Safeguarding and Child Protection Policy

October 2026 v3

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Key School Contact Details

Safeguarding Role	Name	Position at the School	Contact Details
Designated Safeguarding Lead (DSL)	Sophie Blunt	Acting Deputy Head (Pastoral)	01494 896306 07515 063828 blunts@wycombeabbey.com
Deputy DSLs	Vicky Fawkes	Deputy Head (Pastoral)	07930 489270 fawkesv@wycombeabbey.com
	Cat Hoyle	Rubens Housemistress	07515 063830 hoylec@wycombeabbey.com
	Jess Woodward	Wendover Housemistress	07515 063833 woodwardj@wycombeabbey.com
	Nick Woods	Senior Deputy Head	07715 813107 woodsn@wycombeabbey.com
	Rebecca Sparks	Acting Assistant Head (Safeguarding and Pupil Welfare) Clarence Housemistress	07799 471514 sparksr@wycombeabbey.com
Headmistress	Jo Duncan	Headmistress	01494 897026 (EA to the Headmistress) headmistress@wycombeabbey.com
Chair of Council	Peter Warren	Governor	Via Clerk to Council clerktocouncil@wycombeabbey.com
Safeguarding Governor	Caroline Jordan	Governor	Via Clerk to Council clerktocouncil@wycombeabbey.com

Key External Contact Details

Buckinghamshire First Response Team (BFRT)	01296 383962 Out of Hours: 0800 999 7677 secure-cypfirstresponse@buckscc.gov.uk
Education Safeguarding Advisory Service (ESAS), Buckinghamshire	01296 382912 01296 387981 mailto:julwhite@buckscc.gov.uk secure-esasduty@buckinghamshire.gov.uk
Buckinghamshire Local Authority Designated Officer (LADO)	01296 382070 Secure-lado@buckinghamshire.gov.uk
Thames Valley Police (TVP)	Non-emergency: 101 Emergency: 999 wycombesafeguarding@thamesvalley.pnn.police.uk Mo Sariq – Police Constable Safer Schools Officer 07800793291 Mohammed.sariq@thamesvalley.police.uk
NSPCC Whistleblowing Advice	0800 028 0285 help@nspcc.org.uk
'Prevent' Contacts	BCC Prevent Coordinator: 01296 674784 Out of Hours: 0800 999 7677 Alisonwatts1@buckinghamshire.gov.uk To discuss concerns about a child at risk of radicalisation contact one of the following: Prevent Team at Thames Valley Police: preventreferrals@thamesvalley.pnn.police.uk Out of Hours: Call 101 and ask for the on call Special Branch Sergeant National Anti-Terrorist Hotline: 0800 789 321
BCC Equalities and School Improvement Manager	01296 382461 Yvette.thomas@buckinghamshire.gov.uk
Bucks Family Information Service	01296 383065

Terminology and Abbreviations

BCC	Buckinghamshire County Council
BFRT	Buckinghamshire First Response Team
BSCP	Buckinghamshire Safeguarding Children Partnership
CAF	Common Assessment Framework
DBS	Disclosure and Barring Service
DSL	Designated Safeguarding Lead
DDSL	Deputy Designated Safeguarding Lead
ESAS	Education Safeguarding Advisory Services
FGM	Female Genital Mutilation
KCSIE	*Keeping Children Safe in Education* (September 2026)
LADO	Local Authority Designated Officer
MASH	Multi Agency Safeguarding Hub
MARF	Multi Agency Referral Form
TAC	Team Around the Child
TRA	Teacher Regulation Agency
WTSC	*Working Together to Safeguard Children* (March 2026)

School refers to Wycombe Abbey.

Staff covers ALL staff on site, including trainee teachers, ancillary supply and self-employed staff, contractors, Governing Council, and volunteers working with children. For the avoidance of doubt that also includes part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches, whether employed directly by the School or for services.

Child Protection refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

Abuse is defined as a form of maltreatment of a child. Abuse may take the form of physical, emotional, or sexual abuse and includes neglect. This may involve inflicting harm or failing to act to prevent harm. It can also include racism, faith-based prejudice, and other forms of discrimination. Children may be abused by an adult or another child/children.

1. Introduction and Context

Safeguarding and promoting the welfare of children is everyone's responsibility.

1.1 In order to fulfil this responsibility effectively, all staff should consider, at all times, what is in the best interests of the child.

Everyone should maintain an attitude of **'it can happen here'** and **'see something, say something'**

The Teacher Standards (2012) state that teachers, including Headteachers, should safeguard all children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

1.2 Safeguarding children is the action taken to promote the mental and physical welfare of children and protect them from harm. Every adult who comes into contact with pupils has a role to play. All staff must remember that safeguarding incidents or behaviour that gives rise to safeguarding concerns can be associated with factors outside of School, or in situations outside of their families. The School will consider the context within which such incidents and/or behaviours occur, known as Contextual Safeguarding.

1.3 This policy is reviewed and updated annually, and applies to all staff, wherever they are with pupils whether on or off the School site. The School recognises the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. The School encourages all staff to contribute to the safeguarding culture through Drop-In Sessions and by providing material for Staff Briefings and Bulletins. Parents are informed of the policy and procedures, and is available on the School website.

1.4 In order to safeguard and promote the welfare of children, the School will have regard for and act in accordance with legislation and guidance issued by the Secretary of State, and in accordance with the Buckinghamshire Safeguarding Children Partnership (BSCP), Multi Agency Safeguarding Hub (MASH) and Education Safeguarding Advisory Service (ESAS).
This policy has regard for:

- Education (Independent School Standards) regulations 2014 and Independent School Standards (Amendments) 2018
- Keeping Children Safe in Education (September 2026)
    - What to do if you are worried a child is being abused (March 2015)
    - Teaching online safety in School (July 2019, Updated January 2023)
    - Multi-agency statutory guidance on Female Genital Mutilation (July 2020)
    - Criminal exploitation of children, young people and vulnerable adults (County Lines) October 2023
    - Generative AI: Product safety expectations (January 2025)
- Working Together to Safeguard Children (March 2026)
    - Multi Agency Practice Guidelines Female Genital Mutilation (2014)
- Buckinghamshire Multi-Agency Safeguarding Arrangements (November 2019)
- National Minimum Standards for Boarding School (May 2026)
- Information Sharing Duty: Statutory guidance for safeguarding organisations and their practitioners (September 2026)

- Prevent Duty Guidance: for England and Wales (December 2023)
    - How Social Media is used to encourage travel to Syria and (July 2015)
- Children Missing Education: statutory guidance for local authorities and schools (September 2025)

- Children's Wellbeing and Schools Act (June 2026)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (March 2024)
- Relationships education, relationships and sex education (RSE) and health education (July 2025),
- Children's Social Care National Framework (December 2023)
- Searching, screening and confiscation at School (Sept 2022)
- The Equality Act (2010)
- Behaviour in schools (February 2024)
- Working together to improve school attendance (July 2026)
- Digital technology standards in schools and colleges (September 2026)
- Mobile phones in schools: guidance (June 2026)
- Guidance in Restrictive Interventions (April 2026)
- Data protection in schools (April 2024)
- Data (Use and Access) Act 2025
- When to call the police (npcc.police.uk)
- Modern slavery: how to identify and support victims (May 2026)
- Keeping children safe in out of school settings (April 2022)
- After school clubs, community activities, and tuition (safeguarding for providers) (February 2026)
- The Charity Commission guidance-Safeguarding and protecting people for charities and trustees (June 2022)

1.5 The Safeguarding and Child Protection Policy forms part of a set of documents and policies which relate to our safeguarding responsibilities and therefore should be read in conjunction with the following policies and procedures:

- Acceptable Use of ICT – Staff
- Access to Site and Premises including Checks and Supervision of Contractors, Lettings and Residents' Guests
- Accommodation – Adults Living or Guests Visiting on Site with Resident Staff
- AI Policy including Acceptable Use for Pupils and Staff
- Anti-Bullying Strategy
- Appointment, Induction and Retirement of Governors
- Attendance Registration and School Roll Procedure
- Behaviour, Rewards and Sanctions
- Boarders Access to staff accommodation (NMS20)
- Codes of Practice for Confidentiality
- Complaints Procedure
- Data Protection
- Data Management and Retention
- Disclosure of Circumstances - Staff
- Educational Guardianship
- Emergency Response Procedures
- Event Safety
- Equal Opportunities for Pupils
- First Aid
- Global Exchange Programme Guidance
- Health and Safety – Organisation and Arrangements including Letting management
- Health Centre Handbook – including managing children with medical needs
- Medical Conditions
- Missing Pupils Procedures

- Online Safety including Responsible Digital Device Use – for Pupils
- Restrictive Interventions
- Preventing Extremism and Radicalisation
- Pupil Support and Outside Listener
- Pupils Travelling in cars/taxis
- Relationships and Sex Education
- Safer Recruitment
- Search Policy
- Social Media
- Staff Code of Conduct
- Staff Disciplinary and Grievance
- Staff Training and Development
- Special Educational Needs and Disability
- Supervision of Pupils
- Taking, Using and Storing Images of Pupils
- Teacher Training and ECTS
- Trips and Educational Visits
- Visiting Speaker Procedures
- Wellbeing and Mental Health
- Whistleblowing
- Work Experience

2 Policy Aims

2.1 To ensure the best interests of the child are paramount to enable children to have the best outcomes.

2.2 To provide all staff with the necessary information to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of children and to ensure the welfare of children is understood as everyone's responsibility.

2.3 To ensure consistent good practice across the School as a whole School approach to safeguarding.

2.4 To demonstrate the School's commitment with regard to safeguarding children.

2.5 To prevent harm by raising awareness, education to pupils, and promoting an ethos where pupils feel able to talk.

2.6 To raise the awareness of all staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases, or supposed cases, of abuse, neglect and exploitation, including radicalisation and online grooming.

2.7 To emphasise the need for good levels of communication between all members of staff.

3 The Difference between Safeguarding and Child Protection

3.1 Safeguarding is a broader term than child protection. It encompasses all the elements set out within this document and is what a School should do for all children; Child Protection is part of this definition and refers to activities undertaken to protect children who have been harmed or at significant risk of being harmed.

3.2 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 impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

4 Raising Awareness with Pupils, including preventative education

4.1 The School prides itself on its culture of open and effective communication between staff and pupils, where children are listened to, and on its excellent pastoral support structures. The School prepares all pupils to make reasoned, informed choices, judgements, and decisions and recognises its crucial role in preventative education for young people. Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. Time is allocated through PHSE and RSE in Wellbeing, General Studies, Carrington Programme and tutor/House time for discussion of safeguarding issues, relationships and sex, online safety including radicalisation and in developing pupil confidence in recognising abuse and staying safe from online abuse and bullying. The School ensures that all resources are age appropriate, fully inclusive, and developed to be age and stage of development appropriate and where external resources or speakers are used these are well vetted to ensure they fit the requirements and values of our School and wider community. Many of the resources we use are those approved by the PSHE Association.

4.2 All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking with the DSL or DDSLs if they have a concern about a child.

4.3 The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

4.4 Online Safety Training: Pupils are taught about how to stay safe online in their Wellbeing lessons, through General Studies, age-appropriate year group talks and in their Computing lessons. All pupils sign both a Responsible Digital Device Use and Responsible Use of AI statement annually which reminds them, among other things, about the importance of protecting their identity online, and what to do if they come across harmful or inappropriate material.

Pupil education on online safety and artificial intelligence includes age-appropriate discussion of; generative AI, AI chatbots, companion tools, impersonation, misinformation and disinformation, deepfakes and digitally manipulated content. Pupils are taught that they must not create, request, alter, share or threaten to share images, audio or video of another person using digital tools, including AI. "Fake" sexualised imagery can still be abusive, harmful and potentially criminal. Pupils are reminded how to report online harm, including that which is AI-related, and where to seek support.

