



Child Safeguarding Policy

This policy is inclusive of all day and boarding pupils in the school including those in the Early Years Foundation Stage. It is available to parents on the school website and upon request.

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Reviewed by: S McMann and V Rae

TABLE OF CONTENTS

POLICY STATEMENT AND PRINCIPALS.....	3
Child Protection Statement.....	4
SAFEGUARDING LEGISLATION AND GUIDANCE.....	5
ROLES AND RESPONSIBILITIES.....	6
The Designated Safeguarding Lead (DSL):.....	6
GOOD PRACTICE GUIDELINES AND STAFF CODE OF CONDUCT.....	7
ABUSE OF POSITION OF TRUST.....	8
Supporting Children.....	8
MENTAL HEALTH.....	8
CHILDREN WHO MAY BE PARTICULARLY VULNERABLE.....	9
WHISTLE BLOWING IF YOU HAVE CONCERNs ABOUT A COLLEAGUE.....	10
ALLEGATIONS AGAINST STAFF.....	10
STAFF TRAINING.....	11
SAFER RECRUITMENT.....	12
Volunteers.....	12
Contractors.....	12
SITE SECURITY.....	12
EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS.....	13
STAFF/PUPIL ONLINE RELATIONSHIPS.....	13
CHILD PROTECTION PROCEDURES.....	13
Recognising Abuse.....	13
BULLYING.....	13
CHILD-ON-CHILD ABUSE.....	14
Supporting Those Involved.....	15
SEXTING.....	15
Concerns about a Pupil's Welfare.....	16
Pupil Disclosures.....	16
Notifying Parents.....	17
CONFIDENTIALITY AND SHARING INFORMATION.....	17
EARLY HELP ASSESSMENT.....	18
REFERRAL TO CHILDREN'S SOCIAL CARE.....	18

REPORTING DIRECTLY TO CHILD PROTECTION AGENCIES.....	18
CHILDREN WITH SEXUALLY HARMFUL BEHAVIOUR.....	19
CHILD SEXUAL EXPLOITATION (CSE)/CHILD CRIMINAL EXPLOITATION (CCE).....	19
HONOUR-BASED VIOLENCE.....	19
RADICALISATION AND EXTREMISM.....	20
ONLINE SAFETY.....	21
MOBILE PHONES AND CAMERAS.....	22
PRIVATE FOSTERING ARRANGEMENTS.....	23
RELATED SAFEGUARDING PORTFOLIO POLICIES.....	23
Looked After Children (LAC):.....	23
Work Experience.....	23
Children Staying with Host Families.....	24
Boarding Schools and Children's Homes.....	24
FOUR CATEGORIES OF ABUSE.....	25
Physical Abuse.....	25
Emotional Abuse.....	25
Sexual Abuse.....	25
Neglect.....	26
RELATED SAFEGUARDING POLICIES.....	28
SAFEGUARDING ESSENTIAL INFORMATION.....	29



POLICY STATEMENT AND PRINCIPALS

Moulton College is a preparatory school, preparing pupils for the next step in their education. We aim to educate and nurture the whole child, providing opportunities for each child to discover and develop their unique talents and abilities including their emotional, spiritual, academic, cultural, moral, linguistic and physical development. We create a culture of achievement within a vibrant and quality learning environment ensuring positive reinforcement at all levels of ability. Our mission is for Moulton College pupils to stand on their own as lifelong learners, growing in confidence and independence and where good habits become second nature. Above all we want the pupils to enjoy their school.

We aim to provide a holistic approach, wherein the Spiritual, Moral, Social and Cultural values we promote are embedded in every aspect of school life. We aim to foster and develop a caring community where everyone feels respected and valued and children are happy.

- **RESPECT FOR ALL** - We aim to establish a courteous, caring and disciplined community in which self-respect, self-discipline and a sense of responsibility are fostered along with concern for others. We want our children to feel supported and to support each other, sustaining a close partnership between school, home and the local community.
- **CURRICULUM FOR ACHIEVEMENT** - We aim to provide a wide and varied curriculum that is appropriate to the needs of each child. An education that will best develop successful learning strategies, promote autonomous learning and prepare them for the next stage of their education.
- **EVERY CHILD MATTERS** - We aim to embrace the principle of 'Every Child Matters' and work towards the five outcomes: Be Healthy; Stay Safe; Enjoy and Achieve; Make a Positive Contribution; Achieve Economic Well-being. This is built into our PSHE programme known as Learning for Life (LFL).
- **SAFEGUARDING CULTURE** – In line with Keeping Children Safe in Education 2025, we aim to ensure that safeguarding and promoting the welfare of children is embedded throughout school life. This includes promoting early help, preventing and responding to child-on-child abuse, ensuring online safety, and preparing children for life in modern Britain. These principles are built into our PSHE programme known as Learning for Life (LFL).

