speakers will be well known to the school (parents, local professionals, religious leaders) and the

school will be familiar with their standing and reputation. Where a speaker represents an organisation, for example, the fire service or a charity, identity checks will include verification of the speaker's connection with the organisation.

- The school's vetting procedures may include an internet search to check for links with inappropriate organisations or the expression of extremist views which would indicate that it would be inappropriate to address pupils at the school.

The above procedures apply at an appropriate level, to all situations where visitors present to the pupils, not simply formal talks, but also the more informal visits to class, covering topics from dental care to Diwali. The procedures are also followed where speakers visit at the invitation of pupils. Any such pupil invitation must be approved by a member of the SLT.

13 Reviewing this Policy

When reviewing this policy the school will draw on the expertise of staff in shaping the safeguarding arrangements and policies, to ensure that the school considers at all times what is in the best interests of the child.

The Oratory Prep School

Appendix 1 Definitions and Guidance

This section is designed to provide information that facilitates understanding of key terminology and indicators:

1) Abuse, Neglect and Exploitation
WHAT IS CHILD ABUSE? (Pages 12-14, Paras 18 - 28 KCSIE 2026) Staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, 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. Abuse can 12 take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or caregiver abuse.

There are four types of child abuse.

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

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

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

Sexual abuse: Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for

example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

Bullying is not defined as a form of abuse in Working Together but there is clear evidence that it is abusive and will include at least one, if not two, three or all four, of the defined categories of abuse.

Indicators of abuse
All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual making and sharing of nude and semi-nude images and/or videos.

Physical:
- Unexplained injuries, burns, bruises
- Finger marks
- Fear of undressing or medical help
- Improbable explanations for injuries
- Fear of returning home or parents being contacted
- Unexplained absence from school.

Neglect:
- Constant hunger
- Poor personal hygiene
- Inappropriate clothing
- Frequent lateness and non attendance
- Poor social relationships
- Constant tiredness
- Independent and street wise
- No parental support for education
- Compulsive stealing or scrounging.
- A child going missing from an education setting is a potential indicator of abuse, neglect and exploitation.

Emotional Abuse:

- Fear of new situations
- Inappropriate emotional responses
- Self harm
- Reluctance to accept praise
- Low self esteem
- Lack of home support
- Depressed and withdrawn
- Social isolation – not joining in, and few friends.

Sexual Abuse:

- Bruises
- Scratches
- Bite marks on the body
- Persistent infections in the anal or genital area
- Any sexual awareness inappropriate to child's age – shown in drawings, play, vocabulary
- Frequent masturbation
- Changes in behaviour
- Refusal to stay with certain people
- Self-harm
- Depression
- Low self-esteem
- Pregnancy.

Recognition of abuse - The symptoms of stress and distress
Be open to possibilities. Be aware – if you don't believe it is possible you will never see it. Don't jump to conclusions and look for credible non-abusive explanations, but recognise you may need to seek advice to evaluate the facts. Don't let your preconceptions of the family skew your judgement.

An abused child will usually show signs of stress and distress. Possible signs of abuse include, but are not limited to, those listed below. Many of these may, of course, have nothing to do with abuse, but are worth consideration in trying to understand the child's behaviour:

- A drop in school performance
- Aggressive or hostile behaviour
- Difficulties in relationships with peers
- Excessively affectionate or sexual behaviour towards adults or other children
- Regression to more immature forms of behaviour
- Self-harming or suicidal behaviour
- No reasonable or consistent explanation for a pupil's injuries, or a pattern of injuries
- Disturbed sleep

In addition to the information provided in Section 12 on Radicalisation and Extremism and in this section on Abuse, staff can refer to Annex A of KCSIE 2026 for information on further specific areas of concern about vulnerability, including,

- Children and the court system
- Children with family members in prison
- Child criminal exploitation

- Domestic abuse
- Homelessness

Staff should ensure that they are familiar with the information provided within Part 1 of KCSIE 2026 and if they have any concerns report them to the DSL.

