



**Child Protection and Safeguarding Policy
January 2026**



Name of policy	Child Protection and Safeguarding Policy
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This policy applies to (highlight as applicable):	Staff	Pupils	Parents
This policy applies to:	Senior	Junior	WCPS

Staff member/s responsible for policy update and implementation:	RHA/PKB/ADT
Frequency of review:	Annual
Date of last adoption:	January 2026 (DDSL list updated Nov 24, radicalisation section updated Jan 25 to take account of educate against hate guidance, LLCs reporting updated Feb 25, DSLs updated March 25, updated Aug 2025 in response to draft KCSIE 2025, updated September 2025 in response to final version of KCSIE 2025, updated January 2026 due to a new senior school DDSL)
Date of next review:	September 2026

Related policies:	<ul style="list-style-type: none"> • <i>Staff Code of Conduct</i> • <i>Learning Enrichment and SEND policy</i> • <i>Whistleblowing policy</i> • <i>Health and Safety policy and risk assessments</i> • <i>Attendance policies</i> • <i>Missing Pupil policy</i> • <i>Complaints policy</i> • <i>Curriculum policies</i> • <i>Teaching and Learning policy (WPCS)</i> • <i>First Aid policy</i> • <i>Administration of Medicines policy (WCPS)</i> • <i>Drugs, Alcohol and Smoking policy</i> • <i>Relationships, Sex and Health Education policies</i> • <i>Positive Handling policy</i> • <i>PSHE policy and schemes of work</i> • <i>Behaviour, Rewards and Sanctions policies</i> • <i>Behaviour management policy (WCPS)</i> • <i>Anti-bullying policy</i> • <i>Gender Questioning Pupils policy</i> • <i>Social Media policy</i> • <i>Pupil Welfare Risk Assessment</i>
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	<ul style="list-style-type: none"> • <i>Safer Recruitment policy</i> • <i>Intimate Care policy (WCPS)</i> • <i>Data Protection policy</i> • <i>Acceptable Use policies</i> • <i>Visiting Speakers policy</i> • <i>Mental Health and Wellbeing policy</i>
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Policy sign-off and adoption

Reviewed by policy owner	Initials:	RHA/PKB/ADT	Date:	January 2026
Reviewed by policy scrutiny group if applicable:	PSG/PPMB:	PSG	Date:	September 2025
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CHILD PROTECTION AND SAFEGUARDING POLICY

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TERMINOLOGY

Safeguarding and promoting the welfare of children is defined as:

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

Child Protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Early Help means providing support as soon as additional needs emerge at any point in a child's life.

Staff refers to all those working for or on behalf of the school, full or part time, temporary or permanent, in either a paid or voluntary capacity.

Child includes everyone under the age of 18 and applies to pupils/students at our school; however, the policy will extend to visiting children and students from other establishments.

Parents refers to birth parents and other adults who are in a parenting role, e.g., stepparents, foster carers, adoptive parents and those adults caring for children with a Special Guardianship Order.

Children's Social Care refers to the Local Authority Children's Services in the area in which the child resides unless a child is a Child Looked After, in which case this will be the Children's Services in their home authority.

KEY PERSONNEL

Senior School

Designated Safeguarding Lead (DSL): Mr Richard Amlot, Deputy Head (Safeguarding, Mental Health and Wellbeing)

Contact details: RHA@kcs.org.uk; 0208 255 5358; 07594 090012

Deputy DSLs Senior School are:

Mrs Nicola Taylor, Safeguarding Officer and Senior DDSL: NT@kcs.org.uk; 0208 255 5350

Mr Tom Attenborough, Head of Sixth Form: TFA@kcs.org.uk; 0208 255 5256

Mr James Gibson, Head of Lower School: JSG@kcs.org.uk; 0208 255 5360

Ms Lisa Nahorniak, Acting Director of Pupil Mental Health and Wellbeing: LGN@kcs.org.uk; 0208 255 5260

Mr Chris Sandels, Deputy Head (Pastoral): CPS@kcs.org.uk; 0208 255 5256

Mr Sam Young, Head of Middle School: SY@kcs.org.uk; 0208 255 5534

Head: Dr Anne Cotton, head@kcs.org.uk; 0208 255 5353

Junior School

Acting Designated Safeguarding Lead (DSL): Mr Paul Brady, Head of Second & Third Form

Contact details: PKB@kcs.org.uk; 0208 255 5159

Deputy DSLs Junior School are:

Mr Ted Lougher, Headmaster: EHL@kcs.org.uk; 0208 255 5335; 07867 311332

Mrs Caryn Madge, Head of Rushmere: CSM@kcs.org.uk; 0208 255 5181

Wimbledon Common Preparatory School

Designated Safeguarding Lead (DSL): Ms Adel Thomson, Deputy Head (Pastoral)

Contact details: ADT@wcps.org.uk; 0208 946 1001; 07787 333412

Deputy DSLs WCPS are:

Mr Andrew Forbes, Head Teacher: ARF@wcps.org.uk; 020 8946 1001; 07889 724109

Mr Andrew Morrison, Head of PE: ALMN@wcps.org.uk; 0208 946 1001; 07887711646

EYFS point of contact for safeguarding:

Miss Nicola Sargeant, Head of EYFS: NS@wcps.org.uk; 0208 946 1001

The nominated safeguarding governor is Dr Sreena Gawley

Members of the Governing Body can be contacted via the secretary to the governing body, Rachel Wilkinson, R.Wilkinson@kcs.org.uk; Tel: 020 8255 5300.

The Local Authority Designated Officer (LADO) is Mr John Shelley

Contact details: John.Shelley@merton.gov.uk, Tel: 020 8545 3187

King's College School is situated in the Merton Safeguarding Children Partnership.

Contact details for referrals: 0208 545 4226 (02087705000 out of hours)

Children are referred to the Local Authority Children's Social Care services where they reside. The Local Authority details in each case can be found via this link: [Report child abuse to a local council - GOV.UK \(www.gov.uk\)](https://www.gov.uk/report-child-abuse-to-a-local-council)

SAFEGUARDING STATEMENT 2025/26

“It could happen here”

At the school we recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils.

We make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

We are alert to the signs of abuse, neglect and exploitation, and follow our procedures to ensure that children receive effective support, protection and justice. Child protection forms part of the school's safeguarding responsibilities. We expect all staff, governors and volunteers to share this commitment to safeguarding our pupils.

We follow the **Merton Children's Safeguarding Partnership** procedures and have several policies and procedures in place which contribute to our safeguarding commitment, including our *Child protection and safeguarding policy*. A copy of this policy is available on the King's College School website: [Safeguarding at King's - King's College School \(kcs.org.uk\)](https://www.kcs.org.uk) and on the WCPS website: [Safeguarding at WCPS \(wcps.org.uk\)](https://www.wcps.org.uk).

The purpose of this policy is to provide staff, volunteers, and governors with the framework they need in order to keep children safe and secure in our school. The policy also informs parents and carers about how we will safeguard their children whilst they are in our care.

CHAPTER I

I. INTRODUCTION

- I.1. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with government publications: 'Working Together to Safeguard Children' (December 2023, updated July 2025), 'Framework for the Assessment of Children in Need and their Families' (2000), and 'What to do if You are Worried a Child is Being Abused' (March 2015).
- I.2. The policy also reflects both statutory guidance ['Keeping Children Safe in Education' 2025](#) (KCSIE) and ['Early Years Foundation Stage Framework' 2025](#) (EYFS), and [Merton Children's Safeguarding Partnership \(MCSP\) Procedures](#).
- I.3. The Governing Body takes seriously its responsibility under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of children and young people; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children and young people who are suffering harm. Although this policy uses the terms 'child' and 'children', which are defined as a person aged under 18, the school adopts a wider interpretation of its safeguarding responsibilities so that these terms apply to all pupils regardless of age. This policy should be interpreted accordingly. Where pupils are aged 18 or over, there may be some additional considerations in terms of how we work with local agencies and partners if we have a concern, for example a referral may need to be made to Adult Social Care or the Local Adults Safeguarding Board in the case of a concern about a pupil aged 18 or over.
- I.4. This policy applies to all members of staff, governors and volunteers working in the school.

Definitions

In this policy references mean as follows:

References to the "school" mean, unless otherwise stated, the schools owned and operated by The Corporation of King's College School in the UK, namely, King's College School, King's College Junior School and Wimbledon Common Preparatory School, as well as KCS Enterprises and King's International.

References to the "head" mean the head of the relevant school.

References to DSL or a Deputy DSL mean the DSL or Deputy DSL of the relevant school.

2. GUIDANCE AND DOCUMENTS REFERRED TO IN THIS POLICY

- [Keeping Children Safe in Education 2025 \(KCSIE\)](#)
- [Working Together to Safeguard Children \(December 2023, updated July 2025\)](#)
- [Children missing education \(2013, updated September 2025\)](#)
- [Disqualification under the Childcare Act 2006 \(updated 2018\)](#)
- [Multi-agency statutory guidance on female genital mutilation \(2020\)](#)
- [FGM Act 2003 Mandatory Reporting Guidance 2016](#)
- ['What to do if you are worried a child is being abused' 2015](#)
- [Teacher Standards 2011 \(updated 2021\)](#)

- [Information Sharing – advice for practitioners providing safeguarding services 2024](#)
- [DfE Data Protection guidance for schools \(2023, updated September 2025\)](#)
- [Working Together to Improve School Attendance \(2024\)](#)
- [Gender Questioning Children – Draft for consultation \(2023\)](#)
- [The Equality Act 2010](#)
- [The Human Rights Act 1998](#)
- [National Police Chiefs Council – When to call the police](#)
- [Prevent duty guidance: England and Wales \(2015, updated March 2024\)](#)
- [Arranging education for children who cannot attend school because of health needs 2023](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education 2025](#)
- [Early years foundation stage statutory framework \(July 2025, effective September 2025\)](#)

CHAPTER 2 – POLICY OVERVIEW

3. POLICY PRINCIPLES & VALUES

- 3.1. The welfare of the child is paramount.
- 3.2. Maintain an attitude of “It could happen here”.
- 3.3. Children have a right to feel safe and secure; they cannot learn effectively unless they do so.
- 3.4. All children have a right to be protected from harm and abuse.
- 3.5. All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, taking into account risks outside of the home, in accordance with statutory guidance.
- 3.6. All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of school. All staff, but especially the DSLs, will consider whether children are at risk of abuse or exploitation in situations outside of their families, recognising that extra-familial harms include, but are not limited to, sexual exploitation, criminal exploitation, and serious youth violence.
- 3.7. We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- 3.8. The school will work in partnership with parents. The school recognises that the child’s safety is paramount and will always act in the child’s best interests. Whilst the school will work openly with parents as far as possible, it will contact Children’s Social Care or the Police without notifying parents where this is in the child’s best interests.

