KING EDWARD'S SCHOOL
POLICY DOCUMENT

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TABLE of REVISIONS

Policy	Current version KES	Review Period	Last Review	Next Review	Govs mtg	Notes
ORIGINAL	July 2023	Annual	Mar 2023	Sep 2023	Mtg Sep 2023	KCSIE 2023 updates (table of changes for governors mtg)
						Additional refs to peer-on-peer amended
	Jan 2024	n/a				S/G Team changes Refs to CME policy
	Mar 2024	n/a				Safeguarding Team updated
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	Sep 2026	n/a				Amended for new LADO contact details.

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Reporting Concerns

Who to contact at the LA if you're worried a child is being abused

Where there are concerns that a child may be in need of help or at risk of abuse, due to suspicion, belief or other evidence, the DSLs at King Edward's School are committed to making prompt contact, usually with the B&NES Children's Social Care.

Where concerns do not meet the threshold for a referral to Children's Social Care, consideration should be given to the appropriateness of completing Early Help / Family Help assessments and local multi-agency support arrangements and making a referral for a 'Family Help' or 'Team Around the Child' arrangements meeting (as operated by the local authority).

The Request for Service Form **- to share information with your local office. More information on how to make a referral can be found** here.

If you are unsure the Bath & North East Somerset Community Safety & Safeguarding Partnership Procedures **will be able to help guide you or the** Threshold for Assessment of Children and Young People **which tells you which types of services a family may need to get support.**

For dealing with allegations against staff and volunteers who have contact with children and young people in their work or activities, please contact the Bath & North East Somerset Local Authority Designated Officer (LADO). Related guidance can be found here.

Contact Details for Local Authority Child Protection & Safeguarding Team

PREVENT	Children's Social Care (formerly CAFAIT)
Avon & Somerset Police Prevent / Channel Team **Tel:** 0117 945 5536 **Email:** channelsw@avonandsomerset.police.uk	If at any time there is a risk of immediate serious harm to a child, the DSL must immediately contact: **Children's Social Care:** 01225 396111 or 01225 477929 **Emergency Duty Team (out of hours):** 01454 615165 **Police (emergency):** 999
Local Authority Designated Officer (LADO)	**Children Missing Education (CME)**
Any allegation or safeguarding concern involving a member of staff, volunteer, governor, contractor, or other adult working with children must be reported to the LADO within one working day. Katie Williams, Local Authority Designated Officer (LADO) **Tel:** 01225 396810 **Email:** LADO@bathnes.gov.uk	Children Missing Education is managed through the Attendance and Welfare Support Service (AWSS). **Attendance & Welfare Support Service** **Tel:** 01225 394241 **Email:** AWSS@bathnes.gov.uk Bath & North East Somerset Council, Lewis House, Manvers Street, Bath BA1 1JG
Reporting Children Missing Education in Neighbouring Local Authorities	**ChildLine**
North Somerset: 01275 888303 **Wiltshire:** 0300 456 0108	Pupils, staff, parents, and carers can seek advice and support from ChildLine **Tel:** 0800 1111 **Website:** www.childline.org.uk
Special Educational Needs and Disabilities Information, Advice and Support Service (SENDIASS)	**Mencap**
SENDIASS provides free, impartial information, advice and support to children and young people with SEND and their parents/carers. All local authorities provide a SEND Information, Advice and Support Service. Find your local service: Council for Disabled Children	Mencap supports people with learning disabilities and provides advice, information and resources for professionals working with children and young people. **Website:** www.mencap.org.uk

KING EDWARD'S SCHOOL BATH

KES SAFEGUARDING TEAM

Contact Information - September 2026

	WHOLE SCHOOL DESIGNATED SAFEGUARDING LEAD The School has appointed the The Senior Deputy Head Ms Claire Losse as the DSL with oversight of Safeguarding in all three schools, responsibility for training and for managing allegations against staff.	Email: **c.losse@kesbath.com**
	CHAIR OF GOVERNORS MRS WINIFRED THOMSON The Chair liaises with the Designated Officer(s) in the relevant local authority (still referred to as the LADO in BANES CSSP) or other agencies, in the case of an allegation of abuse made against the Headmaster or a member of the Governing Board. In her absence, this responsibility is delegated to the Vice-Chair of Governors, Mr John Isherwood or the DSLG.	Email via **clerktogovernors@kesbath.com**
	DSL GOVERNOR MR KAMBIZ MORADIFAR The DSLG is responsible for providing sufficient information to the Governing Board to allow them to be satisfied that the School's policies and procedures fulfil the School's aims, its statutory obligations and are consistent with the BCSSP's procedures.	Email via **clerktogovernors@kesbath.com**

All of these DSLs liaise closely with the Whole school DSL over any potential safeguarding or child protection issues and have received appropriate and timely training to support them in these roles. They have all completed the designated level of B&NES Inter-agency Child Protection training courses and regularly attend the B&NES Child Protection Forum meetings. Several other pastoral leaders in the Senior School have attended B&NES Inter-agency or single agency Child Protection training courses and are therefore well placed to advise colleagues over the need to refer pupil concerns to the DSL's.

SENIOR SCHOOL SAFEGUARDING TEAM

	DEPUTY HEAD PASTORAL The Deputy Head (Pastoral) Mr Will Quayle is a Senior School DSL with specific responsibility for Senior School pupils.	Email: **w.quayle@kesbath.com**

PRE-PREP AND JUNIOR SCHOOL SAFEGUARDING TEAM

	HEAD OF PRE-PREP AND JUNIOR SCHOOL The Head of the Pre-Prep and Junior School, Mr Sean Price has responsibility for leading safeguarding and child protection at the Pre-Prep & Junior School.	Email: **s.price@kesbath.com**
	ASSISTANT HEAD (PASTORAL) The Assistant Head of the Junior School, Mrs Emma Pike is a Junior School DSL with specific responsibility for Junior School pupils.	Email: **e.pike@kesbath.com**
	JUNIOR SCHOOL DEPUTY HEAD The Deputy Head of the Junior School, MrJohn Ireland is a Junior School DSL with specific responsibility for Junior School pupils.	Email: **j.ireland@kesbath.com**
	DEPUTY HEAD (PRE-PREP) The Deputy Head of the Pre-Prep, Miss Katie Barnsley is a Pre-Prep DSL with specific responsibility for the Pre-Prep pupils.	Email: **k.barnsley@kesbath.com**
	EARLY YEARS CO-ORDINATOR The Early Years Co-ordinator, Mrs Sami Knight is a Pre-Prep DSL with specific responsibility for the Pre-Prep pupils.	Email: **s.knight@kesbath.com**

Introduction & Scope

Statement of Safeguarding

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility.

The School adopts a 'whole school' approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

King Edward's School fully recognises its responsibilities for safeguarding pupils[1] from risk of/or actual abuse. In order to protect children the School is committed to undertaking all reasonable measures to safeguard and promote the welfare of each pupil in its care.

The Governing Board recognises its responsibility to ensure that the policies, procedures and training at King Edward's School are effective and comply with the law[2] at all times.

Parents are encouraged to raise any concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

Aims

This policy aims to detail the duties and responsibilities of all staff, volunteers and governors of the school in their role to ensure the safeguarding of children. This policy also explains the people, procedures, organisation and support which create the culture of safeguarding in our schools.

Scope

This policy applies to all school activities, both on and off-site, undertaken by pupils whilst they are the responsibility of the School.

This policy applies to the Whole School, including the Early Years Foundation Stage (EYFS) in the Pre-Prep School. This policy and procedures apply to all staff, teaching and support staff, including school medical and nursing staff, and volunteers who undertake regulated activity in the School, whether teaching, administrative, management or support, as well as to governors, students on placements (see Annex C of KCSIE 2026 for statutory guidance regarding regulated activity).The School is also committed to safeguarding pupils who undertake regulated activities through other providers of services to the School.

It will be supplied to parents and pupils on request and is available on the School's website.

All Staff and Governors are required to read **Part One in full** of KCSIE in full. The School has put appropriate mechanisms in place to ensure that this is the case and to help ensure that staff understand how to discharge their responsibilities in this important area.

Context

It is the proprietor's responsibility to ensure the Child Protection and Safeguarding Policy is legally compliant; this will be the Governing Board. All references to 'the School' in this policy are to the school proprietor.

This policy has been developed in accordance with the most recent statutory guidance issued by the Department for Education (DfE). The statutory guidance is detailed in "Keeping children safe in education" (KCSIE), which was first published in April 2014 with the latest version of this statutory guidance coming into force on 1 September 2026.
This policy is in accordance with locally agreed interagency procedures. The School works closely with other partnerships within the School's catchment area and with Bath and North-East Somerset Community Safety & Safeguarding Partnership (BCSSP) and any action taken is in line with their guidance. Contact information available on their dashboard: Welcome to the South West Child Protection Procedures (trixonline.co.uk)

Action may be taken by the School to protect a child who is suffering significant harm under:
- section 47 and section 44 of the Children Act 1989.
- section ***17 of the Children Act 1989*** to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk. (*Further information on legislation pertaining to this policy can be found in KCSIE: Part 2).*

Any action taken is also in line with the following legislation/guidance
- What to do if you're worried about a child being abused @gov.uk (2015)

Definition of safeguarding
Safeguarding and promoting the welfare of children is defined as:
• providing help and support to meet the needs of children as soon as problems emerge
• protecting children from maltreatment, whether that is within or outside the home, including online
• preventing the impairment of children's mental and physical health or development
• ensuring that children grow up in circumstances consistent with the provision of safe and effective care
• taking action to enable all children to have the best outcomes.

Definition of types and signs of abuse
Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:
- physical abuse;
- emotional abuse;
- sexual abuse; and/or
- neglect.

Staff are referred to **Annex A** Section 1 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

[1] *In this policy "children" or "pupils" refers to all pupils at the school including those who are over the age of 18. Pupils continue to be members of the School until 31 August, if they leave at the end of an academic year.*

[2] Section *175 Education Act 2002 and Education (Independent School Standards) (England) Regulations 2010, made under section 157 Education Act 2002. Colleges, non-maintained special schools and independent schools: the definition of 'children' applies to the statutory responsibilities for safeguarding and promoting the welfare of children i.e., those under 1*

Introduction to Safeguarding arrangements at King Edward's School

The School fulfils its obligations to safeguarding and child protection through:

Creating a whole School approach to safeguarding

Emphasising that safeguarding is the responsibility of every member of staff and that anyone is permitted to make a referral to children's social care, and parental consent is not required.
The School ensures that child protection and safeguarding are at the forefront and underpin all relevant aspects of process and policy development.

A clear set of values and standards – upheld throughout all areas of the School

A clear list of responsibilities of all school employees in relation to safeguarding is provided in this policy and on induction for new staff.
Appropriate practices are in place to ensure safer recruitment practises are followed.

Raising awareness of safeguarding and child protection issues and organising appropriate training and briefings for staff

A set of policies for Whole School safeguarding are in place.