Guidance - TEN KEY POINTS TO FOLLOW IF YOU SUSPECT, OR ARE TOLD OF, ABUSE:
The following guidelines, compiled by Dr Roger Morgan OBE (former Children's Rights Director), may be helpful:

Adults looking after children or young people in schools (or in residential establishments or youth organisations) should be aware of the risks of abuse (by adults or other young people), and take steps to reduce those risks. Adults (staff or volunteers) in charge of children or young people should know what to do if they suspect that someone is being abused, or if someone tells them that this is happening. The following key points give a guide on what to do and not to do:

1. Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse.
2. If you can, write brief notes of what they are telling you while they are speaking (these may help later if you have to remember exactly what was said) – and keep your original notes, however rough and even if you wrote on the back of something else, (it's what you wrote at the time that may be important later – not a tidier and improved version you wrote up afterwards). If you don't have the means to write at the time, make notes of what was said as soon as possible afterwards.
3. Do not give a guarantee that you will keep what is said confidential or secret – if you are told about abuse, you have the responsibility to tell the right people to get something done about it (see below). If asked, explain that you are going to tell the people who can provide help, but that you will only tell people who absolutely have to know.
4. Don't ask leading questions that might give your own ideas of what might have happened (e.g. "*did he do X to you?*") – just ask "*what do you want to tell me?*" or "*is there anything else you want to say*". Refer to the TED questions in 4(a) above.
5. Immediately tell the DSL (unless they are themselves accused or suspected of abusing, in which case this must be reported to the head) – don't tell other adults or young people what you have been told.
6. Discuss with the DSL whether any steps need to be taken to protect the person who has told you about the abuse (this may need to be discussed with the person who told you).
7. Never attempt to carry out an investigation of suspected or alleged abuse by interviewing people etc – social services and police staff are the people trained to do this – you could cause more damage and spoil possible criminal proceedings.
8. As soon as possible the DSL should refer the matter to the local social services department (helped by your notes). Follow their requests about what to do next. They will set up any necessary investigations, and can advise you.
9. Never think abuse is impossible in your school or group, or that an accusation against someone you know well and trust is bound to be wrong.
10. Children and young people often tell other young people, rather than staff or other adults, about abuse – make sure that senior young people know how to behave if they suspect, or are told of abuse.

Child criminal exploitation (CCE) and child sexual exploitation (CSE)
CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

Child Sexual Exploitation Definition and Guidance
Updated guidance includes the following definition:

- CSE (Child Sexual Exploitation) is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration on (for example rape or penetration with an object) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non- contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.
- CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.
- CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship, professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.
- This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim.
- Victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as
- Further information about CSE including definitions and indicators is included in Annex A of KCSIE 2026
- Some additional specific indicators that may be present in CSE are children who:
  - -have older boyfriends or girlfriends; and
  - -suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.
- Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: Child sexual exploitation: guide for practitioners
- Further information to the CSA Centre's Resources for education setting

Child Criminal Exploitation

- Some specific forms of CCE (Child Criminal Exploitation) can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

- 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. Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals (particularly older children) and should be treated as victims. It is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them.
- 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.

Staff have been made aware of the updated guidance and recognise that no school, community or social group is immune to the risk of child sexual exploitation, including online, and it can affect both boys and girls. Children can be perpetrators as well as victims. Appendix 3 provides links to relevant documentation relating to child sexual exploitation.

Contextual Safeguarding: Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL or deputy need to consider the context within which such incidents and/or behaviours occur. Known as contextual safeguarding, this simply means that assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to the child's safety and/or welfare. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

Serious Violence and County Lines

The school ensures that all staff are aware of

- how to report a risk of violent crime
- factors that increase risk
- indicators which may signal that children are at risk from, or are involved in, serious violent crime.

Indicators 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 well-being, or signs of assault or unexplained injuries. Unexplained gifts of new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Specific risk factors that significantly increase a pupil's likelihood of involvement in serious violence include demographics and history Being male; history of child maltreatmenr; Education Disruption; Behavioural Indicators e.g. history of offending. Schools and staff should also be aware of times and locations within the school site, locality and day when srious violence is more likely e.g. are there areas where pupils feel unsafe.