This policy is one of a series in the school's integrated safeguarding portfolio.

This policy is available on the school website and is included in the staff handbook, as well as being accessible through our Staff Documents and within Google Drive, and available to parents/carers and relevant external agencies on request.

Our core safeguarding principles are:

- the school's responsibility to safeguard and promote the welfare of children is of paramount importance
- the constant reinforcement of safeguarding principles which creates a transparent, open and clear safeguarding culture
- safer children make more successful learners
- policies will be reviewed at least annually and whenever statutory guidance is updated or an incident highlights the need for review.

Child Protection Statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff, volunteers and governors and are consistent with those of Oxfordshire Safeguarding Children Partnership (OSCP).

Policy Principles

- The welfare of the child is paramount
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, or any of the protected characteristics under the Equality Act 2010, have equal rights to protection
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm
- Pupils and staff involved in child protection issues will receive appropriate support
- This policy is written in conjunction with:
 - * [Attendance Policy](#)
 - * [Child Missing From Education Policy](#)
 - * [Promoting Good Behaviour Policy](#)
 - * [Whistleblowing Policy](#)
 - * [Low Level Concerns Policy](#)
 - * [Mobile Phone Policy](#)
 - * [Identity Card and Lanyard Policy](#)

Policy Aims

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities
- To ensure consistent good practice
- To demonstrate the school's commitment with regard to child protection to pupils, parents and other partners

Terminology

Safeguarding and promoting the welfare of children refers to: providing help and support to meet the needs of children as soon as problems emerge; the process of 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; promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement whenever possible and where this is in the best interests of the child; and taking action to enable all children to have the best outcomes, in line with the outcomes set out in the Children's Social Care National Framework.

Child protection refers to the activity undertaken to protect specific children who have suffered, or are likely to suffer, significant harm.

Staff refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity, including agency staff and contractors.

DSL refers to the Designated Safeguarding Lead at the school. The school also has deputy DSLs who are trained to the same standard to ensure safeguarding cover at all times.

Child includes everyone under the age of 18.

Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers, kinship carers, and adoptive parents.

SAFEGUARDING LEGISLATION AND GUIDANCE

This policy has been developed in accordance with the Oxfordshire Safeguarding Children Partnership (OSCP).

Local Authority Designated Officer (LADO); the LADO gives advice and guidance to employers and others who are concerned about an adult who works with children, including volunteers, agency staff and contractors.

Schools LADO: Jo Lloyd lado.safeguardingchildren@oxfordshire.gov.uk

Team Telephone Number: 01865 810603 / 01865816382 / 07901331799

Multi Agency Safeguarding Hub (MASH); the Multi-Agency Safeguarding Hub enables the sharing of information between services so risks to children can be identified at an early stage. It is the single point of contact for early help, safeguarding concerns, and referrals.

MASH: Katrina Johnson 0345 050 7666

The following safeguarding legislation and guidance has been considered when drafting this policy:

- Section 157 of the Education Act, 2002 (Independent schools only, including academies and CTCs)

- The Education (Independent Schools Standards) (England) Regulations 2014 (Independent schools only, including academies and Free Schools)
- The Safeguarding Vulnerable Groups Act, 2006
- The Teacher Standards, June 2013
- Working Together to Safeguard Children, 2023
- Keeping Children Safe in Education, 2025
- What to do if you're worried a child is being abused, 2015
- Prevent Duty Guidance: for England and Wales, 2015
- Channel Duty Guidance, 2023
- The Statutory Framework for the Early Years Foundation Stage

An annual Safeguarding Audit is completed in partnership with the Safeguarding Governor, before completion of our annual Safeguarding Report and ratified by the Governing Body. The Safeguarding policy is updated on an annual basis.

The Safeguarding Policy is updated at least annually, and sooner where necessary, to reflect emerging safeguarding issues, statutory guidance updates, and lessons learned from safeguarding practice.

ROLES AND RESPONSIBILITIES

Designated Safeguarding Lead (DSL)	Mrs Vicki Rae	vrae@moulsford.com 01491 651438
Deputy DSL	Mr Ben Beardmore-Gray	bbeardmoregray@moulsford.com 01491 651438
	Mr Jake Albon	jalbon@moulsford.com 01491 651438
	Mrs Annalisa Mullaney	amullaney@moulsford.com 01491 651438
	Mrs Angela Gipson	matron.sec@moulsford.com 01491 651438
	Mrs Amy Gemmell (EYFS DSL)	mpspphead@moulsford.com 01491 651438
Nominated Child Protection Governor	Mrs Anna Cutts	a.cutts@cheltenhamcollege.org 07973 684894

The Designated Safeguarding Lead (DSL):

