Child protection and safeguarding policy

(including safer recruitment, allegations against staff and low-level concerns)

September 2026 – DRAFT FOR REVIEW

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
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ROLE/ORGANISATION	NAME	CONTACT DETAILS
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1. Aims

Royal Russell School and St David's School aim 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). For children in the Early Years Foundation Stage (EYFS), section 3 of the EYFS statutory framework for group and school-based providers, effective from 1 September 2026, is read alongside KCSIE. 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 National Minimum Standards for Boarding Schools, as updated in May 2026, which set out requirements for safeguarding and promoting the welfare of children accommodated by boarding schools
- The Data (Use and Access) Act 2025, alongside the Data Protection Act 2018 and UK GDPR, including the changes to the data-protection framework in force from January 2026
- The Children's Wellbeing and Schools Act 2026, including the new safeguarding information-sharing duty and provisions relating to children in temporary accommodation
- The Crime and Policing Act 2026, insofar as it changes the definition of regulated activity with children and associated barred-list checking requirements from September 2026
- DfE statutory guidance Mobile phones in schools, effective from 1 September 2026
- DfE guidance Restrictive interventions, including the use of reasonable force, in schools, effective from 1 April 2026
- The revised statutory guidance on Relationships Education, Relationships and Sex Education (RSE) and Health Education, effective from 1 September 2026
- 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, 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 Headmaster (Royal Russell School) and Head (St David's School) 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
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets the safeguarding and welfare requirements in section 3 of the EYFS statutory framework for group and school-based providers effective from 1 September 2026, insofar as they apply to the School's EYFS provision.For EYFS provision, the School will also apply the strengthened safeguarding and welfare requirements effective from 1 September 2026. Where EYFS children sleep or rest, arrangements will comply with the EYFS safer-sleep requirements. Banned dog breeds within section 1 of the Dangerous Dogs Act 1991, including the XL Bully type, must not be kept or present on premises used for the EYFS provision at any time. Recruitment, suitability, screen-use and regulatory-notification requirements are addressed below and in the relevant operational procedures.

Royal Russell School and St David's School follow Croydon's multiagency procedures as set out by Croydon Safeguarding Children Partnership

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 nudes and semi-nudes means the creation, sending or posting by a person under 18 of nude or semi-nude visual content. This includes photographs, videos and livestreams, and includes content that is self-generated, generated by another person, digitally altered or generated using artificial intelligence (including deepfakes or "deep nudes").

Children include 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 or belief, sex, sexual orientation, disability, or because they are questioning their gender
- 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 at risk of modern slavery, trafficking, stalking, financial exploitation, criminal exploitation or serious violence
- 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 12)
- 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 and in promoting an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognized, addressed and challenged.. 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, faith-targeted abuse, misogyny/misandry, homophobia, biphobia, transphobic bullying, sexual violence/harassment, derogatory or discriminatory behaviour and 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 including
    - Privacy and keeping ourselves safe
    - Types of relationships, both positive and negative
    - Appropriate physical contact (age dependent)
    - Appropriate online relationships and interactions
- 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 Part one of the Department for Education's statutory safeguarding guidance Keeping Children Safe in Education (KCSIE) 2026 and review it at least annually. This requirement applies to all staff, whether or not they work directly with children.
- School leaders and staff who work directly with children will also read Annex A of KCSIE 2026 (Further information). The DSL and Deputy DSLs will read and follow Annex B (Role of the Designated Safeguarding Lead).
- Sign a declaration at the beginning of each academic year to say that they have 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 (e.g. sites they need to visit or who they'll be interacting with online)
- Help to create safe and trusted opportunities for pupils who are lesbian, gay or bisexual or who are questioning their gender, to speak to a trusted adult and share concerns
- Promote an inclusive, anti-discriminatory culture where racism and other forms of discriminatory behaviour are recognized, challenged and addressed as part of our culture of safeguarding.

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the DSL and deputies, the behaviour and anti-bullying policies, online safety and filtering and monitoring arrangements, the school's mobile phone policy, the safeguarding response to absence from education, and the distinction between universal/community-based early help and targeted early help delivered through Family Help, 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
- 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 and exploitation, including domestic abuse, child-to-parent or

caregiver abuse, physical, sexual and emotional abuse, stalking, financial exploitation, modern slavery and trafficking, child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), serious violence (including threats involving weapons), FGM, forced marriage and radicalisation

- New and emerging threats, including online harm and generative AI, grooming, sexual and criminal exploitation, misogyny and other discriminatory or derogatory behaviour, radicalisation, cybercrime, and the role of technology and social media in facilitating 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 pupils who are (or are perceived to be) lesbian, gay or bisexual, and pupils who are questioning their gender, may be targeted by other children and may face additional barriers to reporting concerns
- That children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination and that such experiences may affect a child's welfare, wellbeing, mental health and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.
- 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

Section 16 and appendix 4 of this policy outline 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.

At Royal Russell the DSL is Sara Ward (Pastoral Deputy Head, Senior School), with Sarah Pain (Pastoral Deputy Head, Junior School) taking the lead on concerns raised about Junior School pupils. At St David's the DSL is Sarah Syradd (Head).

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 safeguarding concerns. The School will maintain robust, documented cover arrangements whenever the DSL is unavailable because of illness, leave or other circumstances, and for relevant out-of-hours or out-of-term activities. A confidential shared safeguarding mailbox or equivalent monitored system will be used so that safeguarding concerns are received, monitored and acted on without delay. Current out-of-hours contact arrangements will be communicated to all staff.

When the DSL is absent, the named Deputy DSLs will provide cover in accordance with the documented safeguarding cover arrangements. In the Junior School, cover will be provided by the Deputy DSL.

In the unlikely event that neither the DSL or deputies are available, cover will be provided as follows:

- Royal Russell Senior School: Sam Powell (Head of Senior School) or Clare Tovey (Academic Deputy Head, Senior School) will act as cover.
- Royal Russell Junior School: John Evans (Head of Junior School) or Ruth Bannon (Deputy Head Learning and Teaching) will act as cover
- St David's School: Brenda Rogers (Deputy Head) will act as cover

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 Prevent training and induction

The DSL will also:

- Keep the Head 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

The full responsibilities of the DSL and deputies are set out in Annex B of Keeping Children Safe in Education 2026 and in their job descriptions.

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
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headmaster (Royal Russell School) and Head (St David's School) 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 link 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 that the school has appropriate filtering and monitoring systems in place and that their effectiveness is reviewed at least once every academic year by the SLT member responsible for filtering and monitoring, supported by the DSL and IT staff. The review will test that filtering and monitoring work appropriately on internet-connected devices in all relevant school locations and a written record of the checks, findings and actions will be retained. 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
    - 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
    - Ensure information-security arrangements support safeguarding, including appropriate access controls, secure systems, incident response and timely escalation of cyber or data-security incidents that could place children at risk
- 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 school's pupil mobile-phone arrangements meet the statutory guidance effective from September 2026: the school day is mobile-phone-free by default and any exception is specific, proportionate and documented
    - 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 safeguarding concerns or allegations, including low-level concerns, about staff, 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' if an allegation of abuse is made against the Headmaster (Royal Russell School) or Head (St David's School), where appropriate (see appendix 3).

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

Section 16 of this policy has information on how governors are supported to fulfil their role.

5.4 The Headteacher

The Executive Head, through the Head of Senior School, the Head of Junior School and the Head of St David's School, 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 about a member of staff, supply staff member, trainee teacher, volunteer or contractor, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting
- Ensuring that EYFS safeguarding and welfare procedures reflect the September 2026 framework, including safer sleep where applicable, screen-use guidance, suitability checks and the prohibition on banned dog breeds on EYFS premises.

5.5 Virtual school heads

Virtual school heads (VSHs) have a non-statutory responsibility for strategic oversight of the educational attendance, attainment and progress of pupils with a social worker. Attendance is a key safeguarding factor and the School will engage with the VSH and local authority where appropriate to support and improve attendance.

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, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

6. Confidentiality

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes.

The principles that guide our approach to confidentiality and information sharing are outlined below:

- Timely information sharing is essential to effective safeguarding
- 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
- Staff should be proactive about sharing safeguarding information at an early stage. Decisions should consider relevance, the current or foreseeable risk, necessity, context and proportionality; proportionate sharing does not mean withholding information that is relevant to a child's safety or to the safety of others.
- From September 2026 the School will comply with the statutory safeguarding information-sharing duty introduced by the Children's Wellbeing and Schools Act 2026 and will have regard to the final statutory guidance when published.
- The Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 do not prevent or limit appropriate information sharing for the purposes of safeguarding and promoting children's welfare
- 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.
        - There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.
- 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)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

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

- Has a disability
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- 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
- Is suffering from mental ill health
- 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
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL (or deputy DSL)'.

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral** but the DSL (or deputies) can support with this and will usually take responsibility for taking this action.

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

The local procedures for making a referral, as per Croydon Safeguarding Children Partnership, are as follows:

For children who have a Croydon address, including Boarding pupils:

Referrals in Croydon are made to the Multi-Agency Safeguarding Hub (MASH). Social workers at MASH then decide what action needs to be taken by school and by other agencies (such as children's social care, health services or police).

Urgent referrals (Croydon)

If you have an urgent concern about a child that needs an immediate response, consider calling 999 and request the appropriate emergency service.

If it is not appropriate to call 999, but you have an urgent safeguarding concern that requires a same day response, you can contact the MASH team in the following ways:

During office hours, Monday to Friday, 9am to 5pm:

Call the MASH on 0208 255 2888. The referral, if appropriate, will be accepted over the telephone and you will need to follow this up by completing the online referral form within 24 hours.

Out of Hours:

Call our Emergency Duty Team (EDT) on 0208 726 6400. Press 5 for Children's Services and listen to the message until you hear 'If your call is an emergency, please wait and your call will be transferred'.

The call operator will take your details and pass the message on to the EDT social worker to respond. This may not be immediately, dependent on other calls into EDT. EDT responds to any urgent child safeguarding concerns that cannot wait until the next working day.

Non-urgent referrals (Croydon)

If an immediate (same day) or emergency response is not required, referrals should be made via Croydon's online children and families portal. This form should be used to refer a child and family for one of the three following services:

1) Children's Social Care (CSC): Where you are worried about the safety of a child, or the child may be at risk of harm if specialist services are not given to them or their family. This is the threshold for an assessment led by children's social care under Section 17, Children Act 1989, or children in acute needs who are suffering or likely to suffer significant harm under Section 47, Children Act 1989.

2) Family Help: Where you are worried for a child's wellbeing and/or the child may be disadvantaged by their circumstances and the family has asked for support. You (or other organisations) have tried and not been able to improve their circumstances through community early help or universal services. Support is needed by one or more organisation. You can also request parenting programmes through this form.

3) Emotional Wellbeing and Mental Health service: Where you are worried about the emotional wellbeing or/and mental health of a child/young person. This service is for children, young people under 18 and their families who live, go to school, work or have a GP in Croydon.

For children who do not have a Croydon address, excluding Boarding pupils (see above):

All local authorities have a similar process for making referrals. It is not always called MASH. Some call it SPA (Single Point of Access), for instance. Here are links for Bromley, Sutton and Surrey, which – together with Croydon – cover most of our pupils.

Bromley: Bromley Children and Families Hub

Surrey: Children's Single Point of Access (C-SPA) -

Surrey County Council

Sutton: Children's First Contact Service | Sutton

Information Hub

For a pupil with another local authority you can search their local authority by entering their postcode here: Report child abuse to a local council - GOV.UK Alternatively, speak to the DSL or deputies for advice.

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. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, 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 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.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above 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 or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures (see below).

Croydon Procedures for Reporting FGM

If you are a teacher you are required by law to report any 'known' cases of FGM directly to the police via their non-emergency number 101.

'Known' means that you have either visually identified that FGM has been carried out, or you have had direct verbal disclosure from the child affected.

If you'd prefer to speak to someone else before reporting it to the police, you can contact:

- the national FGM helpline on 0800 028 3550.
- the NSPCC to speak to a professional practitioner
- the children's social care team at Croydon

If you are not a teacher, speak to the DSL or Deputy, or contact the social care team at Croydon

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

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 deputy DSL or member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Universal/community-based early help and Family Help

Where a child or family would benefit from support, staff will consider universal services and community-based early help. Where needs are more complex and targeted early help is required, the DSL will work with the family and relevant agencies to consider referral to Family Help in accordance with Croydon's local criteria and assessment protocol. The DSL will generally lead school liaison unless another appropriately skilled practitioner is agreed as lead.

We will work in accordance with the local thresholds, criteria and assessment protocols published by the safeguarding partners, including arrangements for Family Help, section 17 and section 47 responses.

The DSL will keep support under active review. If needs escalate, support is not effective, or there is concern that the child may be suffering or likely to suffer harm, the School will make or escalate a referral to local authority children's social care without delay.

In Croydon, requests for targeted support and safeguarding referrals are made through the Children and Families Portal/MASH route described in section 7.1, using the current local thresholds and referral arrangements.

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.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

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.

Croydon's escalation procedures can be found here:

Escalation and Resolution Policy | Croydon Safeguarding

Other local authority policies on escalation can be found by searching *"[name of local authority] safeguarding escalation*"

7.5 If you have concerns about extremism

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

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. 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.

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.

In Croydon, where a school has concerns that a young person might be considering extremist ideologies and/or may be radicalised and would benefit from specialist support to challenge extremist ideologies, or that a younger pupil may be at risk due to their parent's radicalisation, the school should make a referral to MASH using the MASH Referral Form (see 'Referral' above in section 7.1). Inform the DSL or deputy as soon as practically possible after the referral.