Action and Reporting Protocol

If you suspect or know a pupil is carrying a weapon, using a weapon, or expressing intent to do so, report this immediately to the Designated Safeguarding Lead (DSL) or a Deputy.

DSL Responsibilities & Intervention - Upon receiving a report, the DSL team will:

- Assess immediate risks to the individual pupil and the wider school community.
- Implement tailored safety and support plans.
- De-escalate peer conflicts where relevant.
- Provide early, evidence-based support

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity; drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person, male or female, under the age of 18
- can affect any vulnerable adult over the age of 18
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Further guidance on these areas may be found in KCSIE 2026 Annex A for full indicators, risk factors, and protective actions, Annex B (Managing Referrals) for police contact thresholds. For practical guidance on evidenced support, reference the Youth Endowment Fund (YEF) toolkit https://youthendowmentfund.org.uk/toolkit/

FGM (Female Genital Mutilation)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. The school recognises the requirement, from October 2015, for teachers* to report to the police any cases or suspected cases of FGM. Nevertheless, all staff should liaise with the DSL with regard to any concerns about FGM (unless there is a reason not to do so). The police will be informed and Children's Social Care involved, as appropriate. At no time will staff examine pupils to confirm this.

* "Teachers", here refers to anyone undertaking 'teaching work', as defined in The Teachers' Disciplinary (England) Regulations 2012, as explained in the ISI commentary on the regulations. This definition includes such persons as teaching assistants, sports coaches and visiting instrumental music staff.

For cases where it is believed that a girl may be vulnerable to FGM or there is a concern that she may be about to be genitally mutilated the staff will inform the DSL who will report it as with any other child protection concern.

Honour-Based Abuse (HBV)

Honour-based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community, including FGM, forced marriage, and

practices such as breast ironing. It is often linked to family or community members who believe someone has brought shame to their family or community by doing something that is not in keeping with their unwritten rule of conduct. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV

Honour based violence might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture
- convert to a different faith from the family

Women and girls are the most common victims of honour-based violence. However, it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse
- forced marriage
- being held against your will or taken somewhere you don't want to go
- assault

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the DSL or deputy. As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. However, if it is clear that a crime has been committed or the pupil is at immediate risk, the police will be contacted in the first place. It is important, if honour-based violence is known or suspected, that communities and family members are NOT spoken to prior to referral to the police or social care as this could increase risk to the child.

Children Absent From Education

The school views absence as an issue related to both safeguarding and educational outcomes. Measures have been taken to adopt the additional admissions and attendance requirements which came into force on 1st September 2024 with a view to minimising the occurrence of children absent from education. Relevant staff have received training from the school's safeguarding governor in the implications and implementation of these measures. The school liaises with and reports to the Local Authority, as required, on these matters and may take steps that could result in legal action for attendance, or a referral to children's social care, or both. In accordance with the requirements of KCSIE 2026, the school holds, so far as is reasonably possible, more than one emergency contact number for each pupil. This is fully outlined in the school attendance policy.

Elective Home Education (EHE)

Home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs. Schools must inform their LA of all deletions

from their admission register when a child is taken off roll, except if the name is deleted after they have completed the final year at the school. Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school will work with other key professionals work together to coordinate a meeting with parents/carers; ideally, this would be before a final decision has been made.

Education Off Premises

Where education is provided away from the school premises and provided by a third party, including teaching off site, coaching, alternative provision or educational visits the school will ensure to follow procedures in line with safer recruitment checks. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

Forced Marriage

In the case of children: 'a forced marriage is a marriage in which one or both spouses cannot consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.' In developing countries 11% of girls are married before the age of 15. One in 3 victims of forced marriage in the U.K. are under 18. It is important that all members of staff recognise the presenting symptoms, how to respond if there are concerns and where to turn for advice. Advice and help can be obtained nationally through the Forced Marriage Unit and locally through the local police safeguarding team or children's social care. The school's policies and practices reflect the fact that, while all members of staff have important responsibilities with regard to pupils who may be at risk of forced marriage, they should not undertake roles in this regard that are most appropriately discharged by other children's services professionals, such as police officers or social workers.