4.5 Filtering and Monitoring: The School recognises its responsibility to do all it can to prevent pupils coming to harm through their use of technology but is also aware of the importance of not over-blocking. There are robust filters on the School internet, as outlined in the *Online Safety Policy*, and pupils who have a School-managed device have Smoothwall uploaded to add greater support to pupils. Filtering and monitoring arrangements are reviewed at least annually by the DSL and Head of IT Services, and records are kept of checks across relevant internet-connected devices and locations. The review considers whether provision can address real-time, dynamic, personalised and AI-

generated content, including content accessed through apps, embedded browsers, school-managed devices used off-site and any approved AI tools.

Leaders use appropriate guidance to understand safety considerations and their legal responsibilities if they choose to use Generative AI (either teacher-facing or pupil facing) such as Generative artificial intelligence in Education and online resources with Chiltern Learning Trust and Chartered College of Teaching.

4.6 Listening to Pupils: All pupils know who to turn to if they are worried, including the School Counsellors, Peer Coaches, the Chaplain, the Health Centre, Safeguarding Team, Pastoral Teams including their tutor, Listening @ Wycombe mechanism, Anonymous Concerns form, the Individualised Case Support Worker or the Independent Listener. All pupils have the opportunity to express views and feedback.

4.7 Pupils are provided with appropriate external helpline(s) to ring in case of problems or distress. The inclusive ethos and emphasis on the School's values of trust, encouragement and mutual respect, alongside training for Heads of Houses, prefects and all members of the UV and LVI, protect against child-on-child abuse, but vigilance is maintained.

All pupils know how to find information on where to seek help (Appendix One).

4.8 Where pupils are asked to learn online at home, the School follows government guidance on how to do so safely.

5 Policy Details

5.1 Statement of Intent

5.1.1 The safety and welfare of all pupils is the highest priority. Staff know all pupils as individuals and provide a secure and caring environment in which each pupil can learn safely. In all matters relating to child protection, the School will follow the procedures laid down by statutory guidance with particular reference to Keeping Children Safe in Education (Sept 2026).

5.1.2 Where there is a safeguarding concern, the School will ensure the pupils' wishes and feelings are taken into account when determining what action to take and what services to provide. Staff members should always act in the best interests of the pupil and implement a child-centred approach to safeguarding. Whilst the School is committed to working collaboratively and in partnership, with parents and carers as far as possible the wishes and feelings of the child and what is in their best interests is always central to the School's decision-making process.

5.1.3 The School does not distinguish between pupils on grounds of age, and therefore child protection responsibilities do not end once a pupil reaches the age of 18. Any reference to 'child' or 'pupil' in this policy includes any pupil aged 18 years or over.

5.1.4 Abuse, neglect, exploitation, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. Staff should understand that children can experience more than one type of harm simultaneously.

5.1.5 Safeguarding is a priority across all aspects of the School. The School strives to create an environment where pupils feel supported to share worries and concerns, know how to approach adults if they are in difficulties and where support is both readily available and accessible.

5.1.6 The School understands and recognises its obligations under the Equality Act and that the School must not discriminate against pupils because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation.

In the context of safeguarding, the School will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. The School will also consider their duty to make reasonable adjustments for disabled pupils.

The School recognises that effective safeguarding is anti-discriminatory and anti-racist, and understands factors, including economic and social circumstances, ethnicity and disability, which can impact on children and families' lives. Staff are alert to the risk of adultification bias, where children, particularly Black children, may be perceived as older than they are, which can lead to their needs being poorly understood and opportunities to provide help being missed.

The School also complies with its legal duties under the Equality Act 2010, including putting special provision in place to support dialogue with children who may not be able to convey their wishes and feelings as they may want to. This might include, for example, those who have communication difficulties and those who do not speak English or for whom English is not their first language.

5.2 Identifying Abuse

5.2.1 Abuse is a form of maltreatment. Somebody may abuse, neglect or exploit 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 relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused or exploited in a family or in an institutional or extra-familiar context by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. A child may be abused by an adult(s) or another child/children. This includes in teenage relationships, or under the guise of 'honour' based abuse including forced marriage and Female Genital Mutilation, or abuse related to faith or belief such as allegations of demonic possession. A child may also experience abuse due to their race or faith. We call this racism or faith-targeted prejudice or abuse. Modern slavery is also a form of abuse.

5.2.2 Some of the following signs and types of behaviour might be indicators of abuse, neglect, exploitation or Modern slavery. They are not evidence of abuse and there can be other explanations for a child showing these signs of behaving in these ways:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed.
- Children with clothes which are ill-fitting and/or dirty.
- Children with consistently poor hygiene.
- Children who make strong efforts to avoid specific family members or friends without an obvious reason.
- Children who do not want to change clothes in front of others or participate in physical activities.
- Children who are having problems at school, e.g. a sudden lack of concentration and learning, or they appear to be tired and/or hungry.
- Children who talk about being left home alone, with inappropriate carers or with strangers.
- Children who, with no medical reason, are late to reach developmental milestones, such as learning to

speak or walk.

- Children who are unexplainably or persistently absent from School or education, or who have poor School attendance and/or punctuality.
- Children who are reluctant to go home after School.
- Parents who are dismissive and non-responsive to practitioners' concerns.
- Parents who collect their children from School when under the influence of drugs or alcohol.
- Children who drink alcohol regularly from an early age.
- Children who are concerned for younger siblings without explaining why.
- Children who talk about running away.
- Children who shy away from being touched or flinch at sudden movements.

5.2.3 Children can be harmed either by deliberate acts or by a failure to provide proper care, or both. Children may suffer neglect, emotional, physical or sexual abuse, or a combination of such types of abuse.

5.2.4 Children may also cause harm to other family members, often referred to as child-to-parent or caregiver abuse.

5.3 Impact of Abuse

5.3.1 The impact of abuse should not be underestimated. Many children do recover well and go on to lead happy and productive lives, although most adult survivors agree that the emotional scars remain. For some children, full recovery is beyond their reach and the rest of their childhood and adulthood may be characterised by significant challenges, such as anxiety, depression, eating disorders, alcohol and substance misuse, long term medical or psychiatric difficulties.

5.3.2 Child abuse can be devastating for the child and very distressing for the staff who become involved.

5.3.3 The School will support pupils, families and staff by:

- Taking all suspicions and disclosures seriously.
- Maintaining confidentiality and sharing information on a need-to-know basis.
- Storing records securely.
- Offering details of help lines, counselling and other avenues of support.
- Co-operating fully with the relevant statutory agencies.

5.4 Types of Abuse

5.4.1 Emotional abuse is the persistent emotional or psychological maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse such as persistent criticism, belittling or name calling as well as not giving the child opportunities to express their views, 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, seeing or hearing the ill-treatment of another, serious bullying, including cyberbullying, exploitation or corruption. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

5.4.2 Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding,

drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Corporal punishment by parents is a safeguarding issue. A policy of encouraging parents to use corporal punishment on their children for misbehaviour occurring in School would be considered a breach of the safeguarding standard.

5.4.3 Sexual Abuse (including harassment and exploitation) involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration rape, penetration with an object, non-penetrative acts, 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. Sexual abuse can take place online which facilitates, threatens and/or encourages sexual violence. Technology can also be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and more information can be found at 6.16. Young people can experience domestic abuse in their own intimate relationships (teenage relationship abuse) which can include physical, sexual, emotional abuse and stalking.

5.4.4 Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs for security, love, praise and recognition. Affluent Neglect can present in the following ways: emotional neglect from their parent, delegating parental responsibility to employed carers, gaslighting when they attempt to express their concerns due to their backgrounds and the family they come from, academic pressure which can lead to seeking high levels of perfectionism, or "adultification" in which that young person is treated as if they are an adult, with fewer boundaries at home and a greater access to unsupervised time and money.

5.4.5 Abuse from Use of Electronic Technology - The School recognises the role of technology in many safeguarding and wellbeing issues. The risks are associated with four main areas:

- Content: being exposed to illegal, inappropriate or harmful material, e.g. pornography, misinformation, disinformation, including fake news, conspiracy theories, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence.
- Contact: being subjected to harmful online interactions with other users or generative AI applications that simulate this, including peer-to-peer pressure, commercial advertising, adults posing as children with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct: online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images, including those generated using AI, online bullying and harmful sexual behaviour online
- Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. The School will report to the Anti-Phishing Working Group if they feel that their children or staff are at risk.

All staff should know that abuse can take place wholly online, or technology may be used to facilitate offline abuse. Staff should also be aware of the risks posed by the use of Social Media, and Generative AI including that of misinformation, radicalisation, sexual harassment and grooming, and increased vulnerability to other types of abuse.

AI-related safeguarding risks include, but are not limited to, AI-generated or digitally manipulated images, audio or video; deepfakes and deep nudes; nudification tools; impersonation of pupils, staff, parents or other trusted adults; AI-assisted grooming, coercion, harassment or blackmail; harmful interactions with AI chatbots or companion applications; and misinformation, disinformation or radicalising material generated or amplified by AI. Any concern involving AI must be treated as a safeguarding concern where it causes, or may cause, harm to a pupil.

Making or sharing nudes and semi-nudes refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. Images include photographs, videos, livestreams and visual content that has been digitally altered or wholly generated using artificial intelligence, including deepfakes or deep nudes. All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, whether apparently consensual or non-consensual. Staff must not view or forward illegal images of a child unless this is unavoidable and must report any concern immediately to the DSL.
Staff must not ask a pupil to recreate, forward, download, screenshot, display, save or delete nude or semi-nude imagery, including AI-generated or digitally manipulated imagery. Staff must not investigate whether an image is "real" or "fake" themselves and must not dismiss an incident because the content appears to have been generated by AI. The matter must be reported immediately to the DSL, who will manage the response in line with UKCIS guidance, this Policy and any required referral pathway.

Upskirting involves a picture being taken under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. If staff are made aware of pupil(s) involved in upskirting, they must inform the DSL.

Revenge Porn, deep fakes and deep nudes are also terms used by young people and often refer to digitally manipulated and AI-generated nudes and semi-nudes. Any staff member informed of a direct disclosure must inform the DSL immediately.

5.4.6 Appendix Two of this policy sets out further detail of possible signs of abuse and of grooming including criminal exploitation, including financial exploitation, serious youth violence, county lines and radicalisation.

5.5 Dealing with Concerns

5.5.1 If staff suspect or hear any allegation or complaint of abuse, exploitation, modern slavery, neglect or other safeguarding concern from a child or any third party, they must act immediately and follow the relevant procedure within this Policy. Staff should not assume that somebody else will take action or share information that might be critical in keeping children safe.

5.5.2 Data protection laws, including the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025, do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. Fears about sharing information must not stand in the way of safeguarding. Staff should share relevant, necessary and proportionate information promptly with the DSL, local authority children's social care, safeguarding partners and other agencies where required. If in doubt, staff must speak to the DSL or a DDSL.

5.6 Handling Disclosures

5.6.1 Disclosure may take place at any time of the day or night, and all staff need to be aware of how to handle a disclosure as highlighted below:

- Always stop and listen straight away to someone who wants to speak about incidents or suspicions of abuse, which may involve abuse by another pupil.
- Do not promise confidentiality.
- Listen to what is being said without displaying shock or disbelief.
- Accept what is being said and do not ask leading questions.
- Allow the child to talk freely.
- Reassure the child, but do not make promises which may not be possible to keep.
- Reassure the child that it was not their fault.
- Stress that it was the right thing to tell you.
- Do not criticise the alleged perpetrator.
- Explain what has to be done next and who has to be told.

5.6.2 Where possible, make brief notes of what the pupil is saying whilst they are speaking, and keep original notes without destroying them. If staff do not have the means to write at the time, make notes of what was said as soon as possible afterwards. Notes should be a clear, precise, factual account of the observations, making sure to:

- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child.
- Draw a diagram to indicate the position of any bruising or other injury.
- Record statements and observations rather than interpretations or assumptions. All records need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.
- Information can be submitted via CPOMS using the appropriate Safeguarding category.