- has the status and authority within the school to carry out the duties of the post, including committing resources and supporting and directing other staff, and is given the time, funding, training and resources to fulfil the role effectively
- is appropriately trained (Specialist Safeguarding Training, Level 3) and updated at least every two

years, with knowledge and skills refreshed at regular intervals, and at least annually

- acts as a source of support and expertise to the school community
- has a working knowledge of OSCP procedures
- makes staff aware of OSCP training courses and the latest policies on safeguarding
- keeps detailed written records of all concerns, ensuring that such records are stored securely and flagged on, but kept separate from, the pupil's general file
- refers cases of suspected abuse to children's social care or police as appropriate
- ensures that when a pupil leaves the school, their child protection file is passed to the new school (separately from the main pupil file and ensuring secure transit) and confirmation of receipt is obtained. This should be carried out within 5 days of moving school, or 5 days from the start of term.
- attends and/or contributes to child protection conferences
- coordinates the school's contribution to child protection plans
- oversees online safety including filtering and monitoring standards in line with DfE guidance (2023)
- develops effective links with relevant statutory and voluntary agencies including the OSCP
- ensures that the child protection policy and procedures are reviewed and updated annually liaises with the nominated Governor and Headmaster (where the role is not carried out by the Headmaster) as appropriate
- makes the child protection policy available publicly, on the school's website or by other means.
- helps promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. Ensuring that the school, and staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children."

The Deputy Designated Safeguarding Lead(s):

- are trained to the same standard as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils
- in the event of the long-term absence of the DSL, assume all of the functions above.

GOOD PRACTICE GUIDELINES AND STAFF CODE OF CONDUCT

Good practice includes:

- treating all pupils with respect
- setting a good example by conducting ourselves appropriately
- involving pupils in decisions that affect them
- encouraging positive, respectful and safe behaviour among pupils
- being a good listener
- being alert to changes in pupils' behaviour and to signs of abuse, neglect and exploitation
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the school's child protection policy, staff behaviour policy and guidance documents on wider safeguarding issues

- adhering to the Staff Behaviour Policy (Code of Conduct), including expectations around professional boundaries, use of technology, social media, mobile phones, and one-to-one working
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse
- referring all concerns about a pupil's safety and welfare to the DSL, or, if necessary directly to police or children's social care
- following Safer Working Practice guidance (Safer Recruitment Consortium, 2022) to protect both pupils and staff

See [**Staff Code of Conduct Policy**](#) (In Staff Handbook)

ABUSE OF POSITION OF TRUST

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

Staff understand that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence. This duty extends to all adults working with children in an education setting under the expanded definition of 'positions of trust' (2022).

Supporting Children

Our school will support all pupils by:

- Encouraging self-esteem and self-assertiveness, through the curriculum, our Learning for Life programme and through our relationships, while not condoning aggression or bullying
- Promoting a caring, safe and positive environment within the school
- Educating pupils in regard to online behaviours and relationships, in order to keep them safe online, through our statutory Relationships, Sex and Health Education (RSHE) curriculum
- Provide a Feeling Safe Survey on an annual basis

MENTAL HEALTH

- All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.
- Identifying and supporting those pupils who may be suffering from mental health issues, including access to a school counsellor and training of staff on Mental Health and Wellbeing. (If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the procedures in the Safeguarding Policy and speaking to the DSL.)

- The DSL and deputies will receive training to understand the impact of mental health on safeguarding and the interface between mental health and child protection, as required by KCSIE 2025.

CHILDREN WHO MAY BE PARTICULARLY VULNERABLE

Some children may have an increased risk of abuse, more prone to peer group isolation or bullying (including prejudice-based bullying) than other children. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that all of our pupils receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs
- young carers
- affected by parental substance misuse, domestic violence or parental mental health needs
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of being drawn into extremism.
- persistently absent from education or missing from education
- living in private fostering arrangements
- at risk of or experiencing child-on-child sexual violence and sexual harassment
- at risk of modern slavery, trafficking, or criminal exploitation (including County Lines).

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties may make it more difficult to manage or report these challenges.

EYFS

We recognise that younger children in EYFS are considered more vulnerable, in line with the Early Years Framework all staff in the Early Years setting:

- Supervise children during snack and meal times, both visibly and audibly, with at least one paediatric first aid qualified staff member present at all times.
- Choking risks are mitigated by ensuring small food is cut up and foods which are not recommended are not served, such as; popcorn or grapes.
- Safe ratios, according to the Early Years Framework, are maintained at all times throughout the school day.
- All Pre-Prep staff must hold a current Paediatric First Aid Certification.
- Should a child require a nappy change, they will be given privacy in a designated discrete space. Sight or hearing supervision will be maintained and staff will arrange themselves in such a way that they minimize the risk of exposure or vulnerability during changing.

WHISTLE BLOWING IF YOU HAVE CONCERNS ABOUT A COLLEAGUE

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount.