Characteristics that may indicate forced marriage:

While individual cases of forced marriage, and attempted forced marriage, are often very particular, they are likely to share a number of common and important characteristics, including:

- an extended absence from school/college, including truancy;
- a dip in performance or sudden signs of low motivation;
- excessive parental restriction and control of movements;
- a history of siblings leaving education to marry early;
- poor performance, parental control of income and pupils being allowed only limited career choices;
- evidence of self-harm, treatment for depression, attempted suicide, social isolation, eating disorders or substance abuse; and/or
- evidence of family disputes/conflict, domestic violence/abuse or running away from home.

On their own, these characteristics may not indicate forced marriage. However, it is important to be satisfied that, where these behaviours occur, they are not linked to forced marriage. It is also important to avoid making assumptions about an individual pupil's circumstances or act on the basis of stereotyping. For example, an extended holiday may be taken for entirely legitimate reasons and may not necessarily represent a pretext for forced marriage.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is classified as either "cyber-enabled" (crimes that can happen off-line but are enabled at scale and speed on-line) or "cyber-dependent (crimes that can only be committed by using a computer). Cyber-dependent crimes include unauthorised access to computers ("hacking"), denial of service (DoS) attacks ("booting"), and making, supplying or obtaining malicious software ("malware") with the intent to commit further offences.
Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child the DSL should consider referring into the Cyber Choices programme. This is a nationwide police programme aiming to intervene where a young person is at risk of being drawn into cyber-dependent offences. More information can be found at:
https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices
https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf
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.

Modern Slavery and the National Referral Mechanism
All staff should be aware of the indicators of modern slavery. 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 NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims. A copy of which can be found here.

Definition of harm & significant harm - adoption & children act 2002 (section 10)
"Ill treatment or the impairment of health or development (impairment suffered from seeing or hearing the ill treatment of another)."
'*Development*' means physical, intellectual, emotional, social or behavioural development.
'*Health*' means physical or mental health.
'*Ill treatment*' includes sexual abuse and forms of ill treatment which are not physical.
NB: The Adoption & Children Act 2002 s120 amended the definition of harm to include those instances where a child may witness domestic violence.

Recognition of significant harm.
Significant harm includes an allegation of a sexual nature or parents whose behaviour may present risk because of:

- Domestic violence, drug and alcohol abuse and mental health problems
- Any physical injury caused by assault or neglect which requires medical attention
- Repeated incidents of physical harm
- Any contact with a person assessed as presenting a risk to children
- Children who live in low emotional warmth, high criticism environments
- Children who suffer from persistent neglect
- Children who may be involved in prostitution
- Other circumstances where professional judgement and/or evidence suggest a child's health, development or welfare may be significantly harmed.

- Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Harm Test
What is the harm test? There are occasions where a person may not have engaged in relevant conduct but there are still serious concerns which satisfy the harm test. To satisfy the harm test there needs to be credible evidence of a risk of harm to children or vulnerable adults such as statements made by an individual regarding conduct/behaviour, etc. For a case to be considered as a risk of harm, relevant conduct would not have occurred but there must be tangible evidence rather than a "feeling" that a person represents a risk to children and / or vulnerable adults. For example, a teacher who confides in their head teacher that they are sexually attracted to children (but who had not engaged in 'relevant conduct') would satisfy the harm test.

Appendix 2 - Handling a Report of Sexual Violence or Harassment
The principles for handling a report of sexual violence or sexual harassment remain the same if the incident is alleged to have taken place off the school premises, or to have involved pupils from more than one school. In the latter case, appropriate information sharing and effective multi-agency working are especially important.

If possible, a report will be managed with two members of staff present, (preferably one of them being the DSL or deputy). However, this might not always be possible. The DSL should be informed as soon as practically possible, if he or she is not involved in the initial report. If the report involves illegal images of children, it is a key consideration that staff should not view or forward such images. If viewing such an image is unavoidable, the UKCCIS advice (see link in Appendix 2) provides more details on what to do.