Further advice is also available from:

- The Prevent Manager for Croydon (contact details can be found at the top of this policy).
- 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.

7.6 If you have a concern about mental health

Mental health problems can, in some cases, develop into safeguarding concerns. This can include self-harm, eating disorders, suicidal ideation or risk of suicide; mental health problems may also indicate that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should diagnose mental health conditions. School staff are nevertheless well placed to observe children day to day and identify warning signs, which may include significant changes in behaviour, ongoing sleep difficulties, withdrawal, loss of interest in usual activities, self-harm or self-neglect.

School staff support four key roles:

- promoting good mental wellbeing and preventing mental ill health;
- identifying concerns early;
- ensuring early targeted support;
- and liaising with or referring to specialist services where needed.

Where support is needed, the DSL or deputy should consider whether informing parents/carers will support the child's wellbeing, or whether doing so would place the child at additional risk.

If a child is in immediate danger because of their mental health, staff should call 999 or arrange immediate attendance at A&E with a parent/carer or other suitable person. If urgent mental-health help is needed but it is not an emergency, staff may use NHS 111 online or call 111 and select the mental health option.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.1 and / or 7.4. This should be recorded on MyConcern.

If you have a mental health concern that is **not** also a safeguarding concern, in Royal Russell Senior School should inform the relevant Housemaster/ Housemistress (who will inform the DSL). In the Junior School, they should inform the Deputy Head (Pastoral). At St David's they should inform the SENCO, the DSL, or another member of the safeguarding team.

As per Royal Russell's Healthy Minds (Mental Health) Policy we aim to identify children with mental health needs as early as possible to prevent things getting worse. Our identification system involves a range of processes including:

• Using iSAMS Pastoral Concerns and Safeguarding reports

• Considering data and other information about attendance, bullying, behaviour, sanctions and visits to the Health and Wellbeing Centre

• Pastoral Monitoring via Phase meetings

• Using Leuven scales to identify children in EYFS who need support

• Information shared by parents

• Gathering information from a previous school at transfer or transition

School staff recognise that while any young person can experience mental health difficulties, there are some groups who may be more at risk, or who may find it harder to understand or communicate their needs. These include pupils with Special Educational Need (SEN), Children in Need, looked-after children and previously looked-after children, pupils who board at school and International boarders, children who are lesbian, gay, bisexual, gender questioning and/or who identify as transgender. Further details of the particular needs of these groups can be found in the Healthy Minds (Mental Health) Policy.

At St David's we aim to identify children with mental health needs as early as possible to prevent things getting worse. Our identification system involves a range of processes including:

• Using iSAMS Pastoral Concerns and Safeguarding reports

• Considering data and other information about attendance, bullying, behaviour, and pastoral alerts

• Weekly staff meeting notes raising pastoral concerns

• Information shared by parents

• Gathering information from a previous school at transfer or transition

School staff recognise that while any young person can experience mental health difficulties, there are some groups who may be more at risk, or who may find it harder to understand or communicate their needs. These include pupils with Special Educational Need (SEN), Children in Need, looked-after children and previously looked-after children, pupils who board at school and International boarders, children who are lesbian, gay, bisexual or gender questioning and/or who identify as transgender.

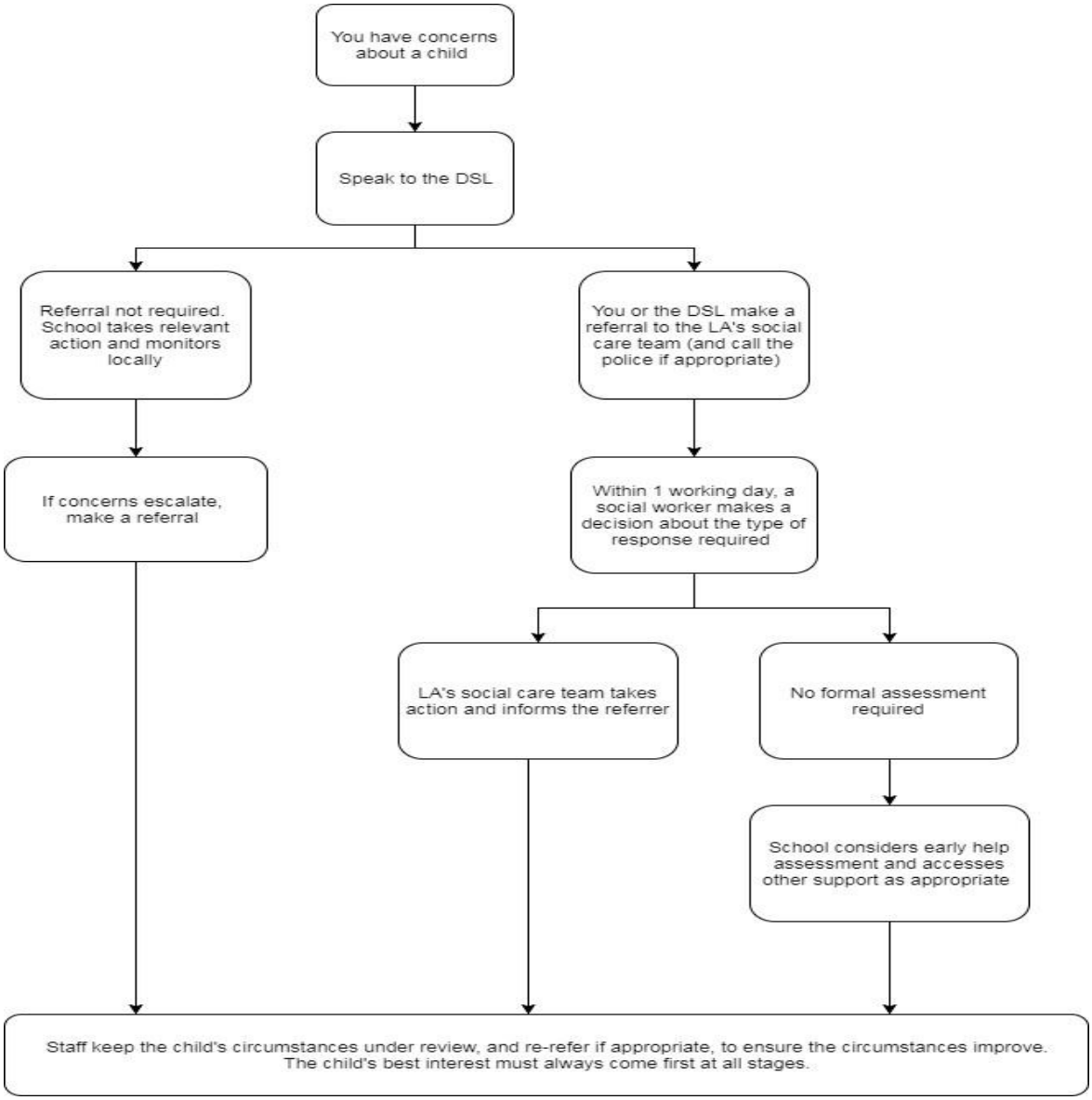

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(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, trainee teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher or trainee teacher), volunteer or contractor, or an allegation is made that such a person may pose a risk of harm to children, speak to the Head of Junior School or the Head of Senior School (Royal Russell School) or Head (St David's School) without delay. If the concern/allegation is about the Head, speak to the Executive Head and if the concern is about the Executive Head, then speak to the Chair of Governors as set out in appendix 3.

The Headmaster/ Head / Chair of Governors will then follow the procedures set out in appendix 3, if appropriate.

Where there is a genuine conflict of interest in reporting a concern or allegation about a member of staff, supply teacher, trainee teacher, volunteer or contractor to the Headmaster/Head, report it directly to the LADO.

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

the LADO, as you would with any safeguarding allegation.

Where appropriate, the school will inform ISI of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

7.8 Child-on-child abuse (including harassment and violence)

Child-on-child abuse is any form of abuse perpetrated by one child against another child. It can occur inside or outside school, face-to-face or online.

Child-on-child abuse may include, but is not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice based incidents
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse');
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- serious physical assault and harm, or the threat of harm with a weapon;
- sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude or semi-nude images or videos;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation, hazing-type violence or rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

We recognise that child-on-child abuse is a safeguarding issue for both the child who has been harmed and the child alleged to have caused harm. It can occur inside or outside school, face-to-face or online, and it is preventable. It will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

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 serious physical harm or threats of physical harm, including threats involving weapons
- 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 sharing of nudes and semi-nudes)

See appendix 4 for more information about child-on-child abuse.

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.

Further details of our procedures for recording, investigating and dealing with allegations and supporting victims, perpetrators and any other children affected can be found in our Child on Child abuse policy.

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 or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
- 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
- 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

The DSL will take a 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, e.g. 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 nudes and semi-nudes

Your responsibilities when responding to an incident

If you are made aware of any incident involving the making or sharing of nudes or semi-nudes, whether consensual or non-consensual, including photographs, videos, livestreams, digitally altered images or AI-generated images, you must report it to the DSL immediately. Every such incident requires a safeguarding response.

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 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 Headmaster (Royal Russell School) or Head (St David's School) 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 dialing 101. It is most likely that the DSL or a deputy DSL will be the individual to take this action.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded in MyConcern. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Wellbeing curriculum (Royal Russell Senior School).

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
- 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 provide (or forward) such images
- The receipt of such images

This policy on the 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

In the Senior School, 'Report Remove' posters are displayed in each House, alongside a reminder that the safeguarding team can help support and advise with worries about this. There is also a button on the Pupil Hub that pupils can use to access this 'Report Remove'. 'Report Remove' is the Childline / Internet Watch Foundation tool for removing nude and semi-nude images from the internet.

At Royal Russell Junior School and St David's School, as per statutory RSHE guidance, content about nudes / semi-nudes is not taught but the curriculum covers the following related content:

- To know that sometimes people can try to gain power or control them
- To know some of the dangers of being online
- To know how to use technology safely and positively to communicate with their friends and family

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
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

In Royal Russell Junior School, pupils can report any concerns about abuse (or any other concern) to staff. The children are regularly reminded that the DSL and JLT are available to listen and respond to concerns. Pupils in Years 1 to 6 also have access to a 'I want my teacher to know' box in each classroom. Pupils are regularly reminded of people who can help them, through the assembly programme, form time and PSHE lessons.

In St David's School, pupils can report concerns about abuse to any member of staff, but they are regularly reminded that the Safeguarding team is available to listen and respond to concerns of this nature. Posters are located around school to highlight who the safeguarding team are. Pupils are reminded about sharing their concerns with any member of staff through reminders in PSHE lessons, assemblies and specific themed activities such as Wellbeing Week. Pupils can also submit their concerns via the Wellbeing Google Classroom or the Wellbeing Monster located on the door of the Wellbeing Room.

In Royal Russell Senior School, pupils can report concerns about abuse to any member of staff, but they are regularly reminded that the Safeguarding team is available to listen and respond to concerns of this nature. There is also advice on the Pupil Hub for pupils about what to do if they have concerns about abuse, bullying, discrimination, online safety or being safe at home. Pupils are made aware of reporting systems and processes through reminders in Wellbeing lessons, assemblies, safeguarding briefings (eg for Boarders) and each half term prior to the holidays they are reminded of the advice and resources on the Pupil Hub. Staff understand that they must reassure a pupil following a disclosure that they are not in trouble, that they have done the right thing in sharing their concern, and that the concern will only be shared with individuals who need to know to keep them safe.

In addition to the usual school support (eg tutors, House staff, safeguarding team, counsellors) Boarders at Royal Russell Senior School have access to an Independent Person, who is not a member of school staff or leadership, or a parent / guardian. Contact details are displayed in boarding houses so that pupils can make contact directly about personal problems or concerns at the school.

At Royal Russell School and St David's School, staff understand that they must reassure a pupil following a disclosure that they are not in trouble, that they have done the right thing in sharing their concern, and that the concern will only be shared with individuals who need to know to keep them safe.

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
- 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, including 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 with generative-AI applications that simulate such interaction, including peer pressure, harmful commercial contact and adults posing as children or young adults to groom or exploit them for sexual, criminal, financial or other purposes**
- **Conduct – personal online behaviour that increases the likelihood of, or causes, harm, including making, sending or receiving explicit content (including AI-generated or digitally altered content), online bullying, harassment and harmful challenge or coercion**
- **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 cyber-bullying, 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 cyber-bullying, 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 Involve, 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
- In the EYFS, Staff are **not permitted to use cameras, mobile phones or smart devices** during working hours in areas where children are present. Smart watches should be in Airplane mode when children are present.
    - In the EYFS, school mobile electronic devices are used to capture images of pupils learning.

These images are used as evidence for their EYFS learning journals, their online profile of development and some display and marketing purposes including our school website. Such images are to be captured solely for these purposes. Mobile electronic devices must not be taken into pupils' toilets or used when they are changing. If photographs of pupils washing their hands in the toilets area are needed for evidence, they must be taken in the presence of another member of staff. The gathering, storage and sharing of images of pupils by staff must be carried out using school equipment only and most adhere to our policies for Online Safety (Royal Russell) E-Safety (St David's) and Mobile Electronic Devices. Staff must be mindful of the additional risks incurred if such devices are removed from school and must act responsibly to ensure images are stored safely.

