

Child Protection and Safeguarding Policy

Including allegations against staff and low-level concerns

Aylesbury High School

Status	Statutory	Date created	January 2015
Any other statutory names for this policy		Date first approved	January 2015
Responsibility for this policy	DSL	Date last reviewed	Autumn 2026
Committee with responsibility for its review	FGB	Frequency of review	Annually
		Website	Yes
Approval necessary	Whole Governing Body		

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Important contacts

School contacts

Headteacher	Marieke Forster, 01296 388222 mforster@ahs.bucks.sch.uk
Designated Safeguarding Lead (DSL)	Harriet Queralt, 01296 388222 hqueralt@ahs.bucks.sch.uk
Deputy Designated Safeguarding Lead(s)	Sarah McNally smcnally@ahs.bucks.sch.uk Miranda Crafts mcrafts@ahs.bucks.sch.uk Marieke Forster mforster@ahs.bucks.sch.uk Andrew Skinner askinner@ahs.bucks.sch.uk Donna Fox dfox@ahs.bucks.sch.uk
Nominated Safeguarding Governor	Helen Bush hbush@ahs.bucks.sch.uk
Co Chairs of Governors	Helen Bush hbush@ahs.bucks.sch.uk Kate Weir kweir@ahs.bucks.sch.uk
Designated Teacher for Children Looked After	Andrew Skinner askinner@ahs.bucks.sch.uk

Contacts in County

Education Safeguarding Advisory Service ESAS offers support to education providers to assist them to deliver effectively on all aspects of their safeguarding responsibilities.	01296 387981 Secure-esasduty@buckinghamshire.gov.uk
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<u>First Response Team aka MASH</u> (Multi Agency Safeguarding Hub) including Early Help and Channel The First Response Team process all new referrals to social care, including children with disabilities. Referrals are assessed by the team to check the seriousness and urgency of the concerns and whether Section 17 and/or Section 47 of the Children Act 1989 apply. The First Response Team will ensure that the referral reaches the appropriate team for assistance in a quick and efficient manner.	01296 383962 Out of hours: 0800 999 7677 Securecyp.firstresponse@buckinghamshire.gov.uk
<u>Local Authority Designated Officer (LADO)</u> The Buckinghamshire Local Authority Designated Officer (LADO) is responsible for overseeing the management of all allegations against people in a position of trust who work with children in Buckinghamshire on either a paid or voluntary basis	01296 382070 Secure-lado@buckinghamshire.gov.uk
<u>Bucks Family Information Service</u> Information for families on a range of issues including childcare, finances, parenting and education	01296 383293 familyinfo@buckinghamshire.gov.uk
<u>Buckinghamshire Safeguarding Children Partnership</u> (BSCP) Procedures, policies and practice guidelines	01296 387146 bscp@buckinghamshire.gov.uk
<u>Schools Web</u> School bulletin, Safeguarding links, A-Z guide to information and services	
Buckinghamshire Council School Improvement and Traded Delivery Manager	01296 382461 Yvette.thomas@buckinghamshire.gov.uk
Buckinghamshire Council Prevent Coordinator	Helen Carter 01296 382321 - direct number M: 07920 298799- work mobile T: 01296 387981 - central ESAS number secure-esasduty@buckinghamshire.gov.uk Helen.Carter@buckinghamshire.gov.uk
Thames Valley Police	101 (999 in case of emergency)

Other contacts

NSPCC NSPCC	0800 800 5000
Childline Childline	0800 11 11
Kidscape - Parent Advice Line (bullying) (Mon-Weds from 9:30am to 2:30pm) Kidscape	020 7823 5430
Female Genital Mutilation Helpline (NSPCC) NSPCC FGM Helpline	0800 028 3550 help@nspcc.org.uk
Samaritans - Helpline Samaritans	116 123
Forced Marriages Unit - Foreign and Commonwealth Office Forced marriage - GOV.UK	020 7008 0151 fmufco.gov.uk
Crimestoppers Crimestoppers	0800 555 111
SAFE	https://www.safeproject.org.uk/
Karma Nirvana Support for Honour Based Abuse and Forced Marriage	0800 5999 247
CEOP (Child Exploitation and Online Protection)	

1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2026\)](#) and [Working Together to Safeguard Children \(2026\)](#). We comply with this guidance and the arrangements agreed and published by our 3 local **safeguarding partners** (see section 3).

This policy is also based on the following legislation:

- Part 3 of the schedule to [The Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The [Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The [Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#) (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination
- [Operation Encompass statutory guidance](#), which explains that the police must notify our school of any incidents involving domestic abuse

This policy also complies with our funding agreement and articles of association.

3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is 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. Appendix 1 defines neglect in more detail.