Promoting a safe learning environment for all pupils
Caring for the safety of pupils, for example, because assurance is gained that the staff of another organisation have been checked for suitability if they supervise the school's pupils on a site other than the school, for example during a residential or non-residential school trip
The Department for Education has published filtering and monitoring standards which set out what schools and colleges should do to ensure that appropriate IT filtering systems are in place for our safeguarding needs. These include:
Internet Filtering and Monitoring
The School utilises **Lightspeed Filter** to inspect, record, and manage internet activity undertaken by staff and students. The system enables the School to regulate access to online content in accordance with defined safeguarding, security, and acceptable use policies.

- For **School-Owned and Managed Devices**, all web traffic is filtered and subject to inspection and SSL decryption by the Lightspeed service, regardless of the device's location or network connection.
- For **Bring Your Own Device (BYOD)** equipment, internet traffic is filtered and monitored when connected to School networks. SSL decryption is applied to web searches and designated websites to support safeguarding and compliance requirements.

In addition, the School uses **Lightspeed Alert** in conjunction with Lightspeed Filter to monitor web activity and Microsoft 365 services, including internet browsing history, chat communications, and document content. User activity is analysed using artificial intelligence and behavioural monitoring techniques to identify patterns that may indicate safeguarding concerns or potentially harmful behaviours.
Where potential concerns are detected, alerts are reviewed by Lightspeed's specialist monitoring team and escalated where appropriate. Relevant alerts are shared with the School's **Designated Safeguarding Lead (DSL)** and the appropriate Heads of Sector, who have authorised access to alert information and associated filtering data relating to pupils within their areas of responsibility.

The School ensures that all users agree to an IT Acceptable Use Policy when they log into school computers. Policies and systems are reviewed regularly by IT, the DSL and the Governance and Data Lead (DPL) to ensure that the appropriate level of safety is in place to safeguard systems, users and data. This includes regular updates to keep up with evolving cyber-crime technologies.
The effectiveness of filtering and monitoring provision is reviewed at least annually by the SLT lead responsible for filtering and monitoring and the DSL Governor, with the DSL and IT support. Records of checks are retained.

Reporting Systems
Developing and implementing procedures for identifying and reporting cases, or suspected cases, of abuse
Ensuring pupils know that there are adults in the school whom they can approach if they are worried
Supporting a pupil who has been abused in accordance with his/her agreed child protection plan.
Establishing procedures for reporting and dealing with allegations of abuse against teachers and other staff (including Head/Governors/Supply staff/volunteers and contractors) allegations of abuse against members of staff and consulting/liaising with the Local Authority Designated Officer when necessary.

Associated School Policies

This policy should be read by staff in conjunction with the school policies/procedures listed at the end of this policy. These are all available on the staff VLE.

Staff and volunteers engaged in regulated activity at the Pre-Prep, and in some cases supervised visitors, must also adhere to additional guidance contained within the Pre-Prep Camera and Mobile Phone Policy.

Creating a culture of zero tolerance to abuse

Pastoral Systems

The School has arrangements for listening to children and providing early help – see Section 2. The following pastoral support measures are in place:

- Mentoring and counselling systems;
- Heads of Sector and Heads of Year form strong relationships with children and families;
- Individual pupil profiles (IPPs) highlight SEND and other potential concerns regarding communication difficulties to support children, listing suggested 'best approach';
- Liaison with external agencies where appropriate;
- Identified additional welfare needs on pupil Watch Lists (maintained by Heads of Year in Senior School)
- Small groups/clubs/societies allowing for strong and supportive relationships between specialist staff and the pupils.

We seek to ensure that a child's wishes and feelings are taken into account when determining what action to take and what services to provide to protect children from harm. To this end we will ensure:
there are systems in place for children to express their views and give feedback e.g. through school council and Sector Forums, an 'open door' approach from pastoral staff, questionnaires, participation in anti-bullying and e-safety events and;

- that the child's thoughts/wishes and feelings are sought and recorded on all referrals; and
- we will continue to work closely with our local Police partners to ensure that we understand any local trends

in crime that may result in our pupils being at risk of becoming involved in crimes, including criminal exploitation (including the risk of drug dealing/use and associated criminal behaviour and possible Child Sexual Exploitation.

RE/RSE programme

Including opportunities within the RSHE/PSHE/PSHEE curriculum, or other age-appropriate opportunities, for pupils to develop the skills needed to recognise and stay safe from abuse, neglect and exploitation.

Children potentially at greater risk of harm
The Governing Board and the School recognises (and reflects in policies and procedures) that some groups of children, are potentially at greater risk of harm than others (both online and offline). These children may benefit from support before statutory intervention. The list below is not exhaustive, but highlights some of those groups, which include pregnancy/parent themselves, early signs of abusive/violent/harmful behaviours, repeated removals, part-time timetables, and risk of honour or faith-based abuse.

Looked after children (and previously looked after children)
Looked after children (and previously looked after children) are a particularly vulnerable group. The School will ensure that prompt action is taken when necessary to safeguard these children and the governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after (and previously looked after) by a local authority.

There is a Designated Person with oversight for LAC and PLAC, whose work is supervised by the DSL.
Information about LAC and PLAC will be shared with the appropriate pastoral teams.

The School ensures that the designated members of staff receive appropriate training in order to carry out their role and have the information they need in relation to any child's looked after status, their care arrangements (including contact arrangements with birth parents and those with parental responsibility) and details of the child's social worker and others as necessary for local arrangements.

The designated member of staff will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care (DSL) and will work closely with those responsible (for example a virtual school head) to promote their educational achievement. The DSL will ensure they have details of the local authority Personal Advisor appointed to guide and support any care leavers and will liaise with them as necessary regarding any issues of concern affecting them.

Children requiring mental health support
Staff are made 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. The School has systems and processes in place for identifying possible mental health problems. The School's senior mental health lead is the School's Lead Nurse. School staff have received Mental Health First Aid training and the School's Wellbeing Centre provides support to pupils including offering a range of trained counsellors.

School staff are well placed to identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one and how children's experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the School's procedures for dealing with concerns about a child.

Special educational needs and/or disabilities (SEND), or pupils with certain health conditions:
Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- the potential for children with SEND or certain health conditions being disproportionally impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

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

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

Any reports of abuse involving children with SEND will entail close liaison with the DSL or DDSL and named person with oversight for SEND.

Lesbian, gay, bi, and gender questioning pupils ("LGBT+"):
Children who are LGBT+ can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT+ (whether they are or not) can be just as vulnerable as children who identify as LGBT+. Risks can be compounded where children who are LGBT+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavor to reduce the additional barriers faced and create a culture that enables pupils to speak out or share their concerns with members of staff.

Gender questioning children - this is a new Section to KCSIE 2026 and is therefore summarised here:

Staff should take time to understand the thoughts and feelings of children who are questioning their gender and be professionally curious about the child's experiences, including potential vulnerabilities.

Considering requests for support with social transition.

• Members of staff should not adopt any changes relating to social transition unless a decision has been made by the school following involvement from the child's parents or carers.
• Schools should make sure that the decision-making process around requests for support with social transition is documented and records are kept.
• Schools should consider whether pupils would be best supported by a policy on social transition which explains the steps the school would take. Schools and colleges have statutory duties to safeguard and promote the welfare of all children
• As a first step when considering a request for support with social transition, schools should consider what is in the best interests of the child and other children.
• In most cases, this would be carried out in conjunction with the child's parents or carers, with referral to clinical evidence and advice where relevant. Parents and carers should be actively involved, and their views are treated with importance.
• The views of the child's parents or carers should be properly considered. In circumstances where involving parents or carers would put the child at a greater risk than not involving them, the school should involve the DSL to determine what action should be taken.
• Schools should explore how best to support conversations with parents and carers, including offering a staff member to be present or speak to parents and carers on the child's behalf.
• In cases where a child speaks to a staff member about their feelings but does not ask the school to make any changes around support with social transition, there is no reason to share this information any further unless there is a related safeguarding risk.

Accommodating social transition is an active intervention so schools and colleges should take a very careful approach:

• Schools should take a very careful approach in relation to social transition. The Cass Review acknowledged that there is a lack of good evidence on the long-term impact of social transition on young people.
• Primary schools should exercise particular caution, and the guidance expects support for full social transition in these settings to be agreed very rarely. The Cass Review acknowledges that older children will generally have greater agency to make their own decisions. Schools should comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition
Discussing constraints on social transition.
• Schools should sensitively discuss any constraints to social transitioning, highlighting that supporting social transitioning does not include allowing access to toilets, changing rooms or residential accommodation designated for the opposite sex.

• Schools must be conscious of the rights of pupils and staff in relation to their religion or belief. Reviews
• Schools and colleges are legally required to record a child's biological sex accurately wherever it is recorded. Schools should make sure that all relevant staff are aware of a child's biological sex.
• Schools should keep in mind that some children who socially transition before puberty will be 'living in stealth,' meaning other pupils and/or staff may be unaware of their biological sex.

• Schools should be aware of the vulnerabilities of children who have fully socially transitioned from an early age and may be living in stealth.

Support for children who wish to detransition:

• In circumstances where a child wants to fully or partially reverse a request that has been previously agreed, schools should work closely with parents or carers and relevant experts to make sure that children in this position are supported.

Part One: Safeguarding information and expectations for all staff

1.1 KCSIE and the School Safeguarding Policy

The School provides clear and detailed guidance to staff, who are all required to read and develop an understanding of Part One in full of KCSIE as part of their appointment and induction process, and each time the guidance is updated.

At King Edward's School, New Staff Induction, regular (at least annual) training/briefing and additional written guidance, including staff codes of conduct, raise awareness and develop a greater understanding amongst staff, governors and volunteers engaged in regulated activity and focuses on developing an understanding of matters of a safeguarding and child protection nature.

KCSIE provides detailed safeguarding information and guidance on the following topics:

- What school staff should know and do
- A child centred and coordinated approach to safeguarding
- The role of school staff
- What school staff need to know
- What school staff should look out for
- What school staff should do if they have concerns about a child (whether it is a child in need or a child in immediate danger)
- What school staff should do if they have concerns about another staff member
- What school staff should do if they have concerns about safeguarding practices within the school
- Types of abuse, neglect and exploitation:
- Links to up-to-date guidance and support for a list of specific safeguarding issues.