The school's Whistleblowing Code, which can be found in the Whistleblowing Policy, enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the head teacher. Complaints about the head teacher/principal should be reported to the chair of governors.

Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action. Alternatively, staff may contact the NSPCC Whistleblowing Helpline (0800 028 0285) if they feel unable to raise concerns internally.

ALLEGATIONS AGAINST STAFF

When an allegation is made against a member of staff, our set procedures must be followed. This would include immediate referral to LADO before commencing any investigation. The full procedures for dealing with allegations against staff can be found in *Keeping Children Safe in Education (DfE 2025)*.

Where an allegation relates to a member of supply staff provided by an agency, the agency should be fully involved. Allegations concerning staff who no longer work at the school, or historical allegations will be reported to the police.

Where there may be a conflict of interest in reporting the matter to the Head, the LADO should be contacted directly.

The school will report promptly to the Disclosure and Barring Service (DBS) any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is, they have caused harm or posed risk of harm to a child.

The school will also consider making a referral 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 such an order may be considered are: 'unacceptable professional conduct', 'conduct that may bring the profession in disrepute', or a 'conviction, at any time, for a relevant offence'.

Low Level Concerns

Low-level concerns (those that do not meet the harm threshold) should be reported to the Headteacher and managed in line with the school's [Low-Level Concerns Policy](#), following KCSIE 2025 guidance.

STAFF TRAINING

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff and governors will receive a briefing during their induction, which includes the following:

- Child Protection Policy
- Staff Behaviour Policy
- Acceptable Use Policy
- Pupil Code of Conduct
- Reporting and recording arrangements
- Children missing in education (including the close monitoring of attendance, absence and exclusion)
- Details for the DSL and DDSLs.

All staff, including the DSL, Headteacher and Safeguarding Governor, will receive training that is regularly updated. The DSL and Deputy DSLs will undergo training at least every two years and will also receive formal updates annually.

All staff with direct contact with children will read and understand Part One of Keeping Children Safe in Education (DfE 2025), including Annex B. Where appropriate, some staff may read Annex A (a condensed version of Part One).

In addition to formal training, safeguarding and child protection updates will be provided at least annually, and more regularly where needed, through staff meetings, e-bulletins, and other communication methods.

All Governors will receive appropriate training at induction and at regular intervals thereafter.

SAFER RECRUITMENT

Our school complies with the requirements of Keeping Children Safe in Education (DfE 2025) and the Local Safeguarding Partnership by carrying out the required checks and verifying the applicant's identity, qualifications and work history. Online searches will also be undertaken for shortlisted candidates as part of due diligence, and candidates will be informed of this in advance.

At least one member of each recruitment panel will have attended safer recruitment training.

All relevant staff (involved in early years settings and/or before or after school care for children under eight) are made aware of the Childcare Disqualification Regulations and their obligations to disclose relevant information to the school. Staff are not required to disclose disqualification by association.

The school obtains written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work in the school have been appropriately checked.

Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained.

The school maintains a single central record of recruitment checks undertaken.

Volunteers

Volunteers, including governors will undergo checks commensurate with their work in the school, their contact with pupils and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.

The school carries out risk assessments for volunteer roles to help determine the appropriate level of safeguarding checks and supervision.

Contractors

The school checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

SITE SECURITY

Visitors to the school, including contractors, are asked to sign in and are given a lanyard, see the [Identity Card and Lanyard Policy](#), confirming they have permission to be on site. All visitors are subject to safeguarding checks, including DBS where appropriate. Parents who are simply delivering or collecting their children do not need to sign in, but should remain in areas where children are supervised.

All visitors are expected to observe the school's safeguarding and health and safety regulations. The Headmaster will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS

All extended and off site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply.

If other organisations provide services or activities on our site, we will check that they have appropriate safeguarding procedures in place, including safer recruitment checks and ongoing supervision.

When pupils attend off-site activities, including day trips, residential visits, and work-related experiences, we will check that effective child protection arrangements are in place, in line with DfE guidance for off-site visits (2023/2024).

STAFF/PUPIL ONLINE RELATIONSHIPS

The school provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. (See *Acceptable Use Policy* in Staff Handbook). Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

The use of mobile and smart technology by pupils is outlined in the ICT Acceptable Use Policy.

CHILD PROTECTION PROCEDURES

Recognising Abuse

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone. Abuse may be committed by adult men or women and by other children and young people.

Keeping Children Safe in Education (DfE 2025) defines four categories of abuse (Appendix 1), along with indicators. This includes online abuse and sexual exploitation.

BULLYING

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidences of child-on-child abuse, bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our tackling-bullying procedures which can be accessed in the Anti-Bullying Policy.