Making or sharing of nudes or semi-nudes is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for an area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations - for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 14)
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. This will be underpinned by our:

- Behaviour policy
- Pastoral support system

- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff will:

- Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance [Keeping Children Safe in Education](#) (KCSIE) in full, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have read and reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (for example, sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the Staff Professional Behaviour Code, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, the online safety policy and the safeguarding response to children who go missing from education/who are absent from education.
- Be aware of the school's unauthorised absence procedures and children missing education procedures
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The safeguarding issues that often overlap and can put children at risk of harm, including:
 - Drug taking and/or alcohol misuse
 - Unexplainable and/or persistent absences from education
 - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
 - Consensual and non-consensual making or sharing of nudes or semi-nudes
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- That children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying
- The potential vulnerabilities of children who are questioning their gender
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Appendix 4 of this policy outlines in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Harriet Queralt. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

When the DSL is absent, the deputy DSLs will act as cover. We have a shared mailbox: safeguarding@ahs.bucks.sch.uk which is monitored over holiday periods.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children

- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Make sure that staff have appropriate Safeguarding and Prevent training and induction

The DSL will also:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Ensure that child protection files are kept up to date
- Where children leave the school, ensure their child protection file is transferred to the new school

The full responsibilities of the DSL and deputies are set out in their job description.

5.3 The governing board

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Ensure that all staff who work directly with children read **at least part 1** of Keeping Safe in Education (KCSIE) and those staff who do not work directly with children read **part 1** of KCSIE
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils

- Ensure the school has appropriate cyber security systems in place
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness at least once every academic year. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Ensuring that reviews are carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept
 - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Make sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
 - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
 - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, trainee teachers, volunteers and contractors). Appendix 3 of this policy covers this procedure
 - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education (KCSIE) in its entirety.

Section 19.3 of this policy has information on how governors are supported to fulfil their role.

5.4 The headteacher

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems that support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

5.5 Virtual school heads

Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

They should also identify and engage with key professionals, for example DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

6. Confidentiality

- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018, Data (Use and Access) Act 2025, and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: 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 child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care

- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment - for example, carefully considering which staff should know about the report, and any support for children involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information (including personal information), and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Where a child leaves the school 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 DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving
- Confidentiality is also addressed in this policy with respect to record-keeping in section 18, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

See information on categories of abuse in [Appendix 1](#) and information on safeguarding issues in [Appendix 2](#).

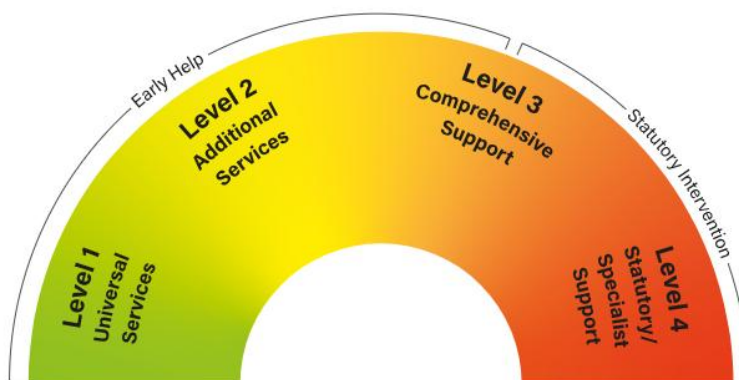
All staff are expected to be able to identify and recognise all forms of abuse, neglect, exploitation and modern slavery and shall be alert to the potential need for early help for a child who:

- Has a disability or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is bereaved
- Is showing early 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/goes missing from education, care or home
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- 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 drugs or alcohol
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

7.1 Levels of Concern and the Buckinghamshire Continuum of Need



Our school adheres to the [threshold framework](#) set out by the Buckinghamshire Safeguarding Children Partnership (BSCP). Students' needs exist on a fluid continuum, and support is calibrated according to four distinct levels.

Level 1: Universal Needs

- Applies to students whose overall developmental, health, and pastoral needs are met through universal provision such as high-quality teaching, routine pastoral care, and standard school wellbeing support.
- Staff should address low-level pastoral concerns directly through form tutors, heads of year, and our internal school tracking systems.

Level 2: Low Level to Emerging Needs (Early Help - Single Agency)

- Applies to students displaying emerging vulnerabilities or low-level unmet needs where a single agency intervention is sufficient. Examples include mild emotional distress, sudden changes in academic engagement, or minor peer conflicts.
- Staff must record concerns using the school's safeguarding reporting software (CPOMS) and liaise with the pastoral team to put internal, targeted support in place.
- [Buckinghamshire Family Information Service](#) (BFIS) has useful links for universal and targeted community support, connecting families with local community groups, youth provision, emotional well-being services, and parenting support such as [parenting courses](#).

Level 3: Complex or Multiple Unmet Needs (Targeted Early Help / Multi-Agency)

- Applies to students with escalating, multiple, or complex unmet needs requiring a coordinated response across multiple agencies with a designated Lead Professional. Examples include chronic attendance issues linked to anxiety, escalating self-harm, severe parental conflict, or complex housing and family pressures.
- The DSL team will initiate or contribute to an Early Help Assessment (EHA). Where appropriate, a referral is made to Buckinghamshire's (or relevant county's) Early Help services or specialised multi-agency support networks.
- [Buckinghamshire Family Support Service](#) can provide Family Workers to support with these issues.

Level 4: Acute Needs or Significant Harm (Statutory Children's Social Care)

- Applies to students who are suffering, or are likely to suffer, significant harm (Child Protection - Section 47), or those whose health and development will be severely impaired without statutory intervention (Child in Need - Section 17). Examples include disclosures of abuse, severe neglect, acute domestic violence in the home, or immediate crisis.
- Staff must inform the DSL or a Deputy DSL immediately. The DSL team will submit a Multi-Agency Referral Form (MARF) directly to the Buckinghamshire (or other county) Multi-Agency Safeguarding Hub (MASH) or contact the Emergency Duty Team out of hours. If a student is in immediate physical danger, 999 must be called without delay.