5.6.3 Never attempt to carry out an investigation of suspected or alleged abuse by interviewing people or making enquiries.

5.6.4 If a child is in immediate danger or is at risk of harm, staff must immediately refer to Children's Social Care and/or the Police. Anyone can make a referral. The referral must be made immediately and, in any event, within 24 hours or one working day of the concern arising. Parental consent is not required for a referral to a statutory agency where a child has been harmed or is at risk of harm. If anyone other than the DSL makes the referral, they must inform the DSL as soon as possible. In the case of a pupil aged 18 or over, the DSL will also consider whether a referral to adult safeguarding services is required.

5.6.5 All concerns and discussions about a child's welfare, the decisions made and the reasons for the decisions should be recorded in writing in CPOMS.

5.6.6 Dealing with a disclosure from a child and a child protection case in general, is likely to be a stressful experience. The member of staff should consider seeking support and discuss this with the DSL who may refer the colleague to the School Counsellors or Chaplain.

5.6.7 Safeguarding records should be clear, factual and distinguish between observed concerns, professional opinion and historic information. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached

and the outcome.

5.7 Information Sharing

5.7.1 Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation and in promoting children's welfare, including their educational outcomes. No single practitioner can have a full picture of a child's needs and circumstances, and effective information sharing is essential to safeguarding children. The School is subject to a statutory duty to share relevant safeguarding information with organisations within the scope of that duty, including local authorities, NHS trusts, the police and other schools. There is no threshold of risk or harm that must be met before the duty applies. The only exception is in rare circumstances where sharing would be more detrimental to the child than not sharing. Where the duty applies, confidential information may be shared without consent.

5.7.2 The School has appropriate arrangements in place to ensure that safeguarding information is transferred, reviewed and actioned promptly at all transition points, including in-year moves, in line with the statutory guidance. When sharing safeguarding information the School will clearly distinguish current safeguarding concerns and support needs from historic information.

5.7.2 Where the School receives safeguarding information for pupils this will be reviewed by the DSL who will take steps to clarify any information that is unclear or incomplete. Where there are issues or concerns this may include a conversation between the DSLs at both settings. The DSL will ensure that key staff are aware of any relevant information for new pupils.

5.7.3 When a pupil leaves the School, including through an in-year transfer, the DSL will ensure that the child protection file is transferred to the new school separately from other documents, as soon as possible and within five days for an in-year transfer or within the first five days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. The transfer will include a clear, structured summary identifying current safeguarding concerns, relevant context, historic information and any ongoing support needs. The summary will distinguish current safeguarding concerns from historic information and present historic information in appropriate context. The DSL will also consider whether additional information should be shared with the new school in advance where this would support risk assessment or support planning for the child or others and enable appropriate support to be put in place.

5.7.4 The DSL will review safeguarding information received for an incoming pupil promptly, clarify any information that is unclear or incomplete and, where there are issues or concerns, liaise with the DSL at the previous setting. The DSL will ensure that key staff are given the relevant information they need to support and safeguard the pupil.

5.7.5 Where the School receives any information that indicates an incoming pupil may present a risk to others and/or themselves, the School will assess the risk and put in place a safety and support plan for when the child arrives.

5.7.6 Data protection law provides a framework that enables safeguarding information to be shared in a fair, proportionate and lawful way. The Data Protection Act 2018, the UK General Data Protection Regulation and the Data (Use and Access) Act 2025 do not prevent information being shared to keep children safe and promote their welfare. Relevant staff receive appropriate training on the applicable data protection principles and the statutory information-sharing duty, including the appropriate legal basis and condition where special category data is shared. Fears about data protection must not stand in the way of safeguarding children.

When deciding whether to share information under the statutory duty, staff will use professional judgement and consider whether: the information is relevant to safeguarding or promoting the child's welfare, recognising that further context may be needed to determine relevance when responding to a request; the recipient falls within the scope of the duty and the information could reasonably help them safeguard or promote the child's welfare; and sharing would not be more detrimental to the child than not sharing, taking account of any mitigating steps that could reduce the risk. Where necessary, information may also be shared with organisations outside the scope of the statutory duty in accordance with data protection law and any applicable duty of confidentiality. When deciding what information to share, staff should consider:

- the relevancy of the information, including to the current safeguarding risk,
- what is necessary for the receiving setting to know, and
- whether it is clearly presented and appropriately contextualised.

The School will keep a clear record of what information was shared, why it was shared and who it was shared with. When sharing safeguarding information. information, the School will generally be as transparent as possible and inform the pupil and/or their parents or carers, unless doing so could place a child or another person at further risk of harm or compromise effective safeguarding arrangements, including a police investigation. The School will not present information sharing as optional where consent is not required under the statutory information-sharing duty or would be inappropriate for safeguarding purposes. If staff are in doubt what information can and should be shared, they must speak to the DSL.

5.7.7 The School will have regard to Information Sharing Duty: Statutory guidance for safeguarding organisations and their practitioners (September 2026) when staff make decisions about sharing safeguarding information.

5.8 "The Six Rs"

READY

- A pupil may wish to talk to you at any point - if this involves safeguarding you must be prepared to listen immediately.
- Do not ask the pupil to come back later or make an appointment.

RECEIVE

- The pupil has chosen you - you are in a position of trust.
- Listen carefully to what they say.
- Do not show shock or disbelief.
- Take it seriously.

REASSURE

- **Do not ask leading questions** (e.g. 'did X do this to you?') or interrogate them.
- Do not criticise the alleged perpetrator.
- Do not ask the pupil to repeat the matter to another member of staff. Explain that you need to talk to the DSL.
- **Do not investigate the matter yourself.**

RESPOND

- Tell the pupil that they have done the right thing by speaking out.
- **Do not promise confidentiality** - you have a duty to refer. You can, however, state that information will only be shared with the people who need to know.
- Alleviate guilt - the pupil is not to blame and they did the right thing in coming to you.

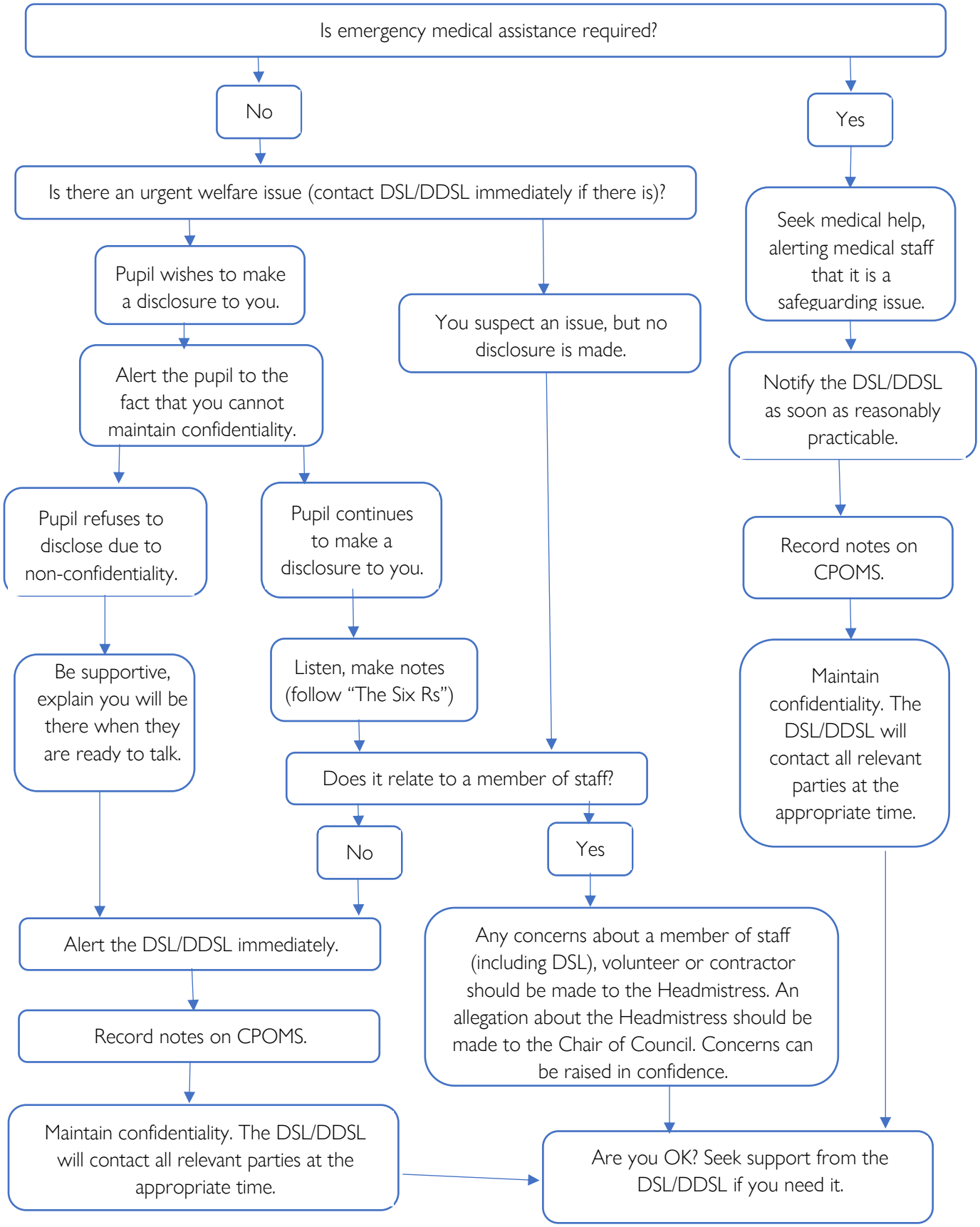
RECORD

- Make brief notes if you can during the meeting, or if not, immediately afterwards.
- Keep your original notes.
- Record the date, time, place and the actual words used by the pupil.
- Record statements and actions rather than your interpretations.

REPORT

- Immediately contact the DSL, DDSL or the Headmistress as appropriate.
- You can use CPOMS to record the disclosure as the DSL may have to make your record available to Children's Services.

5.9 What to do if you suspect a pupil is suffering or likely to suffer harm



6 Concerns about a Pupil

6.1 Early Help, Child in Need and Child at Risk

Staff must maintain a good working knowledge of the Buckinghamshire Continuum of Need (See Appendix Three) and how it should be used to inform decision making regarding a referral to First Response.

6.1.1 Early help means the support available to all children and families through universal and community-based services, including schools, health services, and other local provision. Its purpose is to improve resilience and outcomes or to reduce the chance of problems getting worse.

6.1.2 All staff should be aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL or DDSLs, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

6.1.3 Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child 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 pregnant and/or is a parent themselves.
- Has exhibited early signs of abusive, violent and/or harmful behaviours or is showing early signs of abuse and/or neglect.
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Is frequently missing/goes missing from education (on repeat occasions and/or prolonged periods including persistent absences for part of the School day), care or home.
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- Is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation.
- Is at risk of being radicalised into terrorism.
- Has a parent or carer in custody or is affected by parental offending.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and/or domestic abuse.
- Is misusing alcohol and other drugs themselves.
- Is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
- Is a privately fostered child or has returned home to their family from care; or is an asylum seeker.

6.1.4 Early help support mechanisms can include:

- Managing any support for the child internally via the School's pastoral support processes; the DSL will consider when parents and carers should be informed.
- Wellbeing curriculum exploring emotions and strategies to develop positive relationships.
- Team around the Child (TAC) meetings to identify early help support mechanisms.
- Counsellor referrals.
- Mental Health First Aid (Youth) trained staff.

- House Mother/House Daughter support systems.
- Universal Services – such as education, health services, youth services, and housing provision.
- Community based Early Help – works best when placed alongside strong policy, preventative education and engagement of parents/carers and can be managed alongside internal support for pupil.