When there has been a report of sexual violence, the DSL or deputy should 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 risk and needs assessment should consider:

- the victim, especially his or her protection and support
- the alleged perpetrator
- all the other children (and, if appropriate, adult students and staff) at the school

The risk assessment will be recorded and kept under constant review. Full details of the matters for the DSL to consider in managing a report are given in paragraphs 565-567 of the KCSIE 2026. The school's or college's initial response to a report is incredibly important, as it can encourage or undermine the confidence of further victims in coming forward.

There are four likely scenarios for schools and colleges to consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the school or college should decide on a course of action. Consideration should be given to whether there are wider cultural issues within the school or college that enabled the inappropriate behaviour to occur and where

appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again. Whatever the response, it should be under-pinned by the principle that there is zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

The four scenarios are:
1. Manage internally. In some cases of sexual harassment, for example, one-off incidents, the school or college may take the view that the children concerned are not in need of universal services and community based early help or or the targeted early help level of Family Help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.

2. universal services and community based early help assessment or the targeted early help level of Family Help. The school or college may decide that the children involved do not require referral to statutory services but may benefit from a universal services and community based early help assessment or the targeted early help level of Family Help. This means providing support as soon as a problem emerges, at any point in a child's life. Providing universal services and community based early help assessment or the targeted early help level of Family Help is more effective in promoting the welfare of children than reacting later. An universal services and community based early help assessment or the targeted early help level of Family Help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the universal services and community based early help assessment or the targeted early help level of Family Help process is and how and where to access support. More information on universal services and community based early help assessment or the targeted early help level of Family Help is set out on Page 11 Paragraph 17 and page 137 to 139 of KCSIE 2026 with full details of the universal services and community based early help process in Chapter three of Working Together to Safeguard Children.

Universal services and community based early help assessment or the targeted early help level of Family Help and the option to manage a report internally do not need to be mutually exclusive: a school could manage internally and seek universal services and community based early help assessment or the targeted early help level of Family Help for both the victim and perpetrator(s).

3. Referrals to children's social care. Where a child has been harmed, is at risk of harm, or is in immediate danger, schools and colleges should make a referral to local children's social care. At the point of referral to children's social care, schools and colleges will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care.

If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services. Where statutory assessments are appropriate, the school or college (especially the designated safeguarding lead or a deputy) should be working alongside, and cooperating with, the relevant lead social worker.

Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support

Schools and colleges should not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in the school or college. It will be important for the designated safeguarding lead (or a deputy) to work closely with children's social care (and other agencies as required) to ensure any actions the school or college takes do not jeopardise a statutory investigation. The risk assessment as per paragraph 565 and 566 of KCSIE will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all children at the school or college should be immediate.

In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The school or college (generally led by the designated safeguarding lead or a deputy) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the designated safeguarding lead (or a deputy) should consider other support mechanisms such as universal services, community based early help assessment or the targeted early help level of Family Help, specialist support and pastoral support.

4. Reporting to the Police. Any report to the police will generally be in parallel with a referral to children's social care (as above). It is important that the designated safeguarding lead (and their deputies) are clear about the local process for referrals and follow that process. Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.

Where a report has been made to the police, the school or college should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity. At this stage, schools and colleges will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school or college is supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.

All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It will be important that the designated safeguarding lead (and their deputies) are aware of their local arrangements.

In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important that the school or college continue to engage with specialist support for the victim and alleged perpetrator(s) as required. Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the designated safeguarding lead (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the school or college take do not jeopardise the police investigation.

The police will consider what action to take to manage the assessed risk of harm. This could involve the use of police bail with conditions, prior to a suspect appearing in court, or court bail with or without conditions after the first appearance. Alternatively, the person suspected of an offence could be 'released under investigation' (RUI). People released under RUI can have no conditions attached to their release from custody and it is possible for a person on bail also to have no conditions. Whatever arrangements are in place, the school or college will need to consider what additional measures may be necessary to manage any assessed risk of harm that may arise within their institution. Particular regard should be given to: the additional stress and trauma that might be caused to a victim within the institution; the potential for the suspected person to intimidate the victim or a witness; the need to ensure that any risk management measures strike a balance between management of risk and the rights of an unconvicted person (e.g. rights to privacy, family life, etc). Careful liaison with the police investigators should help to develop a balanced set of arrangements.