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret

- Write up your conversation as soon as possible in the child's own words and record this on CPOMS. Stick to the facts, and do not put your own judgement on it. If you have made written notes, sign and date the write-up and pass it on to the DSL.
- If the DSL or a deputy is not available, you are able to make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education (KCSIE) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting' 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

The duty for teachers does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow our [local safeguarding procedures](#).

7.4 Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

In an emergency, **anyone** can make a referral, but you must tell the DSL as soon as possible. If a student lives in Buckinghamshire, report to [Buckinghamshire First Response](#). Please note that many AHS students live in other counties. To find the relevant council, enter their post code [here](#).

The local authority should make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow [local escalation procedures](#) to ensure their concerns have been addressed and that the child's situation improves.

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

7.6 If you have a concern about mental health

At AHS we are committed to supporting our students' mental health and have a Senior Mental Health Lead (Sarah McNally) and two Wellbeing Assistants. We also prioritise teaching about mental health in our Learning 4 Life lessons.

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- Significant changes in behaviour,
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

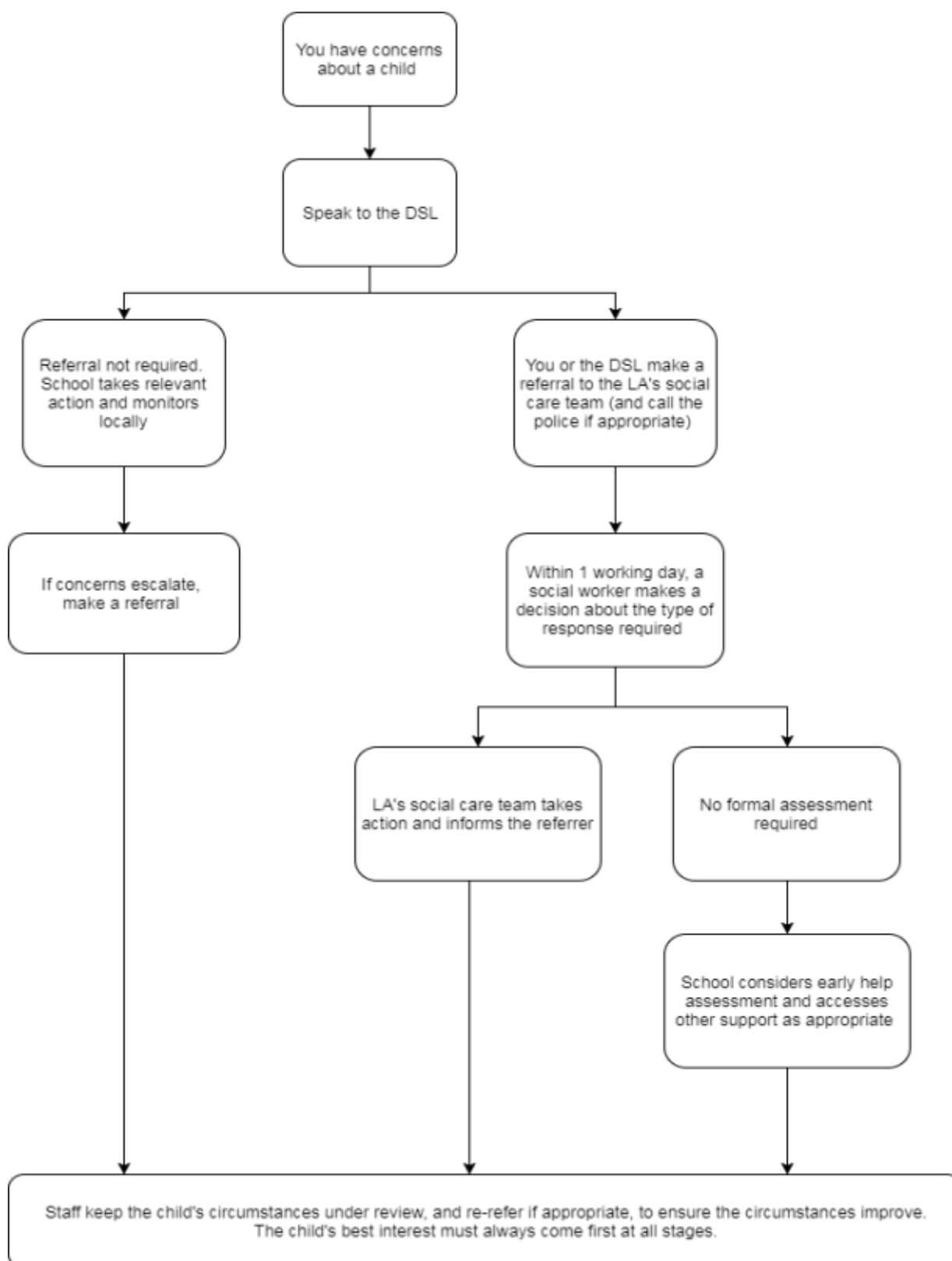
If you have a mental health concern about a child that is also a safeguarding concern, speak to a DSL straight away and record your concern on CPOMS. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

If you have a mental health concern that is **not** also a safeguarding concern, speak to a member of our Wellbeing Team to agree a course of action and record on CPOMS.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note - if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures set out in [Appendix 3](#), if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer ([LADO](#)).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh”, “part of growing up”, or “boys being boys”, as this can lead to a culture of unacceptable behaviours, misogyny/misandry and an unsafe environment for pupils.