The targeted early help of Family Help which are coordinated by a local authority to address specific concerns within a family.

If early help or Family Help is provided, the matter will be kept under review and consideration given to a referral to children's social care for a child protection assessment if the pupil's situation does not appear to be improving or if concerns escalate

6.1.5 A Child in Need is defined as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly impaired without the provision of services; or a child who is disabled. These pupils will be referred to Children's Services and will benefit from additional support which should be put in place as soon as the problem is identified and will work to safeguard and promote their welfare. Children in need may be assessed under section 17 of the Children Act 1989. As outlined in Working Together to Safeguard Children, local authorities, with their safeguarding partners and any relevant agencies, should develop, agree and publish local protocols for assessments and support. This should set out who can act as lead practitioner in supporting children and their families under section 17 (which is not limited to social workers).

6.1.6 A Child at Risk is a pupil who is at risk of significant harm (which may or may not be abuse). Such cases will be referred to Children's Services immediately in accordance with the procedures outlined in this policy.

6.2 Children who need a social worker (Child in Need and Child Protection Plans)

6.2.1 A child may need a social worker due to safeguarding and welfare needs. All staff are aware that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

6.2.2 The DSL will be aware of whether a child has a social worker and will use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

6.3 Anti-Bullying

6.3.1 The School has an *Anti-Bullying Strategy* that is reviewed annually.

6.3.2 All staff will be made aware of the harm caused by bullying through anti-bullying training and of the other types of child-on-child abuse through safeguarding training.

6.3.3 Staff will use the School's anti-bullying and safeguarding procedures where necessary.

6.4 Children Absent or Missing Education

6.4.1 A child who has unexplainable and/or persistent absences from education, is a potential indicator of abuse or neglect. All staff should follow guidance set out in the *Attendance Registration and School Roll* Procedure and the *Missing Pupils Procedures* for dealing with children who are absent or go missing from education, particularly on repeat occasions, to help identify the risk of abuse, neglect, exploitation or modern slavery including sexual

abuse or radicalisation.

6.4.2 The School will, where possible, keep two emergency contact numbers for every pupil, and will contact the Local Authority when pupils leave the School or have been absent from School without the School's permission for a continuous period of 10 school days or more.

6.4.3 Elective Home Education: Where Parents decide to remove their child from the School in order to home educate, the School will work with the Local Authority, Social Workers where applicable, and Parents to coordinate a meeting ahead of any final decision to ensure consideration is given to the best interests of the child.

6.5 Child Sexual Exploitation

6.5.1 Child Sexual Exploitation is a form of sexual abuse where children are sexually exploited for money, power, or status. It can involve violent, humiliating and degrading sexual acts. The abuse may involve physical contact, including penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. In some cases, children are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection, or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them This includes 16 and 17 year olds who can legally consent to have sex. Child sexual exploitation does not always involve physical contact and can happen online. Exploitation can include trafficking of children or modern slavery.

Child Sexual Exploitation can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media.

Child Sexual Exploitation can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. Victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed and exploited without fully understanding the abuse they are experiencing.

6.5.2 Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "Modern slavery: how to identify and support victims (June 2021, Updated May 2026)". In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CSE or CCE is identified.

6.5.3 Signs of child sexual exploitation may include:

- Children who appear with unexplained gifts or new possessions.
- Children who associate with other young people involved in exploitation.
- Children who have older girlfriends or boyfriends.
- Children who suffer from sexually transmitted diseases or repeat pregnancies, abortions or miscarriages.
- Children who misuse drugs and alcohol.

- Inappropriate sexualised behaviour and underage sexual activity.
- Mood swings, poor emotional wellbeing, suicidal ideation, eating disorders, self-injury.

6.6 Child Criminal Exploitation

6.6.1 Child criminal exploitation is the use of a child in criminal activities for economic gain and is typified by some form of power imbalance in favour of those perpetrating the exploitation. This power imbalance can be with regards to age, gender, cognitive ability, physical strength, status, and access to economic or other resources. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. It can constitute modern slavery and a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

6.6.2 County Lines is the most prolific form of child criminal exploitation and is where older individuals or groups of older individuals exploit younger people to carry drugs or other contraband from urban areas to suburban and rural areas.

Other forms of Child Criminal Exploitation can include children being forced to work in cannabis factories, shoplifting or pickpocketing. They can be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims, and their families, with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals and should be treated as victims. It is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise what is happening to them.

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

6.6.3 As with other forms of abuse and exploitation, Child Criminal Exploitation and County Lines exploitation can:

- Affect any child or young person, male or female, under the age of 18.
- Affect any vulnerable adult over the age of 18.
- Still be exploitation even if the activity appears consensual.
- Involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Be perpetrated by individuals or groups, males or females, and younger people or adults, and is typified by some form of power imbalance in favour of those perpetrating the exploitation.

6.7 Cybercrime

6.7.1 Cybercrime is a criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). It is one of the most significant and rapidly evolving threats within the UK's crime landscape.

Staff should be aware that artificial intelligence can increase the speed, scale and realism of cyber-enabled harm, including phishing, social engineering, impersonation, voice cloning, image manipulation, credential harvesting, scams, malware generation and attempts to bypass normal security controls. Concerns that a pupil may be using AI or other technology to commit cybercrime, or may be targeted by AI-enabled cyber abuse, must be

reported to the DSL or DDSL and, where appropriate, referred for specialist advice.

6.7.2 Cyber-dependent crimes include:

- Unauthorised access to computers (illegal 'hacking'), for example, accessing a School's computer network to look for test paper answers or change grades awarded.
- Denial of Service (Dos or DDos) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources.
- Making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

6.7.3 Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime without understanding the legal or ethical implications Its impact extends well beyond immediate financial losses, with scope to cause disruption to national infrastructure.

6.7.4 If there are any concerns about a child in this area, the DSL or DDSL should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local police It aims to intervene where young people are at risk of committing or divert them to a more positive use of their skills and interests. Cyber Choices does not cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation, nor other areas of concern such as online bullying or general online safety.

6.7.5 Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre – NCSC.gov.uk

6.8 Honour-Based Abuse including Forced Marriage

6.8.1 Honour-based abuse (HBA) encompasses crimes that 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 may include non-violent forms of abuse.

6.8.2 Forced Marriage is a human rights abuse and falls within the Crown Prosecution Service's definition of domestic abuse. Young women can be at risk in affected ethnic groups, and forced marriage is an entirely separate issue from arranged marriage.

6.8.3 All forms of honour-based abuse are abuse, regardless of the motivation, and should be handled and escalated as such in accordance with the guidance set out in this Policy.

6.9 Female Genital Mutilation (FGM)

6.9.1 In line with the Buckinghamshire Safeguarding Partnership's FGM Policy, the School recognises that whilst there is not necessarily an intent to harm a girl/young woman through FGM, the practice has serious short and long term medical and psychological implications. The School works with partner agencies to promote understanding and safeguard families who may be at risk of this practice. The School also recognises that the practice of FGM in the UK is a criminal offence.

6.9.2 Female Genital Mutilation is a form of child abuse. All staff need to be alert to the possibility of a pupil being at risk of FGM or already having suffered FGM.

6.9.3 Female Genital Mutilation comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs.

6.9.4 UK communities that are most at risk of FGM include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerians and Eritreans. However, women from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women.

6.9.5 Mandatory Reporting Duty: Section 5B of the Female Genital Mutilation Act (2003) (as inserted by Section 74 of the Serious Crime Act 2015) places a statutory personal duty upon teachers, along with social workers and healthcare professionals, to report to the Police where they discover, either through disclosure by the victim or visual evidence, that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils. Teachers must report their concerns to the DSL immediately, and to the Police by calling the non-emergency number 101 immediately afterwards.

6.9.6 Staff who are not teachers, social workers or healthcare professionals but who have been made aware of an alleged case of FGM should report their concerns to the DSL immediately.

6.9.7 The DSL will refer all concerns in relation to possible or actual FGM via the BFRT. In the event of information coming to the attention of the DSL that there is an immediate threat to the child, or it is believed there is a flight risk, or a criminal offence has taken place, the DSL will refer immediately and directly to the Police.

6.10 Safeguarding and Mental Health

6.10.1 All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. Mental Health problems could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where pupils have suffered abuse or neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

6.10.2 Staff are well placed to observe pupils on a daily basis and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one, but only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff still have an important role to play:

- Promoting good mental wellbeing and preventing the onset of mental illness.
- Observing pupils and identifying early those who may be experiencing mental health problems or may be at risk of developing one.
- Ensuring early targeted support is provided.
- Liaising with/referral to specialist services where needed.

6.10.3 If staff have a concern about a pupil's mental health, that they are self-harming, have an eating issue or disorder, or are experiencing suicidal ideation and making plans to end their life, they are likely to be potential warning signs which education staff are well placed to recognise:

- Significant changes in behaviour.
- Ongoing difficulty sleeping
- Withdrawing from social situations.
- Not wanting to do things they usually like, and

- Physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify children who may be struggling with their mental health and contemplating suicide and can offer support and vital early intervention.

If staff have a concern about a child's mental health that is also a safeguarding concern they should speak to the DSL, or a DDSL in their absence. If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option. All staff must refer to the *Wellbeing and Mental Health Policy* for further information and the support systems in place for pupils.

Where support is needed, the designated safeguarding lead (or a deputy) will consider whether to inform parents or carers to support the child's wellbeing and will do so unless this places the child at additional risk. The DSL acts as the Senior Mental Health Lead for the School and attends regular mental health related training and consults recommended and vetted services such as The Hub of Hope and NHS Every Mind Matters for further information.

6.11 Safeguarding SEND Pupils and Pupils with Medical Conditions

6.11.1 Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse or neglect in this group of children. These can include:

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

6.11.2 Staff must always be prepared to support SEND pupils in expressing any concerns they may have and be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

6.11.3 The fact that there has been an incident relating to the management of a child or young person's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners. The School will make a safeguarding referral where an incident highlighted concern that a child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to the School, or where they are repeatedly sent without essential medication, thereby putting the individual at risk. Further information can be found in our Pupils at School with Medical Conditions policy.

6.12 Safeguarding lesbian, gay, bisexual or gender questioning Pupils

6.12.1 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. All staff are expected to create a culture where pupils can speak out or share their concerns with members of staff.

Staff should take time to understand the thoughts and feelings of children who are questioning their gender and should be appropriately professionally curious about the full range of the child's experiences. Children questioning their gender may well have vulnerabilities, including having complex mental health and psychosocial needs such as relating to relationships with family, peers or their broader social environment and in some cases additional diagnoses of SEND. The School recognises that it is common for children to engage in activities that are less typically associated with their sex and at times younger children may go through a period of questioning their gender but for the majority this will not continue into adulthood while a small proportion may continue to question their gender and this feeling may intensify during puberty.

6.12.2 When a request for support with social transition is made, the School will ensure that their decision-making process is documented and records are kept on CPOMS. The School will make decisions in line with the following principles:

- The School will take a cautious approach and will not initiate any action. A parent or child will bring their request to The School.
- Staff should not adopt any changes relating to social transition unless a decision has been made by The School and a child's parents or carers have been involved. The School will comply with obligations under safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by their evaluation of the welfare and best interests of the child and other children.
- The School should consider how best to fulfil their safeguarding duty towards a child who is questioning their gender, as well as their peers, ensuring that any agreed course of action takes account of the impact of those affected.
- The first step will be to consider what is in the best interests of the child and other children and a decision relating to social transition may not be the same as a child's wishes.
- In the vast majority of cases The School will work with the parents/carers as a matter of priority to determine the best interests of the child. The child's parents/carers views will carry great weight as they have the leading role in the lives of their children. The School understands that outcomes for young people are best if they have a supportive relationship with their families. The School will consider any clinical evidence or advice and seek additional non-clinical professional advice where relevant, such as the SENCO and the designated safeguarding lead will be involved.
- The School will consider everything that could be affecting a child, including whether they have any wider health issues or neurodiversity.
- When involving parents or carers presents a greater risk to the child than not involving them the designated safeguarding lead should determine what action is needed to safeguard the child before the parents or carers are contacted and any decision is taken.
- The School will explore how best to support conversations between child and parents and will offer a staff member to be present or to speak to parents or carers on the child's behalf.
- Where a young person confides in a member of staff about their feelings but does not ask The School to make changes to how they are treated there is no reason to break confidence unless there is a safeguarding risk.
- The School will be very careful in the approach to social transition and acknowledges the good evidence on the long-term impact of social transition on young people that can have significant effects on the child or

young person in terms of their psychological function and longer-term outcomes.

