City of London School Safeguarding and Child Protection Policy

Safeguarding contact information

City of London School: safeguarding contact sheet	
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City and Hackney Safeguarding Children Partnership (CHSCP)	City of London: 020 7332 3621 Hackney: 020 8356 5500 **CHSCP Independent Child Safeguarding Commissioner**: Jim Gamble, JimGamble_LSCP@ineqe.com
City of London Children & Families Team (Social Care)	Dccsdutyf&ypteam@cityoflondon.gov.uk 020 7332 3621 / 020 8356 2710 (out of hours emergencies)
DfE Counter-extremism hotline	counter-extremism@education.gsi.gov.uk 020 7340 7264

Statement

At City of London School ('the School') we are committed to safeguarding and promoting the welfare of children and young people and expect all Staff, Governors and Volunteers to share this commitment. Safeguarding and child protection are at the forefront of all that we do and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart (KCSiE 2026).

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

At City of London School pupils are taught about safeguarding, including online, through various teaching and learning opportunities as part of providing a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it.

Definition

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment;
- preventing 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; and
- taking action to enable all children to have the best outcomes.

Review of Policy

This policy will be reviewed annually (or more regularly where required) prior to approval by the Board of Governors.

Policy last reviewed by:	Alice Martineau (DSL and Deputy Head (Pastoral))
Date last reviewed:	September 2026 (substantive changes as shown, in line with KCSiE 2026, including September 2026 updates)
Approved on behalf of Governors by:	Board of Governors
Date last approved:	8 October 2025
Date for next review:	October 2026

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1. Introduction

1.1 This policy has been prepared in accordance with the requirements of:

1.1.1 relevant legislation, including the Children Act 2004, the Education Act 2002, and the Education (Independent School Standards) (England) Regulations 2014;

1.1.2 relevant guidance issued by HM Government, including "Keeping Children Safe In Education", September 2026. All Staff are issued with the guidance of this document, which includes Part 1 of the guidance notes.). All staff, including those who do not work directly with children, are required to read in full and understand Part one of KCSIE 2026. The DfE's Part one overview for all staff may be used as a complementary quick-reference document, but it does not replace Part one.

1.1.3 Other departmental advice, statutory and non-statutory guidance taken into consideration when formulating this policy include:

- *Home Office Statutory Guidance: "Prevent guidance for England and Wales"*, March 2024
- *Government briefing: "How social media is used to encourage travel to Syria and Iraq: briefing note for schools"*, July 2015
- *Department for Education Statutory Guidance: "Working Together to Safeguard Children"*, March 2026
- *Government, Advice for Practitioners: "What to do if You are Worried a Child is Being Abused"*, March 2015
- *Department for Education Statutory Guidance: "Disqualification under the Child Care Act 2006"*, August 2018
- *Department for Education, Non-Statutory Guidance: "Sexual Violence and Sexual Harassment (SVSH) between Children in Schools and Colleges",* July 2021 (now incorporated within KCSIE 2026)
- *Ofsted: "Review of sexual abuse in schools and college"*, June 2021
- *Charity Commission guidance: "Safeguarding and protecting people for charities and trustees" ,* June 2022
- *Department for Education and Department of Health and Social Care Statutory Guidance: "SEND Code of practice"*, September 2024
- *Department for Education Non-Statutory Guidance: "Mental health and behaviour in schools"*, November 2018
- *Department for Education Non-Statutory Guidance: "Preventing Bullying", July 2017*

- *Department for Education Non-Statutory Guidance: "Information sharing: advice for practitioners providing safeguarding services", May 2024*

- *Department for Education Non-Statutory* Guidance: "Restrictive interventions, including use of reasonable force, in schools", April 2026. (*page 14 of this guidance is statutory).*

- *"London Child Protection Procedures"*, March 2025

- *Government Statutory Guidance: "Channel Duty Guidance"*, 2025

- *Department for Education Statutory Guidance: "Children Missing Education Statutory Guidance",* September 2025

- *Department for Education Statutory Guidance: "Working together to improve school attendance",* July 2026

- *Department for Education Statutory Guidance:* "*Relationships and Sex Education (RSE) and health education*", July 2025

1.1.4 other relevant standards and guidance, including guidance issued by the Independent Schools Inspectorate *"Handbook for the Inspection of Schools, The Regulatory Requirements"*, December 2024.

1.1.5 relevant Local Safeguarding Children Partnerships (LSCP) Procedures, the City of London Prevent Strategy and the City of London Prevent Information Sharing Agreement. The Designated Safeguarding Lead (DSL) and the five Deputy Designated Safeguarding Leads (DDSLs) regularly attend meetings of the City and Hackney Safeguarding Children Partnership (CHSCP).

1.2 Under the Equality Act 2010, schools and colleges:

1.2.1 Must not unlawfully discriminate against pupils because of their protected characteristics;

1.2.2 Must consider how they are supporting pupils with protected characteristics;

1.2.3 Are allowed under certain provisions to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils with certain protected characteristics in order to meet their specific need; and

1.2.4 Are under a duty to make reasonable adjustments for disabled pupils.

1.3 Being subject to harassment, violence or abuse, including that of a sexual nature, may also breach children's rights.

1.4 This policy has been prepared in consultation with the Community and Children's Services Department at the City of London. (See the Cover Sheet of the Safeguarding and Child

Protection Policy for contact details, which may be updated from time-to-time as necessary to reflect changes in personnel.)

1.5 This policy has also been prepared in consultation with members of School staff who have had an opportunity to contribute to the formulation of the School's safeguarding arrangements and who have reviewed and commented on this policy.

1.6 The Governing Body takes seriously its responsibility to safeguard and promote the welfare of children and to work together with other agencies to ensure adequate arrangements within the School to identify, assess, and support those children where there are concerns about a child's safety and welfare.

1.7 We recognise that all adults, including Staff, Volunteers and Governors, have a full and active part to play in protecting pupils from harm, and that the child's welfare is our paramount concern. Staff should at all times consider what is in the best interests of the child. Wherever the word "Staff" is used, it covers ALL staff on site, including support staff, temporary staff, volunteers, supply staff, trainee teachers, contractors' employees working regularly on the School's premises, and volunteers working with children. Wherever the term "School Staff" is used, it covers ALL staff directly employed by the City of London Corporation. Further information on contractor employees is given in paragraph 2.1.21.

1.8 Staff are required to report any concerns about the safety or welfare of a pupil, about the conduct of an adult working in the School or about safeguarding practices in the School in accordance with this policy. Parents are also encouraged to report any concerns directly with the School, if necessary, using this policy for concerns about the safety and/or welfare of children. Parents may raise concerns directly with the DfE if they wish.

1.9 The School, through its Governors and Staff, is committed to providing a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

1.10 The aims of this policy are:

1.10.1 To support each child's development in ways that will foster awareness, understanding, security, confidence, resilience and independence.

1.10.2 To provide an environment in which all children and young people feel safe, secure, valued and respected, and feel confident to approach adults if they are in difficulties, believing they will be effectively listened to.

1.10.3 To recognise that no child or group of children must be treated any less favourably than others in being able to access services which meet their particular needs.

1.10.4 To recognise that all children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs.

1.10.5 To raise the awareness of all Staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases, or

suspected cases, of abuse including radicalisation, child sexual exploitation and female genital mutilation and child on child abuse. N.B. although the usual procedure is for staff who have safeguarding concerns to alert the DSL or a DDSL of them, it is the responsibility of all staff to report any suspicions they have, bypassing the DSL / DDSL if necessary and going straight to the Designated Officer (DO). Staff should only approach the DO where there is an allegation against an adult who works with children. Other matters, for example where a child is subject to abuse or suspected abuse at home, should be referred to MASH, unless you have specific instruction otherwise: Dccsdutyf&ypteam@cityoflondon.gov.uk 020 7332 3621 / 020 8356 2710 (out of hours emergencies).

1.10.6 To promote a culture of 'it could happen here' and to support staff who act as whistle-blowers in raising concerns about poor or unsafe practice and potential failures in the School safeguarding regime.

1.10.7 To provide a systematic means of monitoring children known or thought to be at risk of harm, including the risk of being drawn into terrorism and extremism, child sexual exploitation or female genital mutilation, and ensure we, the School, contribute to assessments of need and support packages for those children.

1.10.8 To emphasise the need for good levels of communication between all members of Staff.

1.10.9 To develop a structured procedure within the School, which will be followed by all members of the School community in cases of alleged or suspected neglect, abuse and/or any other child welfare concern.

1.10.10 To develop and promote effective working relationships with other agencies, especially the Police, the City and Hackney Safeguarding Children Partnership, Community and Children's Services, and the relevant Prevent Coordinators within Community Safety Partnerships.

1.10.11 To ensure that all adults within the School who have the opportunity to have contact with children have had Disclosure and Barring Service (DBS) checks in accordance with the safeguarding requirements in this Policy and as required by law.

1.10.12 To ensure that all visiting speakers to the school have been appropriately vetted and are supervised in accordance with the Prevent duty to protect children from radicalisation by being drawn into terrorism and extremism.

1.10.13 To ensure that all concerns, discussions, decisions and the reasons for those decisions are recorded in writing, Annexure 6 sets out steps to be taken by staff when responding to a pupil disclosure.

1.11 This policy and its annexures are reviewed annually by Governors and are kept under constant review by the School. Should any deficiencies or weaknesses in child protection arrangements become apparent, the arrangements will be remedied without delay.

1.12 We recognise that a multi-agency safeguarding model (which includes child death review partner arrangements) is in place under the *"Working Together to Safeguard Children"* (March 2026) guidance. LSCBs, set up by local authorities, have been replaced. Three safeguarding partners (local authorities, Integrated Care Boards (previously known as clinical commissioning groups) and chief officers of police in a local area) have made safeguarding arrangements to work together with relevant agencies (as they consider appropriate) to safeguard and protect the welfare of children in the area. All professionals and volunteers within safeguarding partner and relevant agencies are members of the City & Hackney Safeguarding Children Partnership.

1.13 Documentation from the NPCC (National Police Chiefs' Council) gives guidance as to when to call the Police: see NPCC – When to Call the Police.

2. Procedures

2.1 Our School procedures for safeguarding children have been prepared in accordance with relevant legislation, guidance and Pan London Child Protection Procedures: Dccsdutyf&ypteam@cityoflondon.gov.uk. Contact details are set out on the cover page of the Safeguarding and Child Protection Policy. We will ensure that:

2.1.1 Arrangements are in place at the School to deal with cases and allegations of abuse, or suspected abuse, including female genital mutilation, child sexual exploitation, radicalisation or child on child abuse, which will be referred to the LSCP. The Local Authority Designated Officer or team of officers (hereafter known as the LADO) will preside over any investigation of any allegation or suspicion of abuse directed at any adult working at the School. The School will engage with the police, other statutory agencies and professionals, as necessary, to provide inter-agency support to the child concerned.

2.1.2 If a member of Staff discovers (either through disclosure by the victim or visual evidence) that female genital mutilation appears to have been carried out on a girl under 18, the teacher **must** report this information to the police and will inform the DSL or DDSL.

2.1.3 The School assesses regularly and reviews the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding, shared with strategic partners, of the risk on the local area. Appropriate referrals will be made in accordance with the School's LCSP CHSCP referral procedures. The School will consider whether it is appropriate to make a Prevent referral (in accordance with the Prevent Duty guidance for England and Wales, 2023) or a referral to the Channel Programme, (in accordance with Channel Guidance, 2023).

2.1.4 The School is aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime. These may include: increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal network or gangs and may be at risk of criminal exploitation.

2.1.5 The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act came into force 12 April 2019. The School is aware that upskirting is a criminal offence. Upskirting typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.

2.1.6 The School recognises that as well as needing to safeguard children who are at risk of harm, it needs to give support and advice to children who require it, working with other agencies as necessary. The School is fully committed to making referrals under CAF (Common Assessment Framework), or MASH (multi-agency safeguarding hub) procedures when appropriate and to working with other agencies as part of the Team Around the Child (TAC) and Channel panels.

2.1.7 All members of the Governing Body understand the need for and fulfil their responsibilities under this Policy and are provided with a copy of this Policy and a copy of *"Keeping Children Safe in Education",* September 2026, including Annex B, upon their appointment to the Governing Body. There is one nominated Governor who is responsible for child protection and who has skills commensurate for this role and their details are set out on the Cover Page of the Safeguarding and Child Protection Policy. It is important for governors to recognise the importance of information sharing between practitioners and local agencies. The City of London Corporation will undertake to ensure that relevant training is provided for Governors in addition to that provided for Governors by the School. In line with KCSiE 2026, the School will ensure that all governors and trustees receive appropriate safeguarding and child protection (including online safety) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training is regularly updated.

2.1.8 The School has a designated senior member of staff, our DSL, who has undertaken relevant child protection training delivered through the LSCP representative and this training is updated at least every two years. Details of the DSL are set out on the Cover Page of the Safeguarding and Child Protection Policy.

2.1.9 There will be five additional members of School Staff (DDSLs) who will act in place of the DSL when absent and must receive relevant child protection training and this training is updated at least every two years. The DSL is also the Prevent lead and has received suitable Prevent awareness training. Other members of the pastoral team will also receive appropriate child protection training. Details of the DDSLs are set out at the beginning of this document. Each DDSL has a specific area of responsibility and there is a clear hierarchy of responsibility which is published to all staff.

2.1.10 Robust cover arrangements must be in place to ensure that for periods where the DSL is not available, due to sickness, leave or other circumstances, there is a Deputy who is aware.

2.1.11 All Staff are provided with relevant Child Protection Awareness information and Child Protection in-service training in accordance with the LSCP at least once a year to develop their understanding of the signs and indicators of abuse, neglect or exploitation, along with individual responsibilities to respond to any child welfare concerns in accordance with the School's child protection procedures. As part of this, all Staff must read and understand Part 1 in full and Annex B of the "*Keeping Children Safe in Education*" (September 2026) guidance documentation by completing the online iHasco safeguarding module. In particular, all Staff understand the need to avoid asking leading questions of children when a child protection matter is brought to the Staff member's attention. The School must consider refraining from undertaking a full investigation without first consulting the LADO, or the City of London Children & Families Team (Social Care) or in the most serious cases, the police, so as not to jeopardise statutory investigations. The mechanisms in place for ensuring that staff understand Part 1 and Annex B of "*Keeping Children Safe in Education"* are Teachmeet discussions, regular briefings / updates at staff meetings, a published set of FAQs, an 'open door policy' with regard to discussion, advice and guidance from the DSL, DDSLs and pastoral team and continued training provided at least annually. These mechanisms will ensure that Staff are provided with the relevant skills and knowledge to safeguard children effectively.

2.1.12 As part of their induction into the School, all new members of Staff will be provided with a copy of our Safeguarding and Child Protection policy and its annexes (including Staff Safeguarding Code of Conduct), the City of London Corporation Staff Code of Conduct and Whistleblowing procedures, and the Department for Education procedures, *"What to do if You're Worried a Child is Being Abused"* (2015), as well as a copy of Part One and Annex B of *"Keeping Children Safe in Education"* (September 2026) with the DSL and DDSL names clearly displayed. All staff are trained in online safety, which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction and will be provided with a copy of the Digital Safety Policy. Staff will also be provided with the pupil behaviour policy and the attendance and registration policy (which include information

about children missing in or absent from education). The expectation for all staff is that the above documents are read and understood. Signed acknowledgement of this is returned to the DSL and recorded with HR on the single central register via the online training module.

2.1.13 The School will review the filtering and monitoring standards set out by the Department of Education and will ensure that the IT department and service providers are aware of those standards and what is required to meet those standards. The School will also seek to meet the cyber security standards for schools and colleges that are set out by the Department for Education. The governing body will keep these standards, and the School's compliance with them, under regular review.

2.1.14 When children attend educational activities offsite, the School strives to ensure their safety by making sure that School staff supervise them and that assurances are sought that staff of other organisations have been checked for suitability. Further details are in the Educational Visits Policy and its annexes.

2.1.15 All members of Staff and Governors are advised on how to respond to 'Disclosures of Abuse' through relevant child protection awareness training. In particular, training will ensure that they understand the need to: consider measures that may be necessary to protect individual pupils; avoid asking leading questions of pupils; avoid giving inappropriate guarantees of confidentiality; make and keep written records (in accordance with the instructions in Annexure 6); and report the matter to the DSL or a DDSL. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. Staff should speak to the DSL if they have concerns about a child. The DSL will report matters to the LADO and to the Head. Where there is a conflict of interest in reporting the matter to the Head, this should be reported directly to the LADO. In the event of a concern about the Head, the Chair of Governors should be informed. All staff and governors are explicitly trained in the importance of ensuring that victims are taken seriously when disclosures are made. All staff should be able to reassure victims 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 abuse, neglect, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain to children that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

2.1.16 All staff are also made aware that, while the normal referral route is through the DSL, they have a duty to report concerns directly to the LADO or the City of London Children & Families Team (Social Care) if they feel

that the School has made an inadequate response to their concerns. All staff are made aware that anyone may make a referral.

2.1.17 Staff are made aware of the difference between a **concern** about a child (**Section 17 Children Act 1989 – child in need**) and a child **in immediate danger or at risk from significant harm (Section 47 – child protection)**. In the former, staff should discuss their concern with the DSL although they may make a direct referral to Children's Social care. They must inform the DSL as soon as possible that a referral has been made. In the case of a child being in immediate danger or at risk from significant harm, a member of staff should make a referral to Children's Social Care immediately (within 24 hours). The Police may also be informed if it is deemed necessary. The member of staff must inform the DSL that a referral has been made as soon as possible. For further information, see Annexure 7.

2.1.18 Staff are made aware that if they have a concern they should act on it without delay. Wherever possible there should be a conversation with the DSL or a DDSL, who will help and support staff in deciding next steps. If the DSL or DDSLs are unavailable, this should not delay action being taken, and staff should seek support from Senior Management or the Head. Any action then taken should be shared with the DSL or DDSLs as soon as it is practically possible.

2.1.19 All staff are aware that concerns must be recorded on CPOMS in a timely manner. This does not replace a conversation with the DSL or a DDSL but serves as a tracking and monitoring of safeguarding concerns.