For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys’ perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the making or sharing of nudes and semi-nudes, including where generated by AI), which may include or be driven by misogyny/misandry

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, making or sending sexual images
- Be vigilant to issues that particularly affect different genders - for example, sexualised comments or touching of our students while on school buses.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse
- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening - staff should maintain an attitude of "it could happen here"
 - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation

- A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, such as by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution - we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Making or sharing of nudes and semi-nudes

Based on [guidance from the UK Council for Internet Safety and Department for Science, Innovation and Technology](#)

Your responsibilities when responding to an incident

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff - this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to their SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the making or sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through our Safer Schools Officers.

Recording incidents

All incidents of making or sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 18 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the making or sharing of nudes and semi-nudes as part of our L4L curriculum and computing programme. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment. This also includes making such images, including where generated by AI
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to make, provide (or forward) such images
- The receipt of such images

This policy on the making or sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse, such as our Report A Concern form
- Ensure our reporting systems are well promoted in L4L lessons and assemblies, and easily accessible on the student section of the school website
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

7.11 Concerns about Attendance

- Through our attendance policy we have a robust system for monitoring attendance and will act to address absenteeism (including unexplained and/or persistent absence) with parents / carers and students promptly and identify any safeguarding issues arising. Our first day absence reporting system ensures that any unexplained absences are followed up on the morning of the absence. Our escalation process is detailed in our Attendance Policy.
- All students are required to have a minimum of two identified emergency contacts.
- Any student whose absence is causing concern and where it has not been possible to make contact with a parent / carer will be reported as a Child Missing in Education (CME) using the Buckinghamshire CME Protocol.
- Any unknown absence of a pupil who is currently subject to a child protection or child in need plan is immediately referred to their social worker.
- Parents / carers must inform school if there are any changes to a student's living arrangements
- AHS has a mandatory duty to inform the local authority via First Response if a child under the age of 16 lives with someone other than their parent, step parent, aunt, uncle or grandparent for a period of more than 28 days. This is defined as being a private fostering arrangement.

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community, including the expectation that our school is a mobile phone-free environment by default

- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** - being exposed to illegal, inappropriate or harmful content, such as 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, such as 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, such as making, sending and receiving explicit images including those generated using AI and online bullying; and
- **Commerce** - risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyberbullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyberbullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Carry out an annual review of our filtering and monitoring effectiveness. This will be conducted by our CFOO and Safeguarding governor with the support of our DSL and IT support
- Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and the section on mobile phones in our Behaviour Policy which can be found on our website.

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

AHS recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (for example, bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

AHS will treat any use of AI to access harmful content or bully pupils in line with this policy and our Behaviour Policy.

Staff should be aware of the risks of using AI tools while they are still being developed. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education (KCSIE).

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, for example, moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges both online and offline. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

We offer extra pastoral support for these pupils. This includes regular meetings with a designated member of the SEND team and a One Page Profile to clearly communicate the student's need to staff.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO. The school consider extra pastoral support and attention for these children, and ensure any appropriate support for communication is in place.

11. Pupils with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

12. Young carers

The school recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time

and by the appropriate services including additional support from external partners, or local authority and health service.

13. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

14. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Andrew Skinner, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

15. Pupils who are lesbian, gay or bisexual

The school recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. Any concerns should be reported to the DSL

16. Pupils who are questioning their gender

16.1 Supporting pupils who are questioning their gender

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. The school will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.

When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach.

The DSL will lead in these cases.

16.2 Involving parents/carers in cases of pupils questioning their gender

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

16.3 Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents/carers have been involved (as set out in [Keeping Children Safe in Education \(KCSIE\)](#)).

In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children. The schools will make decisions in line with the following principles:

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes

- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The school will ensure that the decision-making process is documented and records are kept.

The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

16.4 Single-Sex Spaces, Toilets & Facilities

- As a single-sex setting, the school complies fully with statutory safety duties. Pupils are not permitted to use facilities designated for the opposite biological sex.
- Where a gender-questioning pupil does not wish to use facilities designated for their biological sex, the school will consider providing alternative, single-occupancy facilities (such as self-contained lockable unisex toilets or individual changing spaces) to safeguard their dignity and safety, without compromising the privacy or safety of other pupils.

17. Complaints and concerns about school safeguarding policies

17.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

17.2 Other complaints

Other complaints will be dealt with according to our Complaints Policy.

17.3 Whistleblowing

We have a **Whistleblowing Policy**, which can be found on our website. Staff are required to familiarise themselves with this document during their induction period and should read this annually.

All staff must be aware of their duty to raise concerns about unsafe practice or about the attitude or actions of colleagues and report their concerns to the Headteacher or Chair of Governors as appropriate.

18. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions must be recorded on CPOMS. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will 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

Concerns and referrals will be kept in a separate child protection file for each child and should only be accessed by those who need to see it.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

The last statutory school maintains the child protection files until a young person reaches the age of 25. Therefore if the transfer school is unknown or a student is going to be electively home educated, any child protection files will remain at our school. The Safeguarding records of students who leave at the end of Year 13 will be retained at AHS for 25 years from the child's date of birth. Any records that could be needed for an official enquiry, such as in the case of sexual abuse, will be kept for 75 years.

In addition: Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

19. Training

19.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

19.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

19.3 Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

19.4 Recruitment - interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See our Safer Recruitment policy for more information about our safer recruitment procedures.

19.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervision, which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

20. Monitoring arrangements

This policy will be reviewed **annually** by the DSL. At every review, it will be approved by the full governing board.

21. Links with other policies

This policy should be read in conjunction with the following policies:

- AI Policy
- Anti-bullying
- Attendance
- Children with Health Needs who can't attend school

- Complaints
- Behaviour and Exclusions which includes the use of reasonable force and use of Mobile Phones
- Equality, Diversity and Community Cohesion Policy
- GDPR
- SEND
- Health & Safety
- Hire of School Premises
- E-Safety (including use of social media)
- Low Level Concerns Policy (which is in the Staff Professional Behaviour Code)
- Safer Recruitment Policy
- Staff Professional Behaviour Code (Formerly Code of Conduct)
- Relationships and Sex Education
- Whistleblowing
- Supporting Students with Medical Needs

These appendices are based on the Department for Education's statutory guidance, *Keeping Children Safe in Education (KCSIE) 2026*.

Appendix 1: types of abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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 in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Verbal abuse such as criticism, belittling, or name-calling

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

- Physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse

Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: specific safeguarding issues

1. Adult-Involved Nude and Semi-Nude Sharing

- **Overview:** All adult-involved nude and semi-nude image-sharing incidents are child sexual abuse offences and must be referred immediately to police and social care. These incidents can present as child-on-child sharing, making initial adult involvement difficult to assess. They typically fall into two categories: sexually motivated incidents and financially motivated incidents.
- **Sexually Motivated Incidents:** Adult offenders obtain images directly from a young person using online platforms, often posing as a child to build trust. They groom children in chatrooms, social media, or gaming environments before moving conversations to private messaging or end-to-end encrypted (E2EE) apps. Offenders may share pornography or child sexual abuse material (including AI-generated images) to encourage sharing, and subsequently blackmail victims into sending more content.
- **Financially Motivated Sexual Extortion ('Sextortion'):** Adults threatening to release explicit images unless money or other benefits are provided. These are usually carried out by organised crime groups overseas purely for profit. They may use stolen images from hacked accounts or digitally manipulated/AI-generated images, and may demand money or the use of the child's bank account for money laundering.
- **Signs to Look Out For:** Contact from unknown accounts claiming to be peers, sudden engagement in sexually explicit chats, quick requests to move to private/E2EE platforms, offers of items of value (money or gaming credits), pressure to perform sexual acts, claims that an account has been hacked, or extortion threats following image sharing.
- **Staff Action:** Report immediately to the DSL. Staff must never attempt to view, store, print, download, or share explicit or synthetic images of children.

2. Artificial Intelligence (AI) and Digital Risks

- **Overview:** The rapid evolution of generative AI presents emerging risks, including the creation of synthetic explicit imagery, AI-driven cyberbullying, voice cloning, and unmonitored chatbot interactions.
- **Signs to Look Out For:** Unexplained possession of digitally altered explicit images of peers or staff, distress linked to online extortion or impersonation, or engagement with AI tools providing unsafe advice regarding self-harm, suicidal ideation, or eating disorders.
- **Staff Action:** Report immediately to the DSL. Do not attempt to view, store, print, or download synthetic/AI-generated explicit imagery.

3. Checking the Identity and Suitability of Visitors

- **Overview:** Safeguarding procedures ensure that every adult visiting the school site is properly verified, supervised, and vetted where necessary.
- **Procedures and Expectations:** Staff expecting visitors must inform reception in advance. All visitors must verify their identity, sign in, wear a visitor lanyard, and ensure mobile phones are not used in front of students. Visitors will receive a safeguarding leaflet explaining how to report concerns. Professional visitors (such as educational psychologists and social workers) must show photo ID, and their sending organisation must provide prior written confirmation of an appropriate DBS check. Reception maintains a list of regular DBS-checked visitors; all other visitors (including visiting speakers) must remain accompanied by a staff member at all times.
- **Staff Action:** Ensure reception is notified of visitors. Never leave unvetted visitors unaccompanied. The school will not invite speakers known to disseminate extremist views, and staff must report any unbadged or suspicious adults on site to leadership immediately.

4. Child Abduction and Community Safety Incidents

- **Overview:** Child abduction involves the unauthorised removal or retention of a minor by a parent, relative, acquaintance, or stranger. Community safety incidents include loitering or unknown adults attempting to engage pupils in conversation near school premises.
- **Staff Action:** Report suspicious behaviour or unfamiliar adults loitering near school grounds to the DSL or Leadership team immediately. Outdoor safety education provided to pupils focuses on building confidence and practical awareness rather than simply instilling fear of strangers.