- Older children will generally have greater agency to make their own decision. The School will maintain flexibility and keep a child's options open to help to avoid a child feeling they are under pressure to commit to a potentially irrevocable pathway when they are young.
- The School will not allow pupils into toilets, changing rooms or boarding accommodation designated for the opposite sex with no exception.
- Where the School has decided that single-sex sport is necessary for safety reasons, there will be no exception, and pupils must not be allowed to participate in sports designated for the opposite sex.
- The designated safeguarding lead or a deputy will take their time to sensitively explain the constraints on social transition to the pupil and their parents/carer.
- The designated safeguarding lead or a deputy will make sure that the child and their family is aware that they will appropriately sanction any cases of confirmed bullying and harassment and will take a strong stand against bullying. The School is conscious of the rights of pupils and staff in relation to their religion and belief. The School will consider discussing options with pupils and staff such as using names instead of pronouns.
- The School will review their original decision making should it become known that there are safeguarding issues that were not previously apparent. The designated safeguarding lead will be a part of this review.
- The School is legally required to record a child's biological sex accurately wherever it is recorded and will make sure all relevant staff are aware of a child's biological sex in all cases.
- The School will be conscious of the vulnerabilities of children who have fully socially transitioned from an early age and may be living in stealth (where the School, friends, staff may be unaware of their biological sex). These children may be fearful around puberty, and the designated safeguarding lead will lead in these cases.

Should the child want to fully or partially reverse a request that was previously agreed the school will support this and work closely with parents/carers and relevant experts to ensure the best advice is being followed.

6.13 Safeguarding International Pupils

6.13.1 The School is aware of its safeguarding responsibilities in respect of pupils from overseas who are sponsored by the School via the Child Student Route (a study visa). Specifically, these duties require that:

- Policies and Procedures must be in place to ensure the safety, wellbeing and protection from exploitation of sponsored students.
- Non-school accommodation must meet the requirements of the route.
- All teaching and boarding sites must meet legally required standards.
- All staff who have access to pupils must have a current DBS.

This policy therefore covers all pupils at the School, including those here temporarily on exchange visits.

The School sets out its duties and requirements for educational guardians in the Educational Guardianship Policy.

6.13.2 The School is aware that some international pupils may have an increased safeguarding risk due to their different cultures. The School will follow this Policy if they believe that a young person has been, or is at risk of, being harmed and the DSL will consider consulting with Buckinghamshire Children's Services if the suspected abuse took place overseas.

6.14 Pupils who are looked after, or were previously looked after children

6.14.1 Pupils who are looked after by a local authority, or who were previously looked after, can face additional safeguarding issues. If you have any concerns, you should contact the DSL who is the School's designated member of staff for looked after children. They have overall responsibility for their welfare and progress. In addition to this, they will have up to date assessment information from the relevant local authority, their most recent care plan and contact arrangements for parents and carers.

6.15 Private Fostering

6.15.1 The School recognises its obligation to children who may be privately fostered. Private fostering is defined as accommodation provided for a child under the age of 16, or under the age of 18 if disabled, who lives with someone who is not their parent, a person with parental responsibility, or a close relative, for a period of more than 28 days. A close relative is a grandparent, brother, sister, uncle, aunt or step-parent, whether by full blood, half blood, marriage or civil partnership.

6.15.2 If the School thinks that a pupil is being privately fostered, they will discuss this with their parents or carers and encourage them to notify the Local Authority. If they consent, the School will contact the Local Authority via the BFRT. If they do not consent, the School will discuss their concerns with BFRT.

6.16 Child-on-Child Abuse, Sexual Violence and Sexual Harassment

6.16.1 Staff recognise that children are capable of abusing their peers and other children, including online, inside and outside of School. Knowing how to recognise behaviours and indicators of risk early and providing timely, evidence-based support can be key to preventing children from going on to commit abuse or violence. The School recognises that for some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys perpetrators. Child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator, it is preventable, and may occur between two or more children of any age and sex, including through group behaviour. Forms of child-on-child abuse include, but are not limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between children, sometimes known as 'teenage relationship abuse'.
- Physical abuse, such as kicking, hitting, shaking, biting, hair pulling, or otherwise causing physical harm. This can include an online element which facilitates, threatens and/or encourages physical abuse.
- Racist, faith-targeted abuse and other forms of discriminatory behaviour.
- Serious physical assault and harm, or the threat of harm with a weapon.
- Sexual violence, such as rape, sexual assault by penetration and sexual assault. This may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment which may be standalone or part of a broader pattern of abuse.
- Harmful sexual behaviour (an umbrella term is widely used in child protection and applies to behaviour which is online, face to face or both and should always be considered within a child protection context) which may include misogyny/misandry.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual making or sharing of nudes and semi-nudes.
- Initiation/hazing type violence and ritual, this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

- 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.
- Creating, altering or sharing AI-generated or digitally manipulated images, audio or video of another pupil, including deepfakes or deep nudes.

Using AI tools, chatbots, social media, anonymous accounts or other digital platforms to impersonate, harass, coerce, humiliate, threaten, groom or exploit another pupil.

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage. Advice on stages of typical sexual development and behaviour for different age groups can be found in Sexual development and behaviour in children | NSPCC Learning.

6.16.2 Child-on-child abuse, including harmful sexual behaviour, sexual harassment, and sexual violence should never be tolerated or passed off as "banter", "part of growing up", or "boys being boys" nor will harmful sexual behaviours be dismissed as "the same" or "just having a laugh". This can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children and in the worst-case scenario create a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it. Staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator. The School takes a zero-tolerance approach to reports of sexual violence, sexual harassment, sexism, misogyny/misandry, homophobia and biphobic behaviours. The victim, perpetrator and witnesses will be offered appropriate support and reassured that matters will be taken seriously. The School will support pupils where the incident has occurred outside of the School or online, and these incidents will be treated equally seriously.

6.16.3 When assessing Harmful Sexual Behaviour, the ages and developmental stage of the children involved are critical. Sexual behaviour between children may be considered harmful if there is a significant age difference, typically more than two years' difference, or if one is pre-pubescent and the other is not. However, a younger child may also abuse an older child, especially if they hold power over them, e.g., due to a disability or physical size. Advice on responding to children who display sexualised behaviour is available in Responding to children who display sexualised behaviour.

6.16.4 Sharing nudes and semi nudes may constitute abuse or a criminal offence, so any concern or allegation regarding the sharing or posting of such images must be reported to the DSL. The School will take a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual. The response will be a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

While bullying between children is not a separate category of abuse, it is a very serious issue that can cause considerable anxiety and distress. The School recognises that children with special educational needs and disabilities (SEND), health conditions, or those who identify as LGBT, are perceived to identify as LGBT or gender questioning, can be more prone to peer on peer group isolation than other children and will consider extra pastoral support for those children. All incidents of bullying should be reported and managed in accordance with the School's *Anti Bullying Strategy*.

6.16.5

Disclosure: If one pupil makes a disclosure about another pupil, staff must follow the same principles for listening, recording and reporting as for any other safeguarding concern and report the matter to the DSL immediately. Each report will be considered on its facts and no single response will be appropriate in every case. Where a child has been harmed, is in immediate danger or is at risk of harm, an immediate referral must be made to Children's Social Care and/or the Police. All children involved, including the victim and the alleged perpetrator, will be treated as potentially at risk and offered appropriate safeguarding support.

6.16.6 The victim must always be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor would a victim ever be made to feel ashamed for making a report. Abuse that occurs online or outside of the School should not be downplayed and should be treated equally seriously. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

6.16.7 Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Sexual assaults, including upskirting, will be reported to the Police. If the DSL decides to make a referral to BFRT and/or a report to the Police against the victim's wishes, the reasons should be explained to the pupil, parents will be informed if appropriate, and appropriate specialised support offered.

6.16.8 Where there has been a report of sexual violence, the DSL or DDSL will carry out an immediate risk and needs assessment. For sexual harassment, the DSL will consider whether a risk and needs assessment is required on a case-by-case basis. The assessment will be recorded, reviewed regularly and will consider:

- The victim.
- The alleged perpetrator.
- The other children (and, if appropriate, staff) at the School.
- Proximity of the victim and alleged perpetrator.
- Shared classes, bedrooms, and boarding houses.
- Any siblings who are pupils within the School.

Risk assessments will be recorded and kept under review.
All concerns, discussions, decisions and the reasons for those decisions will be recorded in writing. The School will reflect on reported concerns, decisions and actions to identify patterns of concerning, problematic or inappropriate behaviour, an unacceptable culture, or weaknesses in safeguarding arrangements that require further action, training or policy changes. If a report is found to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child or person who made the report needs help or may have been abused by someone else. If a report is shown to have been deliberately invented or malicious, the Headmistress will consider whether disciplinary action is appropriate in accordance with the School's Behaviour, Rewards and Sanctions Policy.

6.16.9 As a full boarding School, staff must be particularly alert to safeguarding pupils against the risk of child-on-child abuse. Children may be particularly vulnerable in residential settings. In reflection of that, there are additional requirements for boarding Schools that are set out in the National Minimum Standards for Boarding Schools. All staff should understand that, just because there are no reports of child-on-child abuse within a particular House, Tutor Group or Year Group, that it does not mean that it is not happening; it may simply mean that it

is not being reported. Therefore, it is vital that staff report any concerns relating to child-on-child abuse to the DSL or DDSL immediately.

6.16.10 The School will ensure that pupils are aware of how they can report child-on-child abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well-promoted, and in a format that is easily accessible and easily understood.

6.17 Serious Violence

6.17.1 Serious violence may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL or a deputy in their absence. The DSL should assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict.

6.17.2 Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence, who may also be victims themselves.

All staff should be aware of indicators which may signal that a child is at risk from, or involved with, serious violent crime. These may include:

- Increased absence from School
- Returning late from periods of leave
- Change in friendship groups or relationships with older individuals or groups
- Significant decline in education performance
- Signs of self-injury or suicidal ideation or a significant change in wellbeing, or signs of assault or unexplained injuries
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- Having been suspended, spent time in alternative provision or permanently excluded from School
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence.

There may be certain times of the day and places when children might be at highest risk of serious violence, such as end points of activities and the school day. The Safeguarding team conduct termly “risky walks” to try and help identify these spaces in School and maintain regular communication with the Schools Link Police Officer who passes on spaces external to school site.

Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support. The Youth Endowment Fund (YEF) provides practical guidance on evidence-based support

6.18 Domestic Abuse and Operation Encompass

6.18.1 Behaviour of a person towards another person is domestic abuse between those aged 16 and over regardless of gender or sexuality where they are personally connected to each other and the behaviour is abusive. Behaviour is abuse if it consists of any of the following:

- Physical or sexual abuse
- Violent or threatening behaviour
- Controlling or coercive behaviour
- Economic abuse – affects a person's ability to use or maintain money or other property or obtain goods or services.
- Psychological, emotional or other abuse.