4. POLICY AIMS

- 4.1. To demonstrate the school’s commitment about safeguarding and child protection to pupils, parents, other partners and the wider school community.
- 4.2. To raise the awareness of all teaching and non-teaching staff of their responsibilities to safeguard children through identifying and reporting possible cases of abuse.
- 4.3. To enable the school to effectively contribute to Early Help, assessments of need and support for those children.
- 4.4. To provide robust school systems and procedures that are followed by all members of the school community in cases of suspected abuse.
- 4.5. To develop and promote effective working relationships with other agencies, in particular Early Help providers, the Police, Health and Children’s Social Care.
- 4.6. To ensure that all staff working within our school who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory enhanced DBS check (according to KCSIE guidance), and a Single Central Record is kept for audit.

- 4.7. To ensure that we comply with the Disqualification under the Childcare Act 2006 guidance issued in February 2015 (updated August 2018).

5. SUPPORTING CHILDREN

- 5.1. We recognise that school may provide a safe place and the only stability in the lives of children who have been abused or who are at risk of harm.
- 5.2. We recognise that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.
- 5.3. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- 5.4. Our school will support all children:
- 5.4.1. We promote a caring, safe, inclusive and positive environment within the school.
 - 5.4.2. We encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the school community.
 - 5.4.3. We ensure children are taught to how to form positive relationships, recognise abusive relationships, and understand and manage risk through Relationships and Sex Education (RSE) and through all aspects of school life. This includes online safety and anti-bullying, inclusivity, personal safety and independent travel.
 - 5.4.4. We respond sympathetically to any requests for time out to deal with distress and anxiety and support pupils in maintaining positive mental health. There is a whole school approach to pupil wellbeing.
 - 5.4.5. We offer details of helplines, counselling or other avenues of external support.
 - 5.4.6. We liaise and work in partnership with other support services and agencies involved in Early Help and the safeguarding of children.
 - 5.4.7. We will notify Children's Social Care immediately if there is a significant concern.
 - 5.4.8. We will provide continuing support to a child about whom there have been concerns who leaves the school by ensuring that information is shared in a confidential and timely way to the new setting.
 - 5.4.9. We encourage children to share concerns as well as offering access to school counselling and learning enrichment. Children know who they can talk to if they do not feel safe.
 - 5.4.10. We will reassure all children who are victims of abuse that they will be taken seriously and will be supported. They should never be made to feel ashamed or that they are creating a problem by reporting abuse, sexual violence, or sexual harassment.
 - 5.4.11. We will ensure that, following any safeguarding concern, the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

6. PREVENTION / PROTECTION

- 6.1. We recognise that the school plays a significant part in the prevention of harm by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.
- 6.2. The school will:
 - 6.2.1. Establish and maintain an ethos where children feel safe and secure, are encouraged to talk and are always listened to.
 - 6.2.2. Engage in regular consultation with children through surveys and focus and feedback groups.
 - 6.2.3. Ensure that all children know there is an adult in the school whom they can approach if they are worried, either about themselves or a friend or sibling, or are in difficulty. Pupils are supported by their tutor, form tutor or form teacher and made aware of other avenues of support.
 - 6.2.4. Include safeguarding across the curriculum, including opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help.
 - 6.2.5. Ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks in accordance with the School's Acceptable Use of IT policies.

7. SAFE SCHOOL, SAFE STAFF

- 7.1. We will ensure that:
 - 7.1.1. The school operates safer recruitment procedures that include statutory checks on staff suitability to work with children. Disqualification under the Childcare Act 2006 still applies to staff themselves. All staff have a responsibility to inform the school where their relationships and associations, both within and outside of the workplace (including online), may have implications for the safeguarding of children in the school. An enhanced DBS check is carried out for all new employees, and further checks are undertaken as appropriate, for example where individuals live or have lived overseas. Staff have a responsibility to inform the head if their circumstances change whilst employed at the school. This statement is in the Staff Code of Conduct, which all staff have signed and agreed to adhere to.
 - 7.1.2. We will not accept a Curriculum Vitae (CV) unless alongside a full application form from anyone applying to work at the school. As part of our background checks, we complete an online search for shortlisted candidates.
 - 7.1.3. All staff receive information about the school's safeguarding arrangements, the school's safeguarding statement, *Staff code of conduct*, pupil behaviour policies, *Child protection and safeguarding policy*, the role and names of the Designated Safeguarding Lead and their Deputy Designated Safeguarding Lead(s), and [KCSIE 2025 part 1](#) and [annex B](#). Part 2 of this guidance relates to "The Management of Safeguarding" and will be issued to all Governors.

- 7.1.4. All staff receive safeguarding training at induction in line with advice from Merton Children's Safeguarding Partnership which is regularly updated, and receive safeguarding updates (for example, via email, and staff meetings), as required, but at least annually. In addition, we deliver regular safeguarding update sessions for all staff and role specific safeguarding training at INSET days and during specific safeguarding training sessions.
- 7.1.5. All members of staff are trained in and receive regular updates in online safety and in Prevent. This includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- 7.1.6. All staff and governors have regular safeguarding awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse, how to respond to allegations and disclosures of abuse and how to report safeguarding and child protection issues.
- 7.1.7. The *Child protection and safeguarding policy* is made available via the school website. Hard copies of this policy can be viewed by request from the school office.
- 7.1.8. We provide a coordinated offer of Early Help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans. We are alert to the circumstances that might indicate a particular need for early help, including a pupil who:
- is disabled or has certain health conditions and has specific additional needs;
 - has special educational needs (whether or not they have a statutory Education, Health and Care plan);
 - has a mental health need;
 - is a young carer;
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
 - is frequently missing/goes missing from education, home or care;
 - has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit;
 - is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
 - is at risk of being radicalised or exploited;
 - has a parent or carer in custody, or is affected by parental offending;
 - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
 - is misusing alcohol and other drugs themselves;
 - is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
 - is a privately fostered child.
- 7.1.9. We will seek to ensure the suitability of adults working with children on school sites at any time and this includes any persons or organisations using our buildings or outside spaces in a letting or hiring agreement, in accordance with the DfE statutory guidance '[Working Together to Safeguard Children](#)' (December 2023, updated July 2025)
- 7.1.10. Where community users organise activities for children on the site, we ensure that appropriate arrangements are in place to keep children safe, and that relevant providers have appropriate safeguarding and child protection policies and procedures in place.

7.1.11. The name of the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads are clearly advertised in the school with a statement explaining the school's role in referring and monitoring cases of suspected harm and abuse.

CHAPTER 3 – ROLES AND RESPONSIBILITIES

8. ALL SCHOOL STAFF

- 8.1. All staff have a key role to play in identifying concerns and in providing help for children. To achieve this, they will:
- 8.1.1. Provide a safe environment in which children can learn.
 - 8.1.2. Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
 - 8.1.3. Ensure children know that there are adults in the school who they can approach if they are worried or have concerns.
 - 8.1.4. Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
 - 8.1.5. Attend training to be aware of and alert to the signs of child abuse, neglect and exploitation.
 - 8.1.6. Maintain an attitude of “it could happen here” with regards to safeguarding.
 - 8.1.7. Know how to respond to a pupil who discloses or alleges harm or abuse following training of ‘Working together to Safeguard Children’ (December 2023, updated July 2025), and ‘What to do if you are worried a child is being Abused’ (2015).
 - 8.1.8. Know who the DSL and Deputy DSLs are and know how to contact them.
 - 8.1.9. Report their concerns to the DSL immediately and on that day if they are worried a child is being abused, neglected or exploited, and record their concerns. If the DSL is not contactable immediately, a Deputy DSL should be informed.
 - 8.1.10. Be prepared to refer directly to the relevant Children’s Social Care and the Police if there is a risk of significant harm and the DSL or a Deputy DSL is not available.
 - 8.1.11. Follow the allegations procedures and inform the head if the disclosure is an allegation against a member of staff, supply staff or a volunteer. Low-level concerns should be reported to the DSL (senior school), headmaster (junior school) or to the DSL or head teacher (WCPS).
 - 8.1.12. Follow the procedures set out by the Merton Children’s Safeguarding Partnership and take account of guidance issued by the Department for Education.
 - 8.1.13. Treat information with confidentiality but never promising to “keep a secret”.
 - 8.1.14. Understand Early Help and be prepared to identify and support children who may benefit.
 - 8.1.15. Have an awareness of the role of the DSL, Part I and Annex B of KCSIE 2025, the school’s *Child protection and safeguarding policy*, *Staff code of conduct*, *Behaviour, rewards and sanctions policies (KCS)*/*Behaviour management policy (WCPS)* and procedures relating to the safeguarding response for children who go missing from education.
 - 8.1.16. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018 and

UK General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

- 8.1.17. All staff must therefore be aware that they cannot promise a child confidentiality or promise to keep secrets which might compromise that child or another child's safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to children and families; in this respect they are confidential, and the head or DSLs will only disclose information about a child to other members of staff on a need-to-know basis.
- 8.1.18. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL (or a Deputy DSL) and Children's Social Care.
- 8.1.19. Be mindful that the Teacher Standards state that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- 8.1.20. Assist the Governing Body and head in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

9. THE HEAD

- 9.1. In addition to the role and responsibilities of all staff the head will ensure that:
 - 9.1.1. The school fully contributes to inter-agency working in line with the DfE statutory guidance 'Working Together to Safeguard Children' (December 2023, updated July 2025).
 - 9.1.2. The *Child protection and safeguarding policy* and procedures are implemented and followed by all staff.
 - 9.1.3. All staff are aware of who the DSL is and their role.
 - 9.1.4. Sufficient time, training, support, funding, resources, are allocated to the DSL to carry out their role effectively, including the provision of advice and support to school staff on child welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.
 - 9.1.5. Opportunities are provided for a co-ordinated offer of Early Help when additional needs of children are identified.
 - 9.1.6. Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.
 - 9.1.7. With the DSL, adequate and appropriate cover arrangements are in place for any out of hours/out of term activities.
 - 9.1.8. Where there is a safeguarding concern, that the child's wishes and feelings are considered when determining what action to take and what services to provide.

- 9.1.9. Child-centred systems and processes are in place for children to express their views and give feedback.
- 9.1.10. All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- 9.1.11. Pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- 9.1.12. Allegations or concerns against staff, supply staff or volunteers are dealt with in accordance with guidance from Department for Education (DfE) and Merton Children Safeguarding Partnership.
- 9.1.13. Statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally, in the case of teaching staff, the Teacher Regulation Agency where an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.