CHILD-ON-CHILD ABUSE

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, all staff recognise that children are capable of abusing their peers and should be clear about the school's policy and procedures regarding child-on-child abuse. All child-on-child abuse is unacceptable and will be taken seriously with a zero-tolerance approach. The school is aware that although there may not be any reported cases of child-on-child abuse, this does not mean that it is not happening and staff will be constantly vigilant.

Child on child abuse can take many forms, including:

- **bullying** (including cyberbullying, prejudice-based and discriminatory bullying)
- **physical abuse** such as biting, hitting, kicking or hair pulling.
- **sexually harmful behaviour/sexual abuse** such as inappropriate sexual language, touching, sexual assault, causing someone to engage in sexual activity without consent.
- **sexting**, including pressuring another person to send a sexual imagery or video content.
- **teenage relationship abuse** - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner.
- **initiation/hazing** - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them.
- **upskirting** - 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.
- **prejudiced or discriminatory behaviour** - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.
- **Online Abuse** – including threatening and derogatory language and taking into account content which could include misinformation, disinformation (including fake news), and conspiracy theories.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or pupils being subject to initiation/hazing type violence. It is more likely that girls will be victims and pupils will be perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously.

At our school, we take the following steps to minimise or prevent the risk of child-on-child abuse.

- An open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them.
- Assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying.
- RE and PSHE are used to reinforce the message through stories, role play, current affairs and other suitable activities.

- Staff will endeavour always to create surroundings where everyone feels confident and at ease in school.
- We will ensure that the school is well supervised, especially in areas where children might be vulnerable.

Pupils are aware of how to report any child-on-child abuse. This is highlighted regularly in assemblies and form time and includes speaking to senior pupils, any members of staff, the school counsellor or through any agency (including NSPCC) which have contact information posted around the school. All allegations of child-on-child abuse should be passed to the DSL immediately. They will then be investigated and dealt with as follows.

- **Information gathering** – children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.
- **Decide on action** – if it is believed that any young person is at risk of significant harm, a referral will be made to MASH (Multi Agency Support Hub). The DSL will then work with children's social care to decide on next steps, which may include contacting the police.
- **Inform parents** - as with other concerns of abuse, the school will normally seek to discuss concerns about a pupil with parents. Our focus is the safety and wellbeing of the pupil and so if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

Where allegations of sexual violence or sexual harassment are made, the school will act in accordance with the guidance set out in Part 5 of *Keeping Children Safe in Education (DfE 2025)*.

Supporting Those Involved

The support required for the pupil who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the pupil that was the aggressor. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil and/or change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed.

When needed the school can refer to the OSCP Child on Child Abuse guidance
[Child on child abuse - Oxfordshire Safeguarding Children Partnership](#)

SEXTING

There is no accepted definition of 'sexting' but most professionals agree that it refers to the sending or posting of sexually suggestive images, including nude or semi-nude photographs of a person under 18 years of age, via mobiles or over the internet. The [UKCCIS advice document](#) refers to this as 'youth produced sexual imagery'.

All incidents involving youth produced sexual imagery will be responded to as follows:

1. The incident must be referred to the DSL immediately.
2. The DSL will hold an initial review meeting with appropriate staff and, if necessary, conduct interviews with the young people involved.
3. Parents will be informed early unless doing so would place the pupil at risk.
4. At any stage, if there is concern that a pupil is at risk of harm, a referral will be made to children's social care and/or the police immediately.
5. Where appropriate, the police may investigate, including seizure of devices and interviews with pupils.

Key Actions for Staff:

Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.

- In an emergency, take action to protect the child and call 999 if necessary.
- Report concerns to the DSL immediately, or as soon as it is safe to do so.
- Do not investigate independently.
- Share information strictly on a need-to-know basis.
- Complete a record of concern on CPOMS.
- Seek support if personally distressed.

Concerns about a Pupil's Welfare

Staff may notice changes in a pupil's behaviour, artwork, writing, or physical signs indicating distress. In such cases:

- Give the pupil an opportunity to talk and ask if they are OK.
- Record early concerns in CPOMS.
- Discuss concerns with the DSL following an initial conversation.

Pupil Disclosures

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, **the staff member will, at the appropriate time, let the pupil know that in order to help them they must pass the information on to the DSL**. The point at which they tell the pupil this is a matter for professional judgement. During their conversations with the pupils staff will:

- allow them to speak freely.
- remain calm and not overreact.
- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.

- not be afraid of silences.
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the pupil's mother think about it.
- at an appropriate time tell the pupil that in order to help them, the member of staff must pass the information on and explain to whom and why.
- not automatically offer any physical touch as comfort.
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' may be interpreted by the child to mean that they have done something wrong.
- tell the pupil what will happen next.
- report verbally to the DSL immediately even if the child has promised to do it by themselves.
- complete a **CPOMS** entry notifying the DSL as soon as possible.
- seek support if they feel distressed.