2.1.20 Safer recruitment practices are always followed through a rigorous recruitment process and procedures for Staff. The School carries out an online search on shortlisted candidates as part of our due diligence during the shortlisting process. We will inform shortlisted candidates that online searches may be completed on them as part of this process. Our selection and recruitment of Staff includes appropriate criminal record checks, provided by the Disclosure and Barring Service (DBS) for their suitability for work and the receipt of barred list checks for new staff, and checks of the Prohibited List. All Staff who have the opportunity to come into contact with pupils, including contracted support staff such as cleaners and caterers, and any volunteers (if they work with children regularly i.e. more than three days within a 30 day period) will be required to have a criminal records' check – at the appropriate level - on appointment and then at appropriate junctures thereafter. These checks will also be carried out on existing Staff with a break in service of more than three months where required; where Staff have, since their initial appointment to a position not requiring a Disclosure, moved to work that involves significantly greater responsibility for children or there are concerns about an individual's suitability to work with children.

2.1.21 Criminal record checks for Governors will be undertaken in accordance with regulatory requirements. There will always be a member of staff who has completed Safer Recruitment Training who will conduct an

interview during the course of recruitment. There is a separate Safer Recruitment Policy and a separate City of London Corporation policy on Recruitment that provides further details.

2.1.22 Where we have grounds for believing that a member of Staff or volunteer has caused harm, poses a future risk of harm to children or may be unsuitable to work with children, this is notified to the appropriate bodies including the LADO and the DBS. In some cases, a referral may be made to both the DBS and the Teaching Regulation Agency (TRA), where a teacher has been dismissed for misconduct or would have been dismissed had they not resigned first, the reasons for such an order being unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.

2.1.23 The School must consider whether a referral of the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002. Where the School (or an agency) dismisses or ceases to use the services of a teacher because of serious misconduct (or might have dismissed or ceased to use their services had they not resigned) they must consider whether to refer the case to the TRA.

The School will, as soon as possible and ordinarily on conclusion of an investigation, report to the DBS anyone who is removed from regulated activity; this could include when an individual is suspended, redeployed to work that is not a regulated activity; dismissed or when they have resigned.

When an allegation is made, an investigation should be carried out to gather enough evidence to establish if it has foundation, and the School must ensure that it has sufficient information to meet the DBS referral duty criteria. The School understands that there is a legal duty and a failure to refer when criteria are met is a criminal offence.

Where there have been concerns about a member of staff which have not reached the threshold for referral to the DBS, the School will still refer them to the TRA, following the advice in "*Teacher Misconduct: the prohibition of teachers",* February 2022.

2.1.24 All parents/carers are made aware of the responsibilities of Staff with regard to child protection procedures through publication of the School's Safeguarding and Child Protection Policy on the School website, and reference to it in our induction pack. The Policy is also available upon request to the School. Summaries of safeguarding procedures are posted in classrooms for the information of pupils. In addition, all visitors are asked to read a summary of the Safeguarding and Child Protection Policy, in Reception, upon arrival.

2.1.25 Where a contractor's employees visit the School premises irregularly, and are therefore not subject to the same requirements as contractors' employees working regularly on site (as set out otherwise in this Policy), relevant written assurances are obtained from the contractor that all

staff have had a criminal records check within the past three years. Information regarding these checks will be provided by the contractor to the School upon request. Contracts require on-going monitoring and audit of the eligibility of those employees to work with children and any subsequent concerns arising that would affect their continued eligibility must be disclosed immediately to the City of London Corporation. Any allegation of abuse will be dealt with in accordance with the Pan London Child Protection Procedures.

2.1.26 Written assurance is obtained that any staff employed by another organisation and working with the School's pupils on another site have had a criminal records' check within the past three years.

2.1.27 The School sometimes rents out our premises to external organisations or individuals. Our lettings policy will seek to ensure the suitability of adults working with children on School sites at any time. Where services or activities at the School are provided under the direct supervision or management of the School, this policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the School, we will seek assurances that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with us on these matters where appropriate. We will ensure that these safeguarding requirements are contained in the lettings 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. Where School premises are used by outside bodies who are not working with children, there will be sufficient safeguards in place to protect the health, safety and welfare of pupils and to have due regard to the Prevent duty to avoid school facilities being used as a platform for extremism. Measures will also be in place to protect against the interruption of pupils' education by third party users of the School's premises.

2.1.28 We are aware that we have an important role to play in multi-agency safeguarding arrangements. We should seek to work with social care, the police, health services and other relevant services to promote the welfare of children and protect them from harm.

2.1.29 The School is in the unique position of being located in the City of London in which very few pupils reside. Pupils live in boroughs through London and the South East. We engage with a variety of different agencies, including police, LSCPs and health services, with different protocols and thresholds. We are aware of our responsibility, particularly the DSL and DDSLs, to have knowledge of and to take into account the varying procedures, practices and thresholds of the different agencies.

2.1.30 All community users are made aware of the School's Safeguarding and Child Protection Policy and those working with children understand the School's child protection guidelines and procedures. If the School

receives an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children, the School will follow this policy.

2.1.31 Where appropriate, senior pupils given positions of responsibility over other pupils will be briefed on appropriate action to take should they receive any allegations of abuse.

2.1.32 All visiting speakers are suitably vetted by a member of staff prior to their visit and are supervised by a member of staff during their time at school. Further details are set out in Annexure 5.

2.1.33 Annexure 3 to this document deals with the specific issues of Child Sexual Exploitation, Female Genital Mutilation, Forced Marriage, Child Criminal Exploitation, Domestic Abuse, Homelessness and Honour Based Violence. The School recognises and understands that these are all forms of abuse covered by this policy and would trigger the School's referral procedures.

2.2 Our procedures will be reviewed annually by the Board of Governors. The review will also include a review of the efficiency with which the related duties have been discharged, or deficiencies (if any) have been rectified.

2.3 The names of the DSL and DDSLs will be clearly advertised in the School, with a statement explaining the School's role in referring and monitoring cases of suspected abuse and/or risk to a child.

2.4 The current contact details of all those involved in child protection are listed on the cover page of the Safeguarding and Child Protection Policy. Staff must sign to say they have read these documents. This applies to current staff as well when documentation is updated.

2.5 A single central record is held detailing all staff (and Volunteers) employed by the School and the relevant safeguarding checks undertaken.

3. Responsibilities

3.1 The DSL has lead responsibility for safeguarding and child protection. The DSL's responsibilities have been amended to reflect those set out in Annex C to "*Keeping Children Safe In Education"*, September 2026. A copy of these responsibilities is set out in Annexure 7.

3.2 Broadly the DSL's responsibilities encompass:

3.2.1 managing referrals;

3.2.2 working with other parties internally and externally on all matters relating to child protection;

3.2.3 training;

3.2.4 raising awareness;

3.2.5 ensuring that the child protection files are kept up to date and transferred of the child protection file (where necessary);

3.2.6 being available to discuss child protection concerns and providing support to staff;

3.2.7 understanding the views of children;

3.2.8 being aware and having the details of pupils who have a social worker;

3.2.9 helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school leadership staff; and

oversight of the School's online safety arrangements, including understanding the filtering and monitoring systems in place.

4. Supporting Children

4.1 We recognise that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

4.2 We recognise that behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing or being persistently absent from education and sharing nudes or semi-nude images (also known as youth produced sexual imagery) may put children at risk of significant harm.

4.3 We recognise that 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, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

4.4 We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and may find it difficult to develop and maintain a sense of self-worth.

4.5 We recognise that the School may provide the only stability in the lives of children who have been abused or who are at risk of harm.

4.6 We recognise that it is important for children to receive the right help at the right time to address risks and prevent issues escalating. We understand the importance of acting on and referring the early signs of abuse, neglect and exploitation, listening to the child, the need for clear records and of reassessing concerns when situations do not improve, sharing information quickly and challenging inaction. Further details are set out in section 16 below.

4.7 We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

4.8 We understand that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These barriers might include:

4.8.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;

4.8.2 the disproportionate impact on children with SEN and disabilities of bullying or abuse often without them outwardly showing any signs or potentially not being aware that what is happening to them might be abusive;

4.8.3 more dependence or needs that require one-on-one care or intimate care, and

4.8.4 challenges with communication.

4.9 We recognise that safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside the school. We recognise that we must consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding and means that assessments of children by all staff should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

4.10 The School will support all pupils by:

4.10.1 Encouraging self-esteem and self-assertiveness, through the curriculum as well as in our relationships, whilst attempting to counteract aggression and bullying.

4.10.2 Teaching about safeguarding, online safety and relationships and sex education through the curriculum and through PSHEE education. Refer to PSHEE Policy.

4.10.3 Promoting a caring, safe and positive environment within the school.

4.10.4 Liaising and working together with all other support services and those agencies involved in the safeguarding and social care of children.

4.10.5 Notifying the child's Local Authority as soon as there is a cause for significant concern.

4.10.6 Where appropriate, checking any concerns which do not appear to meet the threshold on an anonymous basis with the child's Local Authority and following their guidance and recommendations.

4.10.7 Providing continued support to school-leavers identified as potentially at risk of abuse, by ensuring that appropriate information is forwarded under confidential cover to the pupil's new school and ensuring relevant medical records are forwarded as a matter of priority.

4.11 Working with the Local Authority (or the Police as appropriate) where a child may have suffered significant harm, or there may be a criminal prosecution, to consider what support the child or children involved may need.

4.12 We realise there is a difference between children who have suffered or are likely to suffer harm or are at risk of radicalisation who will require immediate action, and those whose needs fall below the threshold for immediate intervention but who nonetheless require additional support from one or more agencies. The former will be reported to City of London Children and Families Team (children's social care) immediately. The latter will be supported by inter-agency assessment using CAF, TAC approaches, and, in the case of children in the early stages of being drawn into extremism, Channel panel referrals.

4.13 We recognise that looked after children or those who have recently left care through adoption, special guardianship or child arrangement orders require particular support and care. All staff should understand how to keep a looked after child safe. The Head will appoint an appropriately trained teacher to ensure that that educational achievement of looked after children or those who have recently left care is promoted.

4.14 We recognise that children with a parents or parents in prison are at risk of poor outcomes, including poverty, stigma, isolation and poor mental health. The Head will appoint an appropriately trained teacher to ensure that educational achievement of such children is promoted. If and when such a circumstance occurs, the name of this member of staff will be listed on the front of this policy.

4.15 We recognise that where children have suffered abuse, neglect or exploitation, or other potentially traumatic adverse childhood experiences, they can display a very wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. These experiences can have a lasting impact throughout childhood, adolescence and into adulthood. All staff must understand that these children's experiences can impact on their mental health, behaviour and education. Young people may need a social worker due to safeguarding or welfare needs. Young people on CIN or CP plans will have an allocated social worker. The school recognises that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Local authorities should share the fact that a young person has a social worker, and the DSL will use this information to ensure that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. The allocation of a social worker to a young person should inform decisions about safeguarding, for example responding to unauthorised absence or missing education or if there are known safeguarding risks, and about promoting welfare, for example allocating pastoral and/or academic support.

4.16 All staff understand that mental health issues can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

4.17 We recognise that mental health issues can develop into safeguarding concerns. This can include self-harm, suicidal ideation or risk of suicide. It is important that all staff recognise that only appropriately trained professionals should attempt to make a diagnosis of a mental health issue. All staff, however, are well placed to observe young people day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health issue or be at risk of developing one. If staff have a mental health concern which could include self-harm, suicidal ideation or risk of suicide) about a young person which is also a safeguarding concern, immediate action should be taken. Staff should report to the DSL or DDSL following the procedures laid out in this policy. If staff have a mental health concern about a young person which is not necessarily or conspicuously a

safeguarding concern, they should report their concerns to the Head of Year, Head of Section, DSL, Pastoral or Wellbeing Advisor or School Counsellor without delay.

5. Confidentiality and Information Sharing

5.1 We recognise that all matters relating to child protection are confidential subject to overriding legal obligations to disclose information to ensure the safety and well-being of a child. Every effort will be made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Data Protection Act 2018 and UK General Data Protection Regulation do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. This includes allowing practitioners to share information without consent. Pupils' personal data should not be provided in response to a subject access request where the 'serious harm' test under data protection is met. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children. Governors should ensure that relevant staff have an understanding that safeguarding of children and individuals at risk is a processing condition that allows, where appropriate, practitioners to share special category personal data without the need for consent.

5.2 The DSL is responsible for ensuring that child protection files are kept up to date. All safeguarding and child protection information is stored on CPOMS software. As this information is sensitive and personal it is categorised as 'special category personal data', and as such is accessible only to key safeguarding staff. However, CLS recognises that staff may share information should it be in the interests of safeguarding and supporting young people at risk. This includes allowing practitioners to share information without consent when there is good reason to do so and the sharing of that information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a young person at risk. A young person's personal data may be withheld where the serious harm test under the legislation is met.

5.3 The DfE has provided a Data Protection toolkit for Schools: see Data Protection: a toolkit for schools as well as providing advice on information sharing for practitioners providing safeguarding services.

5.4 The Head or DSL will disclose any information about a pupil to other members of Staff on a need-to-know basis only consistent with legal requirements, and in accordance with the Pan London Child Protection Procedures. The Head or DSL, LADO, Police, and Town Clerk (together with other relevant City Officers) will agree who needs to know about the matter, exactly what information can be shared, how to manage speculation, etc., and how to manage any press interest.

5.5 All Staff are made aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

5.6 All staff are aware that data protection obligations to process information fairly and lawfully and to retain information securely should not be a barrier to sharing information where failure to do so would result in a child being placed at risk of harm.

5.7 When a pupil leaves the School, it is the responsibility of the DSL to ensure that their Child Protection file is transferred to the new school as soon as possible, and within 5 days for

an in-year transfer or within the first 5 days of the start of a new term. The Child Protection file should be transferred separate from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

5.8 The DSL will consider if it would be appropriate to share any additional information with a pupil's new school in advance of them leaving. This will enable the new school to provide continuity of care in supporting victims of abuse and have appropriate support in place before the child's arrival at the new school.

5.9 Where there are significant issues or concerns, the DSL should have a direct conversation with the receiving school's DSL.

5.10 All Staff are made aware that they cannot promise a child to keep secrets that might compromise the child's safety or wellbeing.

5.11 We will always inform parents/carers of an allegation affecting their child as soon as possible (if they already do not know of it). However, where a Strategy Meeting is required, the DSL or Head will consult with the LADO (and other relevant agencies such as the Police) beforehand to agree what information can be disclosed to parents so as not to put the child at greater risk of harm, or impede a criminal investigation. Parents/carers will normally be kept informed about the progress of the case and told the outcome where there is no criminal prosecution, including the outcome of any disciplinary process, in confidence.

6. Dealing with Allegations of Abuse Against Staff (Including Support Staff, Supply Staff, Trainee Teachers, Contractors and Volunteers)

6.1 Procedures for dealing with allegations of abuse against Staff (including support staff, supply staff, trainee teachers, contractors and volunteers), are carried out in accordance with HM Government Guidance "*Keeping Children Safe in Education",* Part 4, September 2026, and the Pan London Child Protection Procedures 5th Edition: chapter 7. All Staff are made aware of this guidance, the School's procedures, and other local guidance relating to this issue. All relevant contact details are set out on the front page of this policy.

6.2 There are two levels of allegation/concern: 1) Allegations that may meet the harm threshold and 2) Low level concerns

6.2.1 An allegation that may meet the harm threshold may include, for example:

- a member of staff has behaved in a way that has harmed a child, or may have harmed a child;
- a member of staff has possibly committed a criminal offence against or related to a child
- a member of staff has behaved towards a child or children in such a way that indicates they may pose a risk of harm to children; and/or
- a member of staff has behaved in a way that indicates they may not be suitable to work with children (including behaviour outside of school).

Procedures for reporting allegations that may meet the harm threshold are set out in this section.

6.2.2 Allegations/concerns that do not meet the harm threshold are known as 'low-level concerns'. A low-level concern does not mean that it is insignificant. "A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

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

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating children." (KCSiE 2026)

6.2.4 Procedures for reporting a low-level concern (in addition to neutral notifications and microinequities) are explained in Annexure 4: Safeguarding Code of Conduct.

6.3 All School Staff should take care to ensure that professional boundaries are maintained so that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil (e.g. one-to-one tuition, engaging in inappropriate electronic communication with a pupil, etc.). It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

Staff are made aware that special care must be taken in any circumstances where a child works on a one-to-one basis with a child and in any situation in which it may be necessary for an adult to make physical contact with a child, such as in music instrumental lessons or in sports coaching. See the advice to staff contained in the annexures to this policy.

6.4 We understand that a pupil may make an allegation against any member of Staff.

6.5 Where concerns meet the harm threshold or allegations are made by a pupil against a member of staff, the member of staff with concerns or receiving the allegation must immediately inform the Head. The Head will inform the LADO and the Town Clerk within 24 hours of any allegation. The professional advice of the LADO will be of particular importance in these circumstances. The Head on all such occasions will also discuss the allegation with the Chair of Governors where appropriate. In the absence of the Head, the

allegation should be passed directly to the Chair of Governors. The School will not undertake its own investigation before receiving advice from the LADO (s), or in the most serious cases, the Police, so as not to jeopardise statutory investigations. An allegation made against a member of supply staff or trainee staff should be reported to the LADO; the employment agency or training partner should be informed and should be fully involved and cooperate with the LADO, Police and/or children's services as required; the School will lead on the case. In no circumstances should the School decide to cease to use a supply or trainee teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome (KCSiE, September 2026).

6.6 If an allegation is made against the Head, the person receiving the allegation will immediately inform the Chair of Governors who will consult as in 6.5 above, **without first notifying the Head**.

6.7 If an allegation is made against a person no longer employed as a member of staff, volunteer or Governor or is an historical allegation it should be referred to the LADO.

6.8 If an allegation is made against an individual or organisation relating to an incident that happened when an external individual or organisation was using the School's premises for the purposes of running activities for children, we will follow this Safeguarding and Child Protection Policy, including informing the LADO.