5. Child Criminal Exploitation (CCE) and County Lines

- **Overview:** CCE occurs when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, for the financial advantage of the perpetrator, or through violence/threats of violence. CCE ranges from opportunistic abuse to complex organised networks. It includes forcing young people to work in cannabis factories, moving drugs or money across the country (county lines), shoplifting, pickpocketing, or threatening others. Moving children for exploitation constitutes modern slavery.

- **Signs to Look Out For:** Unexplained gifts, money, or expensive possessions (such as multiple phones or designer clothing), associating with peers involved in exploitation or known gang members, emotional wellbeing changes, drug/alcohol misuse, going missing from home or regularly coming home late, frequent unauthorised school absences, evidence of physical injuries, knife crime involvement, or drug-related debt bondage.
- **Staff Action:** Discuss concerns immediately with the DSL. Staff must recognise that exploited children—even those committing offences under coercion—are victims in need of protection. The DSL will trigger local safeguarding procedures, including referrals to social care and the police.

6. Child Sexual Exploitation (CSE)

- **Overview:** CSE is a form of sexual abuse where individuals or groups take advantage of a power imbalance to coerce, manipulate, or deceive a child into sexual activity. It may involve physical contact or non-contact activity, such as forced sharing of explicit images, sexual texting, or webcam activity. Most sexual abuse is committed by individuals known to the victim, but it can also be facilitated by gangs or organised networks. Children often trust their abuser, may believe they are in a loving relationship, and might not recognise they are being abused. Moving children for CSE constitutes modern slavery.
- **Signs to Look Out For:** In addition to CCE indicators, look for an older boyfriend or girlfriend, sexually transmitted infections, unexpected pregnancy, age-inappropriate sexual behaviour, or non-consensual image distribution.
- **Staff Action:** Report concerns directly to the DSL, who will activate local safeguarding procedures and multi-agency referrals.

7. Child-on-Child Abuse (Including Harassment and Violence)

- **Overview:** Occurs when children abuse other children inside or outside of school, face-to-face or online. It is a safeguarding issue for both the victim and the alleged perpetrator, is preventable, and can involve serious physical harm or weapons. The school maintains a zero-tolerance approach to sexual violence and harassment.
- **Forms of Child-on-Child Abuse:**
 - Bullying (including cyberbullying, prejudice-based, and discriminatory bullying).
 - Abuse in intimate personal relationships between children ('teenage relationship abuse').
 - Physical abuse (hitting, kicking, shaking, biting, hair pulling) or physical harm encouraged online.
 - Physical assault or threats involving weapons.
 - Harmful sexual behaviour (HSB), sexual violence, and sexual harassment (including misogyny/misandry).
 - Causing someone to engage in non-consensual sexual activity (e.g., forced stripping or self-touching).
 - Consensual and non-consensual making or sharing of nudes/semi-nudes (including AI-generated content).
 - Upskirting (taking a picture under clothing without permission for sexual gratification, humiliation, or distress).
 - Initiation or hazing rituals involving abuse or humiliation.
 - Online peer abuse, such as harassing messages, non-consensual sharing of explicit images across chat groups, or sending unwanted pornography.

- **Staff Action:** Challenge inappropriate behaviors immediately. Report all concerns to the DSL. When evaluating HSB, age and developmental stages will be considered. Staff must recognise that children displaying HSB have often experienced trauma themselves and require appropriate support.

8. Children Absent from Education

- **Overview:** Prolonged or repeated periods of unauthorised absence can be a key warning sign of abuse, neglect, CCE, CSE, mental health issues, substance misuse, radicalisation, FGM, or forced marriage.
- **High-Risk Groups:** Children at risk of harm/neglect, those at risk of FGM or forced marriage, Gypsy, Roma, or Traveller families, service personnel families, children who run away or go missing from home/care, children supervised by the youth justice system, new migrant families, and those ceasing attendance without clear progression routes.
- **Staff Action:** Follow school unauthorised absence procedures to identify underlying risks early. Attendance teams will inform the local authority when a child leaves without a named new school or at non-standard transition points. Staff must stay alert to triggers like travel to conflict zones. If harm or neglect is suspected, report immediately to the DSL for local social care/police referrals.

9. Children and the Court System

- **Overview:** Children may be required to give evidence in criminal courts as victims or witnesses, or may be deeply affected by family court arrangements following parental separation. These legal processes create significant emotional stress.
- **Staff Action:** Provide compassionate pastoral support. The school utilises age-appropriate guidance and Ministry of Justice dispute tools to support pupils and families navigating court proceedings and accessing special measures (such as video links).

10. Children with Family Members in Prison

- **Overview:** Children experiencing the imprisonment of a parent or close relative face higher risks of negative outcomes, including social stigma, isolation, trauma, and financial hardship.
- **Staff Action:** Offer discreet, sensitive pastoral care and signpost pupils and carers to specialist support resources (such as NICCO) to mitigate adverse impacts.

11. Child-to-Parent / Caregiver Abuse (CPCA)

- **Overview:** A form of domestic abuse where a child or young person exercises coercion, control, threats, or physical violence towards a parent, carer, or relative within the home.
- **Signs to Look Out For:** Parents or carers disclosing fear, financial loss, or physical harm caused by their child; unexplained parental injuries; or a pupil disclosing intense domestic conflict and controlling dynamics at home.