Notifying Parents

The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted. However, parental consent is not required for referrals to statutory agencies.

CONFIDENTIALITY AND SHARING INFORMATION

All staff will understand that child protection issues are highly confidential, not only out of respect for the pupil and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL, head teacher or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

However, following a number of cases where senior leaders in school had failed to act upon concerns raised by staff, *Keeping Children Safe in Education (DfE 2025)* emphasises that **any** member of staff can contact children's social care directly if they are concerned about a child.

Storage of Records:

- Child protection records are stored securely, separately from the main pupil file.
- Electronic records are password protected; physical records are in a locked facility.
- The main school file is tagged to indicate separate child protection information exists.

Sharing Information:

- Normally, consent from the pupil and/or parents is obtained before sharing sensitive information.
- Where there is good reason, information may be shared without consent, and the reason must be recorded.
- Decisions about sharing must be necessary, proportionate, relevant, adequate, accurate, timely, and secure.
- Records of all information sharing decisions are maintained.

Legal Basis:

- Child protection records are generally exempt from disclosure under the Data Protection Act 2018
- GDPR and Data Protection Act do not prevent sharing information with relevant agencies where necessary to protect a child
- The school's confidentiality and information sharing policy is available to parents on request

EARLY HELP ASSESSMENT

Early help can make the biggest difference when support for families is provided before problems escalate. The concept of early help, or early intervention as it is sometimes known, reflects the widespread recognition that it is better to identify and resolve problems early, rather than respond when difficulties have become acute.

Staff should contact the Locality Community Support Service (LCSS) if they:

- have emerging concerns for a child that do not require an immediate safeguarding response
- need support or guidance with an Early Help Assessment
- wish to complete a Named Consultation with the parent's consent

REFERRAL TO CHILDREN'S SOCIAL CARE

The DSL will make a referral to children's social care (Multi Agency Safeguarding Hub (MASH: 0345 050 7666) if it is believed that a pupil is suffering or is at risk of significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

Any member of staff may make a direct referral to children's social care if they genuinely believe independent action is necessary to protect a child.

REPORTING DIRECTLY TO CHILD PROTECTION AGENCIES

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the Designated Safeguarding Lead, their Deputy, the Headmaster and the Chair of Governors are all unavailable

- they believe that a direct report is the only way to ensure the pupil's safety
- they judge that direct referral is in the best interests of the child

CHILDREN WITH SEXUALLY HARMFUL BEHAVIOUR

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's **anti-bullying procedures** where necessary. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures.

When sexualised behaviour is observed, staff should:

- Recognise that the pupil may also be a victim of abuse
- Follow child protection procedures for both victim and perpetrator
- Report concerns, including online sexual behaviour, to the DSL immediately

Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who become concerned about a pupil's sexual behaviour, including any known online sexual behaviour, should speak to the DSL as soon as possible.

CHILD SEXUAL EXPLOITATION (CSE)/CHILD CRIMINAL EXPLOITATION (CCE)

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be pupils or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

The school includes the risks of sexual and criminal exploitation (CSE/CCE) in the PSHE (LFL) curriculum. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff are made aware of the indicators of Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) and all concerns are reported immediately to the DSL.

HONOUR-BASED VIOLENCE

'Honour-based' violence (HBV) encompasses crimes, which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the

practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupil about going on a long holiday during the summer vacation period.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses. Children may be married at a very young age, and well below the age of consent in England. School staff receive training and should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not be allowed to return to England.

RADICALISATION AND EXTREMISM

The government defines extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Children may be vulnerable to being radicalised: adopting beliefs and engaging in activities which KCSIE identify as harmful, criminal or dangerous. Islamic extremism is the most widely publicised form and schools should also remain alert to the risk of radicalisation into white supremacy extremism.

School staff receive training to help to identify signs of extremism. Staff are also required to undertake Prevent Training (Educare) which is regularly updated. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting fundamental British Values as part of SMCS (spiritual, moral, social and cultural education) in Schools (2014).

Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) notes the following:

There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self esteem or identity and personal or political grievances.

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists.
- changing their style of dress or personal appearance to accord with the group.
- day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause.
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause.
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far-right groups).
- attempts to recruit others to the group/cause/ideology.
- communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- using insulting or derogatory names or labels for another group;
- speaking about the imminence of harm from the other group and the importance of action now;
- expressing attitudes that justify offending on behalf of the group, cause or ideology;
- condoning or supporting violence or harm towards others; or
- plotting or conspiring with others.

Further Guidance:

- OSCB Prevent resources: <https://www.oscb.org.uk/safeguarding-themes/prevent/>
- Promoting fundamental British Values: DfE 2014 guidance

ONLINE SAFETY

The school recognises that online safety is an essential part of safeguarding. Technology can expose children to risks such as child sexual exploitation, sexual predation, radicalisation, cyberbullying, misinformation, disinformation (including fake news), and conspiracy theories.