6.9 The purpose of the initial discussion (as per 6.5 and 6.6 above) is to consider the nature, content and context of the allegation or concern and to agree a course of action, including whether to obtain any additional relevant information. The Head or Chair of Governors should press for reconsideration as necessary. Where this initial sharing of information and evaluation leads to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, the decision and a justification for it will be recorded by both the Head/Chair of Governors and the LADO and agreement reached as to what information should be put in writing to the individual concerned and by whom. The Head/Chair of Governors and the LADO will then consider what action will follow in respect of the individual and those who made the initial allegation.

6.10 The publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation), will remain confidential. Any such information will only be released if the member of Staff is charged with an offence or if the DfE or TRA publish the information.

6.11 Any allegation will precipitate a strategy meeting convened by the LADO, which will involve the Head, representatives from the School and other relevant agencies, to decide on the most appropriate action. This is in accordance with the Pan London Child Protection Procedures.

6.12 Subject to the approval of the LADO or the Police, where a member of Staff is the subject of an allegation of abuse they will normally be informed of the concerns or allegations as soon as possible and given an explanation of the likely course of action. We will follow the City of London Corporation's Disciplinary Procedures when managing allegations against Staff, a copy of which is readily available in the School. Disciplinary action will be considered in conjunction with discussions at the Strategy Meeting.

6.13 We would not normally send a child home, pending such an investigation, unless this advice is given exceptionally as a result of a Strategy Meeting.

6.14 Suspension of the member of Staff against whom an allegation has been made needs careful consideration and will not be the default approach adopted. The decision to suspend will be based on information received at the strategy meeting (or based on discussion with the LADO and other agencies prior to that meeting), the information on potential risks to children and whether it compromises any criminal investigation. Based on the advice from the LADO and in consultation with the School's HR department, the School will consider alternatives to suspension (for example, redeployment) as an alternative to suspension if appropriate.

6.15 In the event of an allegation against the Head, the decision to suspend will be made by the Chair of Governors with advice as in 6.11 and 6.14 above.

6.16 The following definitions should be used when determining the outcome of allegation investigations:

- **substantiated** (there is sufficient evidence to prove the allegation);
- **unsubstantiated** (there is insufficient evidence to either prove or disprove the allegation. The term therefore does not imply guilt or innocence);
- **false** (there is sufficient evidence to disprove the allegation);
- **malicious** (there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive);
- **unfounded** (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

6.17 If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the School should consider whether the pupil who has made the allegation is in need of help or may have been abused by someone else and this was a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate.

6.18 Where a child is found to have made a malicious allegation against a member of staff, the Police should be asked to consider what action may be appropriate in these circumstances. If a report is shown to be deliberately invented or malicious, the School should consider whether any disciplinary action is appropriate against the individual who made it as per the School's own disciplinary and behaviour policies in place from time to time.

6.19 After every occasion on which a safeguarding issue involving a member of staff, the School will review its procedures in the light of lessons learnt from the case and will amend them as necessary.

6.20 If the facts of the incident are found to be substantiated but it is not found that a child has been harmed or there is a risk of harm, then consideration should be given to what a proportionate outcome is in the circumstances.

7. Dealing with Allegations of Abuse by one or more Pupil(s) Against another Pupil: Child-on-Child Abuse Policy

7.1 All staff should be able to reassure victims 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 abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused and/or recognise their experiences as harmful. (*KCSiE* 2026).

7.2 The Child-on-Child Abuse Policy recognises that the School takes a zero-tolerance approach when it comes to child-on-child abuse (including child-on-child sexual violence and harassment) and sets out how the School deals with allegations, as well as recognising and preventing child-on-child abuse in detail. The full Child-on-Child Abuse Policy can be found below in Annexure 1.

7.3 Allegations of abuse, including 'upskirting', or attempts to radicalise by one or more pupil against another pupil are taken very seriously.

7.4 We recognise that child-on-child abuse can take many different forms. These may include, but are not restricted tobullying and cyberbullying; abuse in intimate personal relationships between children (also known as teenage relationship abuse); physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm; sharing nudes or semi-nude images (also known as youth produced sexual imagery) (see UKCIS Guidance, Sharing nudes and semi-nudes: advice for education setting working with children and young people, 2024), harmful sexual behaviour, sexual violence and sexual harassment (such as sexual comments, remarks, jokes, and online sexual harassment, which may be stand alone or as part of a broader pattern of abuse); prejudice-based and discriminatory bullying, including racism, faith-targeted abuse and other prejudice-based incidents; upskirting; initiation / 'hazing' type violence and rituals. We recognise that some issues, such as initiation or 'hazing' may be more likely at the School as it is a boys' school. Staff and pupils are made aware through staff training, the PSHEE programme and the general moral framework and ethos of the School that abuse is abuse and must never be dismissed as 'banter' or 'just having a laugh' or 'part of growing up'.

7.5 We recognise that consent means 'freedom and capacity to choose'. Issues surrounding consent are covered in the PSHEE programme and school curriculum.

7.6 If such an allegation is made, the member of Staff receiving the allegation will immediately inform the Head and the DSL. The Head on all such occasions will discuss the content of the allegation with the Town Clerk, any other relevant City Officer, and the Chair of Governors where appropriate.

7.7 The LADO and the City of London Children and Families Team (children's social care) will also be promptly informed of any allegation.

7.8 An allegation of abuse will normally be referred to a Strategy Meeting convened by children's social care, involving representatives from the School and the Local Authority. A Strategy Meeting also covers any urgent formal strategy discussion that may take place between the police, social care and education managers prior to the first meeting.

7.9 The child experiencing alleged child-on-child abuse will be supported by the pastoral mechanisms within the school. This includes form tutors, heads of year, the Deputy Head Pastoral, School Nurse and School Counsellors.

7.10 We would not normally send a child who is experiencing the alleged abuse home, pending such an investigation, unless this advice is given exceptionally as a result of a Strategy Meeting or on the advice of the allocated or duty social worker, and subject to a risk assessment.

7.11 Suspension of the pupil, against whom an allegation has been made, needs careful consideration, and the Head will seek the advice from relevant agencies before deciding on the course of action to be taken, subject to a risk assessment.

7.12 A bullying incident (as in 11.2 below) will be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. In such cases, the matter will be reported to the DSL and to the City of London Children and Families Team (children's social care).

7.13 We are committed to engaging with specialist support for pupils involved as either experiencing abuse or engaging in abuse, even in cases where the Police choose to take no further action.

7.14 If there is a disclosure about child-on-child abuse, all children involved, whether abusing or experiencing abuse will be treated as being 'at risk'. We acknowledge that when a child abuses another child they may have themselves experienced abuse and require support themselves.

7.15 The School has a Behaviour Policy, a Child-on-Child Abuse Policy (see Annexure 1), an Anti-Bullying Policy and a School Standards, Rules and Regulations document. All pupils are required to read and sign that they have read the School Standards, Rules and Regulations.

8. Supporting Staff

8.1 We recognise that Staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will support such Staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

8.2 Where a member of Staff is the subject of an allegation of abuse, they will normally be informed of the concerns or allegations as soon as possible and given an explanation of the likely course of action. The School will appoint a named representative to keep the individual informed of the progress of the case and consider what other support is appropriate. The investigation will be managed promptly and in a fair and consistent way, and the member of Staff will be provided with further support as appropriate.

9. Whistleblowing

9.1 We recognise that children cannot be expected to raise concerns in an environment where Staff fail to do so. The School strives therefore to have a culture of safety, raising concerns, valuing staff and reflective practice.

9.2 All Staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. Staff can also utilise the City of London Corporation's 'Whistleblowing' facilities via the telephone hotline and/or website. Whistleblowing procedures are covered as part of new staff induction training and child protection regular training for existing staff. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (the line is available from 8.00am to 8.00pm, Monday to Friday) and email help@nspcc.org.uk. The NSPCC's *what you can do to report abuse dedicated helpline* is available at: https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/.

9.3 Staff who raise concerns in good faith about safeguarding either with the School's senior management, or with the CoL children's social care team will not suffer any negative consequences such as notes on their file or denial of promotion.

9.4 Where a member of staff is unhappy about the action taken by the School in relation to a particular concern raised by the staff member, the Head will facilitate a mediation meeting with the staff member and the DSL to explain the School's actions and the reasons for them as far as is possible to maintain a child's confidentiality. If this meeting does not satisfy the member of staff, they should feel able to contact the LADO for more effective action.

10. Restrictive intervention and reasonable force

10.1 The School's policy on physical intervention by staff is set out in the School's Restrictive Interventions Policy and has regard to government guidance: *Restrictive interventions, including use of reasonable force in schools, April 2026.* The policy acknowledges that Staff have a legal power to use reasonable force. Reasonable force means using no more force that is necessary for the least amount of time (DfE). It also acknowledges that a 'no contact' policy can leave staff unable to fully support and protect pupils. Reasonable force can be used to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder. Physical contact must be necessary and proportionate to the level of risk and will normally be used as a last resort. Reasonable physical contact can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury.

10.2 All significant incidences involving the use of force, restraint, seclusion or other restrictive interventions by a member of staff should be reported to the DSL immediately. (In any case where the DSL is not immediately available, the Senior Deputy Head or Head should be informed.) Any such cases should be recorded immediately, or as soon as is practicable. If there was no witness, that should also be recorded.

10.3 We understand that when using restrictive interventions in response to risks presented by incidents involving pupils with SEN or disabilities or with medical conditions, we must recognise the additional vulnerability of these pupils. We also recognise that some pupils without SEND, such as those who have experienced past trauma, may require individual support. An individual behaviour plan, agreed with parents or carers and the pupil, may be appropriate to consider risk, reduce the occurrence of challenging behaviour and reduce the need to use considerable force. Further details are set out in the School's Restrictive Intervention Policy (section 12, page 5-6).

10.4 Staff should avoid touching or restraining a pupil which gives rise to an unacceptable risk of physical harm or in a way that could be interpreted as sexually inappropriate conduct. Physical intervention of a nature that causes injury or distress to a child may need to be considered under child protection or disciplinary procedures. Staff are also prohibited from using force on a pupil for the purpose of punishment.

10.5 We understand that force may never be used as a punishment. As far as possible, staff should seek, wherever possible, to use prevention and de-escalation strategies to avoid the need for restrictive interventions. Any decision to use seclusion must be lawful, necessary and proportionate and will be carried out in accordance with the School's Restrictive Interventions Policy . In such cases, pupils should be supervised at all times.

10.6 All complaints about the use of force should be investigated thoroughly, speedily and appropriately. The School will follow the procedures outlined in Section 7 should a complaint be received.

11. Equalities and Bullying

11.1 The School adheres to the City of London Corporation's Equal Opportunities Policy and action will be taken to prevent, and respond to, incidents of inappropriate discrimination, harassment and victimisation, in particular because of differences which arise out of gender or gender reassignment, pregnancy or maternity, special educational need or disability, race, religion or belief, cultural or linguistic background, or sexual orientation. The School acknowledges that repeated incidents or a single serious incident may lead to consideration under child protection procedures.

11.2 Our policy on bullying (including racial, religious, cultural, sexual/sexist, homophobic, special educational needs or disability, and cyber bullying) is set out in a separate document (the Anti-Bullying Policy). The policy acknowledges that to allow or condone bullying may lead to consideration under child protection procedures, in particular where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. In such cases, the matter will be reported to the DSL and to the LADO.

12. Prevention

12.1 We recognise that the School plays a significant part in the prevention of harm to our pupils by providing pupils with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The School and those in its community will therefore:

12.1.1 Establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.

12.1.2 Ensure that all children know there is an adult in the School whom they can approach if they are worried or in difficulty.

12.1.3 Incorporate into the curriculum and the Assembly programme, including PSHEE (Personal, Social, Health, Economic Education), information and opportunities that equip children with the awareness and skills they

need to stay safe from harm and to know to whom they should turn for help.

12.1.4 Make e-safety an integral part of safeguarding by explicitly teaching pupils how to keep safe online in ICT lessons working with City of London Police, external speakers and through PSHEE.

12.1.5 Ensure that children are resilient to radicalisation and are prepared to challenge extremist ideology by providing a safe environment for the discussion of sensitive issues, helping children to understand how they can participate in decision-making, and by promoting the spiritual, social, moral and cultural development of all pupils and within this, fundamental British Values. Further details are set out in Annexure 5.

12.1.6 Ensure that no political indoctrination takes place in any of the School curricular or extra-curricular activities and that pupils are always exposed to a balanced presentation of political issues.

12.1.7 Ensure that all visiting speakers are suitably vetted and supervised to avoid political indoctrination. Details of the procedure to follow are set out in Annexure 5.

13. Private Fostering

13.1 If a child or young person who is under the age of 16 (or 18 if they have a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home for 28 days or more, it is classed as private fostering arrangement.

13.2 Children being privately fostered are required by law to be seen by a social worker, and if the School is aware of a private fostering arrangement then we must notify the Children and Families team at the City of London Corporation.

13.3 If the School is aware of someone who is looking after a child, or they plan to be, the Children and Families team must be informed so that they can check that the placement is suitable for the child. You should advise the person that they should contact the Children and Families team before the arrangement begins or within 48 hours of the arrangement being made in an emergency.

13.4 As a school, we have a legal responsibility to inform the Children and Families Team of any private fostering arrangements that we become aware of.

13.5 More information about private fostering and keeping children safe can be found on the City and Hackney Safeguarding Children Partnership website: www.chscb.org.uk.

14. Children Who Go Missing from or are Absent in Education

14.1 The School monitors pupils' attendance through a daily register and any unexplained absences are investigated. A child going missing from education is a potential indicator of abuse or neglect. Children who are absent from education for prolonged periods and/ or on repeat can also act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It may

indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour' or faith-based abuse or risk of forced marriage. Early intervention in this context is key and Staff should be aware of the School's unauthorised absence procedures and children missing education procedures, and should report any concerns immediately to the DSL in accordance with this policy.

14.2 The School's response to persistently absent pupils and children missing education will identify such abuse, and in the case of absent pupils, will help prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

14.3 We understand that we have an obligation to hold more than one emergency contact number for pupils where reasonably possible.

14.4 Unauthorised absences must be reported to the Head of Year and Deputy Head Pastoral immediately and followed up with the parents or guardians.

14.5 The DSL will 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, at such intervals as are agreed between the School and the local authority.

14.6 The DSL will inform their local authority of any pupil who is going to be deleted from the admission register where they:

14.6.1 have been registered at another school;

14.6.2 are also registered at one or more other schools and the other schools have agreed to deletion;

14.6.3 have a school attendance order which has either been changed to the name of another school or has been revoked;

14.6.4 have been taken out of school by their parents and are being educated outside the school system and the school has been notified in writing e.g. home education;

14.6.5 have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;

14.6.6 have not returned within ten school days following a leave of absence and the School and LA, having made reasonable efforts, cannot find the pupil's location or circumstances;

14.6.7 have been continually absent from school for 20 school days;

14.6.8 have been detained under a sentence of detention and the School has reasonable grounds to believe the pupil will not return to School once they are released;

14.6.9 have died;

14.6.10 are over compulsory school age and will not continue into the sixth form; or

14.6.11 have been permanently excluded.

This will be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register.

15. Health & Safety and Wellbeing, IT and Related School Policies & Procedures

15.1 Our Health & Safety and Wellbeing policy, set out in a separate document, details the measures being taken by the School to promote the health and safety of all children and staff within the School's environs.

15.2 The procedures for internet use are set out in other School policies, specifically the Acceptable Use Policy, the Digital Safety Policy and the Behaviour Policy

However, in regards to safeguarding, the School recognises the need for a whole-school approach to online safety in order to protect pupils from potentially harmful and inappropriate online material. Such an approach empowers the School to protect and educate pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

15.2.1 The issues classified within online safety are considerable, but can be categorised into four areas of risk:

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories;

contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying;

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The School and its community will therefore:

Ensure that online safety is a running and interrelated theme in its whole school approach to safeguarding and related policies and procedures.

Ensure that appropriate filtering and monitoring systems are in place to prevent children being exposed to inappropriate, illegal or exploitative material. A com of the filtering and monitoring systems must be carried out at least once every year by a senior member of the School's senior leadership team.

Regularly (at least annually) review the effectiveness of school filters and monitoring systems and ensure that the leadership team and relevant staff are aware of and understand the systems in place, manage them effectively and know how to escalate concerns when identified. Records should be kept of those checks.

Ensure that the School uses communications with parents to reinforce the importance of children being safe online and ensure the School shares with parents what systems they have in place to filter and monitor online use, what they are asking children to do online, including the sites they will be asked to access and who from the School (if anyone) their child is going to be interacting with online.

Ensure that effective education about online safety is captured in the curriculum, any teacher training, the role and responsibilities of the DSL and DDSLs and any parental engagement.

Ensure that, where cases of remote education are required, that all pupils and staff are clear about the necessary safeguarding measures. Teachers should discuss with the DSL or Director of Safeguarding on a case-by-case basis.

15.3 The School does not permit pupils – with limited exceptions for Sixth Formers – to use their personal mobile phones or SMART watches during School hours. Full details are laid out in the School's Behaviour Policy.

15.4 Other aspects of health and safety, such as the procedures for school trips are set out in this and/or other School policies.

Family Help/ Early help

15.5 The School recognises that providing early help is more effective in promoting the welfare of children than reacting later. This includes accessing support from universal services and community-based early help, or the more targeted early help level of Family Help (which brings together more targeted early help and support services delivered under section 17 of the Children Act 1989 (Children in Need) support).

15.6 Early help means providing support as soon as a problem emerges, at any point in a child's life.

15.7 Effective early help relies on all members of staff at the School working together with local agencies to: identify children and families who would benefit from community-based early help; assist in the assessment of need of any child who may be in need of early help; and to provide targeted, community-based early help in cooperation with local authorities in order to address the assessed needs of a child and their family in order to significantly improve the outcomes for that child.

15.8 All staff should be alert to children who may benefit from early help. Any child may benefit from early help or Family Help, but staff should be particularly alert to the potential need for a child who:

- is disabled or has certain health conditions or has specific additional needs;
- has special educational needs, irrespective of an Education, Health and Care plan;
- has a mental health need;
- is a young carer;
- is an expectant parent or parent;
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing or goes missing from education, home or care;
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from the School;
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation;
- is at risk of being radicalised into terrorism;
- has a parent or carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing alcohol and other drugs themselves;
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child.