- **Staff Action:** Report concerns to the DSL. The DSL will evaluate the family situation and consider referrals to Family Help or social care First Response teams based on level of need.

12. Cybercrime and Cyber Choices

- **Overview:** Criminal activity committed using computers or the internet. Cyber-dependent crimes include illegal hacking into school networks, launching Distributed Denial of Service (DDoS) attacks, or distributing malware.
- **Staff Action:** Pupils demonstrating advanced IT capabilities who are at risk of straying into illegal hacking should be flagged to the DSL for potential referral to the police-led Cyber Choices diversion programme.

13. Domestic Abuse

- **Overview:** Children can witness and be adversely affected by domestic violence between family members at home, which can cause long-lasting emotional and psychological trauma. Types include intimate partner violence, family abuse, teenage relationship abuse, and child-to-parent violence. Abuse can be physical, sexual, financial, psychological, or emotional. Children who see, hear, or experience the effects of domestic abuse are statutory victims in law.
- **Operation Encompass:** Police notify the school DSL when a pupil has been involved in, present at, or linked to a domestic abuse incident at home. Notifications reflect the 'voice of the child' to enable school staff to offer immediate pastoral care.
- **Staff Action:** Report any disclosures or signs of domestic abuse to the DSL, who will update records and coordinate targeted support.

14. Fabricated or Induced Illness (FII)

- **Overview:** A form of abuse where a parent or carer fabricates, exaggerates, or deliberately induces physical or mental illness in a child.
- **Signs to Look Out For:** Severe mismatches between reported medical symptoms/histories and observed health in school, or frequent unexplained absences linked to inconsistent medical claims.
- **Staff Action:** Record observations objectively and report discrepancies promptly to the DSL.

15. Faith-Based Abuse / Belief in Witchcraft and Spirit Possession

- **Overview:** Abuse linked to beliefs in spirits, witchcraft, demonic possession, or ritualistic practices, which frequently involves severe physical, emotional, or psychological harm.
- **Signs to Look Out For:** Severe unexplained bruising, physical injuries, extreme isolation, emotional trauma, or allegations that the pupil is cursed or possessed.
- **Staff Action:** Treat as a severe child protection risk and report immediately to the DSL.

16. Gender Questioning Children

- **Overview:** Pupils exploring or questioning their gender identity may experience distress or require specific pastoral support.
- **Staff Action:** Listen compassionately to the pupil and inform the DSL. The DSL will ensure a supportive, individualised approach that involves parents and carers, in alignment with statutory guidance and school policy.

17. Harmful Sexual Behaviour (HSB), Sexual Violence, and Sexual Harassment

- **Overview:** The school addresses all reports of HSB, sexual harassment, and sexual violence occurring on site, off site, or online.
- **Definitions:**
 - **Rape:** Intentional sexual penetration of the vagina, anus, or mouth with a penis without consent.
 - **Assault by Penetration:** Intentional sexual penetration of the vagina or anus with a body part or object without consent.
 - **Sexual Assault:** Intentional sexual touching without consent (covers a broad spectrum, including unwanted kissing or touching of breasts, bottom, or genitalia).
 - **Causing Sexual Activity Without Consent:** Forcing someone to strip, self-touch, or engage in activity with a third party.
- **Consent Context:** Consent requires freedom and capacity to choose. It can be withdrawn at any point. A child under 13 can never legally consent to sexual activity; the age of consent is 16.
- **Staff Action:** Reassure victims that they are being taken seriously, kept safe, and will never be blamed or criminalised for reporting abuse. Report all incidents to the DSL.

18. Homelessness and Housing Instability

- **Overview:** Being homeless or at risk of homelessness presents a severe threat to a child's welfare. This includes pupils sofa-surfing, living in a hostel or temporary accommodation, or facing family exclusion.
- **Staff Action:** Inform the DSL immediately. The DSL team maintains referral pathways to local housing authorities and social care to coordinate housing support and maintain educational continuity.

19. So-Called 'Honour-Based' Abuse (Including FGM and Forced Marriage)

- **Overview:** Crimes committed to defend the perceived honour of a family or community. Abuse often involves multi-perpetrator pressure.
- **Female Genital Mutilation (FGM):**
 - *Indicators of occurrence:* Disclosures by the pupil/mother, difficulty walking, sitting, or standing, spending unusually long periods in the toilet, urinary/menstrual problems, avoiding PE, prolonged absence, or psychological distress.

- **Risk factors:** Family history of FGM (biggest factor), origin from a practising community, discussions of a 'special procedure/occasion to become a woman', or extended holiday travel abroad.
 - **Mandatory Duty:** If a staff member discovers an act of FGM has been carried out on a girl under 18, they must report directly to the police.
- **Forced Marriage:**
 - **Overview:** A marriage entered into without full and free consent using physical, emotional, or psychological coercion. It is an offence to cause a child under 18 to marry under any circumstances.
 - **Staff Action:** Follow the '1 chance' rule—you may only get one opportunity to speak to the victim. Speak privately to the pupil if safe, report to the DSL immediately, and access the Forced Marriage Unit (020 7008 0151).