This Safeguarding and Child Protection Policy enables staff to understand/be aware of:

- what they must do if:
    - they have a concern about a child
    - they are worried about the behaviour of a colleague
- a child discloses that they were being abused, sexually harassed or neglected, including child on child abuse
- the identity and function of the Designated Safeguarding Leads (DSLs) across the three sections of School, including EYFS, and the DSL Governor
- types of abuse: physical; sexual; emotional; and neglect and exploitation
- signs and indicators of possible abuse
- 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. Children may feel embarrassed, humiliated or threatened due to their vulnerability, disability, sexual orientation and/or language barriers. None of this should stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead (DSL) if they have concerns about a child,
- how to act if a pupil is in immediate danger
- a teacher's legal duty to report FGM
- what constitutes child on child abuse, including sexual violence and sexual harassment
- expectations of staff in addressing instances of child-on-child abuse, and/or sexual violence or sexual harassment, and/or managing and reporting disclosures of child-on-child abuse and/or sexual violence or sexual harassment

- potential indicators of CSE including CME
- the potential impact on children of Domestic Abuse
- the potential heightened risk of abuse to vulnerable pupils, which might include those with special educational needs and disabilities, or who are experiencing high levels of stress or emotional pressures outside school.
- Prevent Duty and staff responsibilities in supporting the School and to have "due regard to 'the need to prevent people from becoming terrorists or supporting terrorism', including the Channel Programme
- how to access the South West Child Protection Procedures website and the Community Safety & Safeguarding Partnerships information, including for Bath and North East Somerset Community Safety & Safeguarding Partnership (BCSSP)
- BCSSP information sharing protocols
- the Early Help / Family Help assessments and local multi-agency support arrangements in BANES
- whistleblowing responsibilities of staff and how to act if they have concerns about inappropriate behaviour of an adult employee or volunteer toward a child
- safe working practices
- the management process following allegation against a member of staff or adult volunteer
- staff responsibilities for safe recruitment and seeking advice from the Human Resources department and/or DSLs, including when inviting visitors into school or on school activities
- Online safety (E-safety policy and Acceptable use Policy)
- Staff codes of conduct with respect to - communication with pupils; making and storing images of pupils; sexual relationships between staff and pupils.
- School Safeguarding and Child Protection policy and associated policies: all available on the VLE and school website.

1.2 Staff conduct and behaviour toward pupils

Codes of conduct and staff training seek to support the School's 'position of trust' stance and ensure that there is no 'breach of trust' which could potentially put a child at risk.
As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in educational settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between
equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.
The School's policy therefore seeks to prohibit inappropriate physical and social contact between employees and pupils, including contact through text, email and social media.
Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.

The responsibilities of all school employees are to:

- respond appropriately to a pupil disclosure [1] about all child protection matters, including sexual violence and sexual harassment.
- know the identity of the Designated Safeguarding Leads (DSLs)
- act immediately upon any suspicion, belief or evidence of abuse by referring the concern immediately to the DSL
- know the relevant Child Protection procedures and how to access them
- have read and understood the latest version of Part One in full of Keeping Children Safe in Education (KCSIE)
- undertake the required Safeguarding and Child Protection training, attend any update briefings and read and absorb any information/guidance circulated by the DSLs
- monitor/review their own standards and practice and make adjustments as appropriate

[1] Annex A, Section 2:Guidelines for staff receiving a pupil disclosure

- be aware of the potential for child-on-child abuse and to ensure that such behaviour is not tolerated, and is challenged, recorded and reported

Read and understand staff responsibilities as outlined in the Low Level Concerns Policy and act as a whistle-blower whenever there is any suspicion of any inappropriate behaviour between a member of staff, or another adult, and a child, by:

- ensuring that any serious concerns are passed on to the Headmaster immediately
- less serious concerns about the behaviour of another adult should be discussed with the DSL, as a matter of urgency. Failure to 'whistle blow' has the potential to put a child at increased risk, and disciplinary action is likely to be taken against any member of staff who has failed to act.
- ensure that they fulfil their, and/or the School's, legal obligations inc: reporting children regularly missing education; reporting suspicions of possible cases of female genital mutilation; preventing pupils from being drawn into terrorism.

Detailed guidance and expectations can be found in the Staff Code of Conduct Policy on the school website.

1.3 Confidentiality and Information Sharing

- Staff must never make promises of confidentiality to pupils or adults wishing to tell them about matters of Child Protection. The School Nurse follows medical protocol in such matters, in conjunction with the requirements of the School's Safeguarding and Child Protection policy. Visiting professional counsellors work to their professional code of ethics.
- Staff should guarantee only that they will pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to sort out the problem and that they will not tell anyone who does not have a clear need to know.
- Staff may wish to inform pupils of their obligation under child protection procedures to report any allegations or suspicions of abuse to one of the DSLs.
- As a general principle, safeguarding the child always outweighs any right of confidentiality.
- The School will also take whatever steps it can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure has been made.
- Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan).
- The School adheres to Information Sharing Protocols, which are agreements between ALL agencies working together under the remit of B&NES and other Community Safety and Safeguarding Partnerships to ensure the health, well-being and safeguarding of children within Bath & North East Somerset (or other relevant areas). The protocol facilitates the lawful and secure sharing of information between partner agencies and designated professionals working to safeguard children and young people.

Information sharing

The School recognises that information sharing is vital in identifying and responding to abuse, neglect and exploitation. Data protection laws, including the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025, do not prevent the sharing of information for the purpose of keeping children safe. Staff must be proactive in sharing relevant, necessary, and proportionate information as early as possible where this is required to safeguard children.

If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or a deputy). Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children. Any personal data breach involving safeguarding records shall be treated as a safeguarding matter and escalated immediately to both the DSL and Governance & Data Lead for assessment and management.

Parents do not have automatic right of access to the School's Safeguarding records but they may be permitted access depending on the circumstances under the UK GDPR. Contact the School's Governance and Data Lead if you have any further questions in this area. Requests for access to safeguarding records will be considered individually, taking account of the child's welfare, rights of third parties, ongoing safeguarding activity and applicable exemptions under data protection legislation.

1.4 Record Keeping

All disclosures, complaints or concerns should be recorded **at the time** in accordance with the following guidelines:

- Staff should make accurate notes at the time of any allegation or suspicions. These should be made either during the meeting or immediately afterwards to ensure that they are as full and accurate as possible.
- The original notes should not be revised as rough notes carry more 'weight' if a case comes to court. The rough notes should be retained alongside any subsequent 'neat summary copy'.
- The record should be signed and dated by the person making it, with the name clearly printed at the side. It should use names, not initials. The record must be kept securely and handed to the DSL.

The record should consist of:

- the pupil's details, name, date of birth and family details, where relevant
- date and time of the event/concern
- the nature of the concern raised
- the action taken

In the case of disclosure, the record must also include:

- as full and accurate account as possible of what the pupil said
- an account of questions put to the pupil
- time and place of the disclosure
- who was present at the time of the disclosure
- the demeanour of the child
- where the child was taken and where returned to at the end of the disclosure

Paper copies:
Early historic hard copy child protection information is stored securely in confidential files in the DSL's study; each is accompanied by a tracking cover sheet; more historic information is kept securely in confidential files in the Headmaster's study.

Electronic files:
More recent child protection information, including for current members of the Senior school community, is securely stored electronically in CPOMS (a secure cloud-based database).

The school will keep copies of child protection information **for 75 years as per the School's Data Protection policy**

Staff will always be given as much information as necessary in order for them to help the pupil concerned. In general, this will mean that, where a pupil is the subject of external intervention with reference to safeguarding or where there are concerns about a pupil, the Sector Head, Head of Year, the Tutor/Form Teacher, School Nurse and any member of staff specifically chosen by the pupil to provide support will be kept informed on a need-to-know basis.

It may be appropriate in some cases to inform other staff that a pupil requires support and understanding, without necessarily sharing more details. Whenever information is given, care will be taken to indicate its sensitivity and that confidentiality is required.

The School will notify the local authority when they are about to remove a pupil's name from the school admission register when this does not coincide with a usual transfer point, and when a pupil joins the school at a time other than the usual transfer points.

If a pupil who is the subject of safeguarding support leaves to join another school, contact will be made with the receiving school's DSL as soon as possible to alert them. The full contents held in the confidential file, including any on-going concerns raised in the previous year, will be transferred to the new school, separately from the main pupil file, as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term). The School will also contact the Child Missing in Education Service. If the receiving school is not known, a referral will be made to the Child Missing in Education Service so that appropriate enquiries can be made.

The School writes to a new pupil's previous school to request any safeguarding or child protection information pertaining to the child.

1.5 Staff Training and Induction

The School ensures that staff and volunteers are involved in regulated activity, and governors are trained to understand their responsibilities regarding the safeguarding and protection of children. This includes online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring.

New Staff induction procedures for new staff (including all green lanyard holders)			
Training	Policy & required reading	Linked policies including:	Supporting local safeguarding arrangements
Safeguarding & Child Protection training given by WS DSL	King Edward's School Safeguarding and Child Protection policy All staff (teaching and non-teaching), volunteers and Governors who are engaged in regulated activity are required to read and develop an understanding of Part One in full of the latest version of KCSIE	Child on child abuse Policy Attendance Policy Behaviour policy Anti-bullying policy CME procedures (in CP Policy) Staff code of conduct Whistleblowing policy Low-level concerns policy Use of Social Media (in e-Safety policy and Acceptable use policy)	Conversation or meeting with DSL

Prevent training (online)			
All staff (including all green lanyard holders) develop an understanding of the Safeguarding and Child Protection policy and associated procedures, including any changes to them through:			
Training	Policy & required reading	Linked policies including:	
ANNUAL whole school safeguarding and child protection update training in response to changes in guidance and the introduction of any new legislation – undertaken by all staff and governors including the Headmaster.	All staff (teaching and non-teaching), volunteers and Governors who are engaged in regulated activity are required to read and develop an understanding of Part One in full of the latest version of KCSIE	All policies linked and available via the VLE Specific updates communicated via the Safeguarding/Pastoral team to all staff	Specific training events and presentations Staff briefings and email communication
All DSLs and Deputy DSLs			
Undertake the BCSSP's Advanced Inter-agency Child Protection and update this training with an appropriate specialist training course every two years, in line with BCSSP guidelines, except in cases where exceptional circumstances pertain.			
Staff with specific responsibility for student welfare e.g. Tutors/Form Teachers, Heads of Year, Heads of Sector			
Undertake additional and more specialist inter-agency or single-agency training to be better placed to support students at risk.			
Additional training – Training for Trainers			
The WS DSL has completed the Training Trainers course, which supports them in delivering the latest child protection and safeguarding staff training to other colleagues.			
Additional training – Prevent Duty			
Two DSLs and the two Deputy DSLs have attended workshops to raise awareness of prevent (WRAP) – Prevent duty			
Additional training – Safer Recruitment			
The Whole School DSL, Deputy WS DSL, Senior Deputy Head; Senior School Deputy Head (Academic); Pre-Prep School Head; Junior School Head The Chair of Governors The Human Resources Manager The Bursar ***At least one*** of these colleagues participates in the selection, interview, and appointment process for every new member of teaching and support staff.			
Additional Inter-Agency Work			
At least one member of the DSL team attends the termly B&NES/CSSP Child Protection Forum meetings and information is cascaded as necessary through Whole School DSL meetings and Senior/Junior/Pre-Prep Management Team meetings, Pastoral Committee meetings and at termly Governing Board meetings.			
All Governors and Trustees			
All governors and trustees receive appropriate safeguarding and child protection training at induction (delivered by The Key), and annual update training from the DSL. Training provides them with the knowledge to ensure their school's safeguarding policies and procedures are effective.			