10. THE DESIGNATED SAFEGUARDING LEAD

- 10.1. In addition to the role and responsibilities of all staff, the DSL will:
 - 10.1.1. Hold the lead responsibility for safeguarding and child protection (including online safety) in the school; this responsibility is not able to be delegated.
 - 10.1.2. Adopt an **“it could happen here”** approach to safeguarding.
 - 10.1.3. Liaise with the Local Authority, the three safeguarding partners and work in partnership with other agencies in line with the DfE statutory guidance Working Together to Safeguard Children (December 2023, updated July 2025). [“National Police Chiefs Council guidance– When to call the police”](#) should help DSLs understand when they should consider calling the Police and what to expect when they do.
 - 10.1.4. Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them.
 - 10.1.5. Report concerns that a child may be at risk of radicalisation or involvement in terrorism, following the Prevent Referral Process and use the Prevent Referral Form to refer cases by email. If the matter is urgent, the Police must be contacted by dialling 999 or the Police anti-terrorist hotline on 0800 789 321 to report an immediate threat to life or property. In cases where further advice from the Police is sought dial 101 or contact the national Police Prevent advice line on 0800 011 3764.
 - 10.1.6. Refer cases where a crime may have been committed to the Police as required.
 - 10.1.7. Liaise with the “case manager” and Local Authority Designated Officer for child protection concerns in cases which concern a member of staff or a volunteer; and refer cases where a person is dismissed or has left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required.

- 10.1.8. Follow DfE and KCSIE 2025 guidance on child-on-child abuse when a concern is raised that there is an allegation of a pupil abusing another pupil within the school.
- 10.1.9. Be available during term time (during school hours) for staff in school to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the school leadership for any out of hours/term activities.
- 10.1.10. Act as a source of support and expertise in carrying out safeguarding duties for the whole school community.
- 10.1.11. Access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training should be updated at least every two years and knowledge and skills refreshed at regular intervals but at least annually.
- 10.1.12. Have a secure working knowledge of Merton and other Local Safeguarding Children's Partnership (LSCP) procedures and understand the assessment process for providing Early Help and statutory intervention, including the Local Authority levels of need criteria and referral arrangements.
- 10.1.13. Have a clear understanding of access and referral to Local Authority Children's Social Care Early Help offers.
- 10.1.14. Liaise with school staff (especially the other Deputy DSLs, heads of house and heads of year, heads of section, medical team, school counsellors, and the learning enrichment team) on matters of safety and safeguarding and consult the Borough's LSCP Levels of Need document to inform decision making and liaison with relevant agencies.
- 10.1.15. Be alert to the specific needs of children in need, those with SEND, those who identify as lesbian, gay, bisexual or gender questioning, and those who are young carers.
- 10.1.16. Understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep children safe whilst they are online at school (including the filtering and monitoring systems and processes in place); in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- 10.1.17. Ensure that all necessary pupil safeguarding information from feeder schools is obtained and entered into secure notes in a timely fashion.
- 10.1.18. Keep detailed, accurate, secure written records using appropriate secure online software, such as our bespoke school software of KIM secure notes at KCS and SIM secure notes at WCPS. While occasionally there may be circumstances in which notes are hand-written (eg. if staff and pupils are offsite or staff do not have access to the school's IT system), where possible these should then be typed up at the earliest opportunity using the school's IT system such as KIM secure notes at KCS and SIM secure notes at WCPS. The written records should contain details of all concerns, discussions and decisions made about a child including the rationale for those decisions and any action taken. This should include instances where referrals were or were not made to another agency, for example the Local Authority Children's Social Care or the Prevent program. Records also require a clear and comprehensive summary and details on how the concern was followed up and resolved.
- 10.1.19. Ensure that an indication of the existence of a Child Protection file is cross-referenced on the pupil school file. Flag all records where there is a Pupil Welfare Concern (PWC).

- 10.1.20. Be responsible for keeping the pupil welfare concern list updated and ensuring that the support for each pupil on the list is reviewed in an appropriate timescale according to the level of concern.
- 10.1.21. Arrange home visits where appropriate to support pupil wellbeing and attendance.
- 10.1.22. Ensure that when a pupil transfers school, their child protection file is passed to the new school within 5 days of starting a new term, and within statutory timescales (separately from the main pupil file and ensuring secure transit) and that confirmation of receipt is received.
- 10.1.23. Ensure that where a pupil transfers school and is on a Child Protection Plan or is a Looked After Child, their information is passed to the new school immediately, and that the child's social worker is informed. In addition, consideration should be given to a multi-agency schools transition meeting if the case is complex or on-going.
- 10.1.24. Ensure that a copy of the Child Protection file is retained until such a time that the new school acknowledges receipt of the original file. Copies should be handled under the school's policies relating to data retention.
- 10.1.25. Work with the DSL team, Local Authority and Social Care Teams to make informed decisions in the best interests of the child, for instance the child's safety, educational outcomes and welfare. This should be a matter of routine. Furthermore, the social worker and the DSL need to work together to respond to unauthorised absences and promote welfare.
- 10.1.26. Ensure that the school will be included in statutory discussions in cases of child-on-child abuse.
- 10.1.27. Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and SMT to ensure that relevant members of staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- 10.1.28. Report to the head any significant issues, for example: enquiries under section 47 of the Children Act 1989 and Police investigations. This should include being aware of the requirement for children to have an Appropriate Adult [Guidance – Police and Criminal Evidence Act 1984 Code C Revised 2019 and the Code of Practice for the detention, treatment and questioning of persons by police officers](#). Ensure that the case holding Social Worker is informed of any child currently with a Child Protection Plan who is absent without explanation.
- 10.1.29. Ensure that all staff are aware of systems at the school which support safeguarding. These are explained as part of their induction and updated once a year thereafter. Staff should sign to say they have read, understood and agree to work within the school's *Child protection and safeguarding policy*, *Staff code of conduct*, *Behaviour, rewards and sanctions policies (KCS)/Behaviour management policy (WCPS)*, *Missing pupil policy* and KCSIE 2025 Part I and annex B and ensure that the policies are used effectively.
- 10.1.30. Organise child protection and safeguarding induction, with the support of HR, regularly updated training, following the training guidance published by the London Borough of

Merton and the Safeguarding in Schools Officer, and a minimum of annual updates (including online safety) for all school staff.

- 10.1.31. Keep a record of attendance and address any absences in line with the DfE statutory guidance [Working together to improve school attendance 2024](#) and the [School Attendance \(Pupil Registrations\) \(England\) Regulations 2024](#).
- 10.1.32. Ensure that, in collaboration with the school leadership and governors, the *Child protection and safeguarding policy* is reviewed annually and the procedures and implementation are updated and reviewed regularly.
- 10.1.33. Ensure that the *Child protection and safeguarding policy* is available publicly on the school website and that parents are aware that referrals about suspected harm and abuse will be made and the role of the school in this.
- 10.1.34. Establish and maintain links with the three safeguarding partners to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.
- 10.1.35. Ensure that the name of the designated members of staff for Child Protection, the Designated Safeguarding Lead and deputies, are clearly advertised in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- 10.1.36. Ensure that the Single Central Record is compliant with KCSIE 2025.
- 10.1.37. Meet all other responsibilities as set out for DSLs in KCSIE 2025.

11. THE DEPUTY DESIGNATED SAFEGUARDING LEADS

- 11.1. In addition to the role and responsibilities of all staff each Deputy DSL will:
 - 11.1.1. Be trained to the same standard as the Designated Safeguarding Lead and the role is explicit in their job description.
 - 11.1.2. Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
 - 11.1.3. In the absence of the DSL carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL a Deputy DSL will assume all the functions above.

12. GOVERNING BODY

- 12.1. All members of The Governing Body understand and fulfil their responsibilities to ensure that:
 - 12.1.1. There are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
 - 12.1.2. They facilitate a whole school approach to safeguarding children and young people.
 - 12.1.3. Where there is a safeguarding concern, children's wishes, and feelings should be taken into account when determining what action to take and what services to provide. Systems should

be well promoted, understood and easily accessible for children to confidently report abuse, knowing that their concerns will be treated seriously.

- 12.1.4. The school has effective safeguarding policies and procedures including a *Child protection and safeguarding policy*, a *Staff code of conduct*, pupil *Behaviour, rewards and sanctions policies (KCS)/Behaviour management policy (WCPS)* and a response to children who go missing from education, and that policies are consistent with Merton Safeguarding Children's Partnership and statutory requirements, are reviewed annually and that the *Child protection and safeguarding policy* is available on the school website.
- 12.1.5. The school reviews these policies and their implementation, and shares this with governors at least termly in the form of a safeguarding committee meeting, and additionally via one external audit annually.
- 12.1.6. The school operates safer recruitment procedures that include statutory checks on staff suitability to work with children and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training.
- 12.1.7. At least one member of the governing body has completed safer recruitment training to be repeated every five years.
- 12.1.8. Staff have been trained appropriately and this is updated in line with guidance, and all staff have read KCSIE 2025 Part 1 and Annex B and those mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- 12.1.9. All Governors should receive appropriate safeguarding training at induction and then at regular intervals. Training should provide them with the knowledge to ensure their school's safeguarding policies and procedures are effective.
- 12.1.10. There are effective procedures for dealing with allegations of child-on-child abuse.
- 12.1.11. All staff including temporary staff and volunteers are provided with the school's *Child protection and safeguarding policy* and *Staff code of conduct*.
- 12.1.12. The school has procedures for dealing with allegations of abuse by staff (including supply staff, VMTs, sports coaches and the head), contractors and volunteers with children and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns.
- 12.1.13. A nominated governor for safeguarding (including Online Safety) is identified.
- 12.1.14. A member of the Senior Management Team has been appointed as the Designated Safeguarding Lead (DSL) who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- 12.1.15. On appointment, the DSL and deputies undertake relevant training and then 'update' training every two years as well as attending DSL network events and meetings.
- 12.1.16. Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through relationships and sex education (RSE). We recognise that there cannot be a "one size fits all" style and there needs to be a personalised and contextualised approach for more vulnerable children, victims of abuse and those with Special Education Needs and Disabilities (SEND).

- 12.1.17. The school will comply with regular data returns requested by the Local Authority.
- 12.1.18. Appropriate online filtering and monitoring systems are in place. Governors will ensure that the Senior Management Team and relevant staff are aware of the systems, manage them effectively and know how to escalate concerns when identified.
- 12.1.19. Enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at the school) are in place for all Governors.
- 12.1.20. Any weaknesses identified in safeguarding procedures are remedied with urgency.
- 12.1.21. The school is aware that OFSTED/ISI inspections will always report on whether arrangements for safeguarding children and learners are effective.
- 12.1.22. The school will comply with The Human Rights Act 1998 setting out the fundamental rights and freedoms that everyone in the United Kingdom is entitled to. It is unlawful for schools to act in a way that is incompatible with the European Convention on Human Rights, specifically:
- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
 - Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
 - Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination,
 - Article 2 Protocol 1: the requirement to ensure that no person shall be denied the right to an education.
- 12.1.23 The school understands that by discriminating against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics) it will contravene the Equality Act 2010.

CHAPTER 4

13. MULTI-AGENCY WORKING

- 13.1. The school has a pivotal role to play in multi-agency safeguarding arrangements. The Governing Body, SMT and DSLs need to ensure that the school contributes to multi-agency working in line with statutory guidance “Working Together to Safeguard Children” (December 2023, updated July 2025). New safeguarding partnerships and child death arrangements are now in place. Agencies will work together to safeguard and promote the welfare of children, including identifying and responding to their needs.
- 13.2. We will ensure that we fully contribute to all social care assessments concerning students/pupils at this school.

CHAPTER 5

14. CONFIDENTIALITY AND SHARING INFORMATION

- I4.1. All matters relating to child protection will be treated as confidential and only shared as per the [‘Information Sharing – advice for practitioners providing safeguarding services \(DfE 2024\) guidance](#).
- I4.2. Information will be shared with staff within the school who ‘need to know’.
- I4.3. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018 and UK General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for safeguarding concerns to be shared with agencies who have a statutory duty for child protection. This may also include informing agencies of any siblings below 18 years of age.
- I4.4. All staff must also be aware of the provisions in the school’s current *Data protection policy*. The DfE has also produced [Data protection in schools guidance \(2023, updated June 2025\)](#), to help staff and governors understand how to comply with data protection law, develop their data policies and processes, know what staff and pupil data to keep and follow good practices for preventing personal data breaches.
- I4.5. All staff must be aware that they cannot promise a child confidentiality or promise to keep secrets which might compromise the child’s safety or wellbeing. This also applies in the case of staff being made aware by a child that a sibling or other child is at risk. However, staff are aware that matters relating to child protection and safeguarding are personal to children and families and in this respect are confidential and the head or DSLs will only disclose information about a child to other members of staff on a need-to-know basis.
- I4.6. All staff will always undertake to share the school’s intention to refer a child to Children’s Social Care with their parents’/carers’ consent unless to do so could put the child at greater risk of harm or impede a criminal investigation. Sharing information without consent may be reasonable if it is not possible to gain consent or if it cannot be reasonably expected for a practitioner to gain consent.

CHAPTER 6

15. CHILD PROTECTION PROCEDURES

15.1. Introduction

- 15.1.1. The following procedures apply to all staff working in the school and will be covered by training to enable staff to understand their role and responsibility.
- 15.1.2. As set out in the introduction to this policy, the school adopts a wider interpretation of its safeguarding responsibilities so that they apply to all pupils regardless of age. Where pupils are aged 18 or over, there may be some additional considerations in terms of how we work with local agencies and partners if we have a concern, for example a referral may need to be made to Adult Social Care or the Local Adults Safeguarding Board in the case of a concern about a pupil aged 18 or over.
- 15.1.3. The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.
- 15.1.4. The primary concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.
- 15.1.5. A concern involving an adult pupil will need to be considered both in the context of concerns for their welfare (and it may be necessary to refer such concerns to Adult Social Care and/or the Local Safeguarding Adults Board rather than, or in addition to, Children's Social Care) and of any concerns about the welfare of others who may be affected (and who may be children).
- 15.1.6. All staff are aware that very young children and those with disabilities, Special Educational Needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

15.2. **If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:**

- 15.2.1. Report it to the DSL immediately.
- 15.2.2. Make an initial record of the information related to the concern as soon as possible.
- 15.2.3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
- 15.2.4. The DSL will support the staff member to make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
- Dates and times of their observations
 - Dates and times of any discussions in which they were involved.
 - Any injuries identified on a body map

- Explanations given by the child/adult
- Rationale for decision making and action taken
- Any actual words or phrases used by the child

15.3. Records should be uploaded via the KIM secure notes system (KCS)/SIM secure notes system (WCPS). Handwritten notes should be signed, scanned and uploaded as PDFs attached to the secure note record.

15.4. In the absence of the DSL or the deputies, staff must be prepared to refer directly to Children's Social Care, and the Police if appropriate should there be the potential for immediate significant harm.

15.5. Following a report of concerns the DSL must:

15.5.1. Decide whether there are sufficient grounds for suspecting a child is suffering, or is likely to suffer from harm, in which case it is important that a referral is made immediately to the Local Authority Children's Social Care in the borough where the child resides and to the Police if it is appropriate. If a referral is made, Children's Social Care may also ask for details of any siblings below 18 years of age.

15.5.2. Try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to Children's Social Care. However, this should only be done when it will not place the child at increased risk or could impact a Police investigation. The child's views should also be considered.

15.5.3. Contact the Local Authority Children's Social Care if there are grounds to suspect a child is suffering, or is likely to suffer, harm, abuse or exploitation. If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify Children's Social Care of the occurrence and what action has been taken.

15.5.4. Phone Children's Social Care to discuss concerns and take advice if the DSL feels unsure about whether a referral is necessary.

15.5.5. If there is not an immediate risk of harm, the DSL will either actively monitor the situation (through the pupil welfare system) or consider Early Help.

15.5.6. When a pupil needs urgent medical attention and there is suspicion of abuse the DSL or a Deputy DSL should take the child to the accident and emergency unit at the nearest hospital, having first notified Children's Social Care and any other relevant agencies. The DSL should seek advice about what action Children's Social Care will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.

15.5.7. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the Police. The DSL should also be made aware immediately.

16. DEALING WITH DISCLOSURES

16.1. All staff

16.1.1. A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need

to pass information to other professionals to help keep the child or other child/children safe. The degree of confidentiality should always be governed by the need to protect the child or another child/children.

- 16.1.2. Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.
- 16.1.3. Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent them from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that they determine how best to build trusted relationships with children and young people which facilitate communication.
- 16.2. All staff must know who the DSL is and who to approach if the DSL is unavailable. All staff have the right to make a referral to Children's Social Care or the Police directly and must do this immediately if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on the school premises at the time and have concerns about sending a child home.
- 16.3. For children with communication difficulties or who use alternative/augmented communication systems, staff may need to take extra care to ensure that signs of abuse, neglect and exploitation are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other children.

17. FLOWCHART



18. WHAT HAPPENS NEXT?

18.1. It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information, they should seek it out. Ensure the incident is recorded.

- 18.2. Receiving a disclosure can be upsetting for the member of staff; staff should be mindful of this. The school will reassure staff that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately. The school will also ensure that appropriate pastoral support, such as counselling, is available for the member of staff who has received a disclosure.
- 18.3. In some cases, additional counselling might be needed, and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

CHAPTER 7

19. ALLEGATIONS AGAINST ADULTS WHO WORK WITH CHILDREN

19.1. Procedure

19.1.1. KCSIE 2025 part 4 has 2 sections.

19.1.2. The detailed process which the school follows when dealing with allegations against adults is set out in the school's *Allegations against staff and low-level concerns policy*. The paragraph below sets out an overview of the process the school follows.

19.2. Section 1 deals with allegations against staff which meet the threshold of being investigated by the Local Authority Designated Officer (LADO).

19.2.1. This procedure must be used in all cases in which it is alleged a member of staff, supply staff, volunteer or contractor in a school, or another adult who works with children has:

- *Behaved in a way that has harmed a child or may have harmed a child.*
- *Possibly committed a criminal offence against or related to a child.*
- *Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; or*
- *Behaved or may have behaved in a way that indicates they may not be suitable to work with children.*

19.2.2. In dealing with allegations or concerns against an adult, staff must:

- *Report any concerns about the conduct of any member of staff, supply staff, volunteer or contractor to the head immediately.*

19.2.3. If an allegation is made against the head, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly.

19.2.4. There may be situations when the head or Chair of Governors will want to involve the Police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

19.2.5. Once an allegation has been received by the head or Chair of Governors, they will contact the LADO immediately and before taking any action or investigation. Following consultation with the LADO, the head or Chair of Governors will inform the parents of the allegation unless there is a good reason not to.

19.2.6. In liaison with the LADO, the school will determine how to proceed and if necessary, the LADO will refer the matter to Children's Social Care and/or the Police.

19.2.7. When using an agency for supply staff, the school will inform the agency of its process for managing allegations.

19.2.8. Where an allegation is made against a member of supply staff, the head will immediately contact both the agency concerned and the LADO. The school will ensure that any allegations are dealt with appropriately and liaise with relevant parties. The school will continue to support any investigation that is required.

19.3. Section 2 of part 4 of KCSIE 2025 deals with low-level concerns.

- 19.3.1. These will not be treated as insignificant and should be reported to the DSL (senior school), or DSL (junior school), or DSL or head teacher (WCPS). If the low-level concern is reported to the DSL then the DSL will inform the head of all the low-level concerns in a timely fashion according to the nature of each particular low-level concern, who will make the ultimate decision on how to respond.
- 19.3.2. Low-level concerns which are shared about former members of staff, supply staff and contractors should also be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.
- 19.3.3. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- 19.3.4. Examples of such behaviour could include, but are not limited to:
- being over friendly with children,
 - having favourites,
 - taking photographs of children on their mobile phone,
 - engaging with children on social media or outside of school;
 - engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or,
 - using inappropriate sexualised, intimidating, or offensive language.
- 19.3.5. The purpose of this process is to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.
- 19.3.6. Low-level concerns about a member of staff, former member of staff, supply staff or contractor should be reported to the DSL (senior school), or to the headmaster (junior school), or to the DSL or head teacher (WCPS). Where a low-level concern is raised about the WCPS head teacher, it should be shared with the JS headmaster. Where a low-level concern is raised about the JS headmaster, it should be shared with the head. Where a low-level concern is raised about the head, it should be shared with the Chair of Governors.
- 19.3.7. If there is any doubt about whether the information shared about a member of staff, former member of staff, supply staff or contractor as a low-level concern in fact meets the harm threshold then they should consult the LADO.
- 19.3.8. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Children's Social Care may be appropriate.
- 19.3.9. If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate against the individual who made it as per our *Behaviour, rewards and sanctions policies* (KCS)/*Behaviour management policy* (WCPS) for pupils or *Disciplinary policy* for staff.

19.3.10. If an allegation is made relating to an incident that took place when another organisation or individual was using the school premises for running activities for children (for example a community group), the school will follow their usual safeguarding policies and procedures, including informing the LADO.

CHAPTER 8

20. WHAT IS CHILD ABUSE?

20.1. The following definitions are taken from 'Working Together to Safeguard Children' (December 2023, updated July 2025). In addition to these definitions, children can also be abused by being sexually or criminally exploited, honour-based abuse, forced marriage or female genital mutilation.

20.2. What is abuse, neglect and exploitation?

20.2.1. Abuse, neglect and exploitation are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or by another child or children.

20.2.2. All staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. All staff, but especially the DSL and Deputy DSLs, should consider whether pupils are at risk of abuse or exploitation in situations inside and outside of school and home, and online.

20.3. Physical abuse

20.3.1. 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.

20.3.2. Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g., knees, shins.

20.3.3. Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

20.3.4. A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.

20.3.5. Indicators of physical abuse / factors that should increase concern:

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle

- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

20.3.6. In the context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adult's words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

20.3.7. You should be concerned if a child:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers
- has a fear of medical help or attention
- admits to a punishment that appears excessive

20.4. Emotional abuse

20.4.1. Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

20.4.2. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

20.4.3. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another.

20.4.4. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur in isolation.

- 20.4.5. Most harm is produced in *low warmth, high criticism* homes, not from single incidents.
- 20.4.6. Emotional abuse is difficult to define, identify/recognise and/or prove.
- 20.4.7. Emotional abuse is chronic and cumulative and has a long-term impact.
- 20.4.8. All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.
- 20.4.9. Children can be harmed by witnessing someone harming another person – as in domestic abuse.
- 20.4.10. It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later.

20.4.11. Indicators of emotional abuse

20.4.11.1. Developmental issues

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes

20.4.11.2. Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

20.4.11.3. Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

20.4.11.4. Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations ("I deserve this")
- Fear of parents being contacted

- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

20.5. Sexual abuse

20.5.1. Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

20.5.2. The activities may involve physical contact, including rape, assault by penetration (other than by a penis) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including online).

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

20.5.4. Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

20.5.5. Child sexual exploitation is seen as a separate category of sexual abuse.

20.5.6. Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent (this may occur online)
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

20.5.7. Indicators of sexual abuse

20.5.7.1. Physical observations:

- Damage to genitalia, anus or mouth
- Sexually transmitted infections (STIs)
- Unexpected pregnancy
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

20.5.7.2. Behavioural observations:

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually inappropriate behaviour
- Hinting at sexual activity
- Inexplicable decline in education progress

- Depression or other sudden apparent changes in personality as becoming insecure
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour
- Onset of wetting, by day or night; nightmares
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

20.6. Neglect

20.6.1. 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.

20.6.2. 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 caregivers)
- ensure access to appropriate medical care or treatment
- provide suitable education

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

20.6.4. Neglect is a lack of parental care, but poverty and lack of information or adequate services can be contributory factors.

20.6.5. Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

20.6.6. NSPCC research has highlighted the following examples of the neglect of children under 12 years old:

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

- 20.6.7. Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.
- 20.6.8. Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (*What to do if You're Worried a Child is Being Abused* DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.
- 20.6.9. Neglect is often linked to other forms of abuse, so any concerns school staff develop must be discussed with the DSL.
- 20.6.10. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself.

20.6.11. Indicators of Neglect

20.6.11.1. Physical indicators of neglect

- Constant hunger and stealing food
- Poor personal hygiene – unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

20.6.11.2. Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies
- Poor attachment to caregivers and emerging mental health difficulties

20.7. Child-on-Child Abuse

20.7.1. In most instances, the conduct of pupils towards each other will be covered by our *Behaviour, rewards and sanctions policies* (KCS)/*Behaviour management policy* (WCPS). However, some allegations may be of such a serious nature that they may raise safeguarding concerns. The school recognises that children can abuse their peers.

20.7.2. The forms of child-on-child abuse are outlined below:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between peers.
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Sexual violence and sexual harassment (SVSH).

- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery).
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- 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.

20.7.3. The term child-on-child abuse can refer to all these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.

20.7.4. There are also different gender issues that can be prevalent when dealing with child-on-child abuse (i.e., girls being sexually touched/assaulted, or boys being subjected to initiation/hazing type violence). It is more likely that girls will be victims and boys will be perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously.

20.7.5. We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults and other children in school.

20.7.6. Child-on-child abuse will not be passed off as 'banter', 'boys being boys' or 'part of growing up', and staff will challenge inappropriate behaviour between children. Any downplaying of conduct can lead to a culture of unacceptable behaviour which will lead to children not reporting or normalising abuse, causing an unsafe environment. We are clear that there will be a zero-tolerance approach to any form of abuse including child-on-child abuse.

20.7.7. This school understands that even if there are no reports of child-on-child abuse, this does not mean that it is not happening.

20.7.8. We will minimise the risk of child-on-child abuse by: -

- Taking a whole school approach to safeguarding and child protection.
- All staff being trained, highly vigilant and aware of specific characteristics which may indicate child-on-child abuse, for example, vulnerability and controlling behaviour.
- Providing a values-based curriculum, underpinned by the school's behaviour policies and pastoral support, and by a planned programme of evidence-based content delivered through the curriculum.
- Working in partnership with parents and carers.
- Engaging with specialist support and interventions.

20.7.9. **Responding to reports of Sexual Violence and Sexual Harassment (Part 5 KCSIE 2025)**

- Children making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported.
- In some cases, children will find it difficult to tell staff about the abuse so it may come via a third party. Children should never be given the impression that they are creating a problem by reporting sexual abuse or harassment.
- We will carefully listen non-judgementally to the child.
- Staff taking the report will inform the DSL or in their absence a Deputy DSL immediately.
- Staff taking a report will never promise confidentiality.

- Parents or carers should usually be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made immediately to the Children's Social Care and, if appropriate, the Police.
- In line with managing internally, the school may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

20.7.10. Action: The DSL will consider:

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- Ongoing risks.
- Other related issues or wider context.

20.7.11. Options:

- Manage internally
- Early Help intervention
- Refer to the Local Authority Children's Social Care
- Report to the Police all cases of sexual violence (generally in parallel with a referral to Children's Social Care)

20.7.12. Risk Assessment:

20.7.12.1. Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis.

20.7.12.2. The risk assessment will consider:

- The alleged victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- All other children at the school.
- The victim and the alleged perpetrator sharing classes and space at school.
- The risk assessment will be recorded and kept under review.

20.7.12.3. Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting pupils.

20.7.12.4. Support regarding risk assessments can be accessed from Ameliah Rayn, Safeguarding in Schools Officer, email: ameliah.rayn@merton.gov.uk , telephone: 07964 246158.

20.7.13. Ongoing Response:

20.7.13.1. The DSL will oversee support plans for the alleged perpetrator and alleged victim, as well as any other pupils who have been significantly impacted. One aspect of the

support offered for both alleged perpetrator and alleged victim will be ongoing support from a member of staff who has been trained as an SMLO (sexual misconduct liaison officer).

20.7.13.2. As part of the support for both the alleged perpetrator and alleged victim, the DSL will consider signposting to further avenues of support, for example Lucy Faithfull Foundation's '[Shore Space](#)', a confidential chat service to assist young people who are concerned about their own or someone else's sexual thoughts or behaviour.

20.7.13.3. The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Local Authority Children's Services.

20.7.13.4. Where there is a criminal investigation into an allegation of rape, assault by penetration or sexual assault, the alleged perpetrator should in most circumstances be removed from any classes they share with the victim.

20.7.13.5. The DSL will consider how best to keep the alleged victim and alleged perpetrator a reasonable distance apart on school premises and on transport where appropriate.

20.7.13.6. Where a criminal investigation into an allegation of rape or assault by penetration leads to a conviction or caution, the school will liaise with relevant external agencies in order to determine the appropriate course of action. This may include considering appropriate sanctions in accordance with the school's behaviour policies and in consultation with external agencies. The wellbeing and wishes of the (alleged) victim will be especially important in determining how to proceed in such cases. The (alleged) victim, (alleged) perpetrator and any other affected children and adults will receive appropriate support and safeguards on a case-by-case basis.

20.7.13.7. A record of SVSH incidents is maintained by the DSL.

20.8. Physical Abuse

20.8.1. While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive. These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the Police. The principles from the *Anti-bullying policy* will be applied in these cases, with recognition that any Police investigation will need to take priority. Where appropriate and necessary, the school will seek advice from external agencies such as the Police and Children's Social Care.

20.9. Harmful Sexual Behaviour

20.9.1. Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in KCSIE 2025. HSB can occur online and/or face to face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

- 20.9.2. Sexual behaviour between children will be considered harmful if one of the children is much older; if there is more than 2 years difference in age or one child is in puberty and the other is not. A younger child can abuse an older child, particularly if one has power over the other, for example, with a disability or SEND.
- 20.9.3. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

CHAPTER 9 – OTHER FORMS OF ABUSE AND SAFEGUARDING ISSUES

21. ANTI-BULLYING/CYBERBULLYING

- 21.1. Our school policy on anti-bullying is set out in a separate document.
- 21.2. We keep a record of known bullying incidents which is shared with and analysed by the governing body. All staff are aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse.
- 21.3. When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the head and the DSL will also consider child protection procedures.
- 21.4. The PSHE curriculum regularly provides opportunities for children to understand that bullying is wrong, its impact and how to deal with it.
- 21.5. A record of bullying incidents is maintained by the deputy head (pastoral) in the senior school, DSL in the junior school, and the deputy head (pastoral) at WCPS.

22. CHILDREN WHO ARE LESBIAN, GAY, BISEXUAL, OR GENDER QUESTIONING

- 22.1. A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.
- 22.2. However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.
- 22.3. It is recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.
- 22.4. As such, when supporting a gender questioning child, the current advice is that the school should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. We will also refer to the [DfE Guidance for Schools and Colleges in relation to Gender Questioning Children \(2023\)](#), when deciding how to proceed.
- 22.5. This approach will be reviewed once the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents are published by the government.

- 22.6. Risks can be compounded where children lack a trusted adult with whom they can be open. The school will provide a safe space for them to speak out or share their concerns with members of staff.
- 22.7. Lesbian, gay, bisexual, trans or gender questioning inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic, transphobic and gender questioning bullying and abuse.
- 22.8. A record of incidents of lesbian, gay, bisexual, trans or gender questioning related bullying is maintained by the deputy head (pastoral) in the senior school, by the DSL in the junior school and by the deputy head (pastoral) at WCPS.

23. ONLINE SAFETY

- 23.1. New technologies have become integral to the lives of children and young people, both at school and outside of school. We recognise the many benefits that they bring, including increased access to information and resources, easier communication and collaboration on tasks, and more personalised learning. We want pupils to become skilled and confident users of technology, and recognise that this is important for both their education and for their lives beyond school.
- 23.2. However, the use of these new technologies can put young people at risk both at and outside of school. It is essential that pupils are protected from potentially harmful and inappropriate online material. Online safety can be broadly be categorised into four areas of potential risk:
- Content: Being exposed to illegal, inappropriate, or harmful content. For example: pornography, misinformation, disinformation (including fake news), conspiracy theories, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, and extremism.
 - Contact: Being subjected to harmful online interaction with other users. For example: online bullying, peer to peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
 - Conduct: Online behaviour that increases the likelihood of, or causes, harm. For example, sharing too much information online, making, sending and receiving explicit images, sharing other explicit images and bullying.
 - Commerce: Risks such as online gambling, inappropriate advertising, phishing and financial scams.
- 23.3. Many children nowadays have unlimited and unrestricted access to the internet via mobile phone networks. The school has *Acceptable use policies* for pupils which explain how we try to keep pupils safe in school and when learning remotely. We follow the 'Teaching online safety in school' Guidance supporting schools to teach their pupils how to stay safe online, within new and existing school subjects ([Teaching Online Safety in Schools, January 2023](#)) to guide practice.
- 23.4. Children increasingly use electronic equipment, including at home, on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, X, Instagram, Snapchat and TikTok and for online gaming.
- 23.5. Some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour such as webcam photography or face-to-face meetings.

- 23.6. Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.
- 23.7. Staff are not permitted to follow or engage with current pupils of the school on any personal social media network account. This includes accepting friend requests on personal social networking sites. This applies to school-age pupils at any school. Any attempt by pupils to connect with a member of staff should be reported to the designated safeguarding lead. Members of staff who have left the school are also not permitted to connect with current pupils via social media networks. If pupils report that a former member of staff has attempted to make a contact with them this will be treated as a safeguarding matter and dealt with under this policy.
- 23.8. Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The DSLs have oversight of systems and procedures in place to ensure online safety.
- 23.9. The governing body ensure that appropriate filters and monitoring systems are in place. This is to ensure that children have access to 'safe' information and that 'over blocking' does not restrict access to their learning. Government supported online safety websites provide information to support governing bodies to keep children safe online (including when children are at home). Please see below list of links in section 48 for further guidance and information.
- 23.10. The DSLs are responsible for ensuring an appropriate level of security protection procedures are in place to safeguard our systems, staff and learners. The school has a robust system (Fortinet) for monitoring internet searches and blocking websites and links which are inappropriate for pupils and staff to use while on school site. The system is managed by the IT department and monitored by the section teams, junior and senior school DSLs, WCPS DSL and head teacher, and the bursar as appropriate. Daily updates are monitored by the safeguarding team, and immediate alerts are issued in the case of major child protection concerns (such as an internet search regarding suicide). A record of alerts is maintained by the safeguarding team. To ensure that flaws and gaps in the system do not arise, the firewall is also challenged on a termly basis by members of the safeguarding team. The filtering and monitoring provision is also reviewed on an annual basis (or more frequently) to ensure it is working effectively and meeting safeguarding obligations, and that harmful and inappropriate content is blocked without unreasonably impacting teaching and learning. The school also assesses whether any generative AI that it uses meets its filtering and monitoring standards.
- 23.11. Staff may lawfully search electronic devices, without consent or parental permission, if there is a suspicion that the pupil has a device prohibited by school rules, or the staff member has good reason to suspect the device may be used to:
- cause harm,
 - disrupt teaching,
 - break school rules,
 - commit an offence,
 - cause personal injury, or
 - damage property.
- 23.12. Any data, files or images that are believed to be illegal must be passed to the Police as soon as practicable, including pornographic images of children, without deleting them.

Commented [RA1]: We will need to adjust this when we implement a new provider (we plan to move away from smoothwall next term)

23.13. Any data, files or images that are not believed to be unlawful, may be deleted or kept as evidence of a breach of the school's behaviour policies. The school follows DFE 'searching, screening and confiscation at school' guidance and its search and screening policy [here](#).

23.14. The school's policy on the use of mobile phones is set out in its *Behaviour, rewards and sanctions policies* (KCS)/*Behaviour management policy* (WCPS).

24. RACIST INCIDENTS

24.1. Discrimination relates to the unjust or prejudicial treatment of different categories of people, including on the grounds of race. Discrimination impacts the whole school community and will not be tolerated. Any incident of discrimination, including so-called microaggressions and discriminatory language, that is witnessed by or comes to the attention of a member of staff will always be challenged, recorded on secure notes and passed onto senior pastoral staff and the director of EDI who will follow up with both perpetrator and victim as appropriate. Such incidents must never be dismissed as 'banter'.

24.2. Repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. The deputy heads (pastoral) in the senior school and WCPS, and the DSL in the junior school, maintain a record of racist incidents.

25. RADICALISATION AND EXTREMISM

25.1. The government's Prevent duty guidance defines extremism as: "The vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs".

25.2. Pupils may be susceptible to radicalisation into terrorism. Similar to protecting pupils from other forms of harm, abuse and exploitation, protecting pupils from this risk should be a part of the school's safeguarding approach.

25.3. Section 26 of the Counterterrorism and Security Act 2015 places a duty on schools to have "due regard to the need to prevent people from being drawn into terrorism": [Counter-Terrorism and Security Act 2015 \(legislation.gov.uk\)](#). The Prevent duty requires all education settings 'to help prevent the risk of people becoming terrorists or supporting terrorism'. This includes safeguarding pupils from extremist ideologies and radicalisation. DSLs and other senior leaders should familiarise themselves with [Prevent Duty Guidance for England and Wales \(2023, updated March 2024\)](#) and [The Prevent Duty: an introduction for those with safeguarding responsibilities \(September 2023\)](#).

25.4. Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

25.5. The school is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

25.6. The school seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology and Extreme Right-wing ideology, and to tackle other ideologies and concerns that may pose a terrorist threat such as antisemitism, extreme misogyny/incel subculture, and anti-establishment movements. The school is also alert to conspiracy theories which can act as gateways to radicalised thinking and sometimes violence.

- 25.7. School staff receive training to help identify early signs of radicalisation and extremism.
- 25.8. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the [DfE advice Promoting Fundamental British Values as part of SMSC \(spiritual, moral, social and cultural education\) in Schools \(2014\)](#).
- 25.9. Governors, the head and the DSL will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include due diligence checks for external speakers and private hire of facilities, *Anti-bullying policy* and other issues specific to the school's profile, community and philosophy.
- 25.10. When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance.
- 25.11. They should then follow the safeguarding procedures and refer cases to Children's Social Care. The Merton Safeguarding Children Partnership has adopted the [pan-London procedure on extremist ideology and preventing radicalisation](#). If the matter is urgent, then Police must be contacted by dialling 999 or the Police anti-terrorist hotline on 0800 789 321 to report an immediate threat to life or property. In cases where further advice from the Police is sought dial 101 or contact the national Police Prevent advice line on 0800 011 3764.

25.12. Indicators of vulnerability to radicalisation

- 25.12.1. Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.
- 25.12.2. Extremism is defined by the Crown Prosecution Service as the demonstration of unacceptable behaviour by using any means or medium to express views which:
- Encourage, justify or glorify terrorist violence in furtherance of beliefs,
 - Seek to provoke others to terrorist acts;
 - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - Foster hatred which might lead to inter-community violence in the UK.
- 25.12.3. There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
- 25.12.4. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors – it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff can recognise those vulnerabilities.
- 25.12.5. Indicators of vulnerability include:
- Identity Crisis – the pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
 - Personal Crisis – the pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
 - Personal Circumstances – migration; local community tensions; and events affecting the pupil's country or region of origin may contribute to a sense of grievance that is

triggered by personal experience of racism or discrimination or aspects of Government policy.

- Unmet Aspirations – the pupil may have perceptions of injustice or a feeling of failure.
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration.
- Special Educational Needs and Disability – pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

25.12.6. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

25.12.7. More critical risk factors could include:

- Being in contact with extremist recruiters.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations.
- Significant changes to appearance and/or behaviour.
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

26. DOMESTIC ABUSE

26.1. Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, financial, psychological or sexual abuse. It involves the use of power and coercive control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

26.2. We use the term domestic abuse to reflect that several abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

26.3. Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships, including impacting upon their own personal, intimate relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse.

26.4. If you are concerned that a child is suffering from or witnessing domestic abuse, you should inform the DSL without delay.

27. CHILD SEXUAL EXPLOITATION (CSE)

27.1. Child sexual exploitation is a form of child abuse and occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic and other resources. In some cases, the abuse will be in exchange for something the

victim needs or wants and will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time. It can range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may or may not be accompanied by violence or threats of violence. Victims can be exploited even when activity appears to be consensual and exploitation as well as being physical can be facilitated and/or take place online.

- 27.2. All staff are aware of the link between online safety and vulnerability to exploitation.
- 27.3. Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.
- 27.4. The school is aware there is a clear link between regular non-attendance at school and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.
- 27.5. The school is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.
- 27.6. The school includes the risks of sexual exploitation in the RSE curriculum. Pupils will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help.
- 27.7. The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation. Signs include:
- underage sexual activity
 - inappropriate sexual or sexualised behaviour
 - sexually risky behaviour, 'swapping' sex
 - repeat sexually transmitted infections
 - in girls, repeat pregnancy, abortions, miscarriage
 - receiving unexplained gifts or gifts from unknown sources
 - having multiple mobile phones and worrying about losing contact via mobile
 - having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
 - changes in the way they dress
 - going to hotels or other unusual locations to meet friends
 - being seen at known places of concern
 - moving around the country, appearing in new towns or cities, not knowing where they are
 - getting in/out of different cars driven by unknown adults
 - having older boyfriends or girlfriends
 - contact with known perpetrators
 - being involved in abusive relationships, intimidated and fearful of certain people or situations

- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- Police involvement, Police records
- being involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

28. CHILD SEXUAL EXPLOITATION, CHILD CRIMINAL EXPLOITATION & GANGS

- 28.1. Both child sexual exploitation and child criminal exploitation are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. Child sexual exploitation and child criminal exploitation can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- 28.2. There are a number of areas in which young people are put at risk by gang activity, both through participation in, and as victims of, gang violence which can be in relation to their peers or to a gang-involved adult in their household.
- 28.3. A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect.
- 28.4. The risk or potential risk of harm to the child may be as a victim, a gang member or both – in relation to their peers or to a gang-involved adult in their household. Teenagers can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.
- 28.5. Criminal exploitation of children is a typical feature of county lines criminal activity with children being exploited to move and store drugs and money. "County lines" is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". Children might be involved in violence, be pressured into doing things like stealing, carrying drugs or weapons or be abused, exploited and put into dangerous situations. Key identifying features of involvement in county lines are when children are missing. If a victim may have been trafficked for transporting drugs, a referral to the National Referral Mechanism should be considered with Social Care and Police colleagues by the DSL.
- 28.6. A child who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. Girls may be particularly at risk of sexual exploitation.

28.7. Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The school is aware there is a clear link between regular non-attendance at school and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.

28.8. An immediate referral to Local Authority Children's Social Care will be made when any concern of harm to a child because of gang activity including child criminal exploitation becomes known. Any member of staff who has concerns that a child may be at risk of harm should immediately inform the DSL. The DSL will contact the Local Authority Children's Social Care. If there is concern about a child's immediate safety, the Police will be contacted on 999.

29. CHILDREN AT RISK OR INVOLVED IN SERIOUS VIOLENT CRIME

29.1. Serious violent youth crime is defined by the Home Office Assessment of Policing and Community Safety (APACS) as "any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19".

29.2. Indicators include:

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
- Increased absence from school
- Change in friendship/relationships with others/groups
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

29.3. Additional risk factors include:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment
- having been involved in offending, such as theft or robbery

The head (or other senior staff authorised by the head) may search pupils or their possessions, without consent, where they have reasonable grounds for suspecting that the pupil may have a prohibited item. Staff should refer to the school's *Searching, screening and confiscation policy* which is based upon the DfE guidance [Searching, Screening and Confiscation: Advice for Schools \(2022\)](#).

30. SHARING NUDES AND SEMI-NUDES

30.1. The practice of children sharing nudes and semi-nudes (formerly known as sexting or youth produced sexual imagery) and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. It also includes pseudo-images which are computer-generated images that otherwise appear to be a photograph or video. These may be created using tools such as photo/video editing software, deepfake apps and generators (to combine and superimpose existing images or videos onto other images and videos), and AI text-to-image generators. Such imagery involving anyone under the age of 18 is unlawful.

- 30.2. Consensual image sharing, especially between older pupils of the same age, may require a different response. It might not be abusive – but pupils still need to know it is illegal- whilst non-consensual is illegal and abusive.
- 30.3. Nudes and semi-nudes refer to both images and videos where:
- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
 - A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
 - A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.
- 30.4. Upskirting is now a criminal act in the UK. The response to this in schools need to be the same as child-on-child sexual abuse and may include contacting the Police. The [Criminal Prosecution Service \(CPS\)](#) defines 'upskirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.
- 30.5. All incidents of this nature should be treated as a safeguarding concern and in line with the UKCIS/DSIT guidance [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(2020, updated March 2024\)](#).
- 30.6. Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to as such.
- 30.7. If a member of staff becomes aware of an incident involving sharing nudes and semi-nudes, they should follow the child protection procedures and refer to the DSL immediately.
- 30.8. Whilst sharing nude images is often the result of children and young people's natural curiosity about sex and their exploration of relationships, this presents significant risks. Situations should be considered on a case-by-case context, considering what is known about the children and young people involved and if there is an immediate risk of harm. Often, children and young people need education and support for example, on identifying healthy and unhealthy behaviours within relationships and understanding consent and how to give it. The school will take a pupil-centred and/or victim-centred approach as appropriate.
- 30.9. The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate).
- 30.10. Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm.
- 30.11. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made immediately to Children's Social Care or the Police as appropriate.
- 30.12. Immediate referral at the initial review stage should be made to Children's Social Care/Police if:
- The incident involves an adult.

- There is good 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 special education needs).
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

30.13. If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the head, to respond to the incident without referral to Children's Social Care or the Police.

30.14. During the decision making the DSL will consider if:

- There is a significant age difference between the sender/receiver.
- There is any coercion or encouragement beyond the sender/receiver.
- The imagery was shared and received with the knowledge of the child in the imagery.
- The child is vulnerable, for example subject to Child in Need, Child Protection or Early Help plans, Looked After, SEND.
- There is a significant impact on the children involved.
- The image is of a severe or extreme nature.
- The child involved understands consent.
- The situation is isolated or if the image has been more widely distributed.
- There are other circumstances relating to either the sender or recipient that may add cause for concern.
- The children have been involved in incidents relating to youth produced imagery before.
- Voyeurism occurred.

30.15. If any of these circumstances are present the situation will be referred according to our child protection procedures, including making an immediate referral to Children's Social Care or the Police.

30.16. The DSL will record all incidents of sharing nudes and semi-nudes, including the actions taken, rationale for actions and the outcome including whether referrals were or were not made to another agency.

31. HONOUR-BASED ABUSE

31.1. Honour-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. They are a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

31.2. Honour-Based Abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion.
- want to get out of an arranged or forced marriage

- challenge their parents' views on religion or choose a different religion to the family religion
- wear clothes or take part in activities that might not be considered traditional within a culture

31.3. It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

32. FEMALE GENITAL MUTILATION (FGM)

32.1. Female Genital Mutilation (FGM) involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. It is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. [A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s](#), which are identified in the course of their professional work, to the Police.

32.2. The duty applies to all persons in school who are employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status.

32.3. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the DSL; however, the DSL should be informed.

32.4. If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her, or a teacher 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 the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the Police force in which the girl resides by calling 101. The report should be made immediately.

32.5. School staff are trained to be aware of risk indicators of FGM.

32.6. Concerns about FGM outside of the mandatory reporting duty should be reported using the school's child protection procedures. If FGM is suspected or a risk of FGM identified by staff they should discuss these concerns with the DSL. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday.

32.7. There should also be consideration of potential risk to other girls in the family and practising community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the Police, including dialling 999 if appropriate.

32.8. There are no circumstances in which a teacher or other member of staff should examine a girl.

32.9. If staff have any concerns that pupils have been subjected to or are at risk of any other harmful and/or abusive cultural practices (for example breast ironing) they should also discuss these with the DSL.

33. FORCED MARRIAGE

33.1. A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

- 33.2. Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.
- 33.3. In addition and since February 2023, it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used.
- 33.4. A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.
- 33.5. School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the Children's Social Care.

34. ONE CHANCE RULE

- 34.1. All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and honour-based abuse and violence. Staff recognise they may only have 'one chance' to speak to a child who is a potential victim and have just one chance to save a life.
- 34.2. The school is aware that if the victim is not offered support following disclosure, then the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

35. PRIVATE FOSTERING ARRANGEMENTS

- 35.1. A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.
- 35.2. Children looked after by the Local Authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.
- 35.3. Private fostering occurs in all cultures and children may be privately fostered at any age.
- 35.4. The school recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country. Staff will also consider making a referral for Early Help if required.
- 35.5. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify Children's Social Care.

36. LOOKED AFTER CHILDREN (LAC) AND PREVIOUSLY LOOKED AFTER CHILDREN

- 36.1. The most common reason for children becoming looked after children is as a result of abuse and neglect.
- 36.2. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility. Staff will also consider making a referral for Early Help if required.
- 36.3. The designated teacher and governor for looked after children will have the appropriate level training to equip them with the knowledge and skills to undertake their role. At King's and WCPS the designated teacher is the DSL.
- 36.4. The designated teacher for looked after children will have details of the child's social worker and the name and contact details of the Merton Council's Virtual School Head, who is responsible for promoting the educational achievements of children in the care of the Local Authority or kinship care.
- 36.5. The designated teacher for looked after children and previously looked after children will work in partnership with the Virtual School Assistant Head to discuss how Pupil Premium Plus funding can be best used to support the progress of children looked after in the school and meet the needs of the child within their personal education plan.
- 36.6. Previously looked after children are those who immediately after being in care (as defined above) became subject to an adoption order, child arrangements order or special guardianship order.

37. CONTEXTUAL SAFEGUARDING – RISKS OUTSIDE OF THE HOME

- 37.1. As well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from influences outside of their families. The school recognises that these extra-familial threats might arise from within their peer groups, from within the wider community and/or online. These threats can take a variety of different forms and children can be vulnerable to multiple threats, including:
- exploitation by criminal gangs and organised crime groups such as county lines
 - trafficking
 - online abuse
 - sexual exploitation
 - extremism leading to radicalisation. Extremist groups make use of the internet to radicalise and recruit and to promote extremist materials.
- 37.2. Staff are trained on contextual influences and follow the school procedures for reporting concerns.
- 37.3. The DSL will ensure that information is shared in the referral process to help social care assessments consider contexts outside of the home.

38. CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

38.1. The school recognises that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers that can exist when recognising abuse and neglect in this group of children include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- being more prone to peer group isolation than other children.
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

38.2. The school addresses these additional challenges by considering extra pastoral support for children with SEN and disabilities. Where a pupil is in receipt of an Education, Health and Care Plan (EHCP), a member of the school's Learning Enrichment Department will be assigned as a Key Support Worker, who will also liaise with the Local Authority and parents regarding support needs.

39. CHILDREN MISSING EDUCATION

39.1. All children, regardless of their circumstances, are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

39.2. The school recognises that children with unexplainable and/or persistent absences from education are at significant risk of underachieving, being victims of abuse and harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

39.3. Where possible KCS will hold more than one emergency contact number for each pupil. As required in the [Early years foundation stage statutory framework \(July 2025\)](#), WCPS will where possible hold more than two emergency contact numbers for each year Reception pupil.

39.4. The school will ensure that there is a record of joiners and leavers as defined in [The School Attendance \(Pupil Registration\) \(England\) Regulations 2024](#).

39.5. When removing a child's name from the admission register, the school will notify the Local Authority as required with the following information about the pupil:

- full name;
- address;
- the full name and address of any parent the pupil normally lives with;
- at least one telephone number by which any parent the pupil normally lives with can be contacted in an emergency;
- if applicable, the pupil's future address, the full name and address of the parent who the pupil is going to live with, and the date the pupil will start living there;
- if applicable, the name of the pupil's other school and when the pupil began or will begin to attend the school;
- the reason set out in regulation 9(1) or (3) under which the pupil's name has been deleted from the admission register.

Commented [AT2]: As per the updated Early Years Framework, three emergency contact numbers are advised

39.6. Where a pupil has not returned to school for ten consecutive school days after a leave of absence 15 or is absent from school for reasons statistically recorded as unauthorised absence for twenty consecutive school days, the pupil's name can be removed from the admission register when the school and the Local Authority have failed, after jointly making reasonable enquiries, to find out the location and circumstances of the child or have succeeded but agree there are no reasonable grounds to believe that they will attend the school again. In deciding there are no reasonable grounds to believe the pupil will attend the school again both school and Local Authority must agree, including that there are no reasonable steps that could be taken (either jointly or separately) to secure the pupil's attendance. Neither ground for deletion applies if there are reasonable grounds to believe that the pupil is unable to attend because of sickness or unavoidable cause.

39.7. The school will:

- Enter pupils on the admissions register on the first day on which the school has agreed, or has been notified, that the pupil will attend the school.
- Notify the Local Authority within five days of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new pupil.
- Monitor each child's attendance through their daily register and follow the school's procedure in cases of unauthorised absence.
- Remove a child's name from the admissions register on the date that the child leaves the school.
- Notify the Local Authority when they are about to remove a child's name from the school register under any of the fifteen grounds listed in the regulations, no later than the date that the child's name is due to be removed.
- Follow its *Attendance policies* and the DfE statutory guidance [Children missing education \(2013, updated September 2025\)](#).

40. ELECTIVE HOME EDUCATION

40.1. Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will work together with key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

41. PUPILS MISSING OUT ON EDUCATION AND ABSENT FROM EDUCATION.

41.1. Most children engage positively with school and attend regularly. However, in order to flourish, some children require an alternative education offer or may require a modified timetable to support a return to full time education provision.

41.2. It is recognised that children accessing alternative provision, or a reduced or modified timetable may have additional vulnerabilities. Ofsted refer to these as 'Pupils Missing Out On Education' (PMOOE), because they are not accessing their education in school in the 'usual way'.

41.3. Where a pupil is unable to attend school in the usual way, the school will work closely with parents to consider the most appropriate provision. Advice and guidance will be sought from the relevant educational welfare officer, and arrangements will be kept under review.

41.4. Where a pupil is placed with an alternative provision provider, the school will continue to be responsible for the safeguarding needs of the pupil. Reviews will be frequent enough to provide assurance that the modifications are achieving their objectives and that the pupil's needs are being met.

42. HOMELESSNESS

42.1. The school recognises that being homeless or being at risk of becoming homeless presents a significant risk to a child's welfare. The DSLs are aware of referral routes into the Local Housing Authority to help access support for the family.

43. CHILDREN WHO NEED THE SUPPORT OF A SOCIAL WORKER

43.1. Children may need a social worker due to safeguarding or welfare needs, such as abuse, neglect and complex family circumstances.