If a child is convicted or receives a caution for a sexual offence, the school or college should update its risk assessment, ensure relevant protections are in place for all the children at the school or college and, if it has not already, consider any suitable action in line with their behaviour policy. This process should include a review of the necessary actions to keep all parties safe and meet their needs. If the perpetrator(s) remains in the same school or college as the victim, the school or college should be very clear as to their expectations regarding the perpetrator(s) now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the school or college thinks are reasonable and proportionate with regard to the perpetrator(s)' timetable.

Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils or students in the school or college. It will be important that the school or college ensure both the victim and perpetrator(s) remain protected, especially from any bullying or harassment (including online).

Supporting the victim:
KCSIE September 2026 provides a wide range of principles and actions through which the victim can be supported. This includes working closely with the victim on an ongoing basis, ensuring that external support is sought where relevant and that ongoing review of the situation takes place. Further information and useful links to additional documentation can be found at paragraph 619-628 of the KCSIE September 2026. Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the school or college should continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. Schools and colleges should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is also likely to require ongoing support for what will have likely been a difficult experience.

Safeguarding, supporting and sanctioning the alleged perpetrator:
Due consideration will be given to the support and safeguarding needs of the alleged perpetrator. The school will consider the balance of safeguarding the victim and providing the alleged perpetrator with an education, safeguarding support as appropriate and implementing any disciplinary sanctions. KCSIE September 2026 provides a background to

principles and actions that the school may take, and schools should consider this directly in the event of an incident. Children abusing other children may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of the school. These will be considered on a case-by-case basis and will take account of the age and developmental stage of the perpetrator(s), the nature of the allegations and frequency of allegations.

A pupil against whom an allegation of abuse has been made may be suspended from the school during the investigation, as determined by the head in discussion with the DSL. Careful liaison with children's social care and the police, as appropriate, will aim to ensure that any action taken by the school will not prejudice an investigation and/or any subsequent prosecution. It is also important to remember that, as a child, any alleged perpetrator is entitled to, deserving of, and should be provided with, a high level of support to help understand and overcome the reasons for such behaviour. Addressing inappropriate behaviour, including sexism and misogyny, can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future and help protect other children by limiting the likelihood of abuse again. The school will work with professionals as appropriate to provide support and to help alleged perpetrators understand and overcome the reasons for their behaviour and help protect other children by limiting the likelihood of them abusing again.

Disciplinary action and appropriate support are not mutually exclusive; they can and should occur at the same time, where necessary. In addition to the procedures in this policy, the school's policy on behaviour, discipline and sanctions will apply. A bullying incident will be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm.

Schools should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.

More information on harmful sexual behaviours (HSB) can be found at paras 526-535 KCSIE September 2026, Sexual violence and sexual harassment between children at schools and colleges. Advice should be taken, as appropriate, from children's social care, specialist sexual violence services and the police. The NSPCC also provides free and independent advice about HSB: NSPCC Learning - Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework.

In addition, The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

A section explaining issues around the victim and alleged perpetrator(s) sharing classes can be found on page 149 of KCSIE 2026.

Working with parents: The school will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence. The exception to this requirement is if there is a reason to believe that informing a parent or carer will put a child at additional risk. Careful consideration, based, where appropriate, on advice from relevant agencies, will be given to what information is provided to the respective parents, this includes guidance in Paragraphs 636-641.

Safeguarding other children:
The school will consider carefully the safeguarding needs of other children, particularly any who may need support due to having witnessed sexual violence. Following an incident, it is likely that other children will 'take sides' and the school will be vigilant to do all it can to ensure that the victim, alleged perpetrator and any witnesses are not bullied or harassed, including via social media.