1.6 Safer Recruitment

King Edward's School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

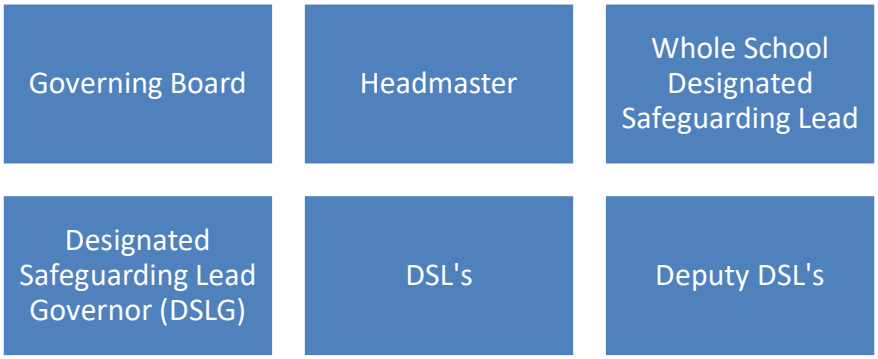
The School has suitable recruitment procedures in place to ensure that applicants are screened for safeguarding

and child protection purposes. The procedures that will apply to staff and volunteers meeting the KCSIE 2026 regulated activity criteria require an enhanced DBS check with children's barred list information. This is detailed in our Safer Recruitment Policy, which can be found on the School website. The School ensures that all persons working directly within EYFS provision are suitable to fulfil their roles. Ongoing suitability is monitored through recruitment checks, safeguarding procedures, staff conduct expectations, declarations and supervision arrangements.

This policy will be followed in conjunction with the current DfE guidance,

Part Two: The Management of Safeguarding

Governors and Staff responsible for Safeguarding and Child Protection



Governing bodies and proprietors have a strategic leadership responsibility for their school or college's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to this guidance, ensuring policies, procedures and training in their schools or colleges are effective and comply with the law at all times.

Headmasters should ensure that the policies and procedures, adopted by their governing bodies and proprietors (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

2.1 The safeguarding role of the Governing Board

The Governing Board and staff at all levels of the school take their responsibilities for safeguarding very seriously and adhere to the clear and detailed guidance in KCSIE by ensuring that:

- the School contributes to inter-agency working, when appropriate.
- School policies and procedures take account of Bath and North East Somerset Community Safety & Safeguarding Partnership (BCSSP) and other local partnership inter-agency safeguarding procedures. These are set by the 3 local safeguarding partners: B&NES Council, Avon and Somerset Constabulary, the B&NES Swindon and Wiltshire Integrated Care Board.
- the School has an effective safeguarding and child protection policy in place, containing clear expectations of appropriate and acceptable staff behaviour toward pupils and further information for staff in the Staff Code of Conduct document.
- the Governing Board is aware of the need to identify and report any children who go missing from the school, particularly on repeat occasions, to the local authority Children Missing Education service. The School follows the B&NES guidelines, which are published in Annex B: Children Missing Education.
- the Governing Board are committed to ensuring that Human rights and Equality legislation are followed in relation to the school's safeguarding practices.
- they have appointed a designated teacher to promote the educational achievement of any 'looked after children' at the School. the School has appointed members of the Senior and Whole School Management teams in the roles of Designated Safeguarding Leads, and explicit reference to their roles is included in their job descriptions.
- the DSLs and all staff, including the Headmaster, undertake the necessary and regular child protection training in line with Bath and North East Somerset (B&NES) BCSSP guidelines.
- pupils are taught about safeguarding, including online safety, and sex and relationships education as part of the PSHE/PSHEE curriculum, when it is appropriate to the age of the pupils.

Online safety and generative AI

- The School recognises that online safety risks evolve rapidly and include content, contact, conduct and commerce risks. These include harmful online content, interaction with users or generative AI applications that simulate harmful contact, AI-generated nudes or semi-nudes/deepfake imagery, misinformation and disinformation, online bullying, grooming, exploitation, phishing, scams and cyber-enabled harm. Online safety is treated as a running and interrelated theme across safeguarding policy, curriculum, staff training, parental engagement and DSL responsibilities.
- the Governors prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff or volunteers who work with children, and may decide to ask for further checks which go beyond what is required. The School ensures that any volunteers, who are not required to complete the necessary checks needed to allow them to be engaged in regulated activity, are appropriately supervised and briefed about their safeguarding responsibilities. These are red lanyard holders.
- at least one member of an appointments panel has undertaken safe recruitment training, which has, as a minimum, covered the guidance contained within KCSIE.
- that appropriate procedures are in place to handle allegations of abuse against teachers and other staff (including the Headmaster/Governors/Supply staff/volunteers and contractors, including discharging the School's legal responsibility by making referrals to the Disclosure and Barring Service (DBS) in any cases where this is required (see KCSIE part 4 for further guidance). All staff must complete an annual declaration to this effect.
- the Chair of Governors is committed to reporting any child protection allegation made against the Headmaster or a member of the Governing Board.
- there are procedures in place to handle allegations made against another child.
- Careful consideration is given to the potential risks to any King Edward's pupils involved in being hosted during visits either within the UK or overseas, for example during overseas modern foreign language exchange visits, sports tours and trips. Reassurances are sought from the host school about the suitability of hosting arrangements and, where possible, safeguarding checks are conducted on adults living at the host family's address.
- The Governing Board also recognise their responsibility to pupils from other schools who might reside with a host family whilst visiting King Edward's School. The School is committed to conducting safeguarding checks on adults who are living at the host family's address during the hosting period.

Governors are aware that safeguarding and child protection will be inspected by the Independent Schools Inspectorate to determine whether the school is compliant in discharging its statutory responsibilities through effective governance and management of the School.

KING EDWARD'S SCHOOL BATH

Governors' Safeguarding duties – Monitoring and review

**Independent School's Council*

The 'proprietor' of an independent school is the person or group responsible for the management of the school – typically the board of governors. The proprietor of each independent school has legal responsibilities in the area of safeguarding. For example, they must ensure that:

- all staff who work with children undertake regular child protection training
- the school has suitable procedures for dealing with allegations of abuse, including a trained senior member of the school to take lead responsibility
- an annual review of the school's policies and procedures relating to safeguarding is carried out and these are available on the website
- any deficiencies or weaknesses in regard to child protection arrangements are remedied without delay
- the school operates safe recruitment procedures and makes sure that all appropriate checks are carried out on those who work with children

Governors receive the same annual training that staff receive which includes direction on how to deal with suspicions/allegations of abuse including procedures for allegations against staff and whistleblowing.

Governors delegate the regular monitoring of training and updates to the DSLG who meets with DSL and has oversight of the training matrix which lists all staff training completed/scheduled and monitors follow-ups for those still outstanding.

Governors delegate the regular monitoring of detailed processes and policies to the DSLG, who is supported by the Clerk at scheduled meetings with the DSL to review compliance of safeguarding at the school across all areas.

Where issues are identified, these are flagged for follow-up at further meetings until resolved.

DSL also provides information in the BCSSP Audit Action Plan that details further improvements to be made across the school – this progress is reported in the Termly report to the Board.

The annual review of the school's safeguarding policy and its associated policies is undertaken following the publication of annual/other updates to the following legislation: KCSIE/WTTTSC. These are the primary guidance documents for school, but a further list is available at section 1.2 of CP Policy

Governors receive an annual report listing the regulatory changes and the changes/updates to schools' systems and policies that have been made to ensure compliance.

Governors delegate the regular monitoring of this area to the DSLG who meets regularly with the DSL in advance of the termly safeguarding report to governors.

The oversight of the safer recruitment policy which is reviewed regularly

Governors delegate the regular monitoring of the recording and follow-up of verification, identity, and qualification checks, including barred list and dis-qualification checks to the DSLG who meets regularly with the HR manager to review the Single Central Record – this visit is included in the termly report to governors and in the Safeguarding Compliance spreadsheet shared with the Board.

Governors know this through the review and approval of relevant safeguarding policies and updates of practice provided by the DSL/DSLG - there is a referral process clearly documented in the safeguarding policy and communicated to staff

Governors receive the same annual training that staff receive which includes direction on how to deal with suspicions/allegations of abuse including procedures for allegations against staff and whistleblowing.

Governors receive a termly report from the DSL with anonymised information regarding allegations and LADO referrals where applicable

2.2 Monitoring and Review

To discharge its shared responsibilities, the Governing Body undertakes an annual review of Safeguarding and Child Protection.

The Designated Safeguarding Lead Governor visits the school to meet with and question the School's DSL, Deputy DSL and the Human Resources Manager, and to sample the Single Central Appointments Register.

The DSLG and DSL present termly reports which, when combined, provide an annual report to the Governing Board, which includes: the numbers of child protection referrals made by the School during the past year; training undertaken by School staff and Governors; a summary of any changes in any national legislation or BCSSP guidance and potential implications for the School; the outcomes of the annual B&NES CSSP audit and action plan.

Any deficiencies or weaknesses in child protection arrangements are remedied without delay.

Safeguarding and Child Protection is a standing item at each Governing Board meeting and the DSL and/or the Headmaster presents a written or verbal update, which is minuted.

The DSLG and DSL are in regular contact at other times, especially if there are any emerging situations which are likely to lead to a referral or require consultation with Children's Social Care or local authority's designated officer(s) (still known as the 'LADO' in BANES CSSP).

2.3 Role of the Designated Safeguarding Lead

The responsibilities of the DSLs are to:

- take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place)
- advise and act upon all suspicion, belief and evidence of abuse reported to him/her to make prompt contact with the B&NES Children's Social Care where there are concerns that a child may be in need of help or at risk. If at any time there is a risk of immediate serious harm to a child, a referral should be made to Children's Social Care immediately. Where concerns do not meet the threshold for a referral to Children's Social Care consideration should be given to the appropriateness of completing and submitting a referral form for a 'Family Help' or 'Team Around the Child' arrangements (as operated by the local authority).
- be the first point of contact for parents, pupils, teaching and support staff, external agencies and any other in all matters of child protection
- ensure all staff are aware of the need to be alert to signs of abuse and know how to respond to a student who may tell of abuse
- co-ordinate, update and review the child protection procedures in the School
- liaise with the Lead Nurse and Wellbeing Coordinator over matters where safeguarding concerns are linked to mental health
- liaise with the Social Services Department and other agencies on behalf of the School
- ensure that all members of staff and volunteers receive basic and induction training in child protection issues and are aware of the School's child protection procedures. This includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- monitor the keeping, confidentiality and storage of records in relation to child protection
- ensure that all students are encouraged to talk, and that students know who to approach with any concerns
- ensure that the duty of care towards pupils and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour and assist staff to monitor their own standards and practice
- keep the Headmaster informed of all actions, unless the Headmaster is the subject of a complaint
- keep the headmaster informed of issues-especially ongoing enquiries under section 47 of the Children Act

1989 and police investigations. The DSL must be aware of the requirement for children to have an Appropriate Adult

- receive training in child protection issues and inter-agency working as required by the Local Safeguarding Children Board, including regular attendance at the B&NES Child Protection Forum
- transfer information to the new school when a pupil on the Child Protection Register or about whom there have been child protection concerns in the preceding year leaves, ensuring that the information is transferred separately from the main pupil file
- contact the Child Missing Education Service and, if necessary, Children's Social Care if the School does not know which school a former pupil has moved to, or becomes aware that they are no longer in formal education.
- co-ordination of the School's approach to online safety.

Children's wishes or feelings are taken into consideration by the DSLs when determining action to be taken in determining the most appropriate services to use to help protect them. Clear guidance is given to staff to ensure that they do not promise confidentiality and act in the best interests of the child.