15.9 If a member of staff has concerns about a child, they should notify the DSL. Where the DSL decides that a referral is not needed to children's social care, they will consider pastoral support and/or a Family Help assessment.

15.10 The DSL should consider whether to inform the child's parents or carers to further support the child's wellbeing. This should only be considered where notification would not place the child in additional risk.

15.11 Staff may then be required to support other agencies and professionals in a Family Help assessment or, in some cases, act as the lead professional in undertaking a Family Help assessment.

15.12 In these instances, the case should be kept under constant review by the DSL and consideration be given to a referral to children's social care if the concerns escalate.

15.13 In order for a Family Help assessment to be effective:

15.13.1 the assessment should be undertaken with the agreement of the child and the parents or carers. It should involve the child and family as well as all the professionals who are working with them;

15.13.2 the member of staff or DSL should be able to discuss concerns they may have about a child and family with a social worker in the local authority in accordance with the relevant local authority's processes;

if the parents or child do not consent to an early help assessment the DSL as the lead professional should make a judgement as to whether, without help, the needs of the child will escalate. If so, referral into local authority children's social care may be necessary.

Annexure 1: City of London School Child-on-Child Abuse Policy

1. Introduction

1.1 The Governors, all staff and volunteers at the School are committed to the prevention, early identification and appropriate management of child-on-child abuse (as defined below) both within and beyond School. The School takes a zero-tolerance approach to child-on-child abuse (including harassment and violence). The School recognises that incidents of child-on-child abuse will be dealt with immediately following disclosure. Staff are trained, should they witness child-on-child abuse of *any* kind, to challenge such behaviour, and report it to the DSL.

In particular we:

- Believe that in order to protect children, the School should (a) be aware of the level and nature of risk to which their pupils are or may be exposed, and put in place a clear and comprehensive strategy which is tailored to their specific safeguarding context; and (b) take a contextual whole-school approach to preventing and responding to child-on-child abuse;
- Regard the introduction of this policy into the Safeguarding and Child Protection Policy as a preventative measure, and do not feel it is acceptable merely to take a reactive approach to child-on-child abuse in response to alleged incidents of it;
- Recognise national and increasing concern about these issues, particularly harmful sexual behaviour, sexual harassment and sexual violence, and wish to implement this policy in order to ensure that our pupils are safe; and
- Encourage parents to hold us to account on this issue, so that if their child is feeling unsafe as a result of the behaviour of any of their peers, they should inform the School to that it can ensure that appropriate and prompt action is taken in response.
- Recognise that simply because there are no reports in school of child-on-child abuse this does not mean it is not happening – it may be the case that it is not being reported. As such if Governors, staff or volunteers have any concerns about child-on-child abuse they should following the reporting requirements as set out in this policy (at 6.2 below).

1.2 This policy sets out our strategy for preventing, identifying and appropriately managing child-on-child abuse.

1.3 This policy avoids the term 'victim' and / or 'perpetrator'. This is because the School takes a safeguarding approach to all individuals involved in allegations of or concerns about child-on-child abuse, including those who are alleged to have been abused and those who are alleged to have abused other children, in addition to any sanctioning work that may also be required for the latter. Research has shown that many children or young people who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised by children, parents or adults in the community prior to their abuse of another child / other children.

1.4 This policy uses the terms 'child' or 'young person', which are defined for the purposes of this policy as a person aged under 18. We have chosen not to restrict our approach under this policy to child-on-child abuse to children or young people but instead to adopt a wider interpretation of our safeguarding responsibilities so that they apply to all pupils,

regardless of age. We recognize that there may be some additional considerations in relation to a pupil aged 18 or over in terms of how local agencies and / or partners respond. Similarly, the School's response to incidents involving the exchange of youth produced sexual imagery will need to differ depending on the age of the pupils involved (see Appendix 1).

1.5 This policy builds on *Sexual violence and sexual harassment between children in schools and colleges* (September 2021) (now incorporated within *Keeping Children Safe in Education* (September 2026), Making or sharing nudes or semi-nudes: advice for education settings working with children and young people (March 2024), the NSPCC's *Harmful Sexual behaviour Framework* and City and Hackney Safeguarding Children's Partnership *Safeguarding in the Context of Access to Technology and Use of Social Media* (2017).

1.6 This policy applies to all staff, governors, contractors and volunteers. It is reviewed annually, and updated in the interim as required, to ensure that it continually addresses the risks to which pupils are or may be exposed.

1.7 This policy is the School's overarching policy for any issue that could constitute child-on-child abuse. It relates to and should be read alongside the rest of this Safeguarding and Child Protection Policy (which includes the Staff Safeguarding Code of Conduct) and any other relevant policies including, but not limited to:

- the School Standards (Rules and Regulations).
- the Acceptable Use Policies.
- the Digital Safety Policy.
- the Anti-Bullying Policy.
- the Mental Health Policy.
- the Behaviour Policy.

1.8 This policy has regard to Part 3 (Welfare, health and safety of pupils), Paragraph 7 (Safeguarding) of the Independent School Standards Regulations

2. Understanding child-on-child abuse (including harassment and violence)

2.1 Child-on-child abuse can occur both online and offline (including technology-assisted abuse) and may take place inside or outside school. Child-on-child abuse is the term chosen by the DfE and, by definition, it applies to abuse by one child of another child – regardless of the age, stage of development, or any age differential between them. The School takes a zero-tolerance approach to abuse. We recognise that it should never be passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys' and that to do so can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children.

2.2 We recognise that child-on-child abuse can take various forms, including:

- bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (also known as teenage relationship abuse)
- physical abuse and harm such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- harmful sexual behaviour, sexual violence and sexual harassment – which may be driven by misogyny or other discriminatory attitudes.
- physical assault and harm, or the threat of harm with a weapon;
- sexual violence such as assault by penetration (for example rape or penetration with an object) and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- 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
- online sexual harassment which might include consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using artificial intelligence (AI), such as deep fakes
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals

2.3 We acknowledge that these types of abuse rarely take place in isolation and often indicate wider safeguarding concerns. Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their times.

2.4 The School recognises that whilst any child may be the victim or perpetrator of child-on-child abuse, research shows that girls are disproportionately affected by sexual violence and sexual harassment and that these behaviours are often associated with wider issues of misogyny.

2.4 We recognise the need to adopt a contextual safeguarding approach and to ensure that our response to incidents of child-on-child abuse takes into account any potential complexity. As a result, we:

- adopt an approach to safeguarding children that recognises their experiences of significant harm in extra-familial contexts, and seeks to include these contexts within prevention, identification, assessment and intervention safeguarding activities.
- recognise that as children enter adolescence, they spend increasing amounts of times outside the home in public environments (including the internet) within which they may experience abuse.
- consider interventions to change the systems or social conditions of the environments where abuse has occurred.

2.5 We acknowledge that research suggests that child-on-child abuse is one of the most common forms of abuse affecting children in the UK. We therefore must adopt an approach of '**it could happen here**.'

3. Sexual behaviour

3.1 Sexual violence and sexual harassment is further categorized and defined by the DfE[1] as follows:

i. Sexual violence
ii. Sexual harassment
iii. Harmful sexual behaviour

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003. The school has a zero-tolerance approach to sexual harassment and sexual violence.

Sexual violence

Sexual violence can be defined as follows:

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

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

Sexual assault:

A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. 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).

A person (A) will also commit an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, for example, to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs.

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

[1] See KSCiE 2026: Part 5

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. Whilst not intended to be an exhaustive list, 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 (staff should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim)
- displaying pictures, photos or drawings of a sexual nature;
- upskirting (this is a criminal offence);
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
    - non-consensual sharing of sexual images and videos. (UKCIS Sharing nudes and semi-nudes provides advice (UKCIS 2024);
    - sharing of unwanted explicit content;
    - sexualised online bullying;
    - unwanted sexual comments and messages, including, on social media;
    - sexual exploitation; coercion and threats; and
    - coercing others into sharing images of themselves or performing acts they're not comfortable with online

It is important to consider sexual harassment in broad terms. Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Harmful sexual behaviour

Harmful sexual behaviour is a useful umbrella term that has been widely adopted in child protection. Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected, to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and/or offline and can also occur simultaneously between the two. Harmful sexual behaviour should be considered in a child protection context. It is also important to recognise the escalatory nature of misogyny and the benefits of early identification to support the risk of harmful sexual behaviour. It is important for staff to be aware that even if there are no reports of harmful sexual behaviour, it does not mean it is not happening.

When considering harmful sexual behaviour, ages and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not.

However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. See NSPCC: Harmful sexual behaviour for more information on what is harmful sexual behaviour.

Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying harmful sexual behaviour have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

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

It should be noted that all incidents of sharing or making nudes should be treated as a safeguarding concern and require a safeguarding response. That response should be proportionate to the relevant circumstances, including age, development, any element of coercion, exploitation or vulnerability.

3.2 The NSPCC explains that '*children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive. [Staff] should recognise the importance of distinguishing between problematic and abusive sexual behaviour … As both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage, a useful umbrella term is Harmful Sexual Behaviours (or HSB).*' In the NSPCC's and Research in Practice's *Harmful Sexual Behaviour Framework*, harmful sexual behaviours are defined as '*sexual behaviours expressed by children … that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child … or adult.*'

3.3 Simon Hackett, in the NSPCC's and Research in Practice's *Harmful Sexual Behaviour Framework*, proposes the following continuum model to demonstrate the range of sexual behaviours presented by children. This model is helpful when seeking to understand a pupil's sexual behaviour and in deciding how to respond to it.

Normal	**Inappropriate**	**Problematic**	**Abusive**	**Violent**
• Development-ally expected • Socially Acceptable • Consensual, mutual, reciprocal • Shared decision making	• Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour	• Problematic and concerning behaviour • Development-ally unusual and socially unexpected • No overt elements of victimisation	• Victimising intent or outcome • Includes misuse of power • Coercion and force to ensure compliance • Intrusive • Informed consent lacking or not	• Physically violent sexual abuse • Highly intrusive • Instrumental violence which is psychologic-ally and / or sexually arousing to the child

	may be inappropriate • Generally consensual and reciprocal	• Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity	able to be freely given • May include elements of expressive violence	responsible for the behaviour • Sadism

4. Other behaviour

4.1 When dealing with other alleged behaviour which involves, for example, emotional or physical abuse, Hackett's continuum is a useful tool to assess where behaviour falls on the spectrum and to decide how to respond. Criteria may include it:

- being socially acceptable
- involving a single incident or occurring over a period of time
- being socially acceptable within the peer group
- problematic and concerning
- involving any overt elements of victimisation or discrimination (e.g. related to race, gender, sexual orientation, physical, emotional or intellectual vulnerability)
- involving an element of coercion or pre-planning
- involving a power imbalance between the child(ren) responsible for the behaviour and the child(ren) allegedly the subject of that power
- involving a misuse of power

4.2 The School recognises that issues rarely occur in isolation and that we may be required to deal with cases involving a range of alleged behaviours including sexual behaviour, emotional behaviour, physical behaviour and behaviour online.

4.3 The School recognises that behaviour which is not abusive at first (e.g. a one-off physical fight between two children), may become abusive quickly or over time. Intervening early and addressing any inappropriate behaviour which may be displayed by a child is vital and could potentially prevent their behaviour from progressing on a continuum to become problematic, abusive and / or violent, and ultimately requiring (greater or more formal) engagement with specialist external or statutory agencies.

5. Identifying child-on-child abuse

5.1 Signs that a child may be suffering child-on-child abuse can overlap with those indicating other types of abuse (see Annexure 2 of the School's Safeguarding and Child Protection Policy). Signs can include:

- failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected
- physical injuries
- experiencing difficulties with mental health and / or emotional wellbeing
- becoming withdrawn and / or shy
- experiencing headaches, stomach aches, anxiety and / or panic attacks
- suffering from nightmares or lack of sleep or sleeping too much
- broader changes in behaviour including alcohol or substance misuse

- changes in appearance and / or starting to act in a way that is not appropriate for the child's age
- abusive behaviour towards others

5.2 The School acknowledges that research suggests that child-on-child abuse may affect boys differently to girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make up.

5.3 The School also recognises that there are other factors, situational and individual, which may make a child more vulnerable to child-on-child abuse, including, but not limited to:

- the onset of adolescence
- peer group dynamics
- sexuality
- gender identity

5.4 The School will ensure that it provides children who are lesbian, gay or bisexual, and children who are questioning their gender with a safe space to speak out or share their concerns with members of staff. We recognise that some pupils at the School may be questioning their gender identity. Staff should be aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, issues with interpersonal relationships and discriminatory bullying. We recognise that it is not for the School to initiate any action in this area, rather to respond in a safe and proportionate way to cases where a child or their parent has raised a request relating to social transition.

Details of how the School and individual staff should manage and support pupils who are questioning their gender are set out in the School's Gender Questioning Children Policy.

6. Responding to concerns or allegations of child-on-child abuse

6.1 It is essential that all concerns / allegations of child-on-child abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on our School environment. Any response should:

- include a thorough investigation of the concerns / allegations and the wider context in which they may have occurred (as appropriate)
- treat all children involved as being at potential risk; while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, he may also have considerable unmet needs and be at risk of harm himself. The School is committed to ensuring that a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter
- take into account:
    - that the abuse may indicate wider safeguarding concerns for any of the children involved and consider and address the effect of wider socio-cultural contexts, such as the child(ren)'s peer group (both within and outside the School); family, the School environment, their experience(s) of crime and victimisation in the local community, and the child(ren)'s online presence. The School must consider what changes may need to be made to these contexts to address the child's/children's needs and to mitigate risk.

- whether there is a discriminatory aspect to the alleged incident, or whether the child(ren) involved may have any particular vulnerabilities because of a protected characteristic.
- the potential complexity of child-on-child abuse and of children´s experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting.
- the views of the child/children affected. Unless it is considered unsafe to do so (e.g. where a referral needs to be made immediately), DSL should discuss the proposed action with the child(ren) and their parents and obtain consent to any referral before it is made. The School should manage the child(ren)'s expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

6.2 **What should you do if you suspect either that a child may be at risk of or experiencing abuse by another child/children, or that a child may be at risk of abusing or may be abusing another child/children?**

If a pupil is in immediate danger, or at risk of significant harm, a referral to children's social care (if the pupil is aged under 18) and / or the police should be made immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made (see the School's Safeguarding and Child Protection Policy).

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay (in accordance with the procedures set out in the School's Safeguarding and Child Protection Policy) so that a course of action can be agreed.

If a child speaks to a member of staff about child-on-child abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement (for further details please see the procedure set out in the School's Safeguarding and Child Protection Policy).

6.3 **How will the School respond to concerns or allegations of child-on-child abuse?**

The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child(ren) affected.

DSLs should always use their professional judgement to determine whether it is appropriate for alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL may wish to consult with children's social care and / or any other external agencies on a 'no names' basis to determine the most appropriate response. Where the DSL considers or suspects that the behaviour in question might be abusive or violent on a spectrum (as opposed to inappropriate or problematic), the DSL should contact the local Safeguarding Children Partnership as well as the Safeguarding Children Partnership(s) in which the pupil(s) reside immediately, and in any event within 24 hours of the DSL becoming aware of it. The DSL will discuss the allegations / concerns with the local Safeguarding Children Partnership and

the Safeguarding Children Partnership(s) in which the pupil(s) reside and agree on a course of action, which may include:

a) Manage internally with help from external specialists where appropriate and possible

Where behaviour between peers is abusive or violent (as opposed to inappropriate or problematic), scenarios (b), (c) or (d) should ordinarily apply. However, where support from local agencies is not available, the School may need to handle allegations / concerns internally. In these cases, the School will engage and seek advice from external specialists (in the private and / or voluntary sector).

b) Undertake / contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child(ren) and their family

These services may, for example, include CAMHS, a specialist harmful sexual behaviour team, and / or youth offending services.

c) Refer child(ren) to children's social care for a Section 17 (Child in Need) and / or Section 47 (Child Protection) statutory assessment

As a matter of best practice, if an incident of child-on-child abuse requires referral to and action by children's social care and a strategy meeting is convened, then the School will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the child who has experienced the abuse, and the child who was responsible for it, and the contexts to which the abuse was associated.

d) Report alleged criminal behaviour to the Police

Alleged criminal behaviour will ordinarily be reported to the Police. However, there are some circumstances where it may not be appropriate to report such behaviour to the Police. For example, where the exchange of youth produced sexual imagery does not involve any aggravating factors (see Appendix 1). All concerns / allegations will be assessed on a case-by-case basis, and in light of the wider context.

6.4 **Individual risk and needs assessment**

Where there is an incident of child-on-child abuse, the School will carry out a robust risk and needs assessment in respect of each child affected by the abuse. These risk assessments will:

- assess and address the nature and level of risks that are posed and / or faced by the child
- engage the child's parents and draw upon local services and agencies to ensure that the child's needs are met in the long-term
- consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child

- be reviewed at regular intervals in light of the child's on-going needs to ensure that real progress is being made which benefits the child.

The DSL should be the owner and author of each individual risk and needs assessment and should share this with senior/safeguarding colleagues as appropriate. It may be appropriate to share a filleted/redacted version with the parents of the subject of the risk and needs assessment. This should be considered on a case by case basis and following consultation with professional services, for example the Police or Children's Services.

If at any stage the child's needs escalate, the DSL should contact the local Safeguarding Children Partnership to determine the appropriate course of action.

6.5 **Disciplinary action**

The School will consider whether disciplinary action may be appropriate for any child(ren) involved; any such action should address the abuse, the causes of it, and attitudes underlying it. Disciplinary action may sometimes be appropriate, including to:

- ensure that the child(ren) take(s) responsibility for and realise(s) the seriousness of their behaviour
- demonstrate to the child(ren) and others that child-on-child abuse will never be tolerated
- ensure the safety and wellbeing of other children. However, these considerations must be balanced against the child(ren)'s own potential unmet needs and any safeguarding concerns. Before deciding on appropriate action the School will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it.

The School will take any disciplinary action in line with processes set out in the School's Behaviour Policy.