20. Mental Health (Self-Harm and Suicidal Ideation)

- **Overview:** Severe mental health struggles, acute emotional distress, self-harm, and suicidal ideation are safeguarding issues that can indicate underlying abuse or neglect.
- **Signs to Look Out For:** Expressions of hopelessness, sudden behavioural changes, social withdrawal, drastic decline in academic work, physical marks/cuts, or disclosures of self-harm.
- **Staff Action:** Treat acute distress as a child protection issue. Report immediately to the DSL to access mental health pathways, safety planning, and emergency medical support where required.

21. Missing Pupils and Non-Collection

- **Missing Pupils:** Procedures ensure missing pupils are located quickly. If a pupil goes missing during the school day, staff must alert the DSL team immediately to launch internal search protocols, paying particular attention to pupils on safety plans.
- **Non-Collection:** If a child is not collected at the end of the day, staff will attempt contact with parents and emergency contacts. Repeated non-collection will be escalated to the DSL as a welfare concern.

22. Modern Slavery and Human Trafficking

- **Overview:** The recruitment, transportation, or receipt of children for exploitation. It is directly linked to CCE, CSE, forced labour, and domestic servitude.
- **Signs to Look Out For:** Pupils controlled by older individuals, working excessive hours outside school, showing signs of physical abuse, or moved frequently between living arrangements.
- **Staff Action:** Report concerns directly to the DSL for referral to children's social care and National Referral Mechanism pathways.

23. Online Safety, Filtering, and Monitoring

- **Overview:** Safeguarding pupils online requires robust IT infrastructure, effective web filtering, and active monitoring to shield pupils from harmful content, online grooming, and radicalisation.
- **Signs to Look Out For:** Attempts to bypass network security filters, accessing restricted material, or signs of distress resulting from online interaction.
- **Staff Action:** Report any web filtering failures or concerning online activity promptly to the DSL and IT lead.

24. Preventing Radicalisation and Extremism

- **Overview:** Radicalisation is the process of legitimising support for terrorist violence. Extremism is vocal opposition to fundamental British values (democracy, rule of law, individual liberty, mutual respect, and tolerance). Schools must prevent children from supporting terrorism.
- **Signs to Look Out For:** Refusal to engage with diverse peers, attraction to conspiracy theories, sudden changes in friendships or appearance, rejecting previously enjoyed activities, talking as if from a script, increased secretiveness (especially online), displaying extremist symbols/literature, or contacting extremist recruiters.
- **Staff Action:** Pass concerns to the DSL, who will evaluate local risk factors and consider referrals to the local Channel programme.

25. Private Fostering

- **Overview:** Occurs when a child under 16 (or under 18 if disabled) is cared for by someone who is not a parent or close relative (e.g., cared for by a friend, partner, or distant relative) for 28 consecutive days or more by private arrangement.
- **Staff Action:** The school has a statutory legal duty to notify Children's Social Care. Staff must report any suspected private fostering arrangements to the DSL immediately.

26. Serious Violence and Weapon Carrying

- **Overview:** A continuing safeguarding concern involving physical assault, criminal exploitation, and carrying or threatening others with weapons.
- **Indicators & Risk Factors:** Increased absences, involvement in gang networks, sudden decline in academic performance, unexplained injuries/gifts, past suspensions/exclusions, or adolescent drug misuse.
- **Staff Action:** Maintain vigilance during high-risk times (e.g. transition points at the end of the school day). Report any suspicion of weapon carrying or intended violence to the DSL immediately to enable safety planning, peer conflict de-escalation, and risk assessment.

27. Substance Misuse

- **Overview:** Pupil involvement with illegal drugs, alcohol, volatile substances, spiked vapes, or prescription drugs, as well as living in a home affected by parental addiction.

- **Staff Action:** Report all substance misuse concerns to the DSL to arrange targeted internal support, harm reduction guidance, or specialist health interventions.

Appendix 3:

MANAGING ALLEGATIONS AGAINST STAFF, SUPPLY TEACHERS, VOLUNTEERS, CONTRACTORS AND ANY PERSON INVOLVED IN ON-SITE HIRINGS WHO IS WORKING WITH CHILDREN AND YOUNG PEOPLE

Status	Statutory	Date created	
Any other statutory names for this policy (where applicable)		Date first approved	May 2008
Responsibility for this policy (job title)	Headmistress	Date last reviewed	Autumn 2026
Governors' Committee with responsibility for its review	FGB as part of annual CP policy review	Frequency of review	GB annually
Tick here if based on Bucks Policy		To be put on the school website? (Yes/No)	No
Approval necessary	Governing Body annually		

Section 1: allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, trainee teacher, volunteer, any person involved in on-site hirings or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children - this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis that supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer - for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services,

where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. For example, from a professional association or a trade union representative.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child - no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers, trainee teachers, and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher, trainee teacher, or contracted staff member provided by an agency, the school shares safeguarding responsibilities with the employment agency or business. We will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The School will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate. Teacher training providers are expected to follow the same procedures as supply agencies.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other

records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, trainee teachers, governors, volunteers, any person involved in on-site hirings and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern - no matter how small - that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the Staff Professional Behaviour Code, 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 designated officer at the local authority

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

- Being overly 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 on social media
- Humiliating pupils
- Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Staff Professional Behaviour Code. The headteacher will be the

ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018, Data (Use and Access) Act 2025, and the UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance.