



SAFEGUARDING AND CHILD PROTECTION POLICY

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Key Safeguarding Contacts

Role	Name / contact
Designated Safeguarding Lead (DSL)	Mrs Hattie Tomlinson
Safeguarding Officer / Deputy DSL	Mrs Louise Holbrook
Other Deputy DSLs	Mr Mark Brunner; Mr Stephen Chamberlain; Mrs Mary Ford
Link Safeguarding Trustee	Mr Geoff Greatwood
Designated Teacher for looked-after and previously looked-after children	Mrs Rachel Greenfield
Case manager for allegations about staff	Designated Senior Case Manager: Headteacher Deputy Designated Senior Manager: Deputy Headteacher to receive and act on reports where the Headteacher is unavailable Chair of Trustees: Where the concern or allegation relates to the Headteacher Conflict of interest: report directly to the LADO
Allegation about the Headteacher	Chair of Trustees: Mr Ian Mears (via the Governance Professional)
Lincolnshire Children's Services	01522 782111 - Monday to Friday, 8am to 6pm 01522 782333 - outside office hours
Local Authority Designated Officer (LADO)	01522 554674 - queries Use the Lincolnshire County Council online LADO referral form
Police	999 - immediate danger / emergency 101 - non-emergency
NSPCC helpline	0808 800 5000
Alternative safeguarding reporting route	Speak Out The mailbox is monitored during normal school operating hours and is for use in a non-emergency. Reports indicating immediate risk should be brought directly to a member of staff, the DSL, Children's Services or the police as appropriate.

Contact details are checked when the policy is reviewed. Staff must use the current local referral pathway and should not send safeguarding referrals to an unverified email address.

Immediate Response

Immediate danger or significant harm

Call 999 where a child is in immediate danger. Make an immediate referral to Lincolnshire Children's Services where a child is suffering or is likely to suffer harm. Any member of staff may make a referral. Tell the DSL or a Deputy DSL as soon as possible.

This policy applies to every adult working in or on behalf of Bourne Grammar School, whether paid or unpaid, including staff, supply staff, trainee teachers, trustees, volunteers, contractors, agency workers and visitors. It applies on site, off site, during educational visits, work experience, remote education and online activity connected with the School.

Safeguarding and promoting the welfare of children is everyone's responsibility. The School maintains an attitude that "it could happen here", acts in the best interests of the child and expects staff to exercise professional curiosity, share information promptly and never assume that another person will act.

1. Purpose, scope and safeguarding principles

The aims of this policy are to ensure that:

- children are protected from maltreatment, abuse, neglect, exploitation and other harm, whether within or outside the home, at school, in the community or online;
- help and support are provided as soon as problems emerge and concerns are not allowed to escalate;
- staff understand their responsibilities, recognise indicators of harm and know exactly how to report and record a concern;
- the School works effectively with parents, carers, safeguarding partners and other agencies;
- safeguarding is embedded in governance, recruitment, curriculum, attendance, behaviour, online safety, premises, educational visits and every aspect of school life; and
- children are heard, treated with dignity, kept informed where appropriate and supported without blame or shame.

The welfare of the child is paramount. The School takes account of the child's wishes and feelings, but these do not override the School's duty to protect the child or other children. No child should be given the impression that they are creating a problem by reporting abuse or neglect.

The School recognises that some students will reach the age of 18 while still enrolled. Although they are no longer children for the purposes of KCSIE, the School will continue to take appropriate action to safeguard their welfare and respond to any concerns about their safety or wellbeing.

The School has zero tolerance of abuse, sexual harassment, sexual violence, harmful sexual behaviour, violence against women and girls, bullying, racism, misogyny, misandry, homophobia, biphobia, transphobia, gender-related prejudice, faith-based prejudice, discriminatory behaviour and other derogatory or violent conduct. "Zero tolerance" means that all concerns are acted on; it does not prevent a proportionate, child-centred and educative response.

2. Statutory framework and related policies

This policy has regard to the current versions of:

- Keeping Children Safe in Education (KCSIE);
- Working Together to Safeguard Children;
- What to do if you are worried a child is being abused: advice for practitioners;
- Prevent duty guidance;
- Working together to improve school attendance and Children Missing Education guidance;
- the statutory Relationships, Sex and Health Education guidance;
- the Academy Trust Handbook and Academy trust governance guide; and
- Lincolnshire Safeguarding Children Partnership procedures, local criteria for action, referral arrangements and the Lincolnshire Joint Professional Escalation and Resolution Protocol.

The principal legislation includes the Education Act 2002; Children Acts 1989 and 2004; Education (Independent School Standards) Regulations 2014; Children and Social Work Act 2017; Safeguarding Vulnerable Groups Act 2006 as amended; Protection of Freedoms Act 2012; Crime and Policing Act 2026; Children's Wellbeing and Schools Act 2026; Equality Act 2010 and Public Sector Equality Duty; Human Rights Act 1998; Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025; Domestic Abuse Act 2021; Female Genital Mutilation Act 2003; Serious Crime Act 2015; Counter-Terrorism and Security Act 2015; Sexual Offences Act 2003; Voyeurism (Offences) Act 2019; School Premises (England) Regulations 2012; School Attendance (Pupil Registration) (England) Regulations 2024; and Rehabilitation of Offenders Act 1974.

2.1 Related School policies

This policy should be read with the School's policies and procedures on:

- allergy safety
- attendance and children missing education;
- behaviour, anti-bullying, suspension and permanent exclusion;

- staff code of conduct and whistleblowing;
- safer recruitment, the single central record;
- online safety, acceptable use, BYOD, mobile phones, filtering and monitoring and generative AI;
- relationships, sex and health education;
- SEND, supporting students with medical conditions;
- data protection, records retention and information security;
- educational visits, alternative provision and use of school premises and
- complaints and equality.

3. Definitions, terminology and equality

3.1 Core definitions

Term	Meaning for this policy
Child	Everyone under the age of 18. The School will also safeguard students who have reached 18 while enrolled.
Safeguarding and promoting welfare	Providing help and support as soon as problems emerge; protecting children from maltreatment inside or outside the home, including online; preventing impairment of mental and physical health or development; ensuring safe and effective care; and acting to enable the best outcomes.
Child protection	The part of safeguarding concerned with protecting children who are suffering, or are likely to suffer, significant harm.
Abuse	Maltreatment by inflicting harm or failing to prevent harm. Harm may be physical or non-physical and includes the impact of seeing, hearing or experiencing the effects of ill-treatment of another.
Neglect	Persistent failure to meet a child's basic physical and/or psychological needs, likely to seriously impair health or development.
Exploitation and modern slavery	Abuse involving coercion, manipulation, deception, trafficking, criminal or sexual exploitation, forced labour, servitude, forced criminality or other forms of exploitation. A child cannot consent to exploitation or trafficking.
Making or sharing nudes and semi-nudes	The creation, sending or posting of nude or semi-nude images by young people under the age of 18. 'Images' includes all visual content, such as photographs, videos and livestreams. Images may be taken by the young person themselves, taken or created by another person, digitally altered, or wholly generated using artificial intelligence, including 'deepfakes' or 'deep nudes'.
Data protection laws	The Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 collectively.

The terms "victim" and "alleged perpetrator" are used for clarity. The School will use language with which the child is comfortable and will consider terminology carefully, especially because a child who has caused harm may also have experienced abuse or trauma.

3.2 Equality and children who may face additional risk

The School complies with the Equality Act 2010, the Public Sector Equality Duty and the Human Rights Act 1998. It will not unlawfully discriminate and will make reasonable adjustments for disabled children. Safeguarding decisions will consider the safety, welfare, dignity, privacy and rights of the child and other children.

Any child may need additional support. Staff should be particularly alert where a child:

- is disabled, has SEND, a medical condition, communication needs or neurodiversity;
- has a mental-health need, is self-harming, has an eating disorder, shows suicidal ideation or is misusing alcohol or other drugs;
- is a young carer, is pregnant and/or is a parent;

- has experienced adversity or trauma, is looked after, previously looked after, in kinship care, a care leaver or has a social worker;
- has a parent or carer in custody or is affected by parental offending;
- is repeatedly absent, missing from education, home or care, on a part-time timetable, repeatedly removed from lessons, suspended, at risk of exclusion or placed in alternative provision;
- is at risk of domestic abuse, honour- or faith-based abuse, FGM, forced marriage, trafficking, modern slavery, sexual exploitation, criminal exploitation, financial exploitation, county lines, radicalisation or serious violence;
- has begun to display abusive, violent or harmful behaviour;
- is lesbian, gay or bisexual, is perceived to be so, or is questioning their gender and may be vulnerable to discriminatory bullying;
- is privately fostered, homeless or placed in temporary accommodation, or lives in family circumstances involving substance misuse, adult mental ill-health or domestic abuse; or
- faces language, cultural, social or other barriers to seeking help.

Identity or protected characteristics are not in themselves safeguarding risks. The risk arises from abuse, discrimination, bullying, unmet need, isolation or other circumstances. Staff must avoid assumptions and remain professionally curious.

4. Roles and responsibilities

4.1 All staff, volunteers and adults working in School

All staff must read and understand Part One of KCSIE 2026 and confirm annually that they have done so. The Part One Overview may be used as a supplementary aide-memoire but does not replace Part One. Additionally, leaders and staff who work directly with children will read Annex A, "Further information". All trustees will read KCSIE in full. Volunteers will receive safeguarding information and training proportionate to their role.

At induction, staff receive this policy, the behaviour policy, staff code of conduct, whistleblowing arrangements, the safeguarding response to absence from education, online safety and filtering and monitoring expectations, and the identity and role of the DSL and Deputies.

Every adult must:

- provide a safe environment and act in the child's best interests;
- know the signs and indicators of abuse, neglect, exploitation, modern slavery, child-on-child abuse, mental-health crisis and other safeguarding concerns;
- act immediately on any concern and record it accurately on MyConcern;
- speak to the DSL or a Deputy DSL, or make a direct referral where necessary;
- never promise secrecy, investigate an allegation or view, copy, forward or unnecessarily retain illegal sexual images;
- reassure children, listen without judgement and recognise that disclosure may be indirect, delayed or incomplete;
- share relevant information promptly and challenge delay or inaction;
- understand community-based Early Help, Family Help and statutory referral thresholds;
- report any concern about an adult, no matter how small, through the correct route;
- challenge abusive, discriminatory, sexualised, violent or derogatory behaviour; and
- maintain professional boundaries and follow the staff code of conduct.

4.2 Designated Safeguarding Lead and Deputy DSLs

The DSL is a member of the Leadership Team with lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place. The DSL has appropriate authority, status, time, training, funding, resources and access to the Headteacher and Board.

The DSL or a trained Deputy is available during the school day. Robust cover is maintained during illness, leave and other absence, including through the School's confidential shared pastoral inbox so concerns are received, reviewed and acted on without delay.

Appropriate safeguarding cover arrangements are made for out-of-hours and out-of-term School activities.

The DSL and Deputies will:

- manage and support referrals to children's social care, police, Channel, the Disclosure and Barring Service and other agencies;
- understand local thresholds, Family Help, section 17 and section 47 processes, escalation procedures and multi-agency arrangements;
- support staff who make referrals and ensure statutory assessments are assisted promptly;
- maintain a complete safeguarding picture and coordinate risk and support plans;
- understand harmful sexual behaviour, sexual violence, serious violence, exploitation, modern slavery, domestic abuse and mental-health risk;
- work with the SENCO, designated teacher, mental-health lead, attendance staff, IT support and other professionals;
- oversee secure, accurate records, information sharing, Operation Encompass notifications and transfer of child protection files;
- ensure children's wishes and feelings are understood and trusted relationships are promoted;
- ensure the policy is available, understood, reviewed annually and aligned with local arrangements;
- have their training updated at least every two years, undertake Prevent training and refresh knowledge at least annually; and
- keep the Headteacher informed of significant issues and provide safeguarding reports to trustees without identifying children unnecessarily.

4.3 Headteacher

The Headteacher is responsible for implementing this policy, ensuring staff understand and follow it, providing effective DSL cover and resources, embedding a whole-school safeguarding culture, ensuring appropriate filtering and monitoring and acting as case manager for allegations about adults other than the Headteacher.

The Headteacher is the ultimate decision-maker for low-level concerns, although decisions will normally be made collaboratively with the DSL and HR advice. The Headteacher ensures safeguarding is included in contracts, premises hire, alternative provision, work experience and other commissioning arrangements.

The Headteacher ensures that this policy is communicated to parents and carers when their child joins the School and is available on the School website.

4.4 Board of Trustees

The Board has strategic leadership responsibility for safeguarding. It will:

- approve and review this policy at least annually and hold the Headteacher to account for implementation;
- appoint a senior board-level safeguarding lead who is not the DSL;
- ensure all trustees receive safeguarding and online-safety training at induction and regular updates sufficient to test and challenge the School's arrangements;
- ensure the DSL has appropriate independence, authority, status, time and resources;
- ensure safer recruitment, low-level concern, allegations, whistleblowing, attendance, child-on-child abuse and online-safety systems are effective;
- ensure filtering and monitoring responsibilities are assigned and effectiveness is reviewed at least once in every academic year by the responsible senior leader, supported by the DSL and IT support;
- ensure that the annual filtering and monitoring review is formally documented and that actions arising are monitored to completion;
- receive assurance that filtering works on all internet-connected devices in relevant locations and that checks and actions are recorded;
- seek assurance that safeguarding concerns, referrals, child-on-child abuse incidents, attendance concerns and exclusion-related safeguarding risks are identified, recorded, monitored and acted upon appropriately;
- consider equality, human-rights and data-protection implications in significant decisions and policy development;

- ensure safeguarding requirements are included in any transfer-of-control, lease, hire or service agreement; and
- ensure lessons from incidents, complaints, practice reviews and local or national guidance are acted on.

The Chair of Trustees acts as case manager where the Headteacher is the subject of a concern or allegation. A conflict of interest is avoided and the LADO is contacted directly where required.

4.5 Designated teacher, SENCO, Virtual School Head and other leads

The designated teacher works closely with the DSL and Virtual School Head to promote the education and safeguarding of looked-after and previously looked-after children. The Virtual School Head is a strategic leader within local authorities in England who promotes the educational outcomes of children with a social worker and children in kinship care. The DSL liaises with the SENCO where a child with SEND is involved in a concern, and with the mental-health lead while recognising that safeguarding responsibility remains with the DSL. Attendance, behaviour, pastoral and curriculum leads share relevant information and contribute to plans.

5. Responding to a concern about a child

5.1 Immediate action

1. If a child is in immediate danger, call 999.
2. If a child is suffering or is likely to suffer harm, make an immediate referral to Lincolnshire Children's Services and, where appropriate, the police. Do not wait for the DSL if delay would place a child at risk.
3. Tell the DSL or a Deputy DSL as soon as possible and record the concern, action and outcome on MyConcern.
4. If the DSL and Deputies are unavailable, speak to another senior leader and/or seek advice directly from children's social care. The absence of a DSL must never delay action.

Staff must not assume that a colleague or another professional will take action. A staff member who makes a referral should expect to support children's social care and other agencies and must follow up if an outcome is not provided within one working day.

5.2 If a child tells you or indicates that they have been harmed

Do	Do not
Listen carefully; give the child your full attention; remain calm; use the child's language; allow time.	Do not investigate, interrogate, challenge the child, ask leading questions or seek proof.
Reassure the child that they have done the right thing and will be taken seriously.	Do not blame, shame, minimise, express disbelief or say they should have told you earlier.
Explain that you must share the information with people who can help and tell them what will happen next.	Do not promise confidentiality or agree to keep the information secret.
Ask open questions only where necessary to establish whether harm occurred and its nature, for example "Tell me what happened".	Do not ask the child to repeat the account unnecessarily or confront any person involved.
Record the child's words accurately as soon as possible, including context, date, time, actions and who was informed.	Do not add personal opinion, interpretation or speculation.
Report immediately to the DSL or Deputy and mark the MyConcern record urgent when required.	Do not discuss the matter with people who do not need to know.

A child may disclose indirectly through behaviour, a friend, an overheard conversation, online activity or gradual fragments of information. Trauma may affect memory. Staff should respond with empathy and professional curiosity, recognising additional barriers related to disability, communication, sex, ethnicity, sexual orientation, language or fear.

5.3 Recording on MyConcern

All safeguarding concerns, discussions, decisions, actions and reasons must be recorded. The record must include:

- a clear and comprehensive summary of the concern in the child's own words where possible;
- the context, date, time, location and people present;
- how the concern was followed up and resolved;
- action taken, decisions reached and outcomes, including why a referral was or was not made; and
- any continuing risk, support, review date and person responsible.

Where staff cannot access MyConcern, they must make a signed, dated written record and give it directly to a DSL. The record will then be uploaded securely. If in doubt, staff should record and speak to a DSL.

5.4 Options following a concern

Led by the DSL, and without delaying immediate protection, the response may include one or more of:

- internal pastoral, academic, attendance or mental-health support;
- universal services or community-based Early Help;
- a targeted Family Help assessment and coordinated multi-agency support;
- services under section 17 of the Children Act 1989 for a child in need;
- an immediate section 47 referral where significant harm is suspected;
- police involvement where a crime may have been committed;
- a National Referral Mechanism referral where modern slavery or trafficking is suspected; and
- a safety, support, risk-management or behaviour plan, with review and escalation.

5.5 Family Help, statutory intervention and escalation

Family Help means coordinated support provided as soon as a problem emerges. It includes targeted early help and support and services under section 17. Community-based Early Help and universal services may be used before a targeted Family Help assessment where appropriate.

Staff will understand local criteria for action and the levels of need for targeted early help, section 17 child-in-need services, section 20 accommodation, section 31 care or supervision orders and section 47 enquiries, including local procedures relating to abuse, neglect and exploitation, disabled children and children managed within the youth secure estate. Targeted early help is voluntary and ordinarily requires family consent. Consent is not required to share information or refer where a child is at risk of harm.

The DSL normally coordinates the assessment and liaison. Suitably qualified practitioners who lead work at targeted early help may continue to lead if the child later receives section 17 support. Cases are kept under constant review and escalated or re-referred if support is ineffective, risk increases or the situation deteriorates.

The referrer follows up if the local authority decision is not received within one working day. If professional disagreement or delay leaves the child at risk, the Lincolnshire Joint Professional Escalation and Resolution Protocol will be used. The child's circumstances remain under review until the concern is resolved.

5.6 Parents and carers

The DSL will normally inform and work with parents or carers, and will consider the child's views. Parents will not be contacted before advice is obtained where doing so may place the child or another person at increased risk, lead to loss of evidence, impede a police or social-care investigation, or is otherwise contrary to the child's best interests.

Where the School makes a referral without the child's or parent's agreement, the decision and reasons will be explained where safe and appropriate, recorded, and supported by specialist advice.

6. Information sharing, confidentiality and safeguarding records

6.1 Information sharing

Information sharing is essential to identify and respond to abuse, neglect and exploitation. Data protection laws do not prevent appropriate safeguarding information from being shared. Fear of sharing information must not stand in the way of protecting children.

Staff should share information early and proactively with the DSL and relevant agencies. Professional judgement will ensure information is:

- relevant to the current safeguarding risk;
- necessary for the receiving person or setting to know;
- focused and proportionate, without omitting information that may be important to understanding or managing risk;
- accurate, clearly presented and appropriately contextualised;
- shared securely and only with those who need it; and
- recorded, including the legal basis, decision and reason where appropriate.

Special-category personal data may be shared without consent where the safeguarding processing condition or another lawful basis applies, including where consent cannot be obtained, cannot reasonably be expected or would place a child at risk. The School will withhold information where the serious-harm test requires it and seek data-protection or legal advice where necessary.

The School will have regard to the statutory information-sharing duty and associated guidance as it is brought into force. Confidentiality means limiting information to those who need it; it never means keeping a safeguarding concern secret.

6.2 Child protection files and transfer

Safeguarding information is confidential, held securely and kept separately from the main student record, including within MyConcern. Access is restricted to those with a professional need. Records are retained in accordance with the School's retention schedule and legal requirements.

When a child leaves, the DSL ensures the child protection file is transferred securely and separately, with confirmation of receipt:

- within five days for an in-year transfer; or
- within the first five days of a new term for a transfer at the start of term.

Where a child protection file is transferred, the School will include a clear, structured summary of current safeguarding concerns, relevant context and ongoing support needs, distinguishing current concerns from historic information. On receipt, safeguarding information will be reviewed promptly by an appropriately trained member of staff and clarification sought where it is unclear or incomplete.

The DSL will consider sharing relevant information in advance where this is needed to have support or risk-management arrangements in place on arrival. This includes information about a social worker, Channel support, serious violence, harmful behaviour, carrying or use of weapons, or risk to other students or staff. Where risk is identified, the receiving setting is expected to complete a risk assessment and establish a safety and support plan. Direct DSL-to-DSL discussion is good practice.

Where a child protection file is transferred, the School will include a clear, structured summary of current safeguarding concerns, relevant context and ongoing support needs, distinguishing current concerns from historic information. On receipt, safeguarding information will be reviewed promptly by an appropriately trained member of staff and clarification sought where it is unclear or incomplete.

6.3 Operation Encompass records

Operation Encompass notifications contain personal and sensitive information and are received through the agreed secure route. The DSL or an appropriately trained Deputy DSL – the School's Safeguarding Officer - acts as the Key Adult for Operation Encompass notifications. The DSL maintains overall safeguarding oversight. Notifications are recorded securely, used to arrange timely support and shared only where necessary. They do not replace normal safeguarding enquiries or referral to children's social care.

7. Recognising abuse, neglect, exploitation and safeguarding issues

KCSIE contains the national definitions, indicators and further information. This policy does not reproduce them in full. Staff must remain alert to physical abuse, emotional abuse, sexual abuse, neglect, exploitation, modern slavery and overlapping forms of harm. Abuse may occur in families, institutions, communities, intimate relationships, extra-familial contexts or online, and may be perpetrated by adults or children.

Emotional abuse may include persistent criticism, belittling, name-calling, silencing or making fun of a child. Children may also cause harm to parents or caregivers, sometimes described as child-to-parent or child-to-caregiver abuse. Technology may be both the setting and facilitator of abuse, and online and offline harm often occur together.

Issue	School response
Child criminal and sexual exploitation, county lines and modern slavery	Treat the child as a victim. Consider organised networks, coercion, debt, weapons, financial exploitation, trafficking and criminalisation of the child. Make child-protection and, where appropriate, National Referral Mechanism referrals.
Domestic abuse and child-to-parent/caregiver abuse	Children are victims in their own right if they see, hear or experience the effects. Record Operation Encompass information securely, provide timely support and make a referral where thresholds are met.
Honour- or faith-based abuse, FGM and forced marriage	Report immediately to the DSL. Teachers personally report to police where FGM appears to have been carried out on a girl under 18. Staff must not examine a child. Forced marriage under 18 is illegal regardless of coercion.
Radicalisation and terrorism	Report to the DSL. Assess under Prevent, seek local advice and consider Channel, police and children's social care. Emergency concerns go to 999. Channel information is shared with police as required.
Serious violence and weapons	Any concern about carrying, using, threatening with or intending to use a weapon is reported immediately. The DSL assesses risk to the child and others, considers peer conflict and exploitation and establishes a safety and support plan.
Mental health, self-harm, eating disorders and suicide risk	Mental-health concerns may be safeguarding concerns. Report to the DSL, use evidence-based support, call 999 or arrange A&E for immediate danger, and use NHS 111 mental-health option for urgent non-emergency help.
Cybercrime	Report concerns to the DSL. Consider illegal hacking, denial-of-service attacks, malware and whether referral to the police Cyber Choices programme may divert the child to positive use of skills.
Homelessness and temporary accommodation	The DSL works with housing and children's services. A local-authority notification that a child has entered temporary accommodation prompts early support but does not replace a safeguarding referral.
Private fostering	Notify the local authority where a child under 16, or under 18 if disabled, is cared for by a non-relative for 28 days or more, or where this is intended. Where a student falls outside the statutory definition of private fostering, but their living arrangements give rise to concerns about their safety or welfare, these will be considered and responded to through the School's usual safeguarding procedures.

8. Child-on-child abuse, harmful sexual behaviour, harassment and violence

Children can abuse other children in and outside School and online. The absence of reports does not mean abuse is not occurring. Staff should be alert to locations and times of heightened risk, including immediately after school and on transport.

Child-on-child abuse may include:

- bullying, cyberbullying, and prejudice-based or discriminatory bullying, including homophobic, biphobic, transphobic and gender-related bullying;
- abuse in intimate personal relationships between children, including physical, sexual or emotional abuse and stalking;
- physical abuse, serious assault, threats or harm involving a weapon;
- harmful sexual behaviour, sexual harassment and sexual violence;
- causing someone to engage in sexual activity without consent;
- consensual or non-consensual making or sharing of nudes and semi-nudes, including AI-generated images;
- upskirting; and
- initiation or hazing violence and rituals.

Child-on-child abuse is a safeguarding issue for the victim, the alleged perpetrator and other affected children. It is preventable. Early recognition, evidence-based intervention, safe relationships, effective RSHE and challenge to misogyny, misandry and abusive conduct can prevent escalation.

The School recognises that many forms of child-on-child abuse disproportionately affect girls and young women. The School adopts a whole-school approach to preventing violence against women and girls, misogyny, sexual harassment and harmful sexual behaviour. Staff will challenge inappropriate attitudes, language and conduct wherever they occur. Child-on-child abuse will never be dismissed as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”.

8.1 Reporting and immediate response

Staff must record and report the concern immediately to the DSL and must not investigate. Where possible, an initial report is managed with two members of staff present, preferably including the DSL or a Deputy, while avoiding repeated questioning. The DSL leads the response, protects the anonymity of all children as far as reasonably possible, and considers the child's wishes, the nature and location of the incident, age and development, power imbalance, disability, patterns, context, possible crime, risk to others and links to exploitation or intra-familial harm.

The DSL will consider an immediate written risk and needs assessment for sexual harassment and will complete one following sexual violence. It will address the victim, alleged perpetrator, potential other victims, witnesses, wider School community, location, transport, online contact and support. It is regularly reviewed and does not replace specialist assessment.

The response may include internal management and pastoral support, community-based Early Help, targeted Family Help, children's social care and/or police. A report of rape, assault by penetration or sexual assault starts from the position that it should be passed to the police, including where the alleged perpetrator is under ten; the police will take a welfare approach in that case.

For a report of rape or assault by penetration, the alleged perpetrator will be removed from shared classes while facts are established and agencies consulted. Reasonable separation across the site, activities and transport will be considered. Where a criminal investigation is underway into rape, assault by penetration or sexual assault, the alleged perpetrator will be removed from any classes shared with the victim; the School will also consider how best to maintain reasonable separation on site and on transport.

For other reports, shared classes and proximity are considered immediately. These actions protect children and are not a judgement of guilt. Where police bail or release under investigation carries no suitable conditions, the School still assesses and puts in place any additional measures needed to manage risk, trauma, intimidation or contact.

8.2 Harmful sexual behaviour and consent

Harmful sexual behaviour exists on a continuum from developmentally expected behaviour to inappropriate, problematic, abusive or violent behaviour. The child's age, development, vulnerability, power, coercion, frequency and impact are considered. Behaviour may indicate the child who caused harm has experienced abuse, trauma or exposure to harmful content and needs safeguarding support.

Consent means freedom and capacity to choose. It can be limited to a particular activity, can be withdrawn at any time and must be present each time. A child under 13 can never consent to sexual activity; the age of consent is 16; and sexual intercourse without consent is rape. Staff do not determine criminal liability but must understand these principles to safeguard children.

8.3 Supporting and safeguarding children

Victims are taken seriously, supported and protected from further harm, bullying, harassment and isolation. Wherever reasonably possible they choose a trusted adult and continue their normal routine. Support may include Family Help, children's social care, mental-health services, sexual assault referral services and specialist sexual-violence support. Support continues for as long as needed, including where police or prosecutors take no further action, an allegation is withdrawn or there is a not-guilty verdict; none of those outcomes necessarily means the reported harm did not occur. A move to another setting should only be considered for the victim at their request and after discussion with parents or carers.

The alleged perpetrator receives education, safeguarding assessment and support alongside proportionate sanctions. Support and discipline are not mutually exclusive. Following a conviction or caution, the risk and needs assessment and protective arrangements are updated and the School considers all lawful sanctions, including permanent exclusion where appropriate. If a child who has caused harm moves setting, the DSL shares the child protection file, ongoing support needs and, where appropriate, risks to children or staff. The School may reach its own conclusion on the balance of probabilities while police or social-care enquiries continue, provided this does not prejudice those enquiries. Decisions and their rationale are recorded.

Any internal fact-finding will be authorised by the DSL and Headteacher and carried out under the Behaviour Policy and harmful sexual behaviour procedures, taking account of advice from the police or children's social care and without prejudicing external enquiries.

Parents or carers of the children involved are normally engaged unless this would increase risk. Information about another child is limited and shared consistently with agency advice. Witnesses and siblings are considered. Social media, transport and the possibility of children taking sides are managed through the risk assessment.

8.4 Making or sharing nudes and semi-nudes, including AI-generated images

Every incident requires a safeguarding response

This applies whether the image is consensual or non-consensual, self-generated, taken by someone else, digitally altered or wholly generated using AI.

A member of staff who becomes aware of an incident must report it immediately to the DSL or a Deputy. Staff must not:

- view, copy, print, forward, save or store the image, or ask a child to show or download it, unless viewing is unavoidable and specifically managed under current UKCIS guidance;
- delete the image or ask the child to delete it before the DSL or police have considered preservation of evidence;
- ask detailed questions about the image or investigate;
- share information beyond those who need to know; or
- blame or shame any child.

The DSL undertakes an initial review and considers immediate risk, coercion, grooming, blackmail, exploitation, age, capacity, distribution, adult involvement, need to preserve a device, parents, police and children's social care. Adult-involved incidents are child sexual abuse offences and are referred immediately to police and social care. The DSL will actively consider coercion, grooming, financial sexual extortion, AI manipulation and possible adult involvement. Where adult involvement is known or suspected, the incident will be referred immediately to the police and children's social care.

The DSL follows current UKCIS advice, the School's searching and confiscation powers and police guidance. All decisions are recorded. Children are supported to use services such as Report Remove and specialist help where appropriate.

9. Online safety, generative AI, mobile phones and cyber security

Online safety is a running and interrelated theme across safeguarding, curriculum, staff training, parental engagement and School policies. Risks are considered through the four Cs:

Risk	Examples
Content	Pornography; racism; misogyny; self-harm and suicide content; antisemitism; radicalisation and extremism; extreme sexual or physical violence; misinformation, disinformation, fake news and conspiracy theories.
Contact	Harmful interaction with users or generative-AI applications that simulate human interaction; peer pressure; advertising; adults posing as children; grooming and sexual, criminal or financial exploitation.
Conduct	Making, sending or receiving explicit images, including AI-generated images; bullying; harassment; non-consensual sharing; unsafe livestreaming; harmful challenges; misuse of data.
Commerce	Gambling; inappropriate advertising; phishing; scams; financial exploitation and misuse of bank accounts.

The School will:

- teach children how to keep themselves and others safe online through age-appropriate, inclusive RSHE and the wider curriculum, including deepfakes, pornography, misogynistic influencers, image sharing, scams and how to seek help;
- train staff at induction and regularly thereafter in online safety, filtering and monitoring responsibilities and generative-AI risks;
- use appropriate filtering and monitoring on school networks and devices while avoiding unreasonable over-blocking;
- assign clear roles and review the effectiveness of filtering and monitoring at least once every academic year, led by the responsible senior leader with the DSL and IT support;
- test filtering on all internet-connected devices in relevant locations, record the checks, act on weaknesses and ensure staff know how to escalate concerns;
- complete an annual online-safety risk assessment reflecting the actual risks faced by students, including those at greater risk of harm;
- apply safeguarding, ethical, data-protection, intellectual-property and product-safety controls to teacher-facing and student-facing generative AI;
- maintain cyber-security and access-management measures consistent with DfE standards and protect personal information;
- communicate with parents about online activity, remote education, filtering and monitoring and age-appropriate screen-time support; and
- respond promptly to online incidents, including those occurring outside School where they affect a child's safety or school community.

9.1 Mobile phones and personal devices

The School is a mobile-phone-free environment by default throughout the school day. Students in Years 7 to 11 must not access mobile phones during lessons, movement time, break or lunch. Sixth Form use is limited to designated Sixth Form areas in accordance with the current School policy. Any exception must be authorised for a specific educational, medical, safeguarding, SEND or reasonable-adjustment need.

Staff personal-device use is governed by the staff code of conduct. Staff do not photograph or record children on personal devices except where a specifically authorised School purpose and procedure

applies; content must be transferred securely and deleted from the personal device without delay. Searches and confiscation are undertaken only in accordance with law and School policy.

10. Children potentially at greater risk of harm

10.1 Children with a social worker, looked-after children, care leavers and kinship care

The DSL holds and uses information that a child has a social worker to inform safeguarding, attendance, behaviour, pastoral and academic decisions. Appropriate staff know the child's legal status, care and contact arrangements, social worker, Personal Adviser where relevant and Virtual School Head. The designated teacher and DSL work together to promote educational outcomes. The role of the Virtual School Head in attendance and children in kinship care is recognised.

10.2 Attendance, children missing education and elective home education

Repeated or prolonged absence, missing education, a part-time timetable, repeated removal from lessons, suspension, exclusion and alternative provision can be warning signs of neglect, exploitation, mental-health need, serious violence, radicalisation, FGM or forced marriage. Attendance and safeguarding information are considered together and vulnerable students receive a timely response.

The School follows statutory attendance and children-missing-education procedures, makes required returns to the local authority and supports joint reasonable enquiries. Where a parent intends to electively home educate, the School seeks a coordinated discussion before the final decision where possible, particularly if the child has SEND, a social worker or other vulnerability. An immediate referral is made if risk thresholds are met.

Where the School receives notification that a child has been placed in temporary accommodation, the DSL records it and coordinates early safeguarding, attendance, welfare and educational support. The notification does not replace normal referrals.

If a student is unaccounted for during the school day, the DSL or a Deputy DSL will be informed and will coordinate the response. This will include an immediate check of the School site, including toilet facilities; enquiries with appropriate students and attempts to contact the missing student where appropriate; informing parents/carers; reviewing CCTV where appropriate; and contacting the police if the student's whereabouts remain unknown.

10.3 SEND, medical conditions and young carers

Children with SEND or medical conditions, including allergies, may face additional online and offline risk because signs are attributed to their condition, they are isolated or bullied, they have communication barriers, they do not recognise abuse, they need intimate care, they depend on adults, or they have difficulty distinguishing fact from fiction online and understanding the consequences of repeating content or behaviour. The DSL and SENCO liaise closely and ensure appropriate communication support and extra pastoral attention.

A medical incident alone is not necessarily a safeguarding matter. A referral is considered where the incident indicates neglect, abuse or exploitation, for example where essential information or medication is repeatedly withheld and the child is placed at risk.

Young carers are identified early and supported because caring responsibilities can affect attendance, attainment, behaviour and wellbeing. The School works with family, health, local-authority and voluntary services as appropriate.

The School follows the statutory Allergy safety in schools guidance and its separate Allergy Safety Policy.

10.4 Mental health

Staff promote wellbeing, identify emerging concerns, ensure early targeted support and liaise with specialist services. Only trained professionals diagnose mental-health conditions. Potential warning signs include marked behaviour change, persistent sleep difficulty, withdrawal, loss of interest, self-harm, neglect of self-care, eating-disorder signs, suicidal ideation or plans.

Where mental health is also a safeguarding concern, staff follow this policy and speak to the DSL immediately. If the child is in danger, staff call 999 or arrange immediate A&E attendance with a suitable adult. For urgent but non-emergency mental-health help, staff may use NHS 111 online or call 111 and

select the mental-health option. School interventions must be evidence-based, safe, effective and appropriate.

10.5 Lesbian, gay or bisexual children and children questioning their gender

Being lesbian, gay or bisexual is not a safeguarding risk. Children who are, or are perceived to be, lesbian, gay or bisexual may be vulnerable to discriminatory bullying, which the School prevents, sanctions and addresses. Children questioning their gender may also face bullying, complex mental-health or psychosocial needs and difficulties in family or peer relationships. Staff listen respectfully and remain professionally curious without assuming a particular outcome.

10.6 Requests for support with social transition

The School does not initiate social transition. This section applies when a child or parent asks the School to make changes so the child presents as the opposite biological sex. A member of staff must not independently change a child's name, pronouns, uniform, records, facilities, sport or other arrangements. Any request is referred to the Headteacher and DSL and considered through a documented, case-by-case process.

The process will:

- start with the safeguarding and best interests of the child and other children, which may not be the same as the child's wishes;
- involve parents or carers as a priority and give proper weight to their views, unless the DSL determines that involvement would create a greater risk to the child;
- consider the child's age, maturity, wishes, full circumstances, mental and physical health, neurodiversity, family and peer relationships, bullying and any clinical evidence or advice;
- involve the DSL, and where relevant the SENCO and appropriately qualified external professionals; staff will not provide clinical advice for which they are not trained;
- take a careful approach because social transition is an active intervention and evidence about long-term effects is limited;
- comply with safeguarding, equality, human-rights and data-protection law and record the legitimate aim and proportionality of decisions;
- explain sensitively the constraints on access to sex-separated facilities, accommodation and safety-based single-sex sport;
- record a child's biological sex accurately wherever it is recorded and ensure that all relevant staff are aware of it; information will be handled in accordance with confidentiality and data-protection law.
- be reviewed at suitable intervals and whenever circumstances, needs, risk or resources change; and
- support any child who wishes to reverse or partially reverse an earlier arrangement.

Where a child confides feelings but does not ask the School to change how they are treated, confidentiality is not broken merely because of those feelings unless a related safeguarding risk exists. Normal safeguarding procedures and appropriate parental involvement apply where wellbeing or safety concerns arise. The DSL is involved where a child may be living in stealth and the School remains alert to associated anxiety, puberty-related and wider safeguarding vulnerabilities. Arrangements made before 1 September 2026 are reviewed under these principles, with careful consideration of the impact of any change. Policies remain flexible and avoid rigid gender stereotypes. Bullying and harassment are never tolerated.

10.7 Domestic abuse and Operation Encompass

Children are victims of domestic abuse if they see, hear or experience its effects, including in their own intimate relationships. Police now have a statutory duty, through Operation Encompass arrangements, to notify relevant education settings where they reasonably believe a child may be a victim of domestic abuse. Notifications may concern children not present at the incident.

The School's Safeguarding Officer (dDSL) receives and secures the notification, records it, considers immediate support and assesses whether a separate referral is required, in liaison with the DSL. Sexual-offence information must not be included in an Operation Encompass notification; if received or disclosed, the DSL seeks advice and protects statutory anonymity.

10.8 Exploitation, modern slavery and serious violence

CCE and CSE may be one-off or repeated, involve an individual or organised network, occur online or offline and include exchange, coercion, violence, debt, threats, trafficking or financial advantage. Most child sexual abuse is committed by a person already known to the victim. Children may identify with the group exploiting them and may be criminalised for actions under coercion. Staff treat them as victims and report indicators such as missing episodes, unexplained money or possessions, older associates, drug activity, sexual-health concerns, weapons, trap houses, cuckooing, debt bondage or use of bank accounts. Where trafficking or modern slavery is suspected, the DSL considers child-protection and National Referral Mechanism referrals and access to an Independent Child Trafficking Guardian where available.

Serious violence includes assault, carrying or using weapons and threats of harm, often linked to peer conflict, bullying or exploitation. Risk may be increased by disrupted education or offending history. The DSL assesses risk to the child and others, considers de-escalation of peer conflict and establishes a safety and support plan. Early evidence-based support, trusted adults, mentoring or therapeutic input are considered.

10.9 Alternative provision

Where the School places a child in alternative provision it remains responsible for safeguarding that student.boys Before placement, the School will complete due diligence, obtain written confirmation of appropriate safeguarding checks and require the provider to notify the School of staff changes or other arrangements that could increase risk.

The School will maintain an accurate record of the student's location during school hours, including any subcontracted provision or satellite sites. The placement, attendance, safety and continuing suitability will be reviewed at least half-termly and more frequently where risk requires. Any safeguarding concern will trigger an immediate review and the placement will be ended where necessary unless or until the concern has been satisfactorily addressed.

11. Premises, sport, educational visits, reasonable force and external use

11.1 Toilets, changing rooms and showers

The School provides separate toilets for boys and girls aged eight and over, except where a self-contained toilet is intended for one student at a time and can be locked from inside. Students are not permitted to use toilets designated for the opposite biological sex. A child aged 11 or over at the start of the school year will not be required or permitted to undress in front of a child of the opposite biological sex or use changing rooms or showers designated for the opposite sex.

Where a child does not wish to use the facility designated for their biological sex, the School will consider a safe alternative such as a self-contained, lockable single-user facility or access at an alternative time, without removing or compromising single-sex provision or the safety, comfort, privacy and dignity of any child. Arrangements are documented, communicated only as necessary and reviewed regularly. Any mixed-sex toilet provision is individually lockable, opens directly onto a public area such as a corridor, and is risk assessed.

11.2 Sport

The School may organise single-sex sport where the physical strength, stamina or physique of the average girl would place her at a disadvantage against the average boy, or vice versa. Where single-sex participation is required for safety, there are no exceptions and participation is based on biological sex. Where safety is not the issue, requests are considered under the social-transition process, including fairness, safeguarding, equality and the interests of all children. National governing-body guidance is followed.

11.3 Overnight accommodation and educational visits

For School-arranged overnight visits, children do not share sleeping accommodation with children of the opposite biological sex. If a child does not wish to share with children of the same sex, a separate arrangement is sought where possible without compromising any child's safety, comfort, privacy or

dignity. Risk assessments cover supervision, private care, online safety, medical needs, transport, safeguarding contacts and how students obtain help.

11.4 Reasonable force and restrictive intervention

Staff may use reasonable force only in lawful, limited circumstances and use no more force than necessary for the least amount of time. Decisions depend on individual circumstances. The School does not adopt a blanket "no contact" policy that would prevent staff from protecting children. SEND, mental-health and medical vulnerabilities, reasonable adjustments and the Public Sector Equality Duty are considered, with positive and proactive plans used to reduce the need for intervention. Incidents are recorded, reviewed and parents informed as appropriate.

11.5 Use of premises by other organisations

Where the School directly manages an activity, this policy applies. Where an external body operates separately, the School seeks and records assurance that it has suitable safeguarding and child-protection policies, checks and reporting arrangements, inspects these where necessary and provides a named liaison route. Safeguarding requirements are conditions of any lease, hire or transfer-of-control agreement, and non-compliance may lead to termination. Allegations relating to activities on School premises are reported under this policy and to the LADO where appropriate.

12. Concerns or allegations about adults

The School manages every safeguarding concern or allegation about an adult working in or on behalf of the School, no matter how small. This includes staff, supply teachers, trainee teachers, volunteers, contractors, agency workers, trustees and people working for organisations using the premises.

12.1 Reporting route

Concern relates to	Report immediately to
Any member of staff, supply staff, trainee teacher, volunteer or contractor	The Headteacher
The Headteacher	The Chair of Trustees
A situation in which reporting to the Headteacher creates a conflict of interest	The LADO directly
A trustee	The Chair of Trustees and LADO under local procedure; if the Chair is involved, another independent trustee/professional and the LADO
Poor or unsafe safeguarding practice or failure to act	Headteacher ; use whistleblowing route if unresolved

12.2 Concerns or allegations that may meet the harm threshold

The harm-threshold procedure applies where an adult may have:

- behaved in a way that harmed a child or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way indicating that they may pose a risk of harm; or
- behaved, or may have behaved, in a way indicating that they may not be suitable to work with children, including behaviour outside work and transferable risk.

The case manager protects the child, ensures immediate referrals where required and discusses the nature, context and content with the LADO without delay. Before contacting the LADO, only basic enquiries permitted by local procedures are undertaken to establish facts, such as whether the adult was present, could have had contact, whether there were witnesses or CCTV, without jeopardising police or social-care enquiries.

The LADO advises and oversees the process but does not investigate. The case manager coordinates with police, children's social care, HR and any employing agency or training provider, informs and supports the adult at the appropriate time, supports the child and parents, maintains confidentiality, monitors progress and records decisions. Where complexity, independence or capacity requires it, an independent

investigator is appointed. Wherever possible the first review takes place no later than four weeks after the initial assessment; subsequent reviews are set ideally at fortnightly, and no longer than monthly, intervals.