7. Preventative work and whole school-approach

7.1 The School is committed to ensuring that its response to concerns / allegations of child-on-child abuse is part of on-going proactive work by the School to embed best practice and take a contextual whole-school approach to such abuse. The School actively seeks to raise awareness of and prevent all forms of child-on-child abuse by:

- Educating all staff, governors, contractors and volunteers, parents and pupils about this issue. This includes:
    - training all Governors, members of the Senior Management Team (SMT), staff and volunteers on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it. This includes

    a) contextual Safeguarding;
    b) the identification and classification of specific behaviours;
    c) the importance of taking seriously all forms of child-on-child abuse (no matter how low-level they may appear) and ensuring that no form of child-on-child abuse is ever dismissed as horseplay, teasing, 'boys will be boys'

or ‘banter’. Training includes case studies which the staff design themselves.

- ensuring that opportunities are found to teach safeguarding. Governors should ensure that children are taught about how to keep themselves and others safe, including online. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and/or disabilities. Education must include the nature and prevalence of child-on-child abuse via PSHEE, assemblies, form time and the wider curriculum. Pupils are regularly informed about the School's approach to such issues, including its zero-tolerance policy towards all forms of child-on-child abuse.
- engaging parents on this issue by: (a) talking about it with parents, both in groups and one to one; (b) asking parents what they perceive to be the risks facing their child and how they would like to see the School address those risks; (c) involving parents in the review of School policies and lesson plans; and (d) encouraging parents to hold the School to account on this issue. This is carried out through the Parents’ Forum, termly meetings with the Friends of CLS and the sharing of the Anti-Bullying Handbook with parents and pupils.

- ensuring that all child-on-child abuse issues are fed back to the DSL and Safeguarding team so that they can spot and address any concerning trends and identify pupils who may need additional support. This is done by sharing of pastoral and safeguarding information in CPOMS, weekly team meetings, and sharing of bulling incidents in the Bullying Log. Logs are cross-referenced and checked against SEND and other pastoral information.
- challenging the attitudes that underlie such abuse (both inside and outside the classroom). This is done via PSHEE, assemblies, form time and internal and external speakers.
- working with Governors, the SMT, all staff and volunteers, pupils and parents to address equality issues, to promote positive values, and to encourage a culture of respect amongst all members of the School community. This is done via PSHEE, assemblies, form time, the School charity programmes, School outreach work; promotion of the School ethos of respect for diversity and inclusion.
- creating conditions in which pupils can aspire to and realise safe and healthy relationships. This is done through PSHEE, assemblies, form time, Relationships and Sex Education (RSE), Parents’ Forum and specific pastoral events for parents and pupils.
- creating a culture in which our pupils feel able to share their concerns openly, in a non-judgmental environment, and have them listened to. This is done via a culture of openness. There are pastoral offices for discussions with pupils, open door policies from Heads of Year and pastoral staff, three School Counsellors, the PSHEE programme and Mindfulness courses.
- responding to cases of child-on-child abuse promptly and appropriately.

7.2 **Multi-agency working**

The School actively engages with its local partners in relation to child-on-child abuse, and works closely with, for example, City and Hackney Safeguarding Children Partnership, children's social care, Early Help teams, the City of London Children Missing in Education

worker, the City of London Police, CAMHS teams, other relevant agencies, and other schools.

The relationships the School has built with these partners are essential to ensuring that the School is able to prevent, identify early and appropriately handle cases of child-on-child abuse. They help the School to (a) develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist; (b) ensure that pupils are able to access the range of services and support they need quickly; (c) support and help inform our local community's response to child-on-child abuse; (d) increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our pupils.

The School actively refers concerns / allegations of child-on-child abuse where necessary to the relevant LCSP, children's social care and / or other relevant agencies. This is particularly important because child-on-child abuse can be a complex issue, and even more so where wider safeguarding concerns exist. It is often not appropriate for one single agency (where the incident cannot be managed internally) to try to address the issue alone – it requires effective partnership working.

Appendix 1: Nudes and semi-nudes, including where generated by AI

1.1 In March 2024, the UK Council for Internet Safety (UKCIS) updated non-statutory guidance on managing incidents of making or sharing nudes and semi-nudes by under-18s. The UKCIS guidance is non-statutory, but should be read alongside Keeping Children Safe in Education (KCSiE, September 2026) and it should be followed unless there's a good reason not to do so.

1.2 The term 'making or sharing nudes and semi-nudes' refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly

1.3 generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes', whether or not the child depicted created or shared the image themselves

1.4 There is no clear definition of 'sexting'. The UKCIS guidance exclusively uses the language of making or sharing nudes or semi nudes about 'youth-produced sexual imagery' and consensual and non-consensual sharing of nudes and semi-nude images and/or videos. This is imagery that is being created by under-18s themselves and involves still photographs, video and streaming. In the guidance, this content is described as sexual and not indecent. 'Indecent' is subjective and has no specific definition in UK law. The motivations for taking and sharing nude and semi-nude images are not always sexually or criminally motivated.

1.5 Incidents covered by the guidance:

- A person under 18 creates a sexual image of themself and shares it with another person under 18.
- A person under 18 shares an image of another under 18 with another person under 18 or an adult.
- A person under 18 is in possession of sexual imagery created by another person under 18.

1.6 Incidents not covered by the guidance:

- Under 18s sharing adult pornography.
- Under 18s sharing sexual texts without sexual imagery.
- Adults sharing sexual imagery of under 18s. (This is a form of child sexual abuse and must always be reported to police.)

1.7 The School is alert to the safeguarding risks arising from artificial intelligence in this context, including the generation of deepfake intimate images using AI tools and the use of AI to create child sexual abuse material. Making and sharing AI-generated intimate images of those aged under 18 is a criminal offence. Staff should be aware that incidents involving AI-generated imagery should be treated with the same seriousness as those involving real images and referred to the DSL immediately.

1.8 **Response to incidents of youth produced sexual imagery**[2]

The response to an incident will differ depending on the motivations behind the incident and the appropriateness of the child's behaviour. The response should be guided by the 'principle of proportionality'. *'The primary concern at all times should be the welfare and protection of the young people involved.'* (Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS 2024),).

1.9 **The Law**

Making, possessing, distributing or showing any imagery of someone under 18 which is indecent is illegal. This includes imagery of yourself if you're under 18. Indecent is not definitively defined in law. Indecent imagery does not always mean nudity, however images are more likely to be defined as such if they meet one or more of the following criteria:

- nude or semi-nude sexual posing (e.g. displaying genitals and/or breasts or overtly sexual images of young people in their underwear)
- someone nude or semi-nude touching themselves in a sexual way
- any sexual activity involving a child
- someone hurting someone else sexually
- sexual activity that includes animals

The term 'indecent images' also include pseudo-images which are computer-generated images that otherwise appear to be a photograph or video. These may be created using tools such as photo/video editing software, deepfake apps and generators (to combine and superimpose existing images or videos onto other images and videos), and AI text-to-image generators.

The non-consensual sharing of private sexual images or videos with the intent to cause distress is also illegal. The relevant legislation is contained in section 33 of the Criminal Justice and Courts Act 2015. The Domestic Abuse Act 2021 amended section 33 of the Criminal Justice and Courts Act 2015 and it is now an offence to make threats to disclose private sexual photographs and/or films.

These laws weren't created to criminalise young people but to protect them. Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and exploration. Young people need education, support, and safeguarding, not criminalisation. The National Police Chiefs' Council (NPCC) is clear that "youth-produced sexual imagery should be primarily treated as a safeguarding issue."

The School may respond to incidents without involving the police. (However, in some circumstances, the police must always be involved.)

1.10 **Crime recording**

When the police are notified about youth-produced sexual imagery, they must record this as a crime. The incident is listed as a crime, and the young person may be listed in relation to it. This is, however, not the same as a criminal record. Every crime reported to the police must have an outcome code. The NPCC, Home Office and the DBS have agreed a new outcome code for youth-produced sexual imagery:

[2] See Guidance from UKCIS: Sharing nudes and semi-nudes: advice for education settings working with children and young people

- **Outcome 21** states: *Further investigation, resulting from the crime report, which could provide evidence sufficient to support formal action being taken against the suspect is not in the public interest. This is a police decision*.

Using this outcome code is likely to mean the offence would not appear on a future Enhanced DBS check (although it is not impossible) as that disclosure is a risk-based decision. The School can be assured that the police have the discretion they need not to adversely impact young people in the future.

1.11 **Handling incidents:**

- Refer to the DSL as soon as possible
- The DSL should hold an initial review meeting with appropriate staff
- DSL meets with the young people involved
- Do not view the image unless it is unavoidable
- Discuss with parents or carers in order to best support the young person, unless there is an issue where that's not possible
- Contact social care or the police where there is any concern the young person has been harmed or is at risk of harm

Always refer to the police or social care if incident involves:

- an adult
- coercion, blackmail, or grooming
- concerns about capacity to consent (e.g. SEND)
- images show atypical sexual behaviour for the child's developmental stage
- violent acts are depicted
- image shows sex acts and includes a child under 13
- a young person at risk of immediate harm as a result of the disclosure (e.g. self-harm or suicide)

Once a DSL has enough information, the decision should be made to deal with the matter in school, refer it to the police or to social care. All information and decision-making should be recorded in line with the School's procedures (see the School's Safeguarding and Child Protection Policy). If the incident has been dealt with in School, a further review should be held to assess risks.

1.12 **Assessing the risks once the images have been shared**

- Why was the nude or semi-nude shared? Was it consensual or was the child or young person put under pressure or coerced?
- Has the nude or semi-nude been shared beyond its intended recipient? Was it shared without the consent of the child or young person who produced the image?
- Has the nude or semi-nude been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread?
- How old are any of the children or young people involved?
- Did the child or young person send the nude or semi-nude to more than one person?
- Do you have any concerns about the child or young person's vulnerability?
- Are there additional concerns if the parents or carers are informed?

1.13 **Viewing images**

Staff **must not** intentionally view any nudes and semi-nudes unless there is good and clear reason to do so as outlined below. Wherever possible, responses to incidents should be based on what DSL has been told about the content of the imagery.
If a decision is made to view imagery, the DSL (or DDSL) would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved;
- is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child or young person or parent or carer in making a report; and
- is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network.

If it is necessary to view the imagery then the DSL (or DDSL) should:

- never copy, print, share, store or save them; this is illegal. If this has already happened, please contact your local police for advice and to explain the circumstances.
- discuss the decision with the Head or a member of the senior leadership team.
- make sure viewing is undertaken by the DSL (or DDSL) or another member of the safeguarding team with delegated authority from the Head or a member of the senior leadership team.
- make sure viewing takes place with another member of staff present in the room, ideally the Head or a member of the senior leadership team. This staff member does not need to view the images.
- wherever possible, make sure viewing takes place on the premises of the education setting, ideally in the Head or a member of the senior leadership team's office.
- make sure wherever possible that they are viewed by a staff member of the same sex as the child or young person in the images.
- record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions. Ensure this is signed and dated and meets any appropriate wider standards e.g. such as those set out in statutory safeguarding guidance and local authority policies and procedures.
- if any devices need to be taken and passed onto the police, the device(s) should be confiscated and the police should be called. The device should be disconnected from Wi-Fi and data, and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device should be placed in a secure place, for example in a locked cupboard or safe until the police are able to come and collect it.

1.14 **Deleting images (from devices and social media)**

If the School has decided that involving other agencies is not necessary, consideration should be given to deleting the images to limit further sharing. It is recommended that pupils are asked to delete the images themselves and confirm they have done so. This should be recorded, signed, and dated. Any refusal to delete the images should be treated seriously, reminding the pupil that possession is unlawful and that the police may become involved.

Annexure 2: TYPES OF ABUSE AND POSSIBLE SIGNS OF ABUSE

The following information about types of abuse is taken from *"Keeping Children Safe in Education"*, September 2026 (DfE).

All staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), child criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline.

Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or extra-familial context 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 another child or children. This includes in teenage relationships, or under the guise of 'honour' based abuse including forced marriage and female genital mutilation, or abuse related to faith or belief such as allegations of demonic possession. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

For the purposes of the following sections, we outline possible signs of different forms of abuse but please note these are not exhaustive. If you have any concerns please follow the procedures set out within this policy.

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."

Possible signs of physical abuse are:

Physical Indicators:

- Unexplained bruises and welts on the face, throat, upper arms, buttocks, thighs or lower back in unusual patterns or shapes which suggests the use of an instrument on an infant in various stages of healing that are seen after absences, weekends or vacations.

- Unexplained burns, cigarette burns, especially burns found on palms, soles of feet, abdomen, buttocks; immersion burns producing “stockings” or “glove” marks on hands and feet; “doughnut shaped” on buttocks or genital area.
- Rope burns.
- Infected burns indicating delay in treatment; burns in the shape of common household utensils or appliances.

Behavioural Indicators:

- Behavioural extremes (withdrawal, aggression, regression, depression).
- Inappropriate or excessive fear of parent or caretaker.
- Antisocial behaviour such as substance abuse, truancy, running away, fear of going home.
- Unbelievable or inconsistent explanation for injuries.
- Lies unusually still while surveying surroundings (for infants).
- Unusual shyness, wariness of physical contact.

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, rape (including assault by penetration (of the vagina, anus or mouth and penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Children can be sexually abused withing the family, an institution, online or a community setting, and are more likely to know their abuser than not. Technology an be used to facilitate offline abuse. Child sexual abuse material available online may have been generated in a family environment. Online abuse can also take the form of cyber-grooming or self-generated sexual content under coercion. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college’s policy and procedures for dealing with it. A child or any age or gender can be a victim of sexual abuse.”

Possible signs of sexual abuse are:

Physical Indicators:

- Torn, stained or bloody underclothes.
- Frequent, unexplained sore throats, yeast or urinary infections.
- Somatic complaints, including pain and irritation of the genitals.
- Sexually transmitted diseases.
- Bruises or bleeding from external genitalia, vaginal or anal region.
- Pregnancy.

Behavioural Indicators:

- The victim’s disclosure of sexual abuse.
- Regressive behaviours (thumb-sucking, bedwetting, fear of the dark).

- Promiscuity or seductive behaviours.
- Disturbed sleep patterns (recurrent nightmares).
- Unusual and age-inappropriate interest in sexual matters.
- Avoidance of undressing or wearing extra layers of clothes.
- Sudden decline in school performance, truancy.
- Difficulty in walking or sitting.

Emotional/Psychological Abuse

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

All abuse involves some emotional ill treatment: this category should be used where it is the main or sole form of abuse.

Possible signs of abuse are:
Physical Indicators:

- Eating disorders, including obesity or anorexia.
- Speech disorders (stuttering, stammering).
- Developmental delays in the acquisition of speech or motor skills.
- Weight or height substantially below norm.
- Flat or bald spots on head (infants).
- Nervous disorders (rashes, hives, facial tics, stomach aches).

Behavioural Indicators:

- Habit disorders (biting, rocking, head banging).
- Cruel behaviour; seeming to get pleasure from hurting children, adults, or animals; seeming to get pleasure from being mistreated.
- Age-inappropriate behaviours (bedwetting, wetting, soiling).
- Behaviour extremes, such as overly compliant-demanding; withdrawn-aggressive; listless-excitable.

Neglect

"The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, 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."

Possible signs of abuse are:

Physical Indicators:

- Poor hygiene, including lice, scabies, severe or untreated diaper rash, bedsores, body odour.
- Squinting.
- Unsuitable clothing; missing key articles of clothing (underwear, socks, shoes); overdressed or underdressed for climate conditions.
- Untreated injury or illness.
- Lack of immunisations.
- Indicators of prolonged exposure to elements (excessive sunburn, insect bites, colds).
- Height and weight significantly below age level.

Behavioural Indicators:

- Unusual school attendance.
- Chronic absenteeism.
- Chronic hunger, tiredness, or lethargy.
- Begging for or collecting leftovers.
- Assuming adult responsibilities.
- Reporting no caregiver at home.

Because of the cultural and social diversity at the School, it is important for us to be aware of the growing number of cases in the UK of female genital mutilation, forced marriage and honour or faith-based crimes which have occurred against children and the fact that such forms of abuse could be a safeguarding/child protection issue for some pupils in the school population.

See separate annexes on Self-Harming, FGM, Child Sexual Exploitation and Forced Marriage/Honour Based Crimes.

Annexure 3: AWARENESS OF FEMALE GENITAL MUTILATION (FGM), CHILD SEXUAL EXPLOITATION (CSE), CHILD CRIMINAL EXPLOITATION (CCE), MODERN SLAVERY, SERIOUS VIOLENCE, FORCED MARRIAGE (FM), HONOUR BASED ABUSE (HBA), DOMESTIC ABUSE and HOMELESSNESS

FEMALE GENITAL MUTILATION (FGM)

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of so-called 'honour' based abuse (HBA), including Female Genital Mutilation (FGM), or already having suffered HBA, including FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and City of London Children and Families Team (children's social care).

Warning Signs relating to FGM

The multi-agency practice guidelines identify a number of warning signs that a pupil may be at risk of undergoing FGM or may have already undergone it. These include:

- Professionals overhearing pupils talking about FGM.
- Disclosure by a pupil or one of the pupil's friends.
- A child going abroad to a country where FGM is known to be prevalent for an extended period.
- A child who presents with medical difficulties such as frequent urinary infections or severe menstrual problems.
- Prolonged unexplained absence from school.
- Behavioural changes such as withdrawal or depression.
- Reluctance to agree to routine medical examination.

Implications for the School

- Although the School is a boys' school, there could be situations where staff become aware of issues relating to FGM. The Lower School PSHEE curriculum covers FGM and staff delivering this should be mindful that disclosures following lessons on FGM may be made.
- A number of pupils at the School belong to communities in which FGM has traditionally been practised and have close family links with countries abroad where it is prevalent and so may know other children potentially at risk.
- From October 2015, teachers have an obligatory duty to report to the police when they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out in a girl under 18. The report should be made to the police force in the area in which the girl resides. Those failing to report such cases face disciplinary action. Teachers should still consider and discuss such cases with the DSL and involve City of London Children and Families Team (children's social care) as appropriate.

The School will take proactive measures to raise pupils' awareness of the issue and to foster an atmosphere in which pupils will be able to voice concerns, by including FGM in PSHEE and elsewhere in the curriculum where appropriate.