The designated safeguarding lead (or a deputy) should always be available to discuss safeguarding concerns, and cover arrangements will always be in place within the Safeguarding Team. If in exceptional circumstances, the designated safeguarding lead (or a deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to any member of the senior leadership team and/or take advice from local authority children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or a deputy) as soon as is practically possible.

Part Three: Safer Recruitment

The School has established procedures for the safe recruitment of staff and volunteers as defined in the Safer Recruitment Policy. These must be adhered to in making all appointments to both the teaching and non-teaching staff.

These procedures seek to help reject or identify people who might abuse children. The Governing Board ensures that the School acts reasonably in making decisions about the suitability of any prospective employee based on checks and evidence.

The DSLs and/or senior and middle managers in all three sections of the School ensure that the Bursar and HR Manager become involved at an early stage in the recruitment process of all staff, governors, volunteers and contractors. The HR Manager maintains the Single Central Register across the whole school and ensures that this information is entered into the School's Information Management System at the earliest opportunity.

Risk assessments are conducted to ascertain any potential risk that an outside speaker, who might address or interact with pupils in school or on a school visit, might pose by encouraging the development of extreme views amongst pupils. Risk assessments are also carried out and approved before visits of other adults to the school sites.

3.1 Recruitment and Selection Procedures

All staff recruited to the School are subject to appropriate identity, qualification and health checks. References will be verified and enhanced Disclosure and Barring Service (DBS) and National College of Teachers & Leadership (TRA) prohibition from teaching and/or management list checks will normally be completed before staff commence their duties.
The School only uses employment agencies which can demonstrate that they positively vet their supply staff and will report the misconduct of temporary or agency staff to the agency concerned and to the Local Authority. Staff joining the School on a permanent or temporary basis will be briefed on the contents of this safeguarding policy as part of their induction process.

*

Part Four: Allegations of abuse against teachers and other staff

(including the Headmaster/Governors/Supply staff/volunteers and contractors).

The School has established procedures to manage any allegations of abuse made against a current member of staff at King Edward's School, regardless of whether the school is where the alleged abuse took place. Allegations made against former employees should be referred to the police.

The procedures apply to all staff, whether teaching, administrative, management or support, as well as to supply staff, contractors, third party providers and adult volunteers. The word 'staff' is used for ease of description.

4.1 Arrangements for dealing with allegations of abuse

Receiving an Allegation from a Child

A member of staff who receives an allegation about abuse from a child should follow the guidelines in Annex A: Section 2 for dealing with a disclosure. An allegation of abuse made against a member of staff should follow this procedure:

- The allegation should be reported immediately to the Headmaster (or in his absence the acting senior member of staff).
- If the Headmaster is the person against whom the allegation is made, this must be reported to the Chair of Governors or, in their absence, to the Vice-Chair of Governors or the Designated Safeguarding Lead Governor (DSLG).
- The Headmaster (or Chair of Governors if the allegation is made against the Headmaster) should:
- Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the Headmaster (or DSL).
- Record information about times, dates, locations and names of potential witnesses
- Initial Assessment by the Headmaster (or Designated Safeguarding Lead)

The Headmaster (or DSL) should make an initial assessment of the allegation, consulting with the DSL, the DSL Governor and the designated officer(s) from the relevant local authority as appropriate.

Where the allegation is that a member of staff has behaved in a way that has harmed a child, or may have harmed a child, or has possibly committed a criminal offence against or related to a child, or has behaved towards a child or children in a way that indicates s/he is unsuitable to work with children, the matter must be reported to the designated officer(s) from the relevant local authority *(still referred to in Bath & NE Somerset as the LADO)* **within one working day at the latest.**

It is important that the Headmaster (or DSL) does not investigate the allegation. The initial assessment should be on the basis of the information received and a decision taken as to whether or not the allegation warrants further investigation. If further investigation is necessary, then the School will provide staff contact details for the relevant agencies to investigate further.

If the allegation is not patently false and there is cause to suspect that the child is suffering or is likely to suffer

significant harm, the designated officer(s) from the relevant local authority will refer to children's social care and ask for a strategy discussion to be convened. The Headmaster (or DSL) will attend this discussion.

If there is not cause to suspect significant harm, but a criminal offence might have been committed, the designated officer(s) from the relevant local authority will inform the police and convene a discussion with the police. The Headmaster (or DSL) will attend this discussion.

If the nature of the allegation does not require formal disciplinary action, the Headmaster will institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within fifteen working days.

Other potential outcomes are:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child. The matter should be addressed in accordance with the School disciplinary procedures.
- Concerns are judged not to have met the harm thresholds. In such circumstances, the School follows the school's Low Level Concerns Policy
- The allegation can be shown to be false or malicious.

Enquiries and Investigations

Child protection enquiries by Social Services or the Police are not to be confused with internal, disciplinary enquiries by the School. The School may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the Police, have no power to direct the School to act in a particular way, however, the School should assist the agencies with their enquiries.

The School shall hold in abeyance its internal enquiries while the formal Police or Social Services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the Police, the Headmaster (or DSL) should normally be involved in, and contribute to, the inter-agency strategy discussions. The Headmaster (or DSL) is responsible for ensuring that the School gives every assistance with the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The Headmaster (or DSL) shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

Subject to objections from the Police or other investigating agency, the Headmaster (or DSL) shall:

- inform the child/children or parent/carer making the allegation that the investigation is taking place and what the likely process will involve
- ensure that the parents/carers of the child making the allegation have been informed that the allegation has been made and what the likely process will involve
- inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve
- inform the Chair of Governors and the DSL Governor of the allegation and the investigation, although there should be no disclosure of details, as this may prejudice the outcome of a Governors' disciplinary panel

The Headmaster (or DSL) shall keep a written record of the action taken in connection with the allegation.

Suspension of Staff

Suspension should not be automatic. In respect of staff other than the Headmaster, suspension can only be carried out by the Headmaster (or the Headmaster's nominee). In respect of the Headmaster, suspension can only be carried out by the Chair of Governors (or in their absence, the Vice Chair).

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary, act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

Suspension should only occur for a good reason. For example:

- where a child is at risk
- where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct
- where necessary for the good and efficient conduct of the investigation

If suspension is being considered, the member of staff should be encouraged to seek advice, for example from a trade union.

Prior to making the decision to suspend, the Headmaster, his nominee (or Chair or Vice Chair of Governors) should interview the member of staff, subject to the approval of the designated officer(s) from the relevant local authority or, if the Police are engaged in an investigation, only after consultation with the officer in charge of the investigation.

The member of staff should be advised to seek the advice and/or assistance of his/her trade union and should be informed that they have the right to be accompanied by a friend. The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made clear that the interview is not a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension and further investigation. During the interview, the member of staff should be given as much information as possible, in particular the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff's innocence or guilt, but to give the opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity of a brief adjournment to consider any information given to him/her at the meeting to prepare a response.

If the Headmaster, his nominee (or Chair or Vice Chair of Governors) considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be dispatched as soon as possible, and ideally within one working day.

Where a member of staff is suspended, the Headmaster, his nominee (or Chair or Vice Chair of Governors) should:

- Inform the Chair of Governors of the suspension in writing.
- Report to the Governing Body that a member of staff has been suspended pending investigation. The detail given to the Governing Body should be minimal, and this matter must be treated with absolute confidentiality.
- Where the Headmaster has been suspended, the Chair or Vice Chair of Governors will need to take action to address the management of the School.

- Inform the parents/carers of the child making the allegation of the suspension. Parents should be asked to treat

the information as confidential. Consideration should be given to informing the child making the allegation of the suspension.

- Inform senior staff who need to know of the reason for the suspension.
- Consider with the nominated Governor whether a statement to the students of the School and/or parents/carers should be made, depending on the nature of the allegation and having due regard for the need to avoid publicity which might have the potential to lead to the identification of a current or former pupil.
- Consider carefully and review the decisions as to who is informed of the suspension and investigation. The designated officer(s) from the relevant local authority and external investigating authorities should be consulted.
- The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals.
- A suspended employee should remain available for interview at any time during normal working hours.
- The suspension should remain under review in accordance with the School disciplinary procedures. An employee who has been under suspension for 3 weeks or more may appeal using the appeals procedure.
- The appeal will be considered as soon as practicable, and the suspension will continue to operate, pending appeal.

The Disciplinary Investigation will be conducted as per the School's Disciplinary Procedures.

Allegations without foundation

False allegations may be indicative of problems of abuse elsewhere. A record should be kept and the designated officer(s) from the relevant local authority should refer the matter to children's social care in order to determine whether the child is in need of services or has been abused by someone else. If the allegation is shown to be deliberately invented or malicious, the Headmaster may consider taking appropriate disciplinary action against the pupil, or the police may be asked to consider whether any action might be appropriate against the person responsible for the allegation if he/she was not a pupil.

In consultation with the DSL and/or Chair of Governors, the Headmaster shall:
Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling/support.
Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome. Where the allegation was made by a child other than the alleged victim, consideration to be given to informing the parents/carers of that child.

Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

Allegations made against the Headmaster

If the complaint concerns alleged abuse by the Headmaster, this must be referred to the Chair of Governors or, in her absence, to the Vice-Chair or the DSL Governor. They will in turn consult with the designated officer(s) from the relevant local authority.

The partners and other household members of members of Staff working in EYFS or providing out of school hours care

All members of staff who work in the EYFS at the Pre-Prep, or provide pre-school or after-school care for children aged eight of younger, in the Pre-Prep or the Junior School, are required to confirm, at regular intervals, whether

or not they live in a household with a person who has a previous criminal conviction for child abuse or violence. Such a circumstance is likely to jeopardies the member of staff's suitability to continue to work with children at the School and may also result in disqualification from working with children in a school or as a registered provider of childcare services.

A member of staff who knowingly fails to disclose such information about a member of their household is likely to be dismissed.

Organisations or Individuals using school premises
Schools and colleges may receive an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the School will follow their safeguarding policies and procedures, including informing the LADO.

Governors
If an allegation is made against a governor, the Board will follow their own local procedures. Where an allegation is substantiated, they will follow the procedures to consider removing the governor from office.

Other pupils
If an allegation is made by one pupil against another pupil, the DSL will convene a meeting with the Headmaster to discuss the appropriate next steps and consult the designated officer(s) from the relevant local authority, if appropriate.

Records
It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. A copy should be provided to the person concerned. The records should be kept for 75 years in line with our data retention policy.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed that the School has a statutory obligation to inform the Disclosure and Barring Service.

In addition, if the actions of teacher might constitute misconduct, then, the National College for Teaching and Leadership (TRA) will also be informed and may consider prohibition of a teacher from the teaching profession.

Monitoring Effectiveness
Where an allegation has been made against a member of staff, the DSLG, together with the DSL should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the School's procedures and/or policies and/or which should be drawn to the attention of the Local Authority Designated Officer. Consideration should also be given to the training needs of staff.

4.2 Arrangements for dealing with low level staff concerns or allegations (i.e. that do not meet the harms test)

A low-level concern is any concern 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO).

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how

small, even if it does no more than give a sense of unease or a 'nagging doubt'. 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 (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust, and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored, and reinforced by all staff.