12.3 Supply teachers, trainee teachers and contracted staff

The School shares safeguarding responsibility with the agency, employer or training provider. The School gathers the facts and manages the safeguarding process because it has access to children, staff and site information. The agency or provider normally leads employment or disciplinary action. The School will not simply stop using a person without finding out the facts and consulting the LADO. Relevant employers or providers are invited to meetings and informed of outcomes and referral duties.

12.4 Suspension and support

Suspension is not automatic. It is considered only where there is reason to suspect risk of harm or the allegation is so serious that dismissal may result. Alternatives include supervised work, redeployment, an assistant being present, preventing unsupervised access or temporary work elsewhere. Moving a child is considered only where in the child's best interests, with their views and parents considered, and is not presented as a punishment. The rationale, alternatives and advice are recorded. Written confirmation and a named support contact are provided if suspension occurs.

The welfare of the child is paramount, and the employer also owes a duty of care to the adult. Appropriate welfare, occupational-health, counselling, trade-union or colleague support is offered. Confidentiality and statutory reporting restrictions are maintained.

12.5 Outcomes, records and referrals

Outcomes are recorded as substantiated, malicious, false, unsubstantiated or unfounded using KCSIE definitions. A lack of criminal charge or a not-guilty verdict does not determine the School's employment or safeguarding decision. The investigation continues where possible if the adult resigns or ceases work. A settlement agreement must not prevent safeguarding investigation, DBS/TRA referral or an accurate reference. A non-recent allegation made by a child is reported to the LADO under local procedure; an adult reporting abuse experienced as a child is advised to report it to the police.

The School makes a DBS referral as soon as possible where a person is removed from regulated activity, or would have been removed had they not left, and the statutory criteria are met. This applies to paid staff and volunteers. The School considers referral to the Teaching Regulation Agency where a teacher is dismissed or would have been dismissed for serious misconduct, having regard to the Public Sector Equality Duty.

False or malicious allegations are removed from the personnel file unless the individual consents to retention. For substantiated, unfounded and unsubstantiated allegations, the file retains a clear summary, follow-up, decisions, action, outcome and whether information will be included in a reference. Records are retained at least until normal pension age or ten years from the allegation, whichever is longer. References exclude false, unfounded, unsubstantiated and malicious allegations and include factual substantiated safeguarding allegations that meet the harm threshold.

12.6 Low-level concerns

A low-level concern is any concern, however small, including a sense of unease or "nagging doubt", that an adult may have acted inconsistently with the staff code of conduct, including outside work, but the behaviour does not meet the harm threshold. Examples include over-friendliness, favouritism, unauthorised photographs, secluded one-to-one contact or humiliating children.

The School promotes a culture of openness, trust and transparency in which low-level concerns are shared and addressed at an early stage. Records identify the person raising the concern unless anonymity is requested, which will be respected as far as reasonably possible. Where a concern is raised by a third party, the Headteacher will gather relevant evidence from the person raising it, the individual concerned and any witnesses as appropriate.

Low-level concerns are reported confidentially to the Headteacher in accordance with the staff code of conduct. Staff are encouraged to self-refer where conduct could be misinterpreted or fell below expected standards. The Headteacher gathers relevant evidence, consults the DSL and LADO where uncertain, and responds sensitively and proportionately.

Every low-level concern is recorded with context, action, decision and rationale; kept confidential and secure; reviewed for patterns; and retained at least until the person leaves employment. Concerns about supply staff or contractors are shared with their employer. Patterns may result in disciplinary action, policy or training changes or referral to the LADO. Low-level concerns are not included in references unless they meet the harm threshold and are substantiated, or relate to misconduct or poor performance that would ordinarily be included.

13. Safer recruitment, volunteers, visitors and ongoing vigilance

The detailed procedure is in the Safer Recruitment Policy. Recruitment is part of the School's whole-school safeguarding culture and is designed to deter, reject and identify unsuitable people. At least one interviewer has completed safer-recruitment training covering KCSIE Part three.

13.1 Recruitment and pre-appointment checks

The School uses an application form, accepts a CV only alongside it, requires a full employment and education history and reasons for gaps, obtains references directly and before interview where possible, asks shortlisted candidates to complete a criminal-record and suitability self-declaration and informs them that online searches may be undertaken as due diligence. Structured interviews explore motivation, boundaries, vulnerability, safeguarding attitude and concerns.

A copy of, or link to, this policy will be included in recruitment application packs and on the School's recruitment pages.

Conditional appointment checks include identity, enhanced DBS and children's barred list where regulated activity applies, right to work, mental and physical fitness for the role, professional qualifications, prohibition from teaching, section 128 where relevant, childcare disqualification where relevant and appropriate overseas checks. The DfE Check a teacher's record service is used for relevant prohibition, direction, restriction, QTS and induction checks. The original DBS certificate is seen, including when using the Update Service; an individual may join the Update Service when applying or within 30 calendar days of the certificate issue date. The single central record is maintained with required dates and information, including agency confirmation and section 128 checks for management roles.

13.2 Volunteer regulated activity from 1 September 2026

Supervision exemption removed

The Crime and Policing Act 2026 removes the previous supervision exemption for volunteers. A volunteer who teaches, trains, instructs or supervises children frequently, on more than three days in a 30-day period, or overnight, is in regulated activity.

This section summarises the 2026 change affecting volunteers; the full definition of regulated activity is set out in KCSIE Part Three and the School's Safer Recruitment Policy.

A volunteer in regulated activity requires an enhanced DBS check with children's barred-list information. Existing volunteers whose role becomes regulated activity from 1 September 2026 will have their barred-list status checked and the appropriate enhanced DBS obtained. Where the period condition is met across multiple settings, the settings coordinate who applies and the volunteer may use the free DBS Update Service.

An unchecked volunteer is never left unsupervised or permitted to undertake regulated activity. For volunteers outside regulated activity, the School completes and records a written risk assessment covering the work, opportunity for contact, what is known about the person, references and whether an enhanced DBS without barred-list information or a basic check is appropriate.

13.3 Agency staff, contractors and self-employed people

The School obtains written confirmation that an agency or third party has completed the checks the School would otherwise perform and obtained the appropriate DBS certificate and barred-list information. If the certificate contains information, a copy is obtained as required. Identity is checked on arrival. Contracts specify safeguarding requirements and reporting obligations.

Contractors in regulated activity require an enhanced DBS with barred-list information. Other contractors with opportunity for regular contact require an enhanced DBS without barred-list information; a basic check may be considered where there is no regular contact. A person without required checks is never unsupervised or permitted regulated activity. The School obtains or verifies the appropriate check for a self-employed person.

13.4 Visitors and external speakers

All visitors report to reception, verify identity as appropriate, sign in, wear identification and follow supervision or escort arrangements based on professional judgement and risk. The School does not request DBS or barred-list checks for relatives or ordinary visitors attending events such as sports days. For a professional visitor, the School checks identity and obtains assurance from the employer that the appropriate check has been completed; it does not normally ask to see the certificate.

The educational value, suitability and age appropriateness of external organisations and speakers are assessed. The previous concept of an "approved visitor list" does not override the legal requirement that barred-list information may be requested only for regulated activity. Frequent attendance alone does not automatically justify a barred-list check.

Detailed arrangements for the Visitor Calendar, booking, signing in and out, badges, escorting, unknown visitors and prospective-parent tours are set out in the Visitors and External Speakers Procedure.

13.5 Trainee teachers, work experience and homestay

For salaried trainee teachers, the School completes all required checks. For fee-funded trainees, the training provider confirms in writing that all checks have been completed and the trainee is suitable. Safeguarding concerns about trainees are managed with the provider under the allegations procedure.