Filtering and Monitoring:

Appropriate and effective filters and monitoring systems are in place to block harmful content, manage pupil communication, and track personal conduct online

- **Filtering:** We use a dual-layer approach with both Sophos (network-level) and Securly (device-level) filtering. This ensures we have coverage on and off site (as long as they are logged in via Chrome at home), and provides resilience against circumvention attempts.
- **Generative AI controls:** Within Securly we have enabled the AI setting. This means that if pupils attempt to access tools such as ChatGPT or Google Gemini directly, they are instead redirected into Securly's own AI environment, which allows prompts to be monitored and flagged for safeguarding concerns.

- **Monitoring and alerts:** Securly Aware is also in place, providing us with real-time alerts if concerning activity is detected across pupils' digital behaviour. Alongside this, Securly's AI Chat flags inappropriate AI prompts, and Sophos provides reporting on blocked categories. Together these tools feed into our safeguarding oversight and allow timely intervention when needed.
- **Testing and assurance:** We carry out regular checks of our filtering system using the DfE-endorsed site <http://testfiltering.com/test/> to ensure it is functioning correctly.

Taken together, this approach gives us the ability not only to block inappropriate AI access, but also to monitor and respond where students are using AI or other online tools in a way that could present safeguarding risks.

- Systems are reviewed at least annually by the IT team and the DSL (Filtering and Monitoring Lead)
- All inappropriate online behaviour is automatically reported to the DSL. The DSL records concerns on CPOMS and notifies the Form Teacher

Responses to Concerns May Include:

- Online safety conversations and education
- Informing parents/carers
- Temporary removal of devices
- Escalation through the Promoting Good Behaviour Policy if the incident is serious

Parental Engagement:

We tell parents and carers what filtering and monitoring systems we use, so they can understand how we work to keep children safe. We will also inform parents and carers of what we are asking children to do online, including the sites they need to access, and with whom they will be interacting online.

Online safety risks:

Staff are aware of risks in four categories:

- **content** - being exposed to illegal, inappropriate or harmful content such as misinformation, disinformation (including fake news), conspiracy theories, pornography, fake news, misogyny, self-harm, suicide, radicalisation and extremism.
- **contact** - being subjected to harmful online interaction with other users such as peer to peer pressure and adults posing as children or young adults to groom or exploit children.
- **conduct** - personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images and online bullying.
- **commerce** - risks such as online gambling, inappropriate advertising, phishing or financial scams.

All staff are aware of these risk areas and should report any concerns to the DSL.

MOBILE PHONES AND CAMERAS

Our school takes steps to ensure that there are effective procedures in place to protect children, young people, and vulnerable adults from the unacceptable use of mobile phones, cameras and other digital recording devices in school, as well as in the EYFS setting.

- Personal mobile phones belonging to members of staff are not used during teaching sessions.
- If members of staff take their own personal mobile phones on outings, for use in the case of an emergency, they must not make or receive personal calls as this will distract them.
- Photographs and recordings of children are only taken for valid reasons i.e: to record their learning and development, for displays within the setting, and for the school controlled social media channels.
- Photographs or recordings of children are only taken either on equipment belonging to the setting, or on equipment authorised by the setting. All images and recordings will be downloaded on the premises and deleted from the photographic equipment.
- Photographs and recordings of children are only taken if there is permission to do so (see registration documents).

(Please refer to the [Mobile Phone Policy](#))

PRIVATE FOSTERING ARRANGEMENTS

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

Further information can be found at:

<http://www.oscb.org.uk/parents-carers/private-fostering/>

When a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the DSL and the school should notify the local authority of the circumstances.

RELATED SAFEGUARDING PORTFOLIO POLICIES

This policy should be read alongside our other safeguarding policies, which are set out in Appendix 2.

Looked After Children (LAC):

The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children (Assistant Head Pastoral) and the DSL

have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

Work Experience

The school has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervise pupils on work experience which are in accordance with the guidance in *Keeping Children Safe in Education (DfE, 2024/2025)*. The DSL has responsibility for overseeing the checking and supervision of pupils on work experience.

Children Staying with Host Families

The school may make arrangements for pupils to stay with a host family during a foreign exchange trip or sports tour. Some overseas pupils may reside with host families during school terms and we will work with the local authority to check that such arrangements are safe and suitable.

It is not possible for schools to obtain criminal record information from the Disclosure and Barring Service (DBS) about adults abroad. Where pupils stay with families abroad we will agree with partner schools a shared understanding of the arrangements in place. Staff will use their professional judgement to satisfy themselves that the arrangements are appropriate and sufficient to safeguard the pupils, which will include ensuring pupils understand who to contact should an emergency occur or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.