43.2. These experiences can leave children vulnerable to further harm, as well as potentially creating barriers to attendance, learning, behaviour and mental health.

43.3. The Local Authority should inform the school if a child has a social worker, and the DSL should hold and use this information in the best interests of the child's safety, welfare and educational outcomes, such as when decisions are made on:

- Responding to unauthorised or unexplainable absences and/or persistent absences from education, where there are known safeguarding risks
- The provision of pastoral and/or academic support

43.4. See <https://www.gov.uk/government/publications/review-of-children-in-need/review-of-children-in-need>

44. SCHOOL ATTENDANCE AND BEHAVIOUR

44.1. Additional policies and procedures are in place regarding school attendance and behaviour. These have regard to the ['School Attendance \(Pupil Registration\) \(England\) Regulations 2024'](#), DfE statutory guidance ['Working Together to Improve School Attendance' \(2024\)](#) and ['Behaviour in Schools: Advice for headteachers and school staff' \(2024\)](#).

44.2. The school recognises that absence from school and exclusion from school may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of school staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

44.3. The school will work in partnership with Merton Police, Wimbledon Village Police (WimbledonVillage@met.police.uk) and other partners for reporting children that go missing from the school site during the school day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

44.4. In accordance with the School Attendance (Pupil Registration) (England) Regulations 2024, a school will also make a return to the Local Authority as required when a pupil's name is deleted from the admission register.

45. RESTRICTIVE PHYSICAL INTERVENTION

- 45.1. We acknowledge that staff must only ever use physical intervention as a last resort, when a child is at immediate risk of harming themselves or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.
- 45.2. Staff who are likely to need to use physical intervention will be appropriately trained.
- 45.3. Staff understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection and/or disciplinary procedures.
- 45.4. We recognise that touch is appropriate in the context of working with children, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundaries. Further details are outlined in the school's *Staff code of conduct*.
- 45.5. When applying disciplinary measures such as physical intervention or isolation for children with SEND the school will consider the risks, given the additional vulnerabilities of these children.

46. HEALTH (INCLUDING MENTAL HEALTH)

- 46.1. School has an important role to play in supporting the mental health and wellbeing of our pupils. All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Although it is only appropriately trained professionals who can diagnose mental health problems, staff observe children day-to-day and identify those whose behaviour suggests that they may be experiencing mental health problems or be at risk of developing one.
- 46.2. Where children have suffered abuse and neglect and other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on mental health, behaviour and education.
- 46.3. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking with one of the school's DSLs. The school has access to a range of advice to help them identify children in need of extra mental health support; this includes working with external agencies. The school has a separate *Mental health and wellbeing policy*.
- 46.4. Any child with a significant health condition requiring regular medication or treatment will require an Individual Health Care Plan which will be completed with the parent and member of school medical staff or WCPS first aid lead. It is vital that parents inform us if their child has a health condition of this nature to enable us to ensure that their child's health needs are managed appropriately whilst they are at school. Information from this plan will be shared with key staff members to ensure that they are alert to the child's individual needs.
- 46.5. We aim to support all children who are unable to attend school due to medical needs, and who would not receive suitable education without such provision, to continue to have access to as much education as their medical condition allows and to enable them to reach their full potential ([Ensuring a good education for children who cannot attend school because of health needs, 2023](#)). Due to the nature of their health needs, some children may be admitted to hospital or placed in alternative forms of education provision. We recognise that, whenever possible, pupils

should receive their education within their school and the aim of the provision will be to reintegrate pupils back into school as soon as they are well enough. We understand that we have a continuing role in a pupil's education whilst they are not attending the school and will work as appropriate on a case-by-case basis with the Local Authority, healthcare partners and families to ensure that all children with medical needs receive the right level of support to enable them to maintain links with their education. This supportive work will be overseen by the DSL or a Deputy DSL.

CHAPTER 10

47. WHISTLEBLOWING

- 47.1. We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- 47.2. All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements. If it becomes necessary to consult outside the school, they should speak in the first instance to the LADO in accordance with the *Whistleblowing policy*.
- 47.3. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by their school. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.
- 47.4. Whistleblowing regarding the head should be made to the Chair of the Governing Body, whose contact details are readily available to staff by contacting the secretary to the governing body, Rachel Wilkinson, R.Wilkinson@kcs.org.uk; 020 8255 5300.

CHAPTER 11

48. FURTHER ADVICE

48.1. Further on safeguarding and child protection is available from:

- Contextual Safeguarding Network <https://www.contextualsafeguarding.org.uk/>
- <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>
- Statutory Guidance to Relationships and sex education (RSE) and health education (2019, updated 2020, 2021 and 2025) [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education guidance](#)
- OFSTED: Inspecting safeguarding in early years, education and skills settings (2023) <https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills>

UK Council for Child Internet Safety (UKCIS) guidance (2018, updated June 2020):
[https://www.gov.uk/government/publications/education-for-a-connected](https://www.gov.uk/government/publications/education-for-a-connected-world)

- [-world](#)

48.2. Additional advice and support

48.2.1. Abuse

- [What to do if you're worried a child is being abused](#) – DfE advice
- [Domestic abuse: Various Information/Guidance](#) - Home Office (HO)
- [Faith based abuse: National Action Plan](#) - DfE advice
- [Relationship abuse: disrespect nobody](#) - Home Office website

48.2.2. Bullying

- Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>
- [Preventing and Tackling Bullying](#) - DfE advice
- [Cyber bullying: advice for heads and school staff](#) - DfE advice

48.2.3. Children missing from education, home or care

- [Children missing education](#) - DfE statutory guidance
- [Child missing from home or care](#) - DfE statutory guidance
- [Children and adults missing strategy](#) - Home Office strategy

48.2.4. Children with family members in prison

- [National Information Centre on Children of Offenders](#) - Barnardo's in partnership with HM Prison and Probation Service

48.2.5. Child Exploitation

- [The Children's Society](#) – guidance on preventing child sexual exploitation
- [Trafficking: safeguarding children](#) - DfE and HO guidance

48.2.6. Drugs

- [Drugs: advice for schools](#) – DfE and ACPO advice
- [Drug strategy– 2017](#) - Home Office strategy
- [From harm to hope: a 10 year drugs plan to cut crime and save lives \(2021, updated April–2022\)](#) - Home Office strategy
- [Information and advice on drugs](#) - Talk to Frank website
- [ADEPIS platform sharing information and resources for schools: covering drug \(& alcohol\) prevention](#) - Website by Mentor UK

48.2.7. “Honour-Based Abuse” (so called)

- [Female genital mutilation: information and resources](#)- Home Office guidance
- [Female genital mutilation: multi agency statutory guidance](#) - DfE, DH, and HO statutory guidance

48.2.8. Health and Well-being

- [Fabricated or induced illness](#) - NHS
- [Better Health: Every Mind Matters](#) - NHS
- [Supporting pupils at school with medical conditions](#) - DfE statutory guidance
- [Mental health and behaviour](#) - DfE advice
- [SEND Code of Practice 0 to 25–years](#) - DfE
- [Safeguarding children with special educational needs and disabilities–\(SEND\) - NSPCC](#)
- [Safeguarding child protection/deaf and disabled children and young–people - NSPCC](#)

48.2.9. Homelessness

- [Homelessness: How local authorities should exercise their functions](#) - Ministry of Housing, Communities & Local Government guidance

48.2.10. Private fostering

- [Private fostering: local authorities](#) - DfE statutory guidance

48.2.11. Radicalisation and extremism

- [Prevent duty guidance](#)- Home Office guidance
- [Prevent duty: additional advice for schools](#) and childcare providers - DfE advice
- [Educate Against Hate website](#) - DfE and Home Office advice

- [Prevent for FE and Training](#) - Education and Training Foundation (ETF)

48.2.12. **Upskirting**

- [Upskirting know your rights](#) – UK Government

48.2.13. **Violence**

- [Gangs and youth violence: for schools and colleges](#) - Home Office advice
- [Tackling violence against women and girls– 2021](#) - Home Office guidance
- [Violence against women and girls: national statement of expectations for victims 2022](#) – Home Office Statement
- [Serious violence strategy](#) - Home Office Strategy

48.2.14. **Advice for governing bodies/proprietors and senior leaders**

- [Centre of expertise on child sexual abuse](#) provide resources to help education professionals identify and respond to concerns about child sexual abuse or behaviour
- [Childnet](#) provide guidance for schools on cyberbullying
- [Cyber security standards for schools and colleges](#) have been developed to help schools improve their cyber resilience
- [Educateagainsthate](#) provides practical advice and support on protecting children from extremism and radicalisation
- [London Grid for Learning](#) provides advice on all aspects of a school or college’s online safety arrangements
- [NSPCC](#) provides advice on all aspects of a school or college’s online safety arrangements
- [Safer recruitment consortium](#) sets out “guidance for safe working practice”, which may help ensure staff behaviour are robust and effective
- [Searching screening and confiscation](#) is departmental advice for schools on searching children and confiscating items such as mobile phones
- [South West Grid for Learning](#) provides advice on all aspects of a school or college’s online safety arrangements
- [Use of social media for online radicalisation](#) - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
- [Meeting digital and technology standards in schools and colleges – DfE guidance on IT service and digital equipment standards](#)
- UK Council for Internet Safety and Department for Science, Innovation and Technology have provided advice on [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) and [using external visitors to support online safety education](#)

48.2.15. **Remote education, virtual lessons and live streaming**

- [Case studies](#) on remote education practice are available for schools to learn from each other

- [Departmental guidance on safeguarding and remote education](#) including planning remote education strategies and teaching remotely
- [London Grid for Learning](#) guidance, including platform specific advice
- [National cyber security centre](#) guidance on choosing, configuring and deploying video conferencing
- [National cyber security centre](#) guidance on how to set up and use video conferencing securely
- [UK Safer Internet Centre](#) guidance on safe remote learning

48.2.16. Support for children

- [Childline](#) for free and confidential advice
- [UK Safer Internet Centre](#) to report and remove harmful online content
- [CEOP](#) for advice on making a report about online abuse
- [Lucy Faithfull Foundation 'Shore Space'](#) for teenagers worried about sexual behaviour
- [Going to court \(5-11 year olds\)](#) and [Going to court and being a witness \(12-17 year olds\)](#)

48.2.17. Parental support

- [Childnet](#) offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
- [Commonsensemedia.org](#) provide independent reviews, age ratings, & other information about all types of media for children and their parents
- [Government advice](#) about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying
- [Internet Matters](#) provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world
- [London Grid for Learning](#) provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online
- [Lucy Faithfull Foundation StopItNow](#) resource can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)
- [National Crime Agency/CEOP Education](#) provides support for parents and carers to help them better protect their children online
- [NSPCC: Keeping Children Safe Online](#) provides support for parents and carers, including a guide to social networks, apps and games
- [Parentzone](#) provides help for parents and carers on how to keep their children safe online
- [UK Safer Internet Centre](#) provide tips, advice, guides and other resources to help keep children safe online