Appendix 3 – Contact details

School Contacts:

Designated Safeguarding Lead (DSL)	James Baker j.baker@oratoryprep.co.uk
Deputy DSL (DDSL) - EYFS	Megan Jones m.jones@oratoryprep.co.uk
Deputy DSL (DDSL) - Pre Prep	Laura Wowk l.wowk@oratoryprep.co.uk
Deputy DSL (DDSL) - Prep	Chris Sizer c.sizer@oratoryprep.co.uk
Deputy DSL (DDSL) - Boarding	Leanne Spencer l.spencer@oratoryprep.co.uk

Bellevue Safeguarding Governor: Steve Wade swade@lvue.com

Oxfordshire Multi Agency Safeguarding Hub (MASH) 0345 050 7666

Early Help and the Locality Community Support Service (LCSS) 0345 241 2705

LADO for Oxfordshire, Jo Lloyd.
lado.safeguardingchildren@oxfordshire.gov.uk 01865 810603.

Independent Schools Inspectorate
Email: info@isi.net
Telephone: 020 7600 0100
Fax: 020 7776 8849
Address: CAP House, 9-12 Long Lane, London, EC1A 9HA

Ofsted
Email: enquiries@ofsted.gov.uk
Telephone: 0300 123 4234
Address: Piccadilly Gate, Store Street, Manchester, M1 2WD

Disclosure and Barring Service
https://www.gov.uk/government/organisations/disclosure-and-barring-service
Email: dbsdispatch@dbs.gsi.gov.uk
Address: DBS, PO Box 181, Darlington, DL1 9FA
Telephone: 01325 953795

Contact details for advice and support about extremism
LA *Prevent* lead, in *Prevent* priority areas:
Multi-Agency Safeguarding Hub MASH 0345 050 7666
Local police force, 101 (the non-emergency police number)
DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors : 020 7340 7264 and counter-extremism@education.gsi.gov.uk).

Contact details for mandatory reporting of FGM to the police: 101 or 999
NSPCC Inform website
http://www.nspcc.org.uk/Inform
Telephone: 0808 800 5000
Email: help@nspcc.org.uk

NSPCC Whistleblowing helpline
https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/
Telephone: 0800 028 0285
Email: help@nspcc.org.uk

Office of the Children's Commissioner for England (OCC)
https://www.childrenscommissioner.gov.uk/
Email: advice.team@childrenscommissioner.gsi.gov.uk
or info.request@childrenscommissioner.gsi.gov.uk

Appendix 4 - Useful Links and Documentation

Core Documentation
Keeping Children Safe in Education (September 2026) (KCSIE)
https://assets.publishing.service.gov.uk/media/6a4cf903b7203c4c023fd2f3/Keeping_children_safe_in_education_2026_.pdf

Working together to safeguard children July 2026
https://assets.publishing.service.gov.uk/media/69fb1c28d0e316a40f269a5b/Working_together_to_safeguard_children_2026_a_guide_to_multi_agency_working.pdf
Version of this guidance suitable for young people
https://www.childrenscommissioner.gov.uk/publication/working-together-to-safeguard-children/
Version of this guidance suitable for younger children
https://www.childrenscommissioner.gov.uk/publication/guide-to-keeping-children-safe/
What to do if you're worried a child is being abused (March 2015)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
Revised Prevent duty guidance for England and Wales:
https://www.gov.uk/government/publications/prevent-duty-guidance

Wider Guidance
DfE guidance on mental health
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools__.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/414908/Final_EHWB_draft_20_03_15.pdf
DfE guidance on Behaviour in schools
Behaviour in schools Advice for headteachers and school staff September 2022
DfE Guidance on Information Sharing
https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf
Further information on contextual safeguarding
https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding
Guidance for safer working practice for adults who work with children and young people
http://webarchive.nationalarchives.gov.uk/20100202180143/http://www.dcsf.gov.uk/everychildmatters/resources-and-practice/IG00311/
Child Sexual Exploitation
Child sexual exploitation: definition and guide for practitioners;
www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners
Child sexual exploitation: annexes;
www.gov.uk/government/uploads/system/uploads/attachment_data/file/591905/CSE_Guidance_Annexes_13.02.2017.pdf

NSPCC Guidance on Harmful Sexual Behaviour:
https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/harmful-sexual-behaviour/

NSPCC - Safeguarding children with special educational needs and disabilities (SEND) and NSPCC - Safeguarding child protection/deaf and disabled children and young people

Home Office guidance on preventing youth violence and gang involvement
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf
Home Office guidance on Criminal Exploitation of children and vulnerable adults: County Lines
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf

SEND
• SEND Code of Practice 0-25 years
https://www.gov.uk/government/publications/send-code-of-practice-0-to-25
• Supporting Pupils at School with Medical Conditions.
https://www.gov.uk/government/publications/supporting-pupils-at-school-with-medical-conditions--
• The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND.