Work-experience providers must have policies and procedures to protect children. A person teaching, training, instructing, caring for or supervising a child frequently, on more than three days in a 30-day period, or overnight, is in regulated activity and must not be barred. The School does not request an enhanced DBS with barred-list information for staff supervising 16- or 17-year-olds where the law prohibits this. A work-experience student aged 16 or over in a specified place may themselves require an enhanced DBS if their activity meets the relevant test; no DBS can be requested for a child under 16.

For School-arranged UK homestays where the School can terminate the arrangement, responsible host adults are in regulated activity and an enhanced DBS with barred-list information is obtained. The School decides whether enhanced checks are needed for other household members aged 16 or over. For overseas homestays, the School agrees safeguarding arrangements with the partner institution and ensures students and parents know how to obtain help. Private arrangements made solely by parents are not regulated by the School, but any safeguarding concern is acted on.

13.6 Ongoing vigilance and rechecks

Safeguarding continues after appointment. Leaders create a culture in which staff can discuss concerns and understand the adult-reporting routes. New checks are completed when a person moves from a non-regulated role into regulated activity, after a break in service of 12 weeks or more, or where suitability concerns arise. Employers remain alert to behaviour inside and outside work, including online, that may create transferable risk.

14. Training, curriculum, whistleblowing, complaints and review

14.1 Staff training

All staff receive safeguarding and child-protection training, including online safety and filtering and monitoring, at induction. Training is regularly updated and staff receive safeguarding updates as required and at least annually. It is aligned with local safeguarding-partner advice, the whole-school safeguarding approach, curriculum planning and Teachers' Standards.

Training includes professional curiosity, response to disclosure, Family Help thresholds, information sharing, child-on-child abuse, harmful sexual behaviour, serious violence and weapons, mental-health warning signs, exploitation and modern slavery, Prevent, Operation Encompass, AI-generated sexual

imagery, generative-AI risks, mobile-phone rules, adult concerns and the procedure for social-transition requests. Staff expertise and experience are used to shape safeguarding arrangements and policy review.

The DSL and Deputies train at least every two years, undertake Prevent awareness training and refresh knowledge at least annually. Trustees receive induction and regular training sufficient to provide strategic challenge. Staff involved in recruitment receive safer-recruitment training at least every three years.

Volunteers, contractors and temporary staff receive proportionate information and training for their role.

14.2 Preventative education

The School teaches children how to keep themselves and others safe through a planned, evidence-based and regularly timetabled RSHE programme and the wider curriculum. Teaching is age- and development-appropriate and inclusive of SEND and other vulnerabilities. It includes positive relationships, kindness, boundaries, consent, stereotypes, equality, body confidence, coercive control, abuse, harassment, violence, image sharing, deepfakes, pornography, misogynistic influencers, racism, conflict and how to report and obtain help. Curriculum planning draws on current DfE, Oak National Academy, PSHE Association, UKCIS and CEOP resources as appropriate.

14.3 Reporting systems for students

Children may report to any member of staff, a DSL, their tutor, pastoral staff or by [following](#) this link: [Speak Out](#). One-to-one student progress review meetings, the tutorial programme, assemblies, School Council and trusted relationships create further opportunities to speak. Systems are well promoted, easy to understand and accessible. Children are told that concerns will be taken seriously, handled sensitively and that they will be kept informed where appropriate.

14.4 Whistleblowing and complaints

Staff and volunteers are expected to raise poor or unsafe practice and failures in safeguarding. Concerns should normally be raised through the School's whistleblowing procedure and senior leadership. Where a person feels unable to raise a concern internally or believes it is not being addressed, they may use the NSPCC Whistleblowing Advice Line or other lawful external route. No person will suffer detriment for raising a genuine concern in good faith.

A complaint that may require a child-protection investigation is handled under the allegations procedure. Other safeguarding complaints are coordinated by the DSL and dealt with under the complaints policy without delaying protective action. The existence of a complaint process never prevents an immediate referral.

14.5 Monitoring and review

The Board reviews this policy at least annually and sooner following statutory or local change, a safeguarding incident, complaint, practice review, audit or identified weakness. The Headteacher and DSL monitor implementation through training records, case-file and MyConcern audits, child and staff feedback, attendance and behaviour data, filtering and monitoring reviews, alternative-provision reviews, safer-recruitment and single-central-record checks, low-level concern pattern review and trustee scrutiny.

Lessons are recorded and used to improve policies, practice, curriculum, training and culture.

Appendix 1 - Staff quick response guide

Situation	Required action
Immediate danger	Call 999. Make the child safe. Tell the DSL as soon as possible. Record on MyConcern.
Child suffering or likely to suffer harm	Refer immediately to Lincolnshire Children's Services: 01522 782111 (8am-6pm weekdays) or 01522 782333 out of hours. Police as appropriate. Do not wait for the DSL if this would delay action.
Any other safeguarding concern	Report to the DSL/Deputy without delay and record on MyConcern. Continue to observe and share new information.

Situation	Required action
Child disclosure	Listen, reassure, explain, record, report. Do not investigate or promise secrecy.
Mental-health emergency	Call 999 or arrange immediate A&E attendance with a suitable adult. For urgent non-emergency support, NHS 111 online or 111 mental-health option.
FGM appears to have been carried out	A teacher must personally report to police. Also tell the DSL and consider children's social care. Do not examine the child.
Concern about an adult	Report to Headteacher; about Headteacher to Chair; conflict of interest to LADO. No matter how small.
Nude/semi-nude or AI-generated sexual image	Do not view, copy, forward, save or investigate. Report immediately to DSL. Preserve device/evidence only as directed.
Weapon or serious violence concern	Report immediately to DSL; call police where immediate risk or crime. DSL completes risk/safety/support planning.
Professional disagreement or no response	Follow up and use Lincolnshire escalation protocol. Keep the child under review.

Appendix 2 - Adult concern and low-level concern quick guide

Question	Action
Could the adult have harmed a child, committed an offence, posed a risk of harm or shown they may be unsuitable?	Use harm-threshold procedure. Report immediately to case manager and consult LADO.
Is the behaviour inconsistent with the code of conduct but below the harm threshold?	Treat as a low-level concern. Report to Headteacher, record and review for patterns.
Are you unsure which threshold applies?	Consult the LADO. Do not downgrade because the concern appears small.

Question	Action
Does the concern involve supply staff, trainee teacher or contractor?	School manages safeguarding/facts; employer or provider is fully involved and usually leads discipline.
Has the adult resigned or left?	Continue the safeguarding process, reach and record an outcome where possible, and make DBS/TRA referrals if criteria are met.
Is suspension proposed?	Complete risk assessment, consider alternatives, seek LADO/HR advice and record rationale.

Appendix 3 - Nudes and semi-nudes quick guide

All incidents, including consensual, non-consensual, digitally altered and AI-generated images, require a safeguarding response.

Staff member	DSL / Deputy DSL
Report immediately. Reassure the child. Do not view, copy, forward, store, delete, investigate, blame or shame.	Complete an initial review; assess immediate risk, age, development, coercion, exploitation, adult involvement, distribution and mental-health risk; consider parents, police and children's social care; record every decision.

Staff member	DSL / Deputy DSL
If an image is accidentally viewed, stop, do not copy or share it and tell the DSL exactly what happened.	Adult-involved or suspected adult-involved incidents, including sexual extortion, are referred immediately to police and social care.
Preserve a device only if directed and handle it in accordance with searching, confiscation and police advice.	Follow current UKCIS guidance. Avoid viewing unless unavoidable. Consider Report Remove and specialist support.