CHILD SEXUAL EXPLOITATION

All young people, whatever their backgrounds, can be at risk of Child Sexual Exploitation (CSE) so Staff at the School need to be aware of its possibility.

Comprehensive information about CSE can be found on the NSPCC Website at: https://learning.nspcc.org.uk/child-abuse-and-neglect/child-sexual-exploitation.

What is child sexual exploitation?

CSE is a form of sexual abuse that involves the manipulation and/or coercion of young people under the age of 18 (including 16 and 17 year olds who can legally consent to having sex) into sexual activity in exchange for things such as money, gifts, accommodation, affection or status. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities.. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

The manipulation or 'grooming' process involves befriending children, gaining their trust, and often feeding them drugs and alcohol, sometimes over a long period of time, before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power that limits the victim's options.

It is a form of abuse that is often misunderstood by victims and outsiders as consensual. Although it is true that the victim can be tricked into believing they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited.

CSE does not always involve physical contact; it can also occur through the use of technology. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

Possible signs of CSE

- inappropriate sexual or sexualised behaviour
- repeat sexually transmitted infections; in girls, repeat pregnancy, abortions, miscarriage
- having unexplained new things (clothes, mobile phone)
- going to hotels or other unusual locations to meet friends
- getting in/out of different cars driven by unknown adults
- going missing from home or care
- having older boyfriends or girlfriends
- associating with other young people involved in sexual exploitation

- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- drug or alcohol misuse
- getting involved in crime
- injuries from physical assault, physical restraint, sexual assault

This is not an exhaustive list and indicators can change over time.

CHILD CRIMINAL EXPLOITATION (CCE) including County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Young people are often recruited to move drugs and money between locations and are known to be exposed to techniques, such as 'plugging', where drugs are concealed internally to avoid detection. Young people can easily become trapped in this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines networks.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious imbalance, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.
- can include young people being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Possible signs of CCE

- young people who appear with unexplained gifts or new possessions
- young people who associate with other young people involved in exploitation
- young people who suffer changes in emotional wellbeing
- young people who misuse drugs and alcohol
- young people who go missing for periods of time or regularly come home late
- young people who regularly miss school or education or who do not take part in education

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as children who:

- go missing (from school or home) and are subsequently found in areas away from their home;
- have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime);
- 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; and
- have their bank accounts used to facilitate drug dealing.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. Both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

MODERN SLAVERY

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

SERIOUS VIOLENCE

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation.

Staff should report any concerns about a child carrying a weapon (or expressing the intent to do so) to the School's DSL. The School's DSL should assess the risk to both the individual pupil and others in the school, considering wider information concerns, and take appropriate action.

Further guidance on indicators and risk factors can be found in Annex A, *Keeping Children Safe in Education",* September 2026.

FORCED MARRIAGE (FM)

Some pupils at the School may be at risk of forced marriage or be related to people who are at risk of forced marriage, so it is important for Staff to be aware of its existence.

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse, and a serious abuse of human rights.

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they are bringing shame on their family). Financial abuse (taking someone's wages or not giving someone any money) can also be a factor.

Warning signs of forced marriage to look out for:

- Depression and self-harming behaviour such as anorexia, cutting, substance misuse or attempted suicide.
- They may ask school nurses for vaccinations for an upcoming "family holiday" or about contraception.
- Victims who have already been forced into marriage may have injuries consistent with rape or domestic violence and may ask about termination of a pregnancy.

All School staff should be aware that young people at risk are often strictly monitored by their parents. They may not be able to attend after-school activities or be allowed to talk to the opposite sex. They may be monitored by siblings while at school. They may not be allowed to consider going to university or getting a job after leaving school or college.

They may be about to travel on a planned "family holiday" or be moving overseas which may be a cover story for a forced marriage. If these factors are present, the young person may be at risk of forced marriage and you should contact the DSL immediately.

In addition, since February 2023 it has 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 existing forced marriage law, this applies to non-binding unofficial 'marriages' as well as legal marriages.

For information about forced marriage and relevant legislation see: https://www.gov.uk/forced-marriage

HONOUR BASED ABUSE (formerly Honour Based Violence HBV)

For a summary of Honour Based Abuse and relevant legislation go to the Crown Prosecution Website at: https://www.cps.gov.uk/legal-guidance/so-called-honour-based-abuse-and-forced-marriage-guidance-identifying-and-flagging

HBA encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, FM, 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. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

It is a violation of human rights and may be a form of domestic and/or sexual violence. There is no, and cannot be, honour or justification for abusing the human rights of others.

The Crown Prosecution Service defines HBA as: “an incident or crime involving violence, threats of violence, intimidation coercion or abuse (including psychological, physical, sexual, financial or emotional abuse) which has or may have been committed to protect or defend the honour of an individual, family and/ or community for alleged or perceived breaches of the family and/or community’s code of behaviour."

Some pupils at the School could be at risk of honour- or faith-based abuse.

DOMESTIC ABUSE

The Domestic Abuse Act 2021 introduced a statutory definition of domestic abuse. Behaviour of a person (A) towards another (B) is domestic abuse if A and B are over the age of 16; are personally connected to each other and the behaviour is abusive. Behaviour is “abusive” if it consists of

- Psychological or sexual abuse;
- Violent or threatening behaviour;
- Controlling or coercive behaviour
- Economic abuse ;
- financial; and
- Psychological, emotional and other abuse.

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. All staff should be aware that children can also be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame itself for the abuse or may have had to leave the family home as a result.

(KCSiE 2026 paragraph 43, page 18, for further definitions of domestic abuse.)

The School is part of the City of London Police Operation Encompass.

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

https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/

https://refuge.org.uk/

http://www.safelives.org.uk/knowledge-hub/spotlights/spotlight-3-young-people-and-domestic-abuse

HOMELESSNESS

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise / progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties:

> https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets

The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL (or a DDSL) should ensure appropriate referrals are made based on the child's circumstances.

SPORT

The School recognises that sport and physical activities can present unique safeguarding risks. Staff involved in the delivery of sport and physical education should be alert to safeguarding concerns that may arise in these settings, including risks associated with physical contact, changing facilities, one-to-one coaching, and away fixtures or tours. The School will have regard to the relevant provisions in KCSIE and any guidance issued by relevant national governing bodies of sport or professional associations. Where the School engages external sports coaches or providers, it will satisfy itself that appropriate safeguarding checks have been carried out and that providers have adequate safeguarding policies in place.

Annexure 4: SAFEGUARDING CODE OF CONDUCT

A) General

This Code of Conduct has been introduced in the light of statutory guidance issued by the DfE entitled "*Keeping Children Safe in Education",* September 2026: it is intended not only to protect children but also members of staff from any malicious allegation(s). It is provided to all School staff (teaching and support) volunteers and trainee teachers. The purpose of the policy is to create and embed a culture of openness, trust and transparency in which the school's values of Kind, Aware and Ready can be realised.

1. All School staff and volunteers accept responsibility for the welfare of children with whom they come into contact in the course of their work, and that they will report any concerns about a child or somebody else's behaviour, using the procedures laid down in the School's Safeguarding and Child Protection Policy.

2. **Alice Martineau** is the School's **Designated Safeguarding Lead (DSL)** who will take action following any expression of concern in accordance with the process laid out in the School's Safeguarding and Child Protection Policy. **Andrew McBroom, Paul Eteson, Basher Savage, Patrick Sanders and Sofie Gutteridge** are the Deputy Designated Safeguarding Leads (DDSLs), with the following responsibilities:

    - **Alice Martineau:** Prevent; training with regard to safeguarding matters; sexual violence and harmful sexual behaviour;
    - **Paul Eteson:** the Sixth Form (Years 12 and 13)
    - **Basher Savage:** the Middle School (Years 10 and 11)
    - **Patrick Sanders:** the Lower School (Years 6 to 9)
    - **Sofie Gutteridge:** Social Services liaison, Looked After Children, Children with parents in prison, CPOMS administration

    The Head and, in his absence, the Senior Deputy Head know how to make appropriate referrals to statutory child protection agencies. Laura Demetriades (020 7332 1215) is the City of London's Safeguarding and Quality Assurance Service Manager and the Local Authority Designated Officer (LADO) and should be consulted for all safeguarding matters via the DSL if the matter pertains to a City of London resident child, or an issue relating to potential / actual allegations against staff, and for advice if the School is experiencing difficulties liaising with another LA in respect of safeguarding issues.

3. All staff who come into contact with children in the course of their professional activities must adhere to the School's Safeguarding and Child Protection Policy and have regard to any other relevant guidance issued by the School. Failure to comply with these obligations may result in disciplinary action in accordance with the School's Disciplinary Procedure.

4. Information relating to any allegation or disclosure must be clearly recorded as soon as possible, and there is a procedure setting out who should record information and the timescales for passing it on. See Annexure 6. A record should include:

a. A clear and comprehensive summary of the concern;
b. Details of how the concern was followed up and resolved; and
c. a note of any action taken, decisions reached and the outcome.

If in doubt about recording requirements, staff should discuss with the DSL.

5. All safeguarding concerns must be recorded on CPOMS in a timely manner, in addition to discussion with the DSL. The Disclosure form can be attached to the relevant pupil record in CPOMS.

6. The *Children Act 1989* states that the 'welfare of the child is paramount'. This means that considerations of confidentiality that might apply to other situations should not be allowed to over-ride the right of children to be protected from harm. However, every effort should be made to ensure that confidentiality is maintained for all concerned when an allegation has been made and is being investigated.

7. The Safeguarding and Child Protection Policy will be referred to or included in recruitment, training and policy materials, where appropriate, and this policy will be openly and widely made available to members of staff and volunteers and actively promoted within the organisation.

8. A culture of mutual respect between children and staff will be encouraged, with adults modelling good practice in this context.

9. It is part of the School's acceptance of its responsibility of duty of care towards children that staff, who encounter child protection concerns in the context of their work will be supported when they report their concerns in good faith.

10. All staff should be aware that it is an offence for a person aged 18 or over, such as a teacher, to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if, in the case of those over 16, the relationship is consensual.

11. Staff can neutrally refer their own behaviour (a neutral notification) as well as the behaviour of any other member of staff (a low-level concern). The procedure for reporting both is set out at the end of the Safeguarding Code of Conduct.

B) <u>Staff and volunteers must avoid</u>:

1. Inappropriate physical contact with children: physical contact is only appropriate in very limited circumstances. Please see the School's policy on Restrictive Intervention. New staff will be directed to a copy of this policy at their induction along with this copy of the Safeguarding Code of Conduct, Safeguarding and Child Protection Policy and *Keeping Children Safe in Education* (September 2026).

2. Being involved in a one-to-one discussion or lesson with a pupil, but if this is necessary it is essential that the door of the room is open or that the meeting is visible from the outside (i.e. there is a vision panel in the room facing out into the corridor or interior school space,

or a vision panel in the door of the room which again faces out into the corridor or interior school space).

3. Using confidential or sensitive information about a child or their family for their own benefit or to humiliate or embarrass a child. Confidential information about pupils, their parents or the School should not be shared casually. However, information that might suggest that a child is in need or at risk of significant harm must be shared with the DSL, in line with the Safeguarding and Child Protection Policy.

4. Taking photographs of pupils: photographs or images of pupils should only be made when they are to be exclusively used in the School's promotional materials such as newsletters, prospectus, Instagram profile and the School website. Pupils' names should not be published with such images unless parents have given permission. Some parents may not wish their child's photograph or image to be used in this way, and authorisation should be sought before any such image is published. Staff should never use their own personal mobile or digital device to capture images of pupils. Only authorised members of the marketing team should upload images to the School's official social media platforms.

5. Establishing or seeking to establish any social contact with a pupil or their parents / carers. Family friendships should be declared to the Senior Deputy Head (e.g. friendships already formed outside school or forged through social contact by staff with children at the School). Staff should not give their personal telephone numbers or email addresses to pupils or their parents. No member of staff will enter into extra or private tuition (see note (i) below) or childcare arrangements with parents of pupils at the School without the permission of the Head. Staff should notify their line manager of any existing or previous family or social relationship with a pupil or their parents / carers.

    (i) Staff should not tutor pupils who are preparing to take the School's entrance examinations.

6. Making suggestive or inappropriate remarks to or about a child, even in fun, as this could be misinterpreted. Inappropriate remarks include innuendo, swearing, and discussing their or your own intimate relationships.

7. Other than in exceptional circumstances, communicating directly with pupils by email or text message on your private phone or mobile/digital device is strictly prohibited. If it is necessary to communicate with pupils via a personal device (in the case of emergency or exceptional circumstances), staff must either copy in the Senior Deputy Head/Deputy Head Pastoral or inform the Senior Deputy Head/Deputy Head Pastoral of the communication as soon as a practicable.

8. Communicating personally with pupils or accepting pupils as 'friends', 'contacts' or 'followers' on any social media or sharing platforms is strictly prohibited. For the avoidance of doubt, where the School uses, or sanctions the use of, social media, it should be for the appropriate dissemination of information and not for entering into discussion or dialogue on the internet. The use of social media regarding School matters should be ultimately approved by the Head. This includes former pupils (unless where an exception has been agreed by the Head and or the Deputy Head (Pastoral)). The Philanthropy and Alumni Engagement Team manage our Old Citizens and should be contacted to help facilitate contact with alumni. Staff should navigate the School's Instagram, Facebook and LinkedIn

accounts professionally and carefully. They should be mindful that current and former pupils and parents are actively engaged with the School's Instagram, Facebook and LinkedIn accounts, often with accounts which are not private.

9. Hosting sites external to the School network / intranet for the purpose of communicating with pupils without the express permission of the Head.

10. Electronic communication with pupils without using a School staff login, or School email address: communications must be internally traceable using staff login credentials. To be clear: when pupils contact a member of staff using their personal email accounts, reasonable efforts should be made to ensure the identity of the pupil account; and further correspondence should be directed, to the pupil's School email account. Care must be taken when responding to non-School email addresses purporting to be a pupil and no information relating to School matters should be divulged to such accounts without seeking to confirm the identity of the sender. Vigilance must be exercised where information is requested from external email accounts.

11. Engaging in behaviour that could be construed as 'grooming' a child (for example giving a pupil money, presents or favours, or talking or behaving in an inappropriate or unprofessional manner towards pupils).

12. Communicating to the public, press, television or any outside agency, the contents of any documents relating to the School / City of London Corporation. This includes the proceedings of any safeguarding matters. In certain circumstances, it may be appropriate for staff to report any concerns to an outside organisation. If they do so, they should ensure they do not disclose any confidential information belonging to the School / City of London Corporation. Please refer to the City of London Corporation's Whistleblowing Policy.

Please note also:

13. It is not unusual for pupils or, sometimes, their parents to develop infatuations or "crushes" towards staff. Staff must take steps to try to defuse these situations. All such situations must be responded to sensitively to maintain the dignity of those concerned and any indications that this might be happening should be reported to the Deputy Head (Pastoral) and or the Senior Deputy Head who will inform the Head. In addition, the object of the pupil or parent's affections may not even be aware of this, in which case colleagues must bring this to the colleague's attention and report this to the Head.

14. It is not permissible to take one or more pupils alone in a car on journeys.

15. Any event during the School day, irrespective of attendees, will not involve alcohol. It is not permissible for staff to allow pupils to drink alcoholic beverages at any time. When the School 'entertains' pupils at events such as the Prefects' Dinner no alcohol will be served. This applies even if the pupil is 18. This also applies on residential and non-residential School trips. (Details regarding the consumption of alcohol by staff on educational visits can be found in the Educational Visits Handbook.) At events hosted by The School for other guests, for example parents, alumni or governors, alcohol must neither be served to pupils in attendance, nor consumed by staff in a supervisory capacity. Exceptions to this are with the agreement of the Head and the Deputy Head (Pastoral).

16. Staff are responsible for their own personal online digital profile and, where social media or games are used, staff should take all reasonable precautions to ensure their own privacy. It is recognised that the position of trust staff hold in relation to pupils will not lapse when the pupil leaves the School. Any contact with former pupils should be appropriate within this context and should take into account the nature of the relationship with a pupil when they were at school and the time elapsed since they left. It is for this reason that former pupils should **not** be accepted as "Friends" or "Followers" to any staff member's social media or gaming accounts at any time, with the exception of LinkedIn for professional purposes or any other specific exceptions agreed with the Deputy Head (Pastoral). The School encourages members of staff with former pupils as existing friends or followers on social media to remove these former pupils. Exceptions to this are with the agreement of the Head and the Deputy Head Pastoral. The Philanthropy and Alumni Engagement Team manage our Old Citizens and should be contacted to help facilitate contact with alumni. Staff should navigate the School's Instagram, Facebook and LinkedIn accounts professionally and carefully. They should be mindful that current and former pupils and parents are actively engaged with the School's Instagram, Facebook and LinkedIn accounts, often with accounts which are not private.

17. Any inappropriate conduct with a pupil or former pupil of CLS, or with a pupil of another school, or conduct, (whether committed at or outside work or on social media) which is likely to damage the School's reputation may be treated as a serious disciplinary offence up to and including an act of gross misconduct.

18. Staff should report to the Head inappropriate or abusive communications appearing to be from pupils and/or their friends or family.

C) <u>Important Points to Note for Staff and volunteers</u>

1. Staff must maintain an attitude of 'it could happen here' where safeguarding is concerned.

2. The School expects all staff to dress appropriately whilst at work so that confidence of employees, pupils, parents and other connected with the School is maintained. Details of the dress code for staff are laid out in the City of London School Staff Dress and Appearance policy. Whilst the School values diversity and is not seeking to achieve a complete uniformity of dress style, the School does expect all employees' clothing at work to be neat, clean and professional.

3. Do take a disclosure of abuse from a pupil seriously. It is important not to deter pupils from making a 'disclosure' of abuse through fear of not being believed, and to listen to what they have to say. Guidance on responding to an allegation of abuse is set out in the School's Safeguarding and Child Protection Policy including Annexure 6. If the allegation gives rise to a child protection concern it is important to follow the School's procedure for reporting such concerns, and not to attempt to investigate the concern oneself.