GDPR and Online safety
Guidance to support schools with data protection activity, including compliance with the GDPR.
The Information Commissioner's Employment Practices Code
Data Protection: toolkit for schools
Sexting: How to respond to an incident:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/647389/Overview_of_Sexting_Guidance.pdf
Sexting in schools and colleges:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf
DfE advice for schools
https://www.gov.uk/government/publications/teaching-online-safety-in-schools
UK Council for Internet Safety (UKCIS)27 guidance: Education for a Connected World
National Crime Agency's CEOP education programme: Thinkuknow Public Health England Rise Above

Resources that could support schools and colleges include:

- Be Internet Legends developed by Parent Zone and Google is a free internet safety curriculum with PSHE accredited lesson plans and teaching resources for Key Stage 2 pupils
- Disrespectnobody is Home Office advice and includes resources on healthy relationships, including sexting and pornography
- Education for a connected world framework from the UK Council for Internet Safety supports the development of the curriculum and is of particular relevance to RSHE education and Computing. It is designed, however, to be usable across the curriculum and beyond (covering early years through to age 18) and to be central to a whole school or college approach to safeguarding and online safety.
- PSHE association provides guidance to schools on developing their PSHE curriculum
- Teaching online safety in school is departmental guidance outlining how schools can ensure their pupils understand how to stay safe and behave online as part of existing curriculum requirements
- Thinkuknow is the National Crime Agency/CEOPs education programme with age specific resources
- UK Safer Internet Centre developed guidance and resources that can help with the teaching of the online safety component of the Computing Curriculum.

The following resources may also help schools and colleges understand and teach about safeguarding:

• DfE advice for schools: Teaching online safety in schools:
https://www.gov.uk/government/publications/teaching-online-safety-in-schools/teaching-online-safety-in-schools
• The Oak National Academy have produced classroom resources to support teaching of the updated curriculum: https://www.thenational.academy/
• UK Council for Internet Safety (UKCIS) guidance:
https://www.gov.uk/government/publications/education-for-a-connected-world
• UKCIS guidance:
https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people,
• The UKCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors:https://www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings
• National Crime Agency's CEOP Education Programme: Protecting children and young people from online child sexual abuse through education. Including PSHE Association accredited lesson plans and resources aligned to the RSHE curriculum, regular e-bulletins on new and

emerging threats and training for professionals on online child sexual abuse: https://www.ceopeducation.co.uk/
•https://www.nhs.uk/every-mind-matters/, and
•Harmful online challenges and online hoaxes - GOV.UK- this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support

Appendix 5 - Glossary of Terms

Regulated activity.
In summary, a person will be engaging in regulated activity with children if they work on a frequent basis in a specified establishment, such as a school. An enhanced DBS certificate (with barred list information where appropriate) is required in connection with the purposes of the establishment, where the work gives opportunity for contact with children.

A person will also be in regulated activity if, as a result of their work or volunteering, they:
• will be responsible, on a frequent basis in a school or college, for teaching, training, instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or
• engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

Further details on regulated activity are below.

Regulated activity includes:
a) paid and unpaid work that involves teaching, training, instructing, caring for or supervising children, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;
b) any other type of paid work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children.

Work under (a) or (b) is regulated activity only if done frequently, on more than 3 days in a 30-day period or overnight.

Some activities are always regulated activities, regardless of frequency. This includes:
c) relevant personal care, or health care provided by or provided under the supervision of a health care professional: personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability. Health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

Regulated activity will not be:

• paid work in specified places which is occasional and temporary and does not involve any of the activities in (a) above.