The School's Staff Code of Conduct can be found in this policy. The aim of the Staff Code of Conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within the Staff Code of Conduct.

Staff must share all concerns with the DSL without delay, so they can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the DSL, it should be shared with the Headmaster. If the low-level concern relates to the Headmaster, it should be shared with the Chair of Governors.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the DSL will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with the Low-level Concerns policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.
All records relating to low-level concerns will be kept confidential and always held securely in compliance with Data protection laws, including the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025.

The School will reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will then follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, staff should share that concern with the DSL. The concern will be recorded in accordance with the School's low-level concern, and the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

Further details are contained in the Low-level Concerns Policy

Annex A: Information and Guidance for School Staff

Section 1 Recognising possible abuse, neglect and exploitation

All staff should be aware of the indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect,

and exploitation so that staff are able to identify cases of children who may be in need of help or protection.
All staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.
Part one of KCSIE defines abuse as:

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 the ill treatment of others. This can be particularly relevant, for example, in relation to the impact of all forms of domestic abuse on children, 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 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.

Definitions	Signs	Impact
Part one of KCSIE defines the following:	The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered.	The sustained physical, emotional, sexual abuse, or neglect of children can have major long-term effects on all aspects of their health, development, and wellbeing. Children can grow up to feel worthless, unlovable, betrayed, powerless, confused, frightened and mistrustful of others. They might feel, wrongly, that the abuse is their fault.
Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.	Any injuries not consistent with the explanation given for them Injuries which occur to the body in places which are not normally exposed to falls or rough games Injuries which have not received medical attention Reluctance to change for, or participate in, games or swimming Bruises, bites, burns and fractures, for example, which do not have an accidental explanation The child gives inconsistent accounts for the cause of injuries Frozen watchfulness	Physical abuse can lead directly to neurological damage, physical injuries, disability and in extreme cases death. Physical abuse has been linked to aggressive behaviour in children, emotional and behavioural problems, and learning difficulties.
Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they	Depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy Obsessions or phobias Sudden underachievement or lack of concentration Seeking adult attention and not mixing well with other children Sleep or speech disorders Negative statements about self Highly aggressive or cruel to others	If a child suffers sustained emotional abuse there is increasing evidence of adverse long-term effects on their development. Emotional abuse has a significant impact on a developing child's mental health, behaviour and self-esteem. It can be especially damaging infancy and can be as important as the other more visible forms of abuse, in terms of its impact on the child. Domestic violence, adult mental health

Definitions	Signs	Impact
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.	Extreme shyness or passivity Running away, stealing and lying	problems and parental substance misuse may be features in families where children are exposed to such abuse.
Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching 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.	Any allegations made by a child concerning sexual abuse The child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age, or regularly engages in sexual play inappropriate for their age Sexual activity through words, play or drawing Repeated urinary infections or unexplained stomach pains The child is sexually provocative or seductive with adults Inappropriate bed-sharing arrangements at home Severe sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations Eating disorders such as anorexia or bulimia.	Disturbed behaviour including self-harm, inappropriate sexual behaviour, sadness, depression and loss of self-esteem have all been linked to sexual abuse. Its adverse effects may last long into adult life. The severity of the impact on the child is believed to increase the longer the abuse continues, the more serious the abuse, the younger the child at the start, and the closeness of the relationship to the abuser. The child's ability to cope with the experience of sexual abuse, once recognised, can be strengthened by the support of a non-abusive adult carer who believes the child, helps the child understand the abuse, and is able to offer help and protection. Some adults who sexually abuse children were themselves sexually abused as children.
Neglect: the persistent failure to	Dirty skin, body smells, unwashed,	Neglect can seriously impair a

Definitions	Signs	Impact
meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.	uncombed hair and untreated lice Clothing that is dirty, too big or small, or inappropriate for weather conditions Frequently left unsupervised or alone Frequent diarrhoea Frequent tiredness Untreated illnesses, infected cuts or physical complaints which the carer does not respond to Frequently hungry Overeating junk food	child's health, physical and intellectual growth and development, and can cause long term difficulties with social functioning, relationships and educational progress. Extreme cases of neglect can cause death.
Serious violence: indicators which may signal that children are at risk from, or are involved with, serious violent crime or exploitation	include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.	increases the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending)

Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex (also known as child-on-child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
Sexual violence such as rape, sexual assault, and assault by penetration are offences under the Sexual Offences Act 2003. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.
Schools 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. The sexual abuse of children by other children is a specific safeguarding issue in education.

Sexual harassment: is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and

outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberating brushing against someone, interfering with someone's clothes, or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non- consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. Further information can be found in Part 5 of KCSIE: Child-on-child sexual violence and sexual harassment.

Child-on-child sexual violence and/or harassment: Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Further information can be found in Part 5 of KCSIE: Child-on-child sexual violence and sexual harassment.

Sharing of nudes and/or semi-nudes: AI-generated imagery / nudes and semi-nudes
All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response. This includes images, videos, livestreams or other visual content which have been taken by a child, taken or created by another person, digitally altered, or wholly generated using artificial intelligence, including deepfakes or deep nudes.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:
children and young people find nudes and semi-nudes online and share them claiming to be from a peer
children and young people digitally manipulate an image of a young person into an existing nude online
images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" sets out the classification of incidents, and how each should be handled. (This is also covered in our Youth Produced Sexual Imagery policy).

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

The NSPCC website also provides useful additional information on abuse and neglect and what to look out for.

Section 2 Guidelines for staff receiving a disclosure

Initial Complaint/concern

A member of staff suspecting or hearing a complaint of abuse (including child on child abuse), exploitation, or neglect from a child or any third party, must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and must share information that might be critical in keeping children safe. Staff must not investigate it beyond the point at which it is clear that there is an allegation. In particular, the member of staff:

- Must listen carefully and calmly to the child and keep an open mind. Staff should not make a decision as to whether or not the abuse has taken place.
- Must not ask leading questions, that is, a question which suggests its own answer.
- Must not undertake their own investigation, question the pupil again or request more details.
- Must reassure the pupil by telling them that they have done the right thing in telling the member of staff and that the allegation/complaint will be taken seriously and that they will be supported and kept safe.
- Must ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report. The immediate response in such cases is very important and the pupil/victim needs to feel reassured, protected and listened to. No victim must ever be made to feel ashamed for making a report.
- Must not give a guarantee of absolute confidentiality and explain the need to pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken.
- Must keep a sufficient written record of the conversation distinguishing clearly between fact, observation, allegation and opinion. The note should then be signed and dated.
- Must seek clarification from a DSL without delay if they are uncertain about whether the information divulged might constitute abuse. The member of staff is not necessarily required to divulge a pupil's name during this conversation, until it becomes clear that the disclosure constitutes likely abuse.

The DSL must ensure that all concerns, discussions, and decisions (together with reasons) made under these procedures should be recorded in writing. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome (to include whether the outcome was substantiated, unsubstantiated or unfounded).
A copy is to be provided to the person concerned, where agreed by children's social care or the police. Additionally, a declaration will be made on whether the information will be referred to in any future reference. From September 2021, substantiated allegations should be included in references, provided that the information is factual and does not include opinion.

The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of *KCSIE*.
Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy).

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place, that are 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. The School operates its processes with the best interests of the pupil/s at their heart.

Preserving Evidence – Confidentiality and Information sharing

All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers, etc.), must be safeguarded and preserved.
Further detail is contained in Section 1.3 and 1.4

Contextual Safeguarding
Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

Early Help, family help and community-based early Help assessment

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early 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 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, care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking, or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending;
- Is experiencing, or is at risk of experiencing family ostracism
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- Is a privately fostered child; and
- Is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the B&NES Safeguarding Children Executive referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

Section 3 Staff Code of Conduct

3.1 Safeguarding Guidance for Staff and Adult Volunteers, working with children and young people

For details, see Staff Code of Conduct on the VLE.

3.2 Safeguarding Guidance for external contractors, service providers and coach drivers working with children and young people

This guidance aims to safeguard children and young people and reduce the risk of contractors or their employees being accused of improper or unprofessional conduct.

A copy of this guidance is provided to each contracting company as part of the terms and conditions of any agreed contractual work or service provision agreed by the School.

All adults working on School premises or in a School situation (such as sporting or other trips and activities, transport or estates and premises related works) are in a position of trust and have a duty to keep children and young people safe and to protect them from neglect and physical and emotional harm. This duty is in part exercised through the development of respectful caring and professional relationships between adults, children, and young people.

This means that contracted adults will:

- Act, and be seen to act, in the child's or young person's best interest;
- Avoid any contact which may lead any reasonable person to question their motivation and intentions;
- Take responsibility for their own actions and behaviour;
- Understand the responsibilities which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached.

Contracted adults should not establish or seek to establish social contact with children or young people for the purpose of securing a friendship. This includes online relationships established through the use of social networking sites. Contracted adults should on no account engage in inappropriate conversation, electronic communication or texting with a pupil.

This means that contracted adults must:

- Be aware that even well intentioned social or physical contact may be misunderstood by the child or young person, an observer, or by anyone to whom the action is described;
- Always contact the school's Designated Safeguarding Lead (DSL) to obtain prior approval for any proposed social contact with children or young people;
- Always be prepared to explain actions and accept that all physical and social contact will be open to scrutiny;
- Never indulge in banter, horse-play, tickling or fun fights;
- Not take photographs of pupils using their personal devices/equipment unless this has been agreed beforehand with the DSL;
- Not have conversations with other adults which are within earshot of pupils which are inappropriate and/or offensive in content and/or use inappropriate/offensive language;
- Follow any other relevant school policies pertaining to the location of their work for the school, for example the Pre-Prep Mobile Phone policy;
- Always ask for further guidance if they are uncertain about their responsibilities.

If a child or young person seeks to establish contact, the contracted adult should politely and professionally decline the invitation and alert their line manager or a member of the School staff immediately. In the rare cases where exceptional circumstances might justify contact being established, this must be discussed and agreed beforehand with one of the Schools' DSLs.

Contracted adults may only work unsupervised in the vicinity of children on any of the school sites if they have completed the required safer recruitment process and have been issued with a green lanyard.

Otherwise, they must be supervised at all times by a member of staff who is a blue lanyard holder.

The governing body or proprietor will seek assurance that the provider 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 for the provider to liaise with the school or college on these matters where appropriate.

The governing body or proprietor will 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.

Contractors who are working exclusively in a designated secure compound, and are therefore not engaged in regulated activity, are not required to be issued with a lanyard but the site manager will undertake a safeguarding briefing, will disseminate guidance and oversee adults working on site. A risk assessment will be completed, and safeguarding aspects will be approved by the DSL.

Adults who have completed the required safer recruitment process should look to avoid working in a one-to-one situation with children and young people where possible, as they may be more vulnerable to potential allegations.

If working alone with a child is normal working practice, for example for a third-party counsellor, they are advised to employ additional mitigation measures and continually risk assess their situation. Every attempt should be made to ensure that the safety and security needs of all parties are met.

This means that contracted adults, in the event of finding themselves together with children or young people, must: consider the needs and circumstances of the child or young person involved, to support them whilst continually risk assessing their own situation and adjusting their practice as necessary;

- Inform their line manager or a member of the School teaching staff of the situation immediately in order to establish whether the contractor needs to be accompanied to continue working.
- Always report to their line manager any situation where a child or young person becomes distressed or angry.