4. If absolutely necessary, staff may enter the pupils' changing rooms for the purpose of respectful supervision. Before entering the changing room, staff must announce their intention to enter by knocking loudly on the door and shouting or blowing a whistle at a decent volume that they are entering the changing room. Respectful supervision is defined by warning the pupils of entry, averting eyes from pupils in a state of undress, the intention

of entry being to monitor standards of behaviour and remaining in the changing room for a maximum of five minutes.

5. Always report any concerns immediately to the School's DSL regarding the conduct of another staff member in relation to pupils or vulnerable adults.

6. Remember that those who abuse children can be of any age (even other children), gender or ethnicity, and it is important not to allow personal preconceptions about people to prevent appropriate action taking place.

7. Good practice includes valuing and respecting children as individuals, and the adult modelling of appropriate conduct - which will always exclude bullying (including cyber-bullying), homophobia, racism, sectarianism or sexism.

8. Further advice and guidance on child protection and safeguarding issues is available via the relevant advice in the School's Safeguarding and Child Protection Policy, which can be found on the School's website and intranet.

9. Written permission from pupils and their parents/carers must be obtained before taking photographs or films. This is included in the Terms and Conditions of the contract that parents sign. All images and films must be stored appropriately and securely and only used by those authorised to do so. Staff should be able to give account of the rationale behind any images of pupils that are in their possession.

10. Unless there is a school function or concert, those members of staff working in the building after 7.00pm must let the Duty School Keeper know and inform them when they are leaving. The building is usually locked and alarmed from 8.00pm.

11. Receiving gifts

Relationships between staff and pupils should remain professional. Staff need to take care that they do not accept any gift (from a pupil or parent) that might be construed as a bribe by others or lead the giver to expect preferential treatment. It is not uncommon for pupils to offer a gift to teachers at the end of a School Term / Year, and whilst small tokens of appreciation may be accepted by staff, it is not acceptable to receive gifts on a regular basis or of any significant value. Any member of staff who receives an inappropriate gift from a pupil or parent should report this to the DSL. Gifts from pupils or parents to staff over an estimated value[3] must be reported to the Senior Deputy Head via the School intranet, and they will not be permitted to be received without the authorisation of the Bursar and / or Senior Deputy Head.

Staff must never give gifts to pupils or their families, as this could be interpreted as a gesture either to bribe or groom, or it might be perceived that a 'favour' of some kind is expected in return.

D) <u>Guidance on responding to a child making an allegation of abuse</u>

[3] Staff will be given regular reminders to declare gifts above a specified value to the Senior Deputy Head: in 2026-2-27, this value is £50.

1. Stay calm.

2. Listen carefully to what is said and show that you are taking it seriously.

3. Find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others – do not promise to keep secrets.

4. Ask the child if there is another trusted adult whom they would feel more comfortable joining the conversation. This might be their form tutor or another trusted adult in School.

5. Tell the child that the matter will only be disclosed to those who need to know about it.

6. Allow the child to continue at their own pace.

7. Ask questions for clarification only, and at all times avoid asking questions that suggest a particular answer.

8. Reassure the child that they have done the right thing in telling you.

9. Tell them what you will do next, and with whom the information will be shared (this is the School's DSL or Deputy DSL, or with the Chair of Governors if the allegation is against the Head).

10. Make no judgement about what you have heard.

11. At the earliest opportunity record in writing what was said, using the child's own words as far as possible. Note the date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated. Hand written records are perfectly acceptable. **The taking of digital notes should be avoided whilst a pupil is making a disclosure**. When recording names, of both pupils and staff, full names should be recorded, not initials, in order to avoid any ambiguity of identity. To ensure appropriate steps are taken during a disclosure, staff should use the steps laid out in the Annexure 6: Steps to take following a pupil disclosure.

12. Remember that whilst you may have been the first person encountering an allegation of abuse it is not your responsibility to decide whether abuse has occurred. That is a task for the professional child protection agencies, following a referral from the School's DSL.

E) Dealing with Allegations of Abuse Against Staff: Allegations that may meet the harm threshold and Low-Level Concerns

This section uses the following terms:

- Allegations that may meet the harm threshold
- Low-level concern
- Neutral notification
- Micro-inequity

Definitions, examples and actions for each of the terms listed above are set out at the end of this section.

Procedures for dealing with allegations of abuse against Staff are carried out in accordance with HM Government Guidance "*Keeping Children Safe in Education",* Part 4, September 2026, and the London Child Protection Procedures and Practice Guidance. All Staff are made aware of this guidance, the School's procedures, and other local guidance relating to this issue. All relevant contact details are set out on the front page of this policy.

There are two levels of allegation/concern:

1. Allegations that may meet the harm threshold.

    An allegation that may meet the harm threshold may include, for example:

    - a member of staff has behaved in a way that has harmed a child, or may have harmed a child;
    - possibly committed a criminal offence against or related to a child;
    - behaved towards a child or children in a way that indicated they may pose a risk of harm to children; or
    - behaved in such a way that indicates they may not be suitable to work with children.

Procedures for reporting allegations that may meet the harm threshold are set out in section 6 of the Safeguarding and Child Protection Policy.

2. Low-level concerns

    A low-level concern (LLC) does not mean that it is insignificant, it means that the behaviour of a colleague towards child does not meet the threshold of an allegation. "A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

    • is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and

    • does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

    • being over friendly with children;

    • having favourites;

    • taking photographs of children on their mobile phone;

• engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,

• humiliating children" (KCSiE 2026)

Recording Low-Level Concerns

Staff are encouraged to share their concerns about others in the school community in a spirit of openness, transparency and in recognition that we foster a culture of 'it could happen here'. Anything which causes staff to have a 'nagging doubt' about the way in which other adults behave or interact with pupils should be referred, in order to protect both pupils and the members of staff involved.

All staff should feel confident to report low-level concerns (LLCs) in the confidence that they will be treated sensitively and with absolute discretion. Both reporter and reported will be offered appropriate support should further discussion or action be required. Such support may be delegated to a trusted member of staff in consultation with the reporter and or reported member of staff.

If a member of staff is unsure whether or not the conduct of a colleague reaches the harm threshold, they should have a conversation in the first instance with the DSL, the Senior Deputy Head, or the Head; whomever they feel most comfortable approaching. Staff should not feel there is any burden of responsibility for them to be the arbiters of whether or not an allegation meets the harm threshold.

All low-level concerns should be reported, even in cases where colleagues are unsure as to whether their instincts are justified. There are two ways of reporting a LLC:

a. Using the reporting form on the School Intranet

b. Verbally to one of the following members of staff

    i. The Head

    ii. The Senior Deputy Head

    iii. The DSL

In cases where LLCs have been reported verbally, a written record will be produced by the person to whom the disclosure was made and stored confidentially by the DSL. The record should include details of the concern, the context in which the concern arose, and action taken, if any. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Though no LLC may be reported anonymously, requests for anonymity on the part of the reporter may be made and such requests will be respected as far as is possible throughout any subsequent process. The information collected will help to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.

Any LLC which is reported using the reporting form on the staff intranet are automatically referred to the DSL. Where appropriate, the DSL will seek guidance from the Head as appropriate, who will remain the ultimate decision maker in respect of all LLCs.

LLCs which are shared about supply staff, trainee teachers, volunteers, external organisations or individuals working with children on the School's premises and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

In instances where there may be any doubt as to whether the information which has been shared about a member of staff as a LLC in fact meets the harm threshold, the School should consult with the LADO.)

The DSL will ultimately receive all LLCs. Such records will be kept confidentially and shared with the relevant agencies ***only*** in cases where it leads to such liaison/reporting is required. A staff member who makes a LLC in good faith will suffer no detriment as a result but failure to report a LLC could, however, constitute misconduct and lead to the implementation of the School's Disciplinary Procedure.

Examples of staff conduct which may constitute a LLC are given in the table below.

3. Neutral Notifications

Rationale

The School promotes an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

It is important that any occasions or incidents which might give rise to such concerns are reported to the DSL. In the vast majority of cases, there will be a perfectly innocent and reasonable explanation for what has occurred.

It is accepted that there are occasions when school staff, as professionals, have to act in a particular way in order to protect the health, safety and welfare of pupils. Such situations could put the adult in a potentially vulnerable position and perhaps cause them, with hindsight, to consider that they might have chosen to act in a different manner.

Consideration will also be given to whether there are wider cultural issues within the School that enabled such behaviour to occur. Where appropriate School policies and procedures may be revised and additional training may be delivered to minimise the risk of it happening again.

Procedure

The procedure for self-reporting or reporting a concern of this nature is called a 'Neutral Notification' (NN). The purpose of a NN is to protect both pupils and the staff working with them and allows a system for a simple record to be kept in case events are later referred to. NNs are not expected to meet the thresholds of a low-level concern or a concern that meets the harm threshold. It is the responsibility of the DSL to monitor activity of NNs for any patterns that emerge that may

require further action if the behaviour of staff may reach the thresholds of either a low-level concern or a concern that meets the harm threshold.

In cases where a member of staff has neutrally notified, they will not be subject to any further action, such is the neutrality of the notification. Notifications of these types are a *neutral* act, and the DSL will, on receipt of a notification, determine how to best approach the issue. In the vast majority of cases, no further action will be required. It is likely that the DSL will follow up an NN with an informal conversation in order to promote the welfare of the member of staff who submitted the NN.

NNs may be made in person or using the electronic Neutral Notification Form (accessed on the Staff Intranet). Any NN which is reported using the reporting form on the staff intranet are automatically referred to the DSL. If the notification is made in person in the first instance, staff may be required to complete a Neutral Notification Form later.

The DSL will receive all NNs. Such records will be kept confidentially and shared with the relevant agencies ***only*** in cases where it leads to such liaison/reporting is required. A staff member who makes a NN in good faith will suffer no detriment as a result but failure to make a NN could, however, constitute misconduct and lead to the implementation of the School's Disciplinary Procedure.

Examples of staff conduct which may constitute a NN are given in the table below.

The following is not intended to be an exhaustive list but representative. Anything which causes staff to have a 'nagging doubt' about the way in which other adults behave or interact with pupils (or their own actions could be viewed) should be notified, in order to protect both pupils and the members of staff involved.

Staff should submit a NN following any incident where they feel that their actions or behaviour towards a pupil could be misinterpreted. This is in the interest of safeguarding both the member of staff and the pupil.

Where there is evidence that a professional boundary has been broken and the threshold for an allegation that meets the harm threshold has been met, the usual reporting lines must be followed. Such allegations should be referred directly to the Head.

4. Reporting micro-inequities

The School seeks to foster an inclusive environment for all in the community, to ensure that all feel safe to learn, contribute and challenge. The School recognises that micro-equities can cause trauma and impairs both wellbeing and workplace performance.

The reporting of micro-inequities is essential for the School, in order to ensure the wellbeing of all, assess the success of current policies and initiatives, to ascertain priorities for changes, including future training, and help with staff retention, as well as assist with any specific incidents that might require further action.

Micro-inequities should be reported whenever they are perceived; it should not be the sole responsibility of a recipient of a micro-inequity or micro-inequity to report.
Reporting can be done through the online form on the staff intranet or through speaking directly with either the DEI Lead, the DSL, Senior Deputy Head or Head.

Micro-inequities can also be reported to line managers, as these relationships may be the preferred route for a recipient of a micro-inequity, but line managers should then log the instance through the form.

Micro-inequities reported through the form will be kept confidentially with the DSL, reviewed by the DEI Lead, and only shared with other parties where there is evidence that the breaking of a professional boundary or a pattern of behaviour constitutes staff misconduct, when the usual reporting lines will be followed.

When a micro-inequity is reported, an informal conversation with the DEI Lead or DSL is likely in order to check on the wellbeing of the recipient. Depending on the nature of the micro-inequity, there may be conversations with the individual(s) who carried out the micro-inequity, which might include suggestions of training.

In some cases, the instance may be shared with SMT in anonymised form to inform the School's future actions and initiatives. A restorative conversation may also be offered if all parties believe that it would be appropriate.

Terms, definitions, examples and actions:

Term	Definition	Example	Action
Allegation that may meet the harm threshold	Conduct of others has caused harm to a child.	Hitting a pupil. Being in a relationship with a pupil. Committing a criminal offense against a child	Refer directly to the Head*. *Where allegations are made concerning the Head, these should be referred directly to the Chair of Governors.
Low Level Concern	Conduct of others causes nagging doubt/sense of unease about their professionalism/behaviour towards pupils.	Intentionally humiliating a pupil. Being over-friendly with a pupil. Using inappropriate language with a pupil.	Submit a concern via the form on the staff intranet or have an initial conversation with either the DSL, Senior Deputy Head or Head.
Neutral Notification	Conduct of oneself is such that it may be misconstrued. Staff recognise they have made a mistake in their interaction with a pupil.	Accidentally using an expletive in front of a pupil. Finding oneself in a private space with a pupil, for example should a pupil enter a staff toilet.	Submit a NN using the online form on the staff intranet.

		Accidentally making physical contact with a pupil.	
Micro-inequity	Behaviours or language that undermine another on the basis of personal characteristics, that, regardless of intention, can be perceived as exclusionary and undermine others. This includes micro-aggressions.	A male colleague repeatedly interrupting a female colleague. The use of racialised slang. Use of incorrect pronouns.	Submit a report using the online form on the staff intranet.

Annexure 5: THE PREVENT DUTY

THE PREVENT DUTY

Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies ("specified authorities" listed in Schedule 6 to the Act), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". From 1st July 2015, all schools and registered childcare providers are subject to this duty and must have regard to the statutory guidance.

The 2011 Prevent strategy has three specific strategic objectives, to:

- respond to the ideological challenge of terrorism and the threat we face from those who promote it;
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support;
- work with sectors and institutions where there are risks of radicalisation that we need to address.

Three important concepts in Prevent are **"extremism"**, **"radicalisation**" and **"terrorism"**. It is argued that terrorist groups often draw on extremist ideology, developed by extremist organisations. Some people who join terrorist groups have previously been members of extremist organisations and have been radicalised by them. The Government has defined extremism as "the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces" (KCSIE 2026)

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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.

WHAT DOES THE PREVENT DUTY MEAN FOR THE SCHOOL?

In order to fulfil the Prevent duty, the School must be able to identify children who may be at risk of radicalisation and know what to do when they are identified. The School's relationship with parents is key to the School's Prevent approach and the School will engage effectively with parents in relation to Prevent.

Protecting children from the risk of radicalisation should be seen as part of the **wider safeguarding responsibilities** of the School and it is similar in nature to protecting children from other harms, whether these come from within their families or are the product of outside influences. This annexure therefore must be read in conjunction with the Safeguarding and Child Protection policy.

The School must also build resilience to radicalisation by promoting fundamental British values and enabling pupils to challenge extremist ideologies. Complying with the Prevent duty should not stop the School from debating controversial issues. On the contrary, the School should provide a safe space where pupils can develop an understanding of the risks associated with terrorism and develop the knowledge and skills to challenge extremist arguments.

There are four general duties placed on all schools:

1) Risk assessments
   Schools are expected to assess the risk of their pupils being drawn into terrorism, including support of extremist ideas that are part of a terrorist ideology, based on a general understanding of the risks affecting young people in their area and a specific understanding of how to identify individual children at risk and offer support. In doing this the School should create risk assessments which must also inform the appropriateness of any filtering and monitoring systems that are put in place by the School.

2) Working in partnership
   Schools are expected to continue to work with Local Safeguarding Partnerships, Community safety Partnerships and local Prevent Leads.

3) Staff training
   Schools are expected to provide Prevent awareness training to help staff identify children at risk of radicalisation and to challenge extremist ideology.

4) IT policies
   Schools are expected to have suitable levels of filtering to prevent access to material that promotes terrorism and extremist ideologies. Compliance with the Prevent duty falls within a school's responsibility to teach e-safety.

HOW THE PREVENT DUTIES ARE DISCHARGED AT THE SCHOOL?

Risk Assessments

The risk to individual pupils is monitored through our pastoral structure and, in particular, the Form tutors, who take into account all the factors and patterns of behaviour detailed in Annexure 2. Attendance monitoring plays an important part in assessing vulnerability.

This risk will be reviewed annually as part of our annual Safeguarding review.

Working in Partnership

The School works closely with the City and Hackney Safeguarding Children Partnership (CHCSP) and with the Community Safety team and its Prevent Coordinator at the City of London Corporation.

Staff Training

As part of the annual INSET on safeguarding, staff receive appropriate training on relevant aspects of the Prevent Duty, including how to identify children at risk of being drawn into terrorism, how to challenge extremist ideologies and what to do if staff become concerned about a child being drawn into terrorism. The Head, the DSL (Prevent Lead) and the DDSLs have completed online Prevent

Awareness training ('Prevent: learning to support the prevent strategy') available at: www.cityoflondon.learningpool.com.

As WRAP training (workshop on raising awareness of Prevent) by the Local Authority becomes available, it will be will completed by at least the DSL (Prevent Lead) and the DDSLs. The DSL (Prevent Lead) is the first source of advice for staff on all matters related to the Prevent Duty.

Filtering and Monitoring

The School has robust and effective filtering and e-safety is delivered through IT&C and PSHEE lessons. The Director of Digital Strategy and Deputy Head (Pastoral) are responsible for all matters of e-safety. Concerns about e-safety of any sort are recorded as safeguarding concerns. The Senior Deputy Head and the Deputy Head (Pastoral) have responsibility for the issuing of sanctions to pupils that may result as a result of misuse of IT.

In addition, to fulfil its Prevent Duty, the School undertakes to:

1) Maintain and review annually robust safeguarding policies which take in to account the policies and procedures set out by City and Hackney Safeguarding Children Partnership and incorporate due regard to the Prevent Duty.

2) Conduct due diligence checks on staff, groups or individuals seeking to hire or use school premises, on visitors to school, particularly visiting speakers, whether invited by children or staff and on contractors working on the school site.

3) Actively promote Fundamental British Values as part of the School's wider SMSC / PSHEE programmes as well as within other subject areas and assemblies.

4) Ensure that no political indoctrination takes place in any of the school curricular or extra-curricular activities and that pupils are always exposed to a balanced presentation of political issues.

5) Ensure that children are resilient to radicalisation and are prepared to challenge extremist ideology by providing a safe environment for the discussion of sensitive issues, helping children to understand how they can participate in decision-making.