The school follows the guidance in Annex E of *Keeping Children Safe in Education (DfE 2025)* to ensure that hosting arrangements are as safe as possible.

Boarding Schools and Children's Homes

Research has shown that children can be particularly vulnerable in residential settings. All boarding schools and residential special schools comply with the National Minimum Standards for their particular setting and are appropriately inspected.

The school Boarding policies can be found in Staff Documents/Inspection Ready to Go/ Boarding.



Appendix I

FOUR CATEGORIES OF ABUSE

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise causing physical harm to a child. It also includes fabricated or induced illness.

Indicators may include:

- Unexplained bruises, burns, fractures, or injuries
- Fear of physical contact or flinching
- Wearing long sleeves in hot weather to cover injuries
- Self-harm or risk-taking behaviour
- Frequent absences or lateness

Emotional Abuse

Emotional abuse is persistent maltreatment that harms a child's emotional development. It can include:

- Conveying that a child is worthless, unloved, or inadequate
- Limiting exploration, learning, or normal social interaction
- Exposure to domestic abuse or substance misuse
- Serious bullying (including cyberbullying)

Indicators may include:

- Withdrawal, anxiety, or low self-esteem
- Sudden changes in behaviour (quiet to aggressive)
- Overly compliant or clingy behaviour
- Poor relationships with peers

Sexual Abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, including:

- Physical contact (penetrative or non-penetrative)
- Non-contact activities (grooming, exposure to sexual content, sexting)

Indicators may include:

- Age-inappropriate sexual knowledge or behaviour
- Sexualised drawings, language, or play

- Receiving gifts, money, or devices from unknown sources
- Engagement in sexting or online sexual activity

Child Criminal Exploitation (CCE) should also be considered in relation to sexual abuse: coercion, control, or exploitation by peers or adults.

Neglect

Neglect is the persistent failure to meet a child's basic physical or psychological needs, likely to result in serious impairment. This may include:

- Lack of adequate food, clothing, or shelter
- Failure to provide medical care or supervision
- Ignoring emotional needs

Indicators may include:

- Constant hunger, poor hygiene, or tiredness
- Frequent absences or lateness
- Unsafe behaviours or risk-taking
- Poor academic performance

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school, arrive late or leave the school for part of the day
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new 'friends'.

General Notes on Indicators

- Indicators rarely provide conclusive evidence alone; they should be considered as part of a wider picture.
- Staff should report concerns immediately to the DSL; it is not the responsibility of staff to investigate or decide if abuse has occurred.
- Behavioural and mental health concerns may also signal abuse, neglect, or exploitation.

Additional Categories of Abuse (KCSIE 2025, Annex B)

- Child abduction and community safety incidents
- Children involved in the court system
- Children missing education
- Children with family members in prison
- County lines and gang involvement
- Modern slavery and National Referral Mechanism
- Cybercrime
- Sexual violence and harassment between children in schools and colleges

Staff should remain vigilant for all these issues as part of safeguarding awareness.



Appendix 2

RELATED SAFEGUARDING POLICIES

Policy	Purpose / Notes
Staff Code of Conduct	Outlines expected professional behaviour towards pupils.
Behaviour / Code of Conduct	Sets expectations for pupil behaviour and disciplinary procedures.
Attendance Policy	Aims to ensure consistent attendance, support learning, and promote student success.
Complaints Procedure	Guidance for parents, pupils, or staff to raise concerns or complaints.
Anti-Bullying Policy	Procedures for preventing and responding to bullying, including cyberbullying.
Restraint / Physical Intervention	Guidance for safe use of physical intervention where necessary.
Health and Safety Policy	Procedures to safeguard staff and pupils on-site and during activities.
Low-Level Concerns Policy	Reporting concerns about staff behaviour that do not meet abuse threshold.
Whistleblowing Policy	Confidential reporting of safeguarding or poor practice concerns about staff.
SEN / SEND Policy	Safeguarding considerations for children with additional needs or disabilities.
Recruitment and Selection Policy	Procedures for safer recruitment, including DBS and safeguarding checks.
Staff / Pupil Online Communication	Guidance on acceptable online communication and behaviour.
Acceptable Use Policy	Procedures and expectations for ICT, devices, and online safety.

Educational Visits / Off-site Activities	Safeguarding during trips, exchanges, and work experience.
Boarding Policies	Guidance for residential pupils, aligned with National Minimum Standards.
Data Protection & Confidentiality	Procedures for secure handling of safeguarding records and information.

SAFEGUARDING ESSENTIAL INFORMATION

Essential Safeguarding information can be found on the School's intranet page. This document provides contact details for the DSL and Deputy DSLs, as well as Links to external agencies (OSCP, NSPCC, Police). It also provides answers to frequently asked questions and links to further policies and documentation.