- 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
- Pupil access to mobile phones is prohibited throughout the school day by default, including lessons, movement between lessons, breaktimes and lunchtime. Any permitted exception will be specific, proportionate and set out in the relevant school mobile-device/behaviour arrangements. Separate, safeguarding-led arrangements apply to boarders outside the school day.
- 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 (see Behaviour Policy).
- 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 and an annual risk assessment of risks to the school community. The effectiveness of filtering and monitoring will be reviewed at least once every academic year by the responsible SLT member, supported by the DSL and IT, with checks across internet-connected devices in all relevant locations and a written record of the review and follow-up actions.
- Provide regular safeguarding and children 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. All information about the rules and expectations regarding the use of phones, other devices and cameras with in EYFS is covered in this section. Further information about other sections of the schools, can be found in our policies on Online Safety (Royal Russell School), E-safety policy (St David's) and the Staff Code of Conduct (staff and volunteers, St David's and Royal Russell School) / the Behaviour Policy (Royal Russell Senior School pupils).

In EYFS, technology and screen use will be purposeful, age-appropriate and consistent with the DfE screen-use guidance to which the EYFS framework requires providers to have regard. The existing restrictions on personal phones, cameras and image-sharing devices remain in force.

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are widespread and can support education, but may also facilitate abuse, grooming, harassment, misinformation, impersonation and the creation or alteration of sexual or otherwise harmful content. The School will use DfE guidance on safe and effective use of generative AI and will keep safeguarding risks under review.

Royal Russell School and St David's School 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 (e.g. 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.

Royal Russell School and St David's School will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying and behaviour policies. Likewise, the sharing of AI-generated

indecent images will be dealt with in line with our procedures relating to an indecent image of any sort (see section 7.9)

Staff will assess safeguarding, privacy, data-security and age-appropriateness risks before a new AI tool is adopted. Filtering and monitoring requirements apply to AI use. Staff must not input confidential safeguarding information or identifiable sensitive pupil information into unapproved AI systems.

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL or deputy 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, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Pupils with SEND or medical conditions, young carers and boarding pupils

Children with SEND may face additional safeguarding risks and barriers to recognition or disclosure. These can include adult assumptions about behaviour or injury, peer isolation and prejudice-based bullying, disproportionate impact without outward signs, communication or reporting difficulties, difficulty recognising abusive behaviour, increased dependency on adults or intimate care, isolation from peers, and difficulty distinguishing fact from fiction online.

We offer extra support for these pupils. At Royal Russell Junior School and St David's, this includes:

- Individual Pupil Passports and Plans
- Quality First Teaching, adapted to support individual needs
- Social and communication interventions where required
- 1:1 check-ins where required
- ELSA/Lego Therapy/Counselling where appropriate

At Royal Russell Senior School, this includes:

- Individual pupils passports which outline the specific support in place for each individual
- 1:1 check-ins where required
- Referral to ELSA, School Counselling Service or Pupils Welfare Coach where appropriate

Any safeguarding concern involving a pupil with SEND will involve liaison between the DSL (or deputy) and the SENCO/Head of Learning Enrichment. Support and communication will be adapted to the child's needs.

- Young carers: staff will be alert to the impact of caring responsibilities on attendance, attainment, behaviour and wellbeing. The School will work to identify young carers early, listen to their views and work with the family and other agencies as required to secure appropriate support.
- Medical conditions: a medical condition or isolated medical incident is not, by itself, a safeguarding referral. Staff must, however, consider whether a condition increases vulnerability to abuse, neglect or exploitation, or whether withheld information, treatment or essential medication creates a safeguarding risk, and consult the DSL where concerned.

- Boarding pupils may face additional vulnerabilities because of the residential setting, overnight accommodation, distance from home, group living, and, for some international boarders, language or cultural barriers. The School will apply the current National Minimum Standards for Boarding Schools and ensure boarders have accessible routes to report concerns, including access to the Independent Person.

The School must not allow a child to share overnight accommodation with a child of the opposite biological sex. This applies to boarding and residential accommodation. On trips involving shared rooms, dormitories or tents, the School will have regard to equality duties, safeguarding obligations and the relevant boarding/residential standards. If a child does not wish to share with another child of the same biological sex, alternative arrangements will be sought where possible without compromising any child's safety, comfort, privacy or dignity.

Where a child is accommodated in a long-term residential arrangement away from the School for three months or more, the School will ensure that any visits/checks required by KCSIE and the relevant boarding standards are undertaken and recorded.

Reasonable force and restrictive interventions: any restrictive intervention will be lawful, necessary, reasonable and proportionate, using no more force than is necessary for the least amount of time. Staff will prioritise prevention and de-escalation, consider SEND, medical and mental-health vulnerabilities, record and report significant incidents as required, and follow the School's behaviour/restrictive-intervention procedures.

11. 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

12. 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 an appropriately trained teacher [the DSL], to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they 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

13. Pupils who are lesbian, gay or bisexual, and pupils questioning their gender

Being lesbian, gay or bisexual is not in itself a safeguarding risk. However, children who are LGB, perceived to be LGB, or questioning their gender may be targeted by other children, experience discriminatory bullying or harassment, or face barriers to speaking openly. The School will respond robustly to bullying and provide trusted adults with whom pupils can speak.

Any safeguarding or mental-health concern will be responded to on its individual facts and referred to the DSL where appropriate.

The School will not initiate a child's social transition. Staff will listen, provide pastoral support and maintain professional curiosity. Individual staff must not independently adopt changes relating to social transition unless a decision has been made by the School through the agreed process and parents/carers have been involved, except where involving them would itself create a significant safeguarding risk.

Any request for support with social transition will be considered carefully, on a case-by-case basis, with the child's best interests and the safeguarding, safety, privacy and dignity of that child and other children at the centre. The child's wishes will be heard but will not automatically determine the outcome. Parents/carers will normally have a leading role, and the School may seek relevant clinical, safeguarding, SEND and legal advice. Decisions and reasons will be documented and reviewed. Particular caution will be exercised with primary-age children.

Where contacting parents/carers may heighten a risk of significant harm, staff must consult the DSL before any decision not to involve them. Staff must not promise confidentiality where information needs to be shared to keep a child or others safe.

The School must not allow pupils to use toilets, changing rooms or boarding/residential accommodation designated for the opposite biological sex. Where single-sex PE or sport is required for safety, there will be no exception permitting participation in the category designated for the opposite biological sex. Where appropriate and practicable, private or self-contained alternative facilities/arrangements will be considered without compromising the provision, safety, comfort, privacy or dignity of others. Any constraints will be explained sensitively to the pupil and family.

14. Complaints and concerns about school safeguarding policies

14.1 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).

14.2 Other complaints

Complaints about other matters relating to safeguarding (eg relating to pupils or premises) will be handled according to the Whole School Complaints Policy.

This includes information relating to the safeguarding and welfare section of the statutory framework for the EYFS, including the procedure for dealing with concerns and complaints from parents and/or carers, which meets the following requirements:

- keeping a written record of any complaints, and their outcome.
- Investigating written complaints relating to how the school is fulfilling the EYFS requirements.
- Notifying the person who made the complaint of the outcome of the investigation within 28 days of having received the complaint.
- Making the record of EYFS complaints available to Ofsted and/or ISI where required by the registration and inspection arrangements applying to the provision.

14.3 Whistleblowing

The Whistleblowing policy outlines how the schools enable members of staff to raise concerns internally and in a confidential fashion, including concerns regarding the way the schools safeguard pupils – including poor or unsafe practice, or potential failures.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, they should use the other channels open to them:

- NSPCC whistleblowing advice line is available. Staff can call 0800 0280285 – 08:00 to 20:00, Monday to Friday and 09:00 to 18:00 at weekends. The email address is: help@nspcc.org.uk. Alternatively,

staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

- Ofsted provides guidance on how to make complaints about a provider: Complaints procedure - Ofsted - GOV.UK (www.gov.uk).
- General guidance on whistleblowing can be found via: Whistleblowing for employees.

Our EYFS settings at St David's and Royal Russell Junior School will make available to parents/carers details of how to contact the relevant regulator/inspectorate (Ofsted and/or ISI, according to the registration arrangements applying to the provision) if they believe EYFS requirements are not being met.

15. 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 in writing. 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 on the secure MyConcern platform.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. For instance, this information will be shared with other agencies, where appropriate in order to prevent harm to a child, following the '7 golden rules' of information sharing and the government's information sharing advice for safeguarding practitioners (see section 6 of this policy). Sharing information in order to prevent harm does not need parental consent, but we will always seek this provided it does not increase the risk of harm to the child.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the School has, or has had, safeguarding concerns moves to another school or college, the DSL will ensure the child protection file is transferred securely, separately from the main pupil file and within the required timescale. The transfer will provide a clear, structured summary that distinguishes historic information from current or foreseeable risks, records ongoing support and identifies information relevant to risks to the child or to others.

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

Where concerns are significant or complex, or statutory services are involved, the DSL will speak to the receiving DSL in advance so that support and risk-management arrangements can be in place when the child arrives. The School will obtain confirmation of secure receipt and record the transfer.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

16. Training

16.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including whistleblowing, online safety, filtering and monitoring, mobile-phone expectations, information sharing and how to identify signs of abuse, exploitation or neglect. All staff will receive Part one of KCSIE 2026 at induction; leaders and staff working directly with children will also be directed to Annex A, and DSLs/deputies to Annex B.

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 changes to Family Help and local thresholds, information sharing, child-on-child abuse, online/AI risks, mobile phones and emerging safeguarding issues, as required and at least annually.

Volunteers will receive appropriate training, if applicable.

16.2 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, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

16.3 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' if an allegation of abuse is made against the Headmaster (Royal Russell School) or Head (St David's School), they receive training in managing allegations for this purpose.

16.4 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 appendix 2 of this policy for more information about our safer recruitment procedures.

16.5 Staff who have contact with pupils and families (EYFS)

All EYFS staff who have contact with children and families will receive supervision that provides support, coaching and training, promotes children's interests and enables confidential discussion of sensitive issues. EYFS safeguarding training, suitability and support arrangements will meet the requirements of the EYFS statutory framework in force from 1 September 2026.

17. Monitoring arrangements

This policy will be reviewed at least annually by the DSL and sooner where legislation, statutory guidance, local safeguarding procedures or significant safeguarding learning requires it. At every formal review it will be approved by the full governing board.

18. Links with other policies

This policy links to the following policies and procedures:

- Behaviour (including mobile device use for pupils)
- Antibullying
- Staff code of conduct (including mobile device use for staff)
- Complaints
- Health and safety
- Attendance
- Online safety (including AI)
- Mobile phones / mobile electronic devices (in Behaviour Policy for Royal Russell Senior School and Junior School and in the 'Computing, Mobile Device and Cameras' Policy for St David's School.
- Restrictive interventions / use of reasonable force (in Staff Code of Conduct at Royal Russell School, in Restrictive Interventions Policy at St David's School)
- EYFS safeguarding and welfare procedures, including attendance/absence and use of cameras, phones and image-sharing devices
- IT Acceptable Use Policy
- Equality - Equal Opportunities and Dignity at Work Policy (staff) and Equality Policy (pupils)
- Relationships and sex education
- First aid
- Curriculum
- Whistleblowing

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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 verbal abuse, including persistent criticism, belittling or name-calling, and may also 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

Sexual abuse involves forcing, causing or inciting a child or young person to take part in sexual activities, whether or not the child understands what is happening and whether or not physical force is used. It can involve contact and non-contact abuse and may be committed by adults or children, individually or as part of an organised network. 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 (including via the internet)

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

There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

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: safer recruitment and DBS checks – policy and procedures

Safer recruitment policy

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the

Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we may ask for includes:
    - If they have a criminal history
    - Whether they are included on the barred list
    - Whether they are prohibited from teaching
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
    - Any relevant overseas information
    - If they are known to the police and children's local authority social care and
    - If they have been disqualified from providing childcare
- Sign a declaration confirming the information they have provided is true

We will also carry out an online search on offered candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we will carry out these checks as part of our due diligence process and that offers will be conditional on the outcome of this check.

Seeking references and checking employment history

We will obtain references before interview, where possible. Any concerns raised will be explored further with referees and taken up with the candidate at interview. Offers will be conditional on receipt of satisfactory references.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

- For EYFS recruitment, the School will obtain at least one written reference for any member of staff, including students and volunteers, before they are recruited, and will apply the reference-checking requirements in the September 2026 EYFS framework. Volunteers will not be permitted to begin working in the EYFS setting until the enhanced DBS certificate and barred list information has been received, except in the few circumstances where there is an exception.

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate, but will keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- For roles in EYFS provision, the September 2026 EYFS framework applies a stricter pre-start requirement: the School will not allow a new employee or volunteer to begin working in the EYFS until the required enhanced criminal-records and children's barred-list check has been received
- Where the DBS Update Service is used, the School will obtain and examine the original certificate, confirm that it matches the individual and the workforce/level of check required, obtain consent for the status check and follow current DBS guidance. Individuals may join the Update Service when applying for a new check or within 30 calendar days of the certificate issue date.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
    - For all staff, including teaching positions: criminal records checks for overseas applicants
    - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

*Management positions are most likely to include, but are not limited to, Headteachers, Deputy Headteachers, Assistant Headteachers, any members of staff who form part of SLT, SSLT, JSLT, members of the Finance

Team and academic Heads of Department.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Staff and prospective staff connected with EYFS provision must disclose information that may affect their suitability to work with children, including relevant arrests, charges, convictions, cautions, court orders, reprimands and warnings, subject to the protections in law. The School will assess such information promptly and take any action required to safeguard children.

Regulated activity with children includes paid or unpaid work involving teaching, training, instructing, caring for or supervising children, providing advice or guidance on their physical, emotional or educational wellbeing, or driving a vehicle only for children, where the activity is frequent, takes place on more than 3 days in a 30-day period, or overnight. It also includes relevant personal care or health care even if carried out only once. From 1 September 2026 the previous supervision exemption for relevant volunteer activity no longer applies.

- Paid or unpaid teaching, training, instructing, caring for or supervising children (or specified advice/guidance/driving activity) when the statutory frequency or overnight condition is met
- Other paid work in a specified place such as a school, where it gives the opportunity for contact with children and meets the statutory frequency or overnight condition
- Engaging in relevant personal care or health care, which is regulated activity regardless of frequency; overnight teaching, training, instructing, caring or supervising is also regulated activity

Existing staff and volunteers

In certain circumstances we will carry out all relevant checks on existing staff and volunteers as if the individual were newly appointed or newly engaged. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post or volunteering arrangement that is not regulated activity to one that is
- There has been a break in service of 12 weeks or more

We will refer to the DBS any member of staff or volunteer who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from regulated activity (paid or unpaid), including volunteering, or would have been removed had they not resigned, left or ceased volunteering

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave a volunteer on whom no checks have been obtained unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with children's barred-list information for volunteers in regulated activity, including volunteers whose teaching, training, instructing, caring for or supervising role is frequent, occurs on more than 3 days in a 30-day period, or is overnight
- Before 1 September 2026, review existing volunteer roles affected by the removal of the supervision exemption and check the children's barred-list status of any existing volunteer who will newly be in regulated activity from that date, using the route permitted by KCSIE/DBS guidance.
- For volunteers who are not in regulated activity, complete and retain a written risk assessment to determine what checks, if any, are appropriate, taking account of the nature of the work, what is known about the volunteer, available references and the degree of contact with children
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Alternative provision

Although Royal Russell School and St David's School do not currently use alternative provision, if a pupil is

placed with an alternative provider the School remains responsible for that pupil's safeguarding. Before placement we will obtain written confirmation of appropriate safeguarding checks and carry out our own safeguarding due diligence. We will record where the pupil is being educated, including the address and any subcontracted or satellite sites; require the provider to notify us of staff, site or other changes that may affect safeguarding risk; and review the placement, attendance, safety and the pupil's needs at least half-termly. Any safeguarding concern about the placement will trigger an immediate review and the placement will be ended if the concern cannot be satisfactorily addressed.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that the placement provider has policies and procedures to protect children from harm and will assess safeguarding arrangements in light of the child, placement and nature/frequency of supervision.

A person who teaches, trains, instructs, cares for or supervises a child on work experience frequently, on more than 3 days in a 30-day period or overnight is in regulated activity and must not be barred. Other workplace staff who do not undertake those activities are not in regulated activity merely because a child is present. We will follow the specific DBS eligibility rules for 16- and 17-year-olds on work experience.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 3: allegations of abuse made against staff

Allegations and concerns about adults working in or on behalf of the School

Section 1: allegations that may meet the harm threshold

This section applies where it is alleged that a member of staff, supply teacher, trainee teacher, volunteer 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 Head of Junior or Head of Senior School (Royal Russell School) or Head (St David's School), or the Executive Head where Head is the subject of the allegation, or the chair of governors where the Executive Head (Royal Russell School) 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
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school

If in doubt, the case manager will seek views from the school's Head of HR 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. Support at Royal Russell School includes the staff union representatives, the staff Common Room Association, our Employee Assistance Programme (Educational Support) and Occupational Health, if appropriate.
- 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

The School will make all safeguarding and regulatory notifications required by law and by the applicable independent-school/EYFS arrangements, without allowing any notification requirement to delay referral to children's social care, the LADO or police. Where an EYFS provision is subject to the Ofsted registered-provider notification duty, the registered provider will notify Ofsted of allegations of harm or abuse by any person living, working or looking after children at the premises, whether the alleged harm or abuse occurred on the premises or elsewhere, and of the action taken, as soon as reasonably practicable and in any event within 14 days of the allegation being made. The Executive Head /DSL will separately ensure any notification required under the Independent School Standards, ISI arrangements or other applicable regime is made within the relevant timescale.

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 contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, 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 governing board 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.

Where a concern or allegation relates to a trainee teacher, the School will work with the employing school, agency and/or initial teacher training provider as applicable. The School and the third-party organisation share safeguarding responsibilities; arrangements for information gathering, support, disciplinary/employment processes and LADO liaison will be agreed without delaying action to protect children.

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, ceases volunteering or otherwise ceases to provide their services, the School will make a referral to the DBS where the legal referral conditions are met 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 and, where applicable, will have regard to the Public Sector Equality Duty when making that decision.

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, with reference to the school's Behaviour Policy and/or Staff Code of Conduct.

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager 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, with reference to the school's Behaviour Policy and/or Staff Code of Conduct.

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.

We will retain all records at least until the accused 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, volunteers 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 code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the 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 behind a closed door
- Humiliating pupils

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
- Including information about Low Level Concerns and how they should be shared (including self-referral) in staff training
- Ensuring staff know that the DSL can support them in speaking to the Head of Junior School or Head of Senior School (Royal Russell School) or Head (St David's School), or to the Executive Head about a concern, should they feel worried about raising it without this support.
- 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 Headmaster (at Royal Russell School) or Head (at St David's School) 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

Some of these actions may be delegated by the Headmaster to another member of the Leadership team at Royal Russell School.

The Headmaster (at Royal Russell School) or Head (at St David's School) will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. The Headmaster 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 and securely in accordance with the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025
- 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

Further details of the schools' policies and procedures in relation to Low Level Concerns can be found in the Low Level Concerns policy.

Appendix 4: specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the Department for Science, Innovation and Technology and the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

The procedure for managing an incident when nudes or semi-nudes have been shared is set out in Section 7.9 of this policy.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Attendance

Prolonged or repeated absence from education can be an important indicator of safeguarding concerns,

including neglect, child sexual exploitation, and child criminal exploitation—particularly in relation to county lines. The school's approach to managing persistent absence and children missing from education is designed to support the early identification of such risks.

Our response aims not only to address patterns of absence but also to prevent children from becoming missing from education in the future. This applies both when concerns are just beginning to emerge, and where children are already known to local authorities about children's social care—such as those with a social worker, children in need, those on child protection plans, or looked-after children. In such cases, absence from education can heighten existing safeguarding risks within the home or wider community.

Attendance policy and procedures for Royal Russell Junior and Senior Schools, and for St David's School are outlined in the Attendance of Pupil's policy, which is based on the Department of Education's statutory guidance Working together to improve school attendance

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

Staff should raise concerns of this nature relating to absence with the DSL or Deputy DSL immediately.

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse in which an individual or organised network or gang takes advantage of a power imbalance to coerce, control, manipulate or deceive a child into criminal activity. Children may identify themselves as belonging to the group exploiting them and may be criminalised for acts carried out under coercion. CCE may constitute modern slavery and requires consideration of referral to the National Referral Mechanism as well as local safeguarding and police routes.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced

into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse in which an individual or organised network or gang takes advantage of a power imbalance to coerce, manipulate or deceive a child into sexual activity. Most child sexual abuse is committed by someone known to the child. A child may not recognise the exploitation and may appear to consent; apparent consent does not remove the need for a safeguarding response.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse (including harassment and violence)

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual assault includes intentional sexual touching without consent and without a reasonable belief in

consent; a single non-consensual kiss or touching of the bottom, breasts or genitalia can constitute sexual assault.

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Domestic abuse can affect children directly or indirectly, including physical, sexual, emotional, psychological or economic abuse, coercive or controlling behaviour, stalking, abuse in teenage relationships and child-to-parent/caregiver abuse. A child who sees, hears or experiences the effects of domestic abuse is recognised as a victim in their own right.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't

physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Operation Encompass is now supported by a statutory police information-sharing duty. Where police have reasonable grounds to believe a child under 18 is a victim of domestic abuse, the police should notify the relevant education setting/local authority in accordance with that duty. This may include children connected with the household who were not present at the incident. The DSL/Key Adult will receive and act on notifications, but Operation Encompass does not replace the School's duty to make a safeguarding referral where required.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The Children's Wellbeing and Schools Act 2026 introduces a notification duty on local housing authorities in specified circumstances when a child is placed in temporary accommodation. Where the School receives such a notification,

the DSL will consider the child's educational, attendance, welfare and safeguarding needs and coordinate proportionate support. Receipt or absence of a notification does not replace normal safeguarding action or referral.

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise or missing PE
    - Being repeatedly absent from school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
    - Being reluctant to undergo any medical examinations
    - Asking for help, but not being explicit about the problem
    - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM

- Having limited level of integration within UK society
- Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘1 chance’ rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate local safeguarding procedures and, where appropriate, refer the child to Croydon MASH/local authority children’s social care and/or the police.
- Seek specialist advice where required from the Forced Marriage Unit: 020 7008 0151, fmu@fcdo.gov.uk (and use 999 in an emergency)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to**:**
    - Negate or destroy the fundamental rights and freedoms of others; or
    - Undermine, overturn or replace the UK’s system of liberal parliamentary democracy and democratic rights; or
    - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- **Terrorism** is an action that:
    - Endangers or causes serious violence to a person/people;
    - Causes serious damage to property; or
    - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and the NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Where a Channel referral is considered or made, relevant safeguarding information will be shared with the police and other Channel partners in accordance with the Prevent duty, information-sharing law and local arrangements.

Staff should **always** take action if they are worried.

Further information on the measures to prevent radicalisation at Royal Russell School and St David's School are set out in the Preventing Extremism and Radicalisation Policy.

Cybercrime

Staff should be alert to cyber-enabled harm and to children who may become involved in Computer Misuse Act offending, such as unauthorised access ("hacking"), denial-of-service attacks or creating/distributing malware. Curiosity or technical skill is not itself a safeguarding concern, but where behaviour creates risk or appears

linked to coercion, exploitation, criminality or wider vulnerability, staff will report the concern to the DSL and appropriate support/referral routes will be considered.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual or transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Serious violence may arise from peer conflict, criminal exploitation, group or gang activity, weapon carrying or other threats and acts of violence. Risks may be heightened around the start/end of the school day and journeys to and from school. Indicators may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries

- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors and contextual information must be considered together; no single factor determines risk. Relevant factors can include:

- Being male
- Having disrupted education, including frequent absence, suspension, time in alternative provision or permanent exclusion
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery
- Early or problematic drug and/or alcohol use
- Having previously been a victim or perpetrator of violence
- Exposure to violence, exploitation, gang association, weapon carrying, significant peer conflict or unsafe travel routes

Any concern that a pupil is carrying or using a weapon, or has expressed an intention to do so, must be reported promptly to the DSL or deputy. The DSL will assess the risk to the pupil and to others, consider the wider context, put an appropriate safety and support plan in place and consider how peer conflict can be de-escalated.

Staff will report concerns promptly to the DSL. The DSL will consider the needs and safety of all children involved, contextual risks, appropriate risk-management/support plans and whether referral to children's social care, police, health services or other specialist support is required.

Visitors and safeguarding on site

Visitors will be managed according to their role and level of contact with children. Identity and purpose of visit will be checked as appropriate, and escort/supervision will be determined through professional judgement and risk assessment. The School will not routinely request DBS checks or ask to see DBS certificates for casual visitors such as relatives attending events.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors to both Royal Russell Junior and Senior School are expected to sign in electronically at reception and wear a visitor badge (with photo) on a red lanyard during their time on site.

Visitors to St David's School are required to sign in at Reception and wear a Visitors Badge for the duration of their time on site.

For professional visitors, such as educational psychologists, social workers and education-related practitioners, the School will check identity and obtain assurance that the visitor has the appropriate DBS check for the activity. Where the visitor's employer has confirmed appropriate checks, the School will not normally ask to see the DBS certificate itself.

Other educational visitors, including visiting speakers and performers, will be subject to proportionate suitability checks and supervision. The School will consider the educational value and age-appropriateness of the proposed activity and any safeguarding or Prevent risks. Visitors who require escort will be clearly identified in accordance with local site procedures.

Non-collection of children

If a child is not collected at the end of the session/day, we will follow the procedures set out below:

Royal Russell Junior School procedures are outlined in Royal Russell Junior School Policy for non-collection of Children including the EYFS.

St David's School procedures are outlined in St David's Collection of Children Policy, including children in the EYFS.

There is no requirement for Senior School's to have a non-collection policy, as the majority of senior school

pupils travel home from school independently (eg on public transport, in their own vehicle). There is also no process for overseeing pick up of pupils from senior schools, including Royal Russell Senior School in the normal course of events. Should a member of staff become aware of a senior school pupil who has not been collected as expected, however, they should locate the member of the Senior School Leadership who is on duty. This person will use the contact details on iSAMS to make contact with parent / carer or emergency contact. Should it not be possible for the child to travel independently to their home and/or no one is available to collect them due to exceptional circumstances, arrangements will be made for them to be supervised in a boarding house until pick up is possible.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will follow the procedures set out below:

Royal Russell Senior School: procedures are outlined in the Pupil Supervision Policy. This includes procedures for day pupils and for boarding pupils.

Royal Russell Junior School: procedures are outlined in the Junior School Missing Pupil Policy, which covers all pupils in the Junior School including EYFS.

St David’s School: procedures are outlined in the St David's School Missing Child Policy, which covers all pupils including EYFS.