DSL (Prevent Lead) Responsibilities

The DSL is the nominated Prevent Lead at the School and has responsibilities for the oversight of the discharge of the Prevent Duty at school. Details of the DSL are on the cover sheet of the Safeguarding and Child Protection Policy and their responsibilities are as follows:

1) To be the first point of contact for parents, pupils, teaching and non-teaching staff and outside agencies in matters relating to Prevent.
2) To coordinate the Prevent Duty procedures in the School.
3) To undergo appropriate training.
4) To maintain an ongoing training programme on Prevent related issues for all staff.
5) To liaise with the local prevent coordinator, the police, local authorities and other agencies.
6) To keep appropriate records of Prevent related incidents.

PROCEDURES OF VETTING VISITING SPEAKERS

Visiting speakers invited by either staff or pupils must be vetted prior to the invitation being issued to them. If a pupil is inviting the speaker, the member of staff sponsoring the activity must carry out the checks. Staff should complete the School's Visiting Speakers Information Form (available on the School intranet) and submit it to the Assistant Head Co-curricular and Staff Development (a Deputy DSL). Details of the checks on visiting speakers are recorded on the SCR.

HOW TO SPOT A CHILD VULNERABLE TO RADICALISATION: VULNERABILITY ASSESSMENT

"*There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading*." (Channel Guidance)

The Channel Duty Guidance (August 2025) suggest 22 indicators. The framework involves three dimensions: engagement, intent and capability.

Engagement with a group, cause or ideology ("psychological hooks")

- Feeling under threat
- A need for identity, meaning and belonging
- A desire for status
- A desire for excitement and adventure
- A need to dominate and control others
- Susceptibility to indoctrination
- A desire for political or moral change
- Opportunistic involvement
- Family or friends' involvement in extremism
- Being at a transitional time of life
- Being influenced or controlled by a group
- Relevant mental health issues

Intent to cause harm or readiness to use violence

- Over-identification with a group or ideology
- 'Them and Us' thinking
- Dehumanisation of the enemy
- Attitudes that justify offending
- Harmful means to an end
- Harmful objectives

Capability to cause harm

- Individual knowledge, skills and competencies
- Access to networks, funding or equipment
- Criminal Capability

Some pupils will be more vulnerable to be influenced by others because of the existence of one or more factors, which may include:

- An identity crisis, involving an individual's distance from their cultural / religious heritage, including peer / family / faith group rejection
- A personal crisis, including family tension / social isolation / friendship issues
- Personal circumstances, such as migration, experience of racism
- Unmet aspirations
- Criminality
- Experience of poverty, disadvantage, discrimination or social exclusion

The following are further risk indicators:

- Racist graffiti / symbols / comments made in school
- Speaking out or writing in favour of extremist ideas in schoolwork
- Extreme comments shared on social media
- Erratic attendance patterns, including travel for extended periods of time to international locations known to be associated with extremism
- Distribution of extreme or terrorist propaganda among other pupils
- Association with those known to be involved in extremism (including via the internet)
- A significant shift in the child / young person's behaviour or outward appearance, particularly involving conflict with his/her family and/or faith group
- A simplistic or flawed understanding of religious / political / global issues
- A significant adult or other in the child / young person's life who has extremist views or sympathies

Critical risk factors include:

- Contact with extremist recruiters
- Articulation of support for extremist causes / leaders
- The possession of extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Membership of extremist organisations

All staff, and in particular pastoral staff, need to be alert to the signs described above in their interactions with pupils. Monitoring of attendance by tutors and Heads of Year is a crucial part of detecting potential radicalisation.

CHALLENGING EXTREMIST IDEOLOGIES

"All terrorist groups have an ideology. Promoting that ideology, often through the internet, facilitates radicalisation and recruitment. Challenging ideology and disrupting the ability of terrorists to promote it is a fundamental part of Prevent."

"In addressing ideological issues, we also need to be very clear about our purpose and method. The great majority of people in this country find terrorism repugnant and will never support it. Work to challenge ideology should not try to change majority opinion because it does not need changing. Our purpose is to reach the much smaller number of people who are vulnerable." (Prevent Strategy)

The School ensures that no political indoctrination takes place at school and that pupils are always exposed to a balanced presentation of political views both in lessons and in extra-curricular activities. The School has a vetting procedure for visiting speakers and has due regard to the Prevent duty in its lettings policy.

The School also builds resilience to radicalisation by providing a broad and balanced curriculum that promotes the spiritual, social, moral and cultural development of pupils (and within this, fundamental British values) and by providing a safe environment where pupils can discuss sensitive issues and learn how to participate in decision making. Pupils will be taught in PSHEE information and skills to keep safe from harm of all types and to be aware of who to turn to for help. In addition, the PSHEE curriculum will continue to challenge pupils to be critical of media, including social media, and provide key counter-narratives to extremist ideology, through resources such as the Community Response to Extremism DVD, London Grid for Learning and Inspire.

The School will continue to encourage learning through diversity by promoting the objectives of the Equalities Act 2010.

The School's Religion and Philosophy department can help challenge extremist ideologies by including lessons at KS3 and KS4 on the difference between Islam and Islamic Extremism, building on the schemes of work that are already in place. It will also continue to challenge any "Islamophobic" feelings by giving a balanced and objective overview of the main precepts of all the major religions.

The School promotes critical thinking skills across all subjects as these remain central to challenging any form of extremism.

If staff encounter expressions of extremist ideology in their lessons, they should challenge the views and correct any factual misconceptions; however, it is very important that this is done in a non-judgmental way that encourages further dialogue. Therefore, it is advisable to engage the pupil with open questions, using conditional rather than absolute language. This can either be done during the class discussion or on a one-to-one basis after the lesson has finished.

WHAT TO DO WHERE THERE ARE CONCERNS ABOUT A PUPIL

Concerns about a child being vulnerable to radicalisation and extremism should be reported promptly following the usual procedures as detailed in the Safeguarding and Child Protection policy. Staff should bring their concerns to the attention of the DSL (Prevent Lead) or a DDSL in the first instance but are also entitled to contact the LADO or the Prevent Coordinator at the Community Safety Team of the City of London Corporation directly. Details of how to contact the DO and the Prevent Coordinator are on the Cover Sheet of the Safeguarding and Child protection policy.

Records will be kept by the DSL of all concerns and the DSL will liaise with outside agencies as appropriate in line with the Safeguarding and Child Protection Policy.

For children perceived to be at immediate risk of harm, the LADO will be contacted immediately. For children who show early signs of being vulnerable to radicalisation and who need further support, the School will make a Channel panel referral, in consultation with the LADO and the Prevent Coordinator in the Community Safety Team.

If a child is suspected or identified as already engaged in illegal terrorist related activity, they will be reported to the police. The following are useful contact numbers:

- Anti-Terrorist Hotline: 0800 789 321
- Crime stoppers: 0800 555 111
- Relevant Police force: 101.

Staff and governors may also use the DFE dedicated helpline and mailbox for non-emergency advice: 0207 340 7264 and counter-extremism@education.gsi.gov.uk.

Annexure 6: Steps to be taken following a pupil disclosure.

The following steps should be taken when a pupil discloses to any member of staff or volunteer that they or another pupil is suffering or is at risk of abuse. The incident should be recorded immediately after the disclosure has been made and brought to the attention of the DSL or a DDSL straight away or no later than the end of the timetabled day on which the disclosure was made.

All verbal conversations should be promptly recorded in writing, on CPOMS. When recording names, of both pupils and staff, full names should be recorded, not initials, in order to avoid any ambiguity of identity. In long documents, initials may be offered in brackets after the first accurate use of the full name and used consistently thereafter.

When listening to a pupil disclosure, avoid using leading questions. These sentence starters help to facilitate this:

Tell

Explain

Describe

Details to be recorded:

[Those in **bold** will be automatically captured in CPOMS.]

1. **Your name**
2. **Date**
3. **Name of pupil**
4. **Tutor group**
5. The alleged perpetrator(s), if named
6. The disclosure
7. Record of conversation:
    i. Record what was said by the pupil and by you
    ii. To the best of your ability, use the exact words and phrases used by the pupil
    iii. Clearly distinguish between fact, observation, allegation and opinion
    iv. Make a record of any striking non-verbal behaviour and the key words in the language used by the pupil.
    v. Did the pupil name witnesses? If so, include them in your report.
    vi. Was anyone else present during the disclosure? If so, record their name and role (if staff)/year/tutor group (if pupil) if appropriate.
8. Consent to Share
    i. Indicate whether was the pupil able to provide informed consent for you to share.
    ii. If so, how did you seek consent? Be as specific as you can. What did you explain, what questions did you ask and what were the responses?
    iii. If yes, what did the pupil say? To the best of your ability, note the exact words used by the pupil.
    iv. If no, did you explain that you would have to share this information with the DSL and who else might receive this information and why?
9. Record any other relevant comments or information.

Annexure 7: The Role of the Designated Safeguarding Lead

This section is aligned with the guidance as contained in Annex C of KCSIE 2026***, "Role of the Designated Safeguarding Lead"***

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of DSL. The DSL should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description.

This person should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the DSL carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and interagency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

Deputy designated safeguarding leads

The School will have five DDSLs to ensure that the DSL can delegate appropriately, and so that cover is available if and when the DSL is away from the School in any circumstance.

Any deputies should be trained to the same standard as the DSL and the role should be explicit in their job description. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL, this lead responsibility should not be delegated.

To ensure continuity of safeguarding responsibilities, the School should implement robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances.

Availability

During term time the DSL (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the DSL, to define what "available" means and whether in exceptional circumstances availability via phone and or Teams or other such media is acceptable. It is a matter for individual schools and colleges and the DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities. If the DSL is not on site and is required to be available, the DDSLs should be contacted in the first instance. This should be done via CPOMS if a conversation is not possible. If the DSL is required urgently and is not on site, they should be contacted using the telephone number on the first page of this policy. This number is duplicated on the safeguarding posters published around the school building.

Manage referrals

The DSL is expected to refer cases:

• of suspected abuse, neglect or exploitation to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
• to the Channel and Prevent Multi-Agency Panel (PMAP) programme where there is a radicalisation concern as required and support staff who make referrals to the Channel and PMAP programme;
• where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
• where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

Working with others

The DSL is expected to:

• act as a source of support, advice and expertise for all staff;

• act as a point of contact with the safeguarding partners;

• liaise with the Head to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;

• as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;

• liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEND in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;

• liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;

• promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;

• work with the Head and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:

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

Information sharing and managing the child protection file

The DSL is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE 2026.

Where children leave the School (including in year transfers) the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The child protection file should include sharing any information indicating that a pupil may pose a risk to themselves or to others, such as concerns about serious violence or harmful behaviours.

The child protection should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives. Where there are significant issues or concerns, the DSL should have a direct conversation with the receiving school's DSL.

Where a pupil transfers from another school to the School and is alerted to safeguarding concerns or issues, the DSL should assess the risk and put in place a safety and support plan or risk assessment for the transferring pupil. The School should ensure key staff such as SENCOs are aware as required.

Raising Awareness

The DSL should:

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff;
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;

- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this;

- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and,

- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

Training, knowledge and skills

The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The DSL should undertake Prevent awareness training. Training should provide DSLs with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the DSL has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional safeguarding challenges and risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training should support the DSL in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that children feel heard and understood. Therefore, DSLs should be supported in developing knowledge and skills to:

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

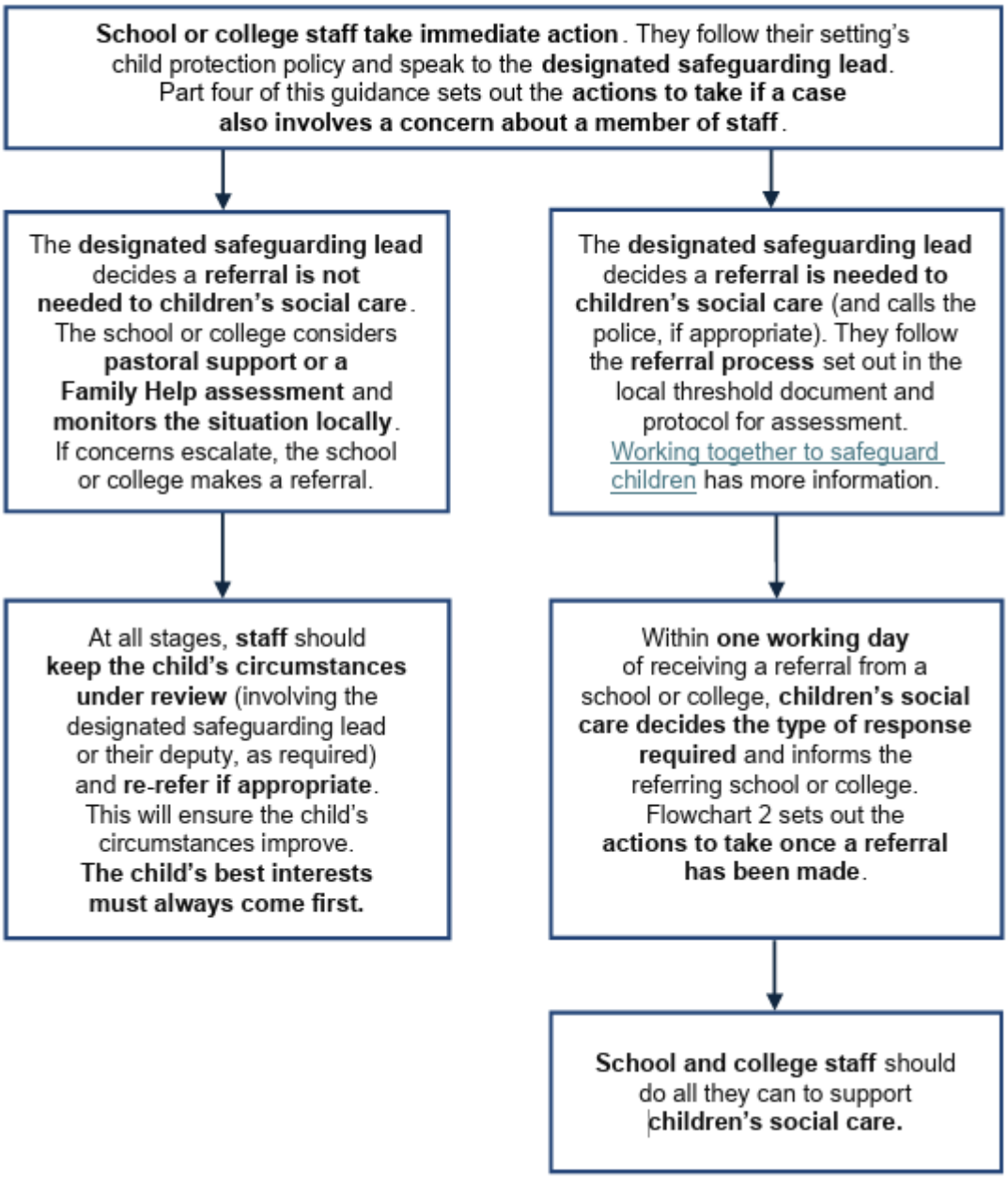
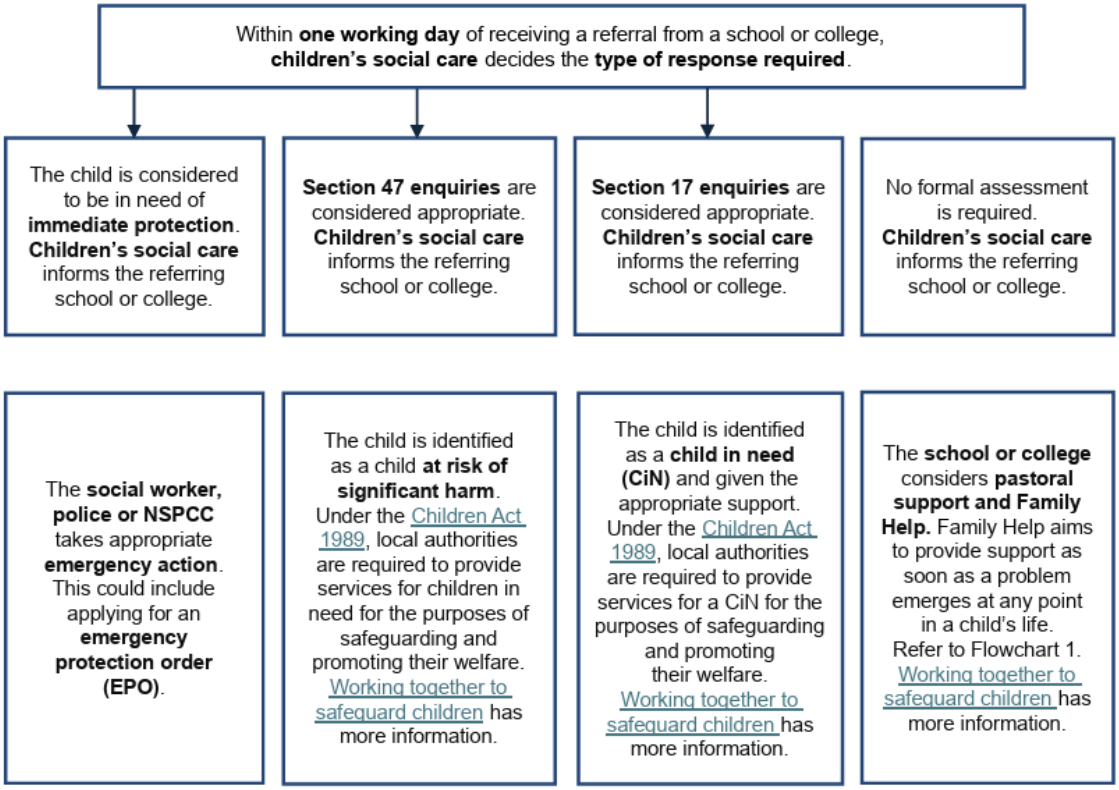
Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this KCSIE 2026, and therefore the DSL should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR; and,
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Annexure 8: Actions where there are concerns about a child with reference to referrals to Children's Services

Flowchart 1: actions taken by a school or college when there are concerns about a child



Flowchart 2: actions taken once a referral has been made to children's social care