This guidance has been produced to help contracted adults establish the safest possible play, learning and working environments. Please contact the DSL if there are other situations you would like advice about.

Contracted adults should be familiar with the local child protection arrangements and understand their responsibilities in order to safeguard and protect children and young people.

All contracted adults should know the structure of the School's Safeguarding Team and how to make contact with members of the team or outside agencies.

Annex B: Information and guidance for School staff on Specific Safeguarding Issues

Specific safeguarding issues such as behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, unexplainable and/or persistent absences from education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

Annex A of KCSIE contains important additional information about specific forms of abuse and safeguarding issues. School leaders and those staff who work directly with children should read this annex.

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

2.2 Child sexual exploitation (CSE)
CSE is a form of child sexual abuse which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity:

- in exchange for something the victim needs or wants (for example, money, gifts or affection),
- for the financial advantage or increased status of the perpetrator or facilitator.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16- and 17-year-olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The Child criminal exploitation (CCE) indicators listed further down the page can also be indicators of CSE, as can:

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

The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners*".
CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

2.3 Child criminal exploitation (CCE)
CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

- in exchange for something the victim needs or wants (for example, money, gifts or affection),
- for the financial or other advantage (such as increased status) of the perpetrator or facilitator through violence or the threat of violence.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket. 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 can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation - where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

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

The experience of girls who are criminally exploited can be very different from that of boys. The indicators may not be the same, however staff 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.
CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse. Children who have been exploited will need additional support to help maintain them in education.

2.4 County lines:
County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of "deal line".
This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing from school or home and are subsequently found in areas away from their own
- have been the perpetrator or alleged perpetrator of serious violence (e.g. knife crime), as well as the victim are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

2.5 Children and the Court System
Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5- 11 year-olds and 12–17 year-olds available on the **gov.uk website.**

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

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

2.6 Children Missing Education (CME)
All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. **The law requires all children between the ages of 5 and 18 to be in full-time education or training.**

A child going missing from education is a potential indicator of a range of safeguarding issues. Staff must follow the School's procedures for dealing with children who go missing as per the School's Attendance Policy or the Missing Child Policy in the pre-Prep (as per EYFS Guidelines).

A child going missing from education is a potential indicator of a range of safeguarding issues including abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who go missing, particularly persistently. The School's procedure for dealing with children who go missing can be found in the Attendance Policy on the VLE. All unexplained absences will be followed up in accordance with this Policy. It is therefore important that all staff are aware of the School's policy and its procedures for reporting any Children Missing Education.

School attendance registers are carefully monitored to identify any trends. King Edward's School acknowledges its responsibility to inform the local authority of any pupil who fails to attend school regularly or has been absent without the school's permission **FOR A CONTINUOUS PERIOD OF 10 SCHOOL DAYS OR MORE.**

The School maintains an Admissions Register and an Attendance Register in line with legal requirements. The Admissions Registrar ensures that the local authority is informed of any pupil who is going to be added to or deleted

from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This is in accordance with the circumstances detailed in Part One of KCSIE. These include where a pupil has: been removed from the school to be home educated; moved to an address beyond the School's catchment area; been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age; been permanently excluded. The local authority is notified as soon as the grounds for deletion are met, and no later than deleting the pupil's name from the admissions register, which is held electronically on the Schools Information Management Systems (SIMS).

This will assist the local authority to:

- fulfil its duty to identify children of compulsory school age who are missing from education;
- follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, or radicalisation.

Staff training alerts staff to the signs to look out for, and the individual triggers to be aware of, when considering the risks of potential safeguarding concerns. Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child going missing in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

The School operates robust procedures in following up unexplained pupil absences. In addition, ALL Staff are expected to alert a DSL if they have any concerns about a pupil's attendance record, particularly when a child is absent frequently and/or on a regular basis. This is necessary to help identify the risk of abuse and neglect, including sexual exploitation, and to reduce the risks of a child going missing in the future.

Children go missing from education for a number of reasons including:

- They don't start school at the appropriate time and so they do not enter the educational system
- They are removed by their parents
- Behaviour and/or attendance difficulties
- They cease to attend, due to exclusion, illness or bullying
- They fail to find a suitable school place after moving to a new area
- The family move home regularly
- Problems at home
- Children and young people in the following groups are more likely to be missing from education:
- children who are removed or asked to leave independent schools
- children who are excluded from school
- young carers
- children with long term medical or emotional problems
- young people who have committed offences
- young runaways
- teenage parents
- children living in women's refuges
- children of homeless families perhaps in temporary housing
- unaccompanied asylum seekers and refugees or children of asylum-seeking families
- looked after children
- children with a Gypsy/Traveller background
- children from transient families

Why is it important to get Children Missing Education back in school? - Children who are not in school could be missing

out on vital educational and social opportunities and experiences. Some of them may be at risk of harm or be in situations that are unsafe.

Children who are not in school are at greater risk of involvement in criminal activity and becoming victims of crime themselves. There is also a higher risk that these children will be victims of abuse.

What can you do to help? - Children Missing Education Services are keen for schools to tell them about these children so that they can make sure that they are safe and that they receive an appropriate education.
If you are aware of any King Edward's pupils, former pupils or prospective pupils whose circumstances have changed resulting in them not receiving a formal education, you must alert the Designated Safeguarding Lead, who will ensure that the Children Missing Education (CME) service in the appropriate local authority is informed.
If you are aware of other children outside school who are CME you can alert the relevant Local Authority CME service direct and confidentially, either by phone, letter or e-mail. The Local Authority will then make contact with the family and children to make sure that they are safe and to arrange for some appropriate education. If the children need some support to help them get back into school, this will be provided.

Further information can be found at the following:
How we deal with school absence and education welfare | Bath and North East Somerset Council (bathnes.gov.uk)

KCSIE Part One provides detailed further information regarding CME. CME contact details for the School's catchment area are contained in this policy.

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

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

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

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC - When to call the Police' and National Cyber Security Centre - NCSC.gov.uk

2.8 Female Genital Mutilation (FGM)
From October 2015, Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) placed a statutory duty upon teachers, along with social workers and healthcare professionals, to

report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.
Unless there is a very good reason not to, a teacher who discovers that FGM appears to have taken place, should still discuss such a case with the School's DSL, who will also help to ensure that children's social care is involved as appropriate, and in line with BCSSP guidelines.

Teachers failing to report such cases will face disciplinary sanctions.
If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18, teachers should follow the School's local safeguarding procedures.
^*It will be rare for teachers to see visual evidence, and they should* <u>*not*</u> *be examining pupils; the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.*

So called 'honour based' abuse: 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.

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.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. The signs that a girl has already been subjected to FGM may include:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence. Although, countries where breast ironing is prevalent have ratified the African Charter on Human Rights to prevent harmful traditional practices, it is not against the law. Breast ironing does not stop the breasts from growing, but development can be slowed down. Damage caused by the 'ironing' can leave women with malformed breasts, difficulty breastfeeding or producing milk, severe chest pains, infections and abscesses. In some cases, it may be related to the onset of breast cancer.

Staff worried about the risk of breast ironing in their school should speak to the Designated Safeguarding Lead as soon as possible. Schools need to know the risk level within their communities and tackle the risk as appropriate. Where schools have a concern about a child, they should contact Children's Social Care Services. If the concerns are based on more concrete indicators - i.e., the young person says this is going to happen to them, or disclosure that it has happened to them or to an older sister - schools should make a child protection referral and inform the Police as required by the mandatory reporting duty.

Schools should not:

- contact the parents before seeking advice from children's social care;
- make any attempt to mediate between the child/young person and parents.

It is important to keep in mind that the parents may not see FGM or Breast Ironing as a form of abuse; however,

they may be under a great deal of pressure from their community and or family to subject their daughters to it. Some parents from identified communities may seek advice and support as to how to resist and prevent FGM for their daughters, and education about the harmful effects of FGM and Breast Ironing may help to make parents feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support FGM or Breast Ironing.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.
There are a range of potential indicators that a child may be at risk of forced marriage including, a sudden drop in performance, truancy from lessons and conflicts with parents over continuation of the student's education.

School staff can also contact the Forced Marriage Unit if they need advice or information:
www.fco.gov.uk/forcedmarriage
020 7008 0151
Emergency Duty Officer (out of hours): 020 7008 1500

fmu@fco.gov.uk.

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

The 'one chance' rule: You may only have one chance to save the life of a person who is at risk or under threat of 'Honour'-Based Abuse and harmful practices (forced marriage and female genital mutilation). They may only have one chance to make a disclosure, meaning you only have one chance to save and protect a life. This means that we all need to be aware of our responsibilities and obligations when we come across those at risk. If a person at risk is not listened to or taken seriously and walks out of the door without immediate support and protection being offered, that one chance might be wasted.

It is essential, therefore, that schools take such concerns seriously and act without delay. Never underestimate the determination of parents who have decided that it is right for their daughter to undergo FGM or a forced marriage. Attempts to mediate may place the child/young person at greater risk, and the family may feel so threatened at the news of their child's disclosure that they bring forward their plans or take action to silence her.

2.9 Preventing Radicalisation
As part of its wider safeguarding duties, King Edward's School seeks to protect its pupils from the risk of radicalisation and aims to intervene to prevent vulnerable people being radicalised.
Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence.
Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.
Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with the specific needs for which

an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing 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. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. This may include making a referral to the Channel programme.

Rather than mental ill health, religious ideology or political views, radicalisers seek to prey on human needs for esteem, achievement, meaning or identity, competence and control (like gangs and sexual groomers).
The more marginalised, discriminated against and less integrated a person is, the more likely they are to be susceptible to radicalisation into terrorism. Hence extremist groups portray themselves as successful, righteous, powerful, protectors of the downtrodden and have a strong identity (symbols, flags etc).

Risk indicators
There is no single route to radicalisation. However, there are some behavioural traits that could indicate that a learner is susceptible to radicalisation into terrorism. The following guidance should be used.

Managing risk of radicalisation in your education setting - GOV.UK (www.gov.uk)
Based on "Channel Vulnerability Assessment Framework", Channel Duty Guidance 2015, Home Office
Police Prevent Team, SWCTIU, 01278 647466,

channelsw@avonandsomerset.pnn.police.uk

Any member of staff who has concerns about a pupil at risk from possible radicalisation should raise these concerns with the DSL. The DSL may make a **Prevent** referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child from becoming terrorists or supporting terrorism they must call 999 or submit a referral form to the B&NES Prevent team. Advice and support can also be sought from children's social care.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the '**Channel' programme** and have that support in place for when the child arrives at the new school.

The Prevent Duty
All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015, in the exercise of their functions, to have *"due regard to the need to prevent people from becoming terrorists or supporting terrorism"*. This duty is known as the Prevent duty.

The Channel programme
This is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to becoming terrorists or supporting terrorism and provides guidance, and develops understanding, about how and when it is appropriate to make a referral if they are concerned that an individual might be vulnerable to radicalisation. Staff are made aware that an individual's engagement in the Channel programme is entirely voluntary at all stages.
Statutory guidance on Channel is available at: Channel guidance

King Edward's School takes its Prevent duty responsibilities seriously by:
Carrying out an annual audit to assess the risk of any children at the School becoming terrorists or supporting terrorism. Such risk assessments are discussed with the Head, DSL, Senior Deputy Head and the governor responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from becoming terrorists or supporting terrorism and are regularly revised.

Building on existing local partnership arrangements with other schools, including regular attendance at the Bath and North East Somerset (B&NES) BCSSP Child Protection Forum and taking account of BCSSP policies and procedures.

The majority of the DSLs and Deputy DSLs have attended a workshop to raise awareness of prevent (WRAP) training and/or a Prevent 'Training for Trainers' Course in order to: be able to deliver appropriate Prevent Awareness training to school staff; to equip them to identify children at risk from becoming terrorists or supporting terrorism; and to challenge extremist ideas.

Ensuring that suitable filtering is in place to protect children from terrorist and extremist material when accessing the internet at school, and teaching pupils about online safety.

Training for King Edward's staff raises awareness of the Channel programme.

2.10 Domestic abuse
The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour.
Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

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

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

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children and young people who live with domestic abuse are at increased risk of behavioural problems, emotional trauma, and mental health difficulties in adult life.

The impact of domestic abuse on children and young people can be wide-ranging and may include effects in any or all of the following areas:

Physical: Children and young people can be hurt either by trying to intervene and stopping the violence or by being injured themselves by the abuser. They may develop self-harming behaviour, or eating disorders. Their health could be affected, as they may not be being cared for appropriately. They may have suicidal thoughts or try to escape or blank out the abuse by using drugs, alcohol or by running away.

Sexual: There is a high risk that children and young people will be abused themselves where there is domestic abuse. In homes where living in fear is the norm, and situations are not discussed, an atmosphere of secrecy

develops and this creates a climate in which sexual abuse could occur. In addition to this, children and young people may sometimes be forced to watch the sexual abuse of their mother/carer. This can have long-lasting effects on the sexual and emotional development of the child/young person.

Economic: The parent or carer of the child or young person may have limited control over the family finances. Therefore, there might be little or no money available for extra-curricular activities, clothing or even food, impacting on their health and development. Emotional: Children and young people will often be very confused about their feelings – for example, loving both parents/carers but not wanting the abuse to continue. They may be given negative messages about their own worth, which may lead to them developing low self-esteem. Many children and young people feel guilty, believing that the abuse is their fault. They are often pessimistic about their basic needs being met and can develop suicidal thoughts. Some children and young people may internalise feelings and appear passive and withdrawn or externalise their feelings in a disruptive manner.

Isolation: Children and young people may become withdrawn and isolated; they may not be allowed out to play; and if there is abuse in the home, they are less likely to invite their friends round. Schooling may be disrupted in many ways, and this may contribute to their growing isolation. They may frequently be absent from school as they may be too scared to leave their mother alone. They may have to move away from existing friends and family – e.g. into a refuge or other safe or temporary accommodation.

Threats: Children and young people are likely to have heard threats to harm their mother/father. They may have been directly threatened with harm or heard threats to harm their pet. They also live under the constant and unpredictable threat of violence, resulting in feelings of intimidation, fear and vulnerability, which can lead to high anxiety, tension, confusion and stress.

The warning signs that domestic abuse may be about to take place, or may have already taken place include, but are not limited to:

- Unexplained absences or lateness - either from staying at home to protect their parent or hide their injuries, or because they are prevented from attending school;
- Children and young people attending school when ill rather than staying at home;
- Children and young people not completing their homework, or making constant excuses, because of what is happening at home;
- Children and young people who are constantly tired, on edge and unable to concentrate through disturbed sleep or worrying about what is happening at home;
- Children and young people displaying difficulties in their cognitive and school performance;
- Children and young people whose behaviour and personality changes dramatically;
- Children and young people who become quiet and withdrawn and have difficulty in developing positive peer relations;
- Children and young people displaying disruptive behaviour or acting out violent thoughts with little empathy for victims;
- Children and young people who are no trouble at all.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.
Research shows that the repeated use of physical, sexual, psychological and financial abuse is one of the ways in which male power is used to control women. The underlying attitudes which legitimate and perpetuate violence against women should be challenged by schools as part of the whole school ethos.

Schools can support individual children and young people by:

- Introducing a whole-school philosophy that domestic abuse is unacceptable;
- Responding to disclosures and potential child protection concerns;
- Giving emotional support – the child or young person might need referral to a more specialist service or need additional support to complete coursework, exams etc.;
- Facilitating a peer support network - children and young people can become isolated but often welcome talking to friends about their problems;

- Offering practical support - if children or young people are new to the School, they may not yet have a uniform, they may also need financial help with extra-curricular activities, or they may be unfamiliar with the syllabus, the area, where to hang out, etc.;
- Providing somewhere safe and quiet to do their homework or just to sit and think;
- Improving the self-esteem and confidence of children and young people by:
- offering them opportunities to take on new roles and responsibilities;
- offering tasks which are achievable and giving praise and encouragement;
- monitoring their behaviour and setting clear limits;
- criticising the action, not the person;
- helping them to feel a sense of control in their school lives;
- involving them in decision making;
- helping them to be more assertive; - respecting them as individuals;
- encouraging involvement in extra-curricular activities.

Source: Home - Women's Aid (womensaid.org.uk)
Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

2.11 Homelessness
Being homeless, or at risk of homelessness, presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness, they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

2.12 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. 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.
Where children have suffered abuse and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.
If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL or a deputy.
The DfE has published advice and guidance on *Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools*. In addition, Public Health England has produced a range of resources to support secondary schools in their promotion of positive health, wellbeing and resilience among young people, including its guidance *Promoting Children and Young People's Emotional Health and Wellbeing*. Its resources include social media, forming positive relationships, smoking and alcohol.

2.13 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 National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (June 2021).*

2.14 Child on Child Abuse

Children can abuse other children.
This is generally referred to as child-on-child abuse and can take many forms. This can include (but is not limited to):

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- sexual violence and sexual harassment;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexting, to include consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as youth-produced sexual imagery)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- initiating/hazing type violence and rituals
- upskirting.

The School acknowledges that even if there have been no reported cases of child-on-child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child-on-child abuse and can recognise the indicators and signs of child-on-child abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The risks to disabled children may be increased by their need for practical assistance and physical dependency including intimate care which may be delivered by a number of different carers, by possible communication difficulties and lack of access to strategies to keep themselves safe or by the increased risk that they may be socially isolated.

Staff who work with children in any capacity must be particularly aware of and sensitive to how the effects of abuse or harm may present and be able to pick up on any changes in behaviour or presentation that might indicate a concern. Concerns should be shared immediately with the DSL.

All staff working with children with special educational needs or disabilities will receive appropriate training to enable them to meet the needs of these children appropriately and to recognise and report any concerns. The School will consider extra pastoral support for these children such as regular meetings with pastoral leads such as Heads of Year in the Senior School. Junior School and Pre-Prep pupils have contact with or may take part in targeted interventions with a Pastoral Lead. This may be through designated 'Time to Talk' slots or through an

intervention such as Lego Therapy or mentoring from older pupils. Pastoral staff have times of the day available for meeting with children who may need support on a one-off basis or to provide support to families. We also encourage the use of a mentor for some pupils. Time is set on a regular basis for the child to meet with the mentor to talk and discuss any behaviour, emotional or social issues. Many of the children who access this support are on the Learning Support register or feature on a Watch List.

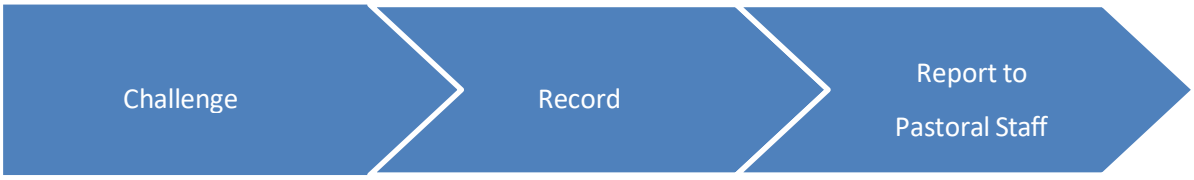
The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

Sexual violence and sexual harassment

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Staff MUST:



Sexual Violence

It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to harmful sexual behaviours and sexual offences under the Sexual Offences Act 2003 such as rape, assault by penetration and sexual assault.

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.
What is consent? Consent is about having the freedom and capacity to choose.

Sexual Harassment

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

Sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;

- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (in some cases this may be deemed to cross a line into sexual violence) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment, which may include:
- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and sexual exploitation; coercion and threats
- sharing AI generated imagery of nudes/semi-nudes

Behaviour Between Pupils (copied from Pupil 'Rights and Responsibilities')
Pupils should be mindful that at all times a certain formality of behaviour is required at School, and on the way to and from School. Behaviour should always be appropriate to the circumstances, and pupils must be sensitive to other individuals and to the wider community. Violent or aggressive behaviour towards others is never acceptable. Behaviour should never be exclusive or cause embarrassment to other pupils, staff or visitors to the School; for example, pupils should not indulge in overt displays of affection.
Formal moments in the school day include, but are not limited to: registration, assemblies and lessons; lesson change-overs; lunch or bus queues; lunch.
A Code of Conduct applies to all residential trips and off-site activities. It is sent to parents with trip information and used to form the basis of a group briefing in advance of any such visit.

Bullying
The School does not tolerate bullying, harassment and victimisation. See the separate Anti-Bullying Policy for further information. We expect civilised, sensible and tolerant behaviour towards other members of the school community at all times, in person and when using social networking and other internet or messaging sites. Pupils must not use electronic media unkindly or maliciously, or bring themselves, their family or the school into disrepute.

Specifically, Keeping Children Safe in Education (KCSIE) requires School Rules and Behaviour policies to be clear regarding child on child sexual violence and sexual harassment. The start point regarding any report of this nature will always be that sexual violence and sexual harassment are not acceptable and will not be tolerated at King Edward's School. Teachers and pupils will not pass off such behaviours as "banter", "part of growing up", or "having a laugh". Staff are aware of the importance of not tolerating or dismissing such issues, and are expected to challenge behaviours such as grabbing, groping and excessive physicality. Child on child abuse can take many forms and can occur in real life as well as online. The School works to UKCIS guidance when incidents of Youth Produced Sexual Imagery arise – see policy for more details.
Safeguarding principles apply, which means that schools can be required to pass on such incidents to local safeguarding agencies and possibly even the police.

The Response to a Report of Sexual Violence or Sexual Harassment
The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a child or a child makes a report to them, they should follow the School's child protection and safeguarding referral process.

As is always the case, if staff are in any doubt as to what to do, they should speak to the designated safeguarding lead (or a deputy).

If a pupil makes a disclosure of child on child abuse, colleagues must follow the procedures detailed in the Child on

Child Abuse Policy which details how the school will minimise the risk of child on child abuse; how allegations of child on child abuse will be recorded, investigated and dealt with, and outlines how victims, perpetrators and any other child affected by child on child abuse will be supported.