It does not matter whether the behaviour consists of a single incident or a course of conduct. A person's behaviour can be considered abusive towards someone even if they are not directly targeting that person – for example if someone deliberately threatens, controls or harms the other person's child, friend or colleague in order to upset, frighten or control the other person.

Two people are personally connected to each other if any of the following applies:

- They are, or have been, married or civil partners to each other
- They have agreed to marry or enter a civil partnership agreement with one another, whether or not the agreement has been terminated
- They are, or have been in an intimate personal relationship with each other
- They each have, or there has been a time when they each have had, a parental relationship in relation to the same child.
- They are relatives

Domestic abuse includes a child who sees or hears or experiences the effect of the abuse. Exposure to domestic abuse and/or violence can have serious, long-lasting emotional and psychological impacts on children and may lead to other safeguarding concerns. Young people can experience domestic abuse within their own intimate relationships, and this child-on-child abuse is sometimes referred to as teenage relationship abuse.

6.18.2 The School is part of Operation Encompass, which is an information sharing scheme placed on a statutory footing by Section 49A of the Domestic Abuse Act 2021 (as inserted by Section 20 of the Victims and Prisoners Act 2024). Operation Encompass operates within England and Wales and supports children who experience domestic abuse. Under this statutory duty, the police are required to notify the School if they have reasonable grounds to believe that a child may be a victim of domestic abuse. This duty applies in respect of all children connected to a household where police attend a domestic abuse incident, including children connected to a household who are not physically present at the time of the incident. The system ensures that when police are called to an incident, the police will inform the key adult (usually the DSL) before the child or children arrive back at School. This allows the School to have up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. The teacher's helpline is available from 8am to 1pm Monday to Friday on 0204 513 9990. The School will ensure that information regarding Domestic Abuse and notifications from Operation Encompass is shared on a 'need to know' basis.

6.19 Homelessness and Temporary accommodation notification

6.19.1 Being homeless or at risk of homelessness presents a real risk to a child's welfare. The School is aware of potential indicators of homelessness, such as:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.

6.19.2 If the School becomes aware of a pupil at risk of homelessness, they will make a referral to the Local Housing Authority as appropriate and in accordance with local procedures, and submit a referral to the MASH where a child has been harmed or is at risk of harm.

6.19.3 Where the School receives a notification from the local housing authority, under the Children's Wellbeing and Schools Act 2026, that a child has been placed in temporary accommodation, the DSL (or a deputy) will:

- assess whether the child's welfare needs have changed and whether additional pastoral, academic or safeguarding support is required;
- liaise with relevant agencies, including the local housing authority and, where appropriate, local authority children's social care, to ensure coordinated support is provided; and
- make a referral to local authority children's social care where there are concerns that the child has been harmed or is at risk of harm.

This notification does not replace existing safeguarding and welfare duties. Staff who become aware of concerns about a child's welfare arising from homelessness or temporary accommodation should report these to the DSL

6.20 Children and the Court System

6.20.1 Children are sometimes required to give evidence to criminal courts, either for crimes committed against them or for crimes they have witnessed. Age-appropriate guides on the gov.uk website explain each step of the process, and the support and special measures that are available.

6.20.2 Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. Where appropriate, the School may refer some parents or carers to this service.

6.20.3 Child Abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); or by strangers. All staff should remain vigilant. Further information can be found at: www.actionagainstabduction.org

6.21 Children with Family Members in Prison

6.21.1 Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children to help mitigate negative consequences for those children.

6.21.2 The Prison Service will undertake a child safeguarding enquiry with children's social care for all sentenced prisoners to identify any who present an ongoing risk to children from within custody. Prisons will also decide

on the level of contact, if any, they will allow between a prisoner and a child based on a child contact risk assessment.

6.22 Preventing Radicalisation

6.22.1 Staff must be alert to the possibility of pupils who may be susceptible to extremist ideology and becoming radicalised and exposed to subversive organisations and must report concerns immediately to the DSL, or direct to the Local Authority Channel Referral and Intervention Processes (see separate guidance on *Preventing Radicalisation and Extremism* and *Visiting Speakers Procedure*).
The School recognises that radicalising material may be generated, altered, amplified or personalised through artificial intelligence, including synthetic images, audio and video, deepfakes, AI chatbots, recommender systems and automated content feeds. Staff must treat concerns about AI-generated extremist content, AI-enabled grooming or manipulation, or online communities using AI to reinforce extremist narratives as safeguarding concerns and report them in the usual way.

6.22.2 Signs of radicalisation may include:

- Growing social isolation and increasing time spent online.
- Engagement with AI-generated extremist content, synthetic media, deepfakes, AI chatbots or recommender systems that reinforce grievance, conspiracy theories, dehumanising language or extremist narratives.
- Feelings of grievance and injustice and feeling under threat.
- Cutting off from former friendship groups.
- Change in outward appearance and clothing.
- Change of social activities to a narrow focus.
- A desire for status, excitement, adventure and/or political or moral change expressed in extreme language.
- Development of "Them and Us" thinking and dehumanising of a perceived "enemy" by using derogatory terms.

6.22.3 We recognise that some pupils may be susceptible to being drawn into terrorism or other forms of extremism and carry out appropriate risk assessments. This may involve consultation with local partners, such as the Police, about the potential risk in the local area. Such risk assessment is discussed with the Headmistress, the DSL, DDSLs and the nominated Safeguarding Council Member, to ensure our safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism. The risk assessment is regularly reviewed.

6.22.4 If you are concerned that a pupil may be exposed to radicalisation, the normal referral processes apply, i.e. you should discuss your concerns with the DSL who will follow the safeguarding procedures outlined in this policy and may also make a referral to the Channel programme. Borderline cases will be discussed with the Channel Panel on a no-names basis, and a member of staff may be asked to attend the Channel Panel to help with this assessment. Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism and a child must consent before any support through this programme is delivered. Whilst the referral is being processed should any further or new information come to light this shall be passed onto the police. The DSL will consider if it would be appropriate to share this information with the new school of a child leaving in order for support to continue and to have it in place for when the child arrives.

6.22.5 For non-emergency advice about extremism, staff and governors may contact the Department for Education

on 020 7340 7264 or at counter.extremism@education.gov.uk. In an emergency, staff must call 999. The Police non-emergency number is 101. For further advice

6.23 Non-Collection of a Day Boarder

6.23.1 If a pupil is not collected at the end of the School day, the School will call the contact numbers for the parent or carers. Where reasonably possible, the School will hold more than one emergency contact number for each pupil. If there is no answer, a member of ELT or the Housemistress will begin to call the emergency numbers for the pupil. During this time, the child will be safely looked after in House. If there is no response from the parents' or carers' contact numbers or the emergency numbers within a one-hour period of boarders' bedtime routine, arrangements will be made to look after the pupil within the boarding House overnight. The DSL will be notified and will decide the next course of action. The School will make a full written record of the incident and consider whether further safeguarding action is required.

6.23.2 The School will look after the child safely throughout the time that she remains under our care, until such a time as they have been collected by a parent, educational guardian or carer, or until appropriate, alternative care arrangements have been made with Social Care and/or the Police in order to prioritise the child's safety. The School's DSL will keep a record of incidents where parents/carers do not collect a child from School or are late for no explained or good reason, or where there are repeated incidents.

6.24 Alternative Provision

6.24.1 The School will have regard to statutory guidance when commissioning Alternative Provision placements for any child. The School recognises that it will continue to be responsible for the safeguarding of that pupil and will be satisfied that the placement meets the pupil's needs.

6.24.2 The School will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment. This includes written confirmation that the alternative provider will inform The School of any arrangements that may put the child at risk (i.e. staff changes), so that The School can assure itself that appropriate safeguarding checks have been carried out on new staff.

6.24.3 The School will ensure that they always know where a child is based during school hours, have records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend, regularly review the alternative provision placements on a half termly basis to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

6.25 Young Carers

The School recognises the additional needs of young carers and that their caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. The School understands that early identification is essential to ensure young carers receive support at the right time and from the appropriate services including additional support from external partner, or local authority and health services and The School will work with these partners for the best interests of the child.

6.26 Mobile phones

The School understands that many children have unlimited and unrestricted access to the internet via mobile phone networks which can lead to children being harmed or harming others online when at School. We are a boarding school and pupils need to be able to access their phones at times outside of teaching hours in order to contact their family and it is important for our International community to have access to technology platforms which enable efficient communication with their family in their home country. To protect children while they are at school our approach to mobile and smart technology is:

- UIII-UV The School is a mobile phone free environment during the School Day.
- LVI-UVI are permitted to bring their mobile phones to School, however these should be never seen, never used, never heard outside of permitted areas in the East Wing.
- Access to mobile phones outside of teaching hours depends on the age of our pupils.
- Mobile phones are kept in lockable cabinets in the Boarding House for those not able to bring them to School and access is given by a member of the Boarding House team at the relevant times for that pupil.

Full details of our approach to technology at School can be found in the *Behaviour and Sanctions Policy and Online Safety including Responsible Digital Device Use – for Pupils policy.*

7 Concerns about a member of staff

As defined on page 5 ***Staff*** *covers ALL staff on site, including ancillary supply and self-employed staff, contractors, Governing Council, and volunteers working with children. For the avoidance of doubt that also includes part-time staff, trainee teachers, temporary and supply staff including those attending on work experience and visiting staff, such as musicians and sports coaches, whether employed directly by the School or for services.*

7.1 Child Protection Concerns

7.1.1 If you are concerned about the behaviour of a colleague towards a pupil or pupils, you may worry that you have misunderstood the situation or wonder whether a report could jeopardise a colleague's career. However, any concern about a member of staff must be raised immediately (see section 7.3) **regardless of how unlikely it seems that there would be any substance to the concern**. No further action may be necessary, but it is important that such information is brought to the School's attention as soon as possible. You must remember that in all situations **the welfare of the child is paramount**.

Concerns about staff conduct may include the inappropriate or unauthorised use of AI or digital tools where this could harm a pupil, breach professional boundaries or compromise safeguarding. Examples include using AI to generate, alter or simulate pupil images, audio or video; uploading pupil personal data, safeguarding information or confidential School material into unauthorised AI tools; using AI-generated communications to impersonate pupils, parents, colleagues or the School; or using AI-enabled tools in a way that facilitates inappropriate one-to-one communication, grooming, coercion, harassment or boundary breaches.

7.1.2 Our reporting procedures for managing concerns/allegations against staff (including supply staff, trainee teachers, volunteers, Council Members and contractors) are in line with Part Four of KCSIE and local safeguarding partner arrangements. They apply when staff have, or are alleged to have:

- 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 that he or she may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

7.1.3 When you report a concern of this nature you can expect:

- The concern to be taken seriously.
- Your identity to remain confidential (if this is your wish), unless you are later required to act as a witness in court proceedings.
- To be protected as far as possible from victimisation or harassment.
- For an initial inquiry to take place to identify any action necessary.
- Children's Services and the Police to be involved if the concern relates to abuse or neglect or the potential commission of a crime.
- Written confirmation within the timeframes given in the *Whistleblowing Policy* that your concern has been received and is being dealt with.
- To be informed of the final outcome where possible, subject to the constraints of confidentiality and legal advice (please note, if restrictions are in place, or if we have received specific direction from the LADO or the Police, communication with the reporting party might not be permissible).

7.1.4 If you feel the School is not dealing with the matter in accordance with our procedures, you should follow the *Whistleblowing Policy*.

7.2 Abuse of Trust

7.2.1 All staff are made aware that inappropriate behaviour with or towards children is unacceptable. Staff should note that, under the Sexual Offences Act (2003), it is an offence for a person aged 18 or over and in a position of trust to (a) intentionally touch a child in a sexual way; (b) have a sexual relationship with a child, even if the relationship is consensual; (c) cause or incite a child to engage in sexual activity; (d) intentionally engage in sexual activity in the presence of a child; or (e) for the purposes of sexual gratification cause a child to watch a third person engaging in a sexual activity or look at an image of any person engaging in sexual activity. A position of trust could arise even if the member of staff does not teach the child. A child for these purposes is a person under the age of 18.

7.2.2 One to one teaching and working with pupils - Staff working in one to one situations with pupils present a higher level of safeguarding risk. Teachers and others should recognise this possibility and plan and conduct such meetings to ensure that they are transparent and open to scrutiny.

7.2.3 All staff receive training during the Annual Safeguarding Training in September of each year and at Induction relating to one to one situations, and Line Managers should ensure that each member of their teams have read and understood this Code of Conduct.

7.2.4 Where an individual meeting or lesson needs to take place, staff should consider their environment carefully to minimise the risk of misunderstanding. Staff should not arrange meetings with pupils in remote, secluded areas of the School. Any space in which private meetings take place should have visual access to the room or a door left open, or the member of staff must inform a colleague that a meeting, lesson or interview is taking place.

7.2.5 Should a pupil become distressed, anxious or angry during such a meeting, or should anything happen which could be misinterpreted or give rise to a concern, this must be reported to the DSL as soon as possible.

7.2.6 Late evening individual meetings in quiet places present significant risk and should be avoided.

7.3 Raising concerns about a member of staff (including supply staff, volunteers, trainee teachers and contractors)

7.3.1 Allegations that meet the harms threshold may relate to a member of staff who 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/children in a way that indicated they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Allegations that do not meet the harms test will be dealt with as a low level concern (see below).

7.3.2 Should a pupil disclose abuse by **a member of staff**, the situation must be reported to the Headmistress immediately.

Should the allegation be made against **the Headmistress**, the situation must be reported to the Chair of Council without informing the Headmistress.

The *Staff Code of Conduct* offers clear guidance to protect staff from allegations of abuse.

7.3.3 The School will consider whether an onward referral to the LADO is required and if a referral is required will work with the BSCP and Thames Valley Police, following their guidance, in order to deal with any allegations as swiftly as possible and always within 24 hours. In the case of an allegation against the Headmistress, the Chair will contact the LADO.

7.3.4 Allegations against a teacher who is no longer working at the School or no longer teaching will be referred to the Police and any relevant authorities. Historical (non-recent) allegations of abuse will be referred to the Police and to the LADO.

7.3.5 The Headmistress will inform the accused person about the allegation as soon as possible after consulting the LADO and Police, giving as much information as possible on the likely course of action. Parents of the pupil(s) involved will also be informed as soon as possible and kept informed about the progress of the case. Where appropriate, parents will also be made aware of the prohibition on reporting or publishing allegations against teachers in Section 141F of the Education Act (2002).

7.3.6 The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

7.3.7 Procedures will be applied with common sense. There will be a risk assessment of the potential harm they can inflict on pupils by staying in School. If the risk is deemed manageable, so that no pupil will come to harm, then there is no need to suspend that member of staff or require them not to talk to anyone in School about the matter during the investigation. The School has a duty of care to its employees: staff will be supported; for instance, they will be advised to contact their union and given advice on possible counselling available. A person will be appointed to keep the subject of an allegation informed on its progress.

7.3.8 The following definitions are to be used when determining the outcome of allegation investigations:

- **Substantiated**: there is sufficient evidence to prove the allegation.
- **False**: there is sufficient evidence to disprove the allegation.
- **Malicious**: there is sufficient evidence to disprove the allegation and there has been a deliberate act to

deceive.

- Unsubstantiated: this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

7.3.9 Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances, a comprehensive summary written record will be made of the allegation, details of how it was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and will be retained on the individual's personnel file in accordance with KCSIE (2026) and a declaration on whether the information will be referred to in any future reference.
A copy will only be provided to the individual concerned.

7.3.10 Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Headmistress will consider whether any disciplinary action is appropriate against the pupil(s) or staff member who made it, or whether the Police should be asked to consider appropriate action against the person responsible if they are not a pupil.

7.3.11 Allegations found to be false or malicious will be removed from the individual's personnel records unless the individual gives consent for the information to be retained. For all other allegations, including substantiated, unfounded and unsubstantiated allegations, a clear and comprehensive summary will be retained on the individual's personnel file, including how the allegation was followed up and resolved, action taken, decisions reached, the outcome, and whether the information will be referred to in any future reference. Records will be retained at least until the member of staff has reached normal pension age, or for 10 years from the date of the allegation if longer.

7.3.12 The School acts in accordance with locally agreed inter-agency procedures and KCSIE (September 2026) for dealing with allegations against staff, including always making a referral to the DBS where a person in regulated activity, whether paid or volunteer, has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. Where the individual is a teacher and the criteria are met, the School will also consider referral to the Teaching Regulation Agency.

7.3.13 Should the individual not be directly employed by the School then the School shares responsibilities with the employment agency business or teacher training provider. The School will remain responsible for gathering the facts and managing the safeguarding process while working closely with the employment agency or business, which will usually lead on any disciplinary action.

7.3.14 The School has an obligation to preserve records which contain information about allegations of sexual abuse, and this will be held in line with the School's Data Management and Retention Policy.

7.4 Low Level Concerns about staff, contractors or adults in School

7.4.1 Low level concerns can be reported by the low level concerns form which can be found on the staff handbook, or can be passed onto the Headmistress or DSL directly. The term "low level concern" does not mean that it is insignificant, but that the behaviour towards a child does not meet the "harm threshold". A low level concern is any concern, no matter how small, and even if no more than causes a sense of unease or a "nagging or niggling doubt", that an adult working in or on behalf of the School may have acted in a way that is

inconsistent with the *Staff Code of Conduct*, including inappropriate contact outside of School. It could also be a sense of unease as to the adult's behaviour particularly towards or around children. Examples of this behaviour could include, but is not limited to:

- Being over friendly with pupils.
- Having favourites.
- Taking photographs of pupils on their personal devices.
- Engaging with a pupil on a one-to-one basis in a secluded area.
- Using inappropriate sexualised, intimidating, or offensive language.
- Using AI or digital tools in a way that is inconsistent with the Staff Code of Conduct, including creating or altering pupil images, audio or video; entering pupil personal data or safeguarding information into unauthorised AI tools; or using AI-generated communications in a manner that could mislead, impersonate, manipulate or blur professional boundaries.

7.4.2 Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to abuse. If there is uncertainty as to whether a low level concern meets the harm threshold the LADO will be consulted for guidance.

7.4.3 The School takes all concerns about safeguarding seriously and recognises that addressing low-level concerns is important in creating and embedding a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored, and reinforced by all staff. A culture in which staff are confident and clear about expected behaviour of themselves and their colleagues, the delineation of boundaries and are empowered and know how to share concerns. The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

7.4.4 Only substantiated safeguarding allegations, and not low-level concerns, will be provided in references.

7.4.5 All low level concerns are recorded and stored on CPOMS StaffSafe for the duration of the individuals' employment with the School. The record will include details of the concern, the context in which the concern arose, the action taken and decisions reached (along with the rationale for them) and the eventual outcome. The name of the individual sharing the concerns will also be noted, although if the reporter wishes to remain anonymous this will be respected as far as possible). All records will be kept confidential and stored securely in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

7.4.6 Records of low level concerns are reviewed by the Headmistress and the Designated Safeguarding Lead on a termly basis to determine if potential patterns have emerged and to ensure all actions have been completed. Where a pattern of behaviour is identified consideration will be given to whether disciplinary procedures should be invoked, the matter should be escalated to the LADO and, more broadly, whether existing policies need to be revised and/or additional training is required to address wider cultural issues and minimise the risk of recurrence in the future.

7.4.7 Low level concerns which are shared about supply staff, trainee teachers and contractors will be notified to their employers.

7.5 Neutral Notifications

7.5.1 A neutral notification is where a member of staff either self-reports or reports a concern regarding a situation

they have found themselves in which could be misinterpreted, might appear compromising to others, and/or they believe they have behaved in such a way that they consider falls below the expected professional standards.

7.5.2 All neutral notifications should be communicated with the DSL, and the DSL will decide whether further action is required.

7.5.3 A neutral notification, along with recording a data breach, may also be appropriate where a member of staff has inadvertently used an AI tool or digital platform in a way that could be misunderstood, for example by entering confidential information into an unapproved tool, generating or editing pupil-related content without prior approval, or using AI-assisted communication that could appear personal, misleading or outside professional expectations. Reference should be made to the AI Policy and Data Protection Policy.

7.5.4 All neutral notifications are stored on CPOMS StaffSafe for the duration of the individuals' employment with the School. Reports relating to supply staff, trainee teachers and contractors are discussed directly with their employer.

7.5.5 The School will reflect and, as required, take steps to act on reported concerns in order to identify any patterns of concerning, problematic, inappropriate behaviour which may indicate an unacceptable culture, or weakness within the safeguarding system.

7.6 Whistleblowing

7.6.1 Where staff have a concern about the School's safeguarding practices, they should refer to the *Whistleblowing Policy*. All staff should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding. There will be no disciplinary action taken against a member of staff for making such a report provided it is done in good faith.

8 Management of Safeguarding

The School regularly reviews all policies and procedures and these are produced in line with the School's contextual safeguarding risk assessment, which recognises the influence of different environments on our pupils, to ensure that the School and all staff best understand the risks, understand how to engage with children and help keep them safe.

8.1 Safer Recruitment

8.1.1 The School takes seriously its responsibility to recruit staff who are suitable to work with children and who share the Schools commitment to the welfare of pupils. All necessary pre-employment checks on suitability of all staff (including agency staff, volunteers and contractors) are in accordance with Education (Independent School Standards) (England) Regulations (2014) and Keeping Children Safe in Education (Sept 2026) with particular reference to Part Three. The School's Safer Recruitment Policy and Access to Site Policy set out the steps taken to ensure that no-one is employed within, by or on behalf of the School who is unsuitable to work with children. The School will ensure that regulated activity requirements, including the removal of the volunteer supervision exemption introduced by the Crime and Policing Act 2026, are reflected in recruitment and checking processes.

8.2 Staff Induction and Training

8.2.1 All new staff undertake an online Level 2 safeguarding course, including Online Safety and the prevention from being drawn into terrorism, in addition to having a safeguarding briefing with the DSL or DDSL. All new staff must read and be familiar with:

- Safeguarding and Child Protection Policies and Procedures
- KCSIE (September 2026) – Part One in full. Relevant staff must also understand Part Five where this is relevant to their role.
- Staff Code of Conduct
- Acceptable use of ICT Policy – Staff
- Online Safety Policy and an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring
- Pupils' Behaviour Policy – Behaviour, Rewards and Sanctions Policy and Procedures
- Attendance Registration and School Roll Procedure
- Anti-Bullying Strategy
- Whistleblowing Procedure
- Data Protection and Codes of Practice for Confidentiality - Pupils
- Access to Site and Premises Policy
- Health and Safety Arrangements and Organisation
- AI Policy and Acceptable Use
- Restrictive Interventions Policy

Staff induction and annual safeguarding training include online safety and AI-related safeguarding risks, including AI-generated intimate imagery, deepfakes, AI chatbots or companion tools, AI-assisted grooming or coercion, impersonation, misinformation and disinformation, filtering and monitoring expectations, and the requirement to report AI-related concerns promptly to the DSL. Training reinforces that safeguarding concerns override normal behavioural or IT routes where online or AI-related conduct causes, or may cause, harm.

8.2.2 All staff are required to:

- Attend regular safeguarding updates from the DSL at the beginning of every academic year.
- Confirm that they have read and understood Part One of KCSIE each time KCSIE is updated by the Department for Education. This understanding is tested through questionnaires and discussions as appropriate.
- Undertake regular awareness training and receive updates to provide them with the relevant skills and knowledge to safeguard children effectively. The School provides these termly via, for example, e-bulletins, INSET days and staff meetings, in accordance with advice from MASH and ESAS.
- Know where and how to contact the DSL or DDSLs.
- Recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth, may feel helplessness, humiliation and some sense of self-blame.
- Recognise that children can be vulnerable and exploited by others: staff must be alert to the signs of vulnerability and/or susceptibilities to sexual harassment, sexual violence, violent extremism or indoctrination.
- Know how to ensure that staff behaviour and actions do not place pupils or staff at risk of harm or allegations of harm to a pupil.
- Know that any concerns about a member of staff's behaviour towards a pupil(s) is dealt with under the *Staff Disciplinary Procedure*, having particular regard to expert advice on child protection issues involving staff and our legal obligation to report any possible offences.
- Compulsory safeguarding refresher training (Level 2) for all staff will take place on a three yearly basis.

Records of all training are kept, including induction and ongoing training.

8.2.3 All contractors, work experience placements and visitors to the School receive the contact details of the DSL and guidance on what to do if they are concerned about a child or safeguarding practice at the School. The following measures are also implemented:

- identity checks and signing-in;
- DBS/barred list checks where required;
- supervision where checks are not required or not complete;
- safeguarding induction/briefing;
- no unsupervised pupil contact unless authorised;
- conduct expectations, including mobile phones, images, AI and confidentiality;
- how to report concerns to the DSL.

8.3 The Role of Governance

8.3.1 The full Governing Council annually reviews the School's safeguarding policies, including an update of the effectiveness of procedures and their implementation to facilitate a whole School approach to safeguarding. Safeguarding is on each agenda of the Council's Safeguarding, Pastoral and Boarding Committee and that of Full Council. The Safeguarding Governor carries out a termly inspection visit to School and works with the DSL team to produce and evaluate policies. The Governing Council Safeguarding team also carry out an annual deep dive visit.

8.3.2 The Council ensures that after any safeguarding-related incident, and as part of routine oversight, the Headmistress and DSL review procedures and the effectiveness with which safeguarding duties and child protection procedures have been discharged, including safer recruitment, information sharing, online safety, filtering and monitoring, and record-keeping, to:

- Ensure that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay.
- Approve amendments to safeguarding arrangements in the light of changing regulations or recommended best practice.

8.3.3 The Council approves the job description of the DSL (Appendix Six) and ensure they have sufficient time, funding, supervision and support to perform their duties.

8.3.4 All statutory checks and required training for members of Governing Council are in place in accordance with the *Recruitment, Induction and Retirement of Council Members Policy*.

8.3.5 All Governing Council members receive appropriate safeguarding and child protection training, including online safety, at induction and regularly thereafter. This equips them to provide strategic challenge and assure themselves that safeguarding policies and procedures are effective and support the delivery of a robust whole-school approach. Council members confirm that they have read and understood relevant sections of KCSIE (September 2026).

8.3.6 The Safeguarding Governor is familiar with Buckinghamshire Safeguarding Children Partnership (BSCP) procedures and guidance issued by the Department for Education.

8.3.7 The Governing Council complies with the DfE's Data Protection guidance for schools, ensuring staff know

how to comply with data protection law, develop their data policies and processes, what staff and pupil data to keep and the importance of good practices for preventing personal data breaches. They ensure measures are taken to safeguard children by protecting personal information and ensure the School has appropriate cyber security systems in place.

8.4 The Role of the DSL (and DDSLs)

8.4.1 The DSL is a member of the Executive Leadership Team.

8.4.2 The DSL has ultimate lead responsibility for all child protection matters in the School. Whilst some activities of the DSL will be delegated to a DDSL, the ultimate lead responsibility for child protection remains with the DSL.

8.4.3 The DSL and DDSLs have been fully trained for the demands of their role in safeguarding, prevent duties and inter-agency working. They undergo refresher training every two years and regularly attend courses with other child support agencies to ensure that they remain conversant with best practice and in line with LSCE advice.

8.4.4 During term time the designated safeguarding lead or deputy is always available for staff to discuss any safeguarding concern.

8.4.5 If the DSL is unavailable due to illness, leave or other circumstances the School will make all staff aware that they should go to a DDSL and will inform all staff when the DSL is back to work. All staff will be asked to send their safeguarding concerns to the confidential shared inbox dsl@wycombeabbey.com which both the DSL and DDSL can access. An out of office will be placed on the DSL email address in order to redirect internal emails to this email address with their question or concern. This will ensure concerns are received, monitored and acted upon without delay.

8.4.6 The DSL remains alert to concerns across holiday periods and is vigilant and will act upon concerns that come in during this time. Parents are written to ahead of the Summer holiday to explain how the monitoring system on their pupils work and that a member of the DSL team will be in contact with parents/carers should a concern flag during a holiday period. This duty is shared across the Summer holiday amongst the DSL and DDSL team.

8.4.7 The DSL is responsible for the following broad areas:

- Acting as the Senior Mental Health Lead for the School.
- Briefing all staff on the relevant contents of the above guidance and procedures.
- Acting as a source of support, advice and expertise for all staff, pupils, and parents.
- Always being available to discuss safeguarding concerns or ensuring that a DDSL is available to cover.
- Receiving reports of alleged or suspected child abuse within the School, or reported by a pupil relating to incidents outside the School, contacting the BFRT and taking other action in response, as set out in their Job Description (Appendix 6).
- Liaising with parents, relevant statutory and voluntary agencies.
- Pupils - Keeping clear and comprehensive written records of all concerns, including how the concern was followed up and resolved along with a note of any action taken, decisions reached and the outcome. They should ensure that such records are stored securely, away from the central pupil file and transferred securely to the DSL of any new School. All paper records are kept locked in the DSL's office, with access restricted to the DSL and the Headmistress's Office. An electronic record of

information is stored in CPOMS, and access is restricted to the DSL, DDSLs, Housemistress, Health Centre Manager, Individualised Care Support Worker and Headmistress's Office.

- Ensuring receipt of new pupil information from other Schools and information is shared with appropriate staff members where there is a safeguarding concern or special educational need.
- Ensuring that a pupil's Child Protection File is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. Transferred files will include a clear, structured summary identifying current safeguarding concerns, relevant context and any ongoing support needs – this may happen as a phone call and this will be recorded in the pupils CPOMS file.
- Particular care will be given to distinguish between current safeguarding concerns and historic information, ensuring past issues are presented with appropriate context.
- The DSL will review all incoming safeguarding information and will seek clarification if information is unclear or incomplete.
- The DSL will consider what information needs to be shared with other relevant staff and when this should be shared.
- Monitoring and evaluating the effectiveness of the School's safeguarding arrangements, including online safety, cybersecurity, filtering and monitoring.
- Referring all allegations against members of staff directly to the Headmistress. Where the Headmistress is the subject of an allegation or concern, reports will be made to the Chair of Council without informing the Headmistress.
- Ensuring that Safeguarding arrangements for responding to allegations relating to an individual or organisation using the School premises, whether in term time or out of term, are followed in line with this policy.

Member of Staff	Designated Safeguarding Lead
Last Review Date	September 2026 (Updated October 2026)
Approved By Council	September 2026

Appendices

Appendix One – Where do I turn? Poster

Where do I turn?

WYCOMBE ABBEY



Supporting you throughout your time in education is at the heart of what we do here at School. Support comes in many ways and your needs can vary at different times.

Independent Listener

The School has a nominated independent listener who you can contact via telephone on **01494 896311**.

House, Tutors and Teaching Staff

Your Housemistress, Deputy Housemistress, Matron, Head of Section, Tutor, the Headmistress, Deputy Head (Pastoral), Director of Safeguarding and Pupil Welfare and other members of staff are always ready to help. You can talk to any member of staff you feel comfortable talking to. They will always do their best to support and guide you.

The Chaplain is there for you to talk to at any time. You can contact her to arrange a time to meet by emailing **stanawayp@wycombeabbey.com**.

Peer Mentors

The School has a number of trained Peer Mentors. These Lower Sixth pupils are available to meet either in person or via MS Teams. Please see the posters around School for further information.

The School Safeguarding Team

Safeguarding your welfare and wellbeing is our main priority. Every member of staff is available for you to talk to if you are worried or concerned.

The School has a designated safeguarding team who are available to speak to. If you have any concerns about a pupil's Wellbeing or any safeguarding issues, please contact the Director of Safeguarding and Pupil Welfare.

Outside Agencies and Advocacy

There are always people to turn to in School but there are also outside agencies who are available. A comprehensive list is available on the important information for pupils' pages on SharePoint.

- **The Office of the Children's Commissioner**
  0800 528 0731
  advice.team@childrenscommissioner.gsi.gov.uk
- **Child Line**
  0800 1111
  childline.org.uk
- **Get Connected (The Mix)**
  0808 808 4994 (11:00 - 23:00 daily)
  themix.org.uk
- **The Samaritans**
  01494 432000
  samaritans.org
- **Beat Eating Disorders**
  0808 801 0711 (15:00 - 22:00 daily)
  beateatingdisorders.org.uk
- **Kooth**
  kooth.com
- **National Youth Advocacy Service**
  0800 808 1001
  nyas.net
- **Shout**
  Text 85258
  giveusashout.org

Health and Wellbeing Centre

You can always talk with staff at the Health and Wellbeing Centre. There are both nurses and counsellors available for you to speak to.

One of the School Doctors:
Wycombe General Hospital, Queen Alexandra Road, High Wycombe, HP11 2TT
Dr S Baig, Dr F Carter and Dr B Haynes
Tel: **01494 521044**

OR the School Counsellors:
You can arrange a counselling session by emailing **counselling@wycombeabbey.com**.

Sharing an Anonymous Concern

You can share anonymous concerns with the School's safeguarding team via the "Safeguarding and Anti-Bullying" page on MyWycombe. There is a QR code for this page below. Each submission will be followed up by the safeguarding team.

This service is not monitored 24 hours a day and may not be monitored during the school holidays. If you have immediate concern during term time, please speak to a member of staff.

Find more information about pupil support on the **Where do I turn** page of ***My Wycombe***.
Scan the QR Code to go straight there.

Code: WDITV2

Appendix Two – Signs of Abuse

Possible signs of abuse include the following (but are not limited to these and these signs do not necessarily mean that abuse is occurring):

- The pupil says that she has been abused or asks a question which gives rise to that inference.
- There is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries.
- The pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the pupil's behaviour. For example, they may become aggressive, challenging, disruptive or withdrawn.
- The pupil does not want to change clothes in front of others or participate in physical activities.
- The pupil is having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry.
- The pupil talks about being left home alone, with carers that appear to be inappropriate or with strangers.
- The pupil is regularly missing from school or education.
- The pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons.
- The pupil's development is delayed in terms of emotional progress.
- The pupil suddenly loses or gains weight.
- The pupil drinks alcohol regularly from an early age.
- The pupil is concerned for younger siblings without explaining why.
- The pupil talks about running away.
- The pupil shies away from being touched or flinches at sudden movements.
- The pupil demonstrates undue anxiety, over-reacts to problems and demonstrates an excessive fear of making mistakes.
- The pupil appears neglected, e.g. dirty, hungry or inadequately clothed.
- The pupil is reluctant to go home, or has been openly rejected by their parents or carers.

Signs of Grooming:

The signs of grooming are not always obvious. Groomers will go to great lengths not to be identified. Some actions associated with those grooming children in schools may include:

- Meeting pupils secretly.
- Collusive behaviours designed to cultivate dependence, such as:
    - Unprofessional conversations about other members of staff
    - Breaking School Rules or providing pupils with alcohol
    - 'Friending' pupils on social media platforms, contrary to the Staff Code of Conduct

Pupils who are being groomed at School or elsewhere may

- Be very secretive, including about what they are doing online.
- Have unexplained absences.
- Have older friends or girlfriends/boyfriends.
- Go to unusual places to meet friends.
- Have new belongings such as clothes or mobile phones they can't or won't explain.
- Have access to drugs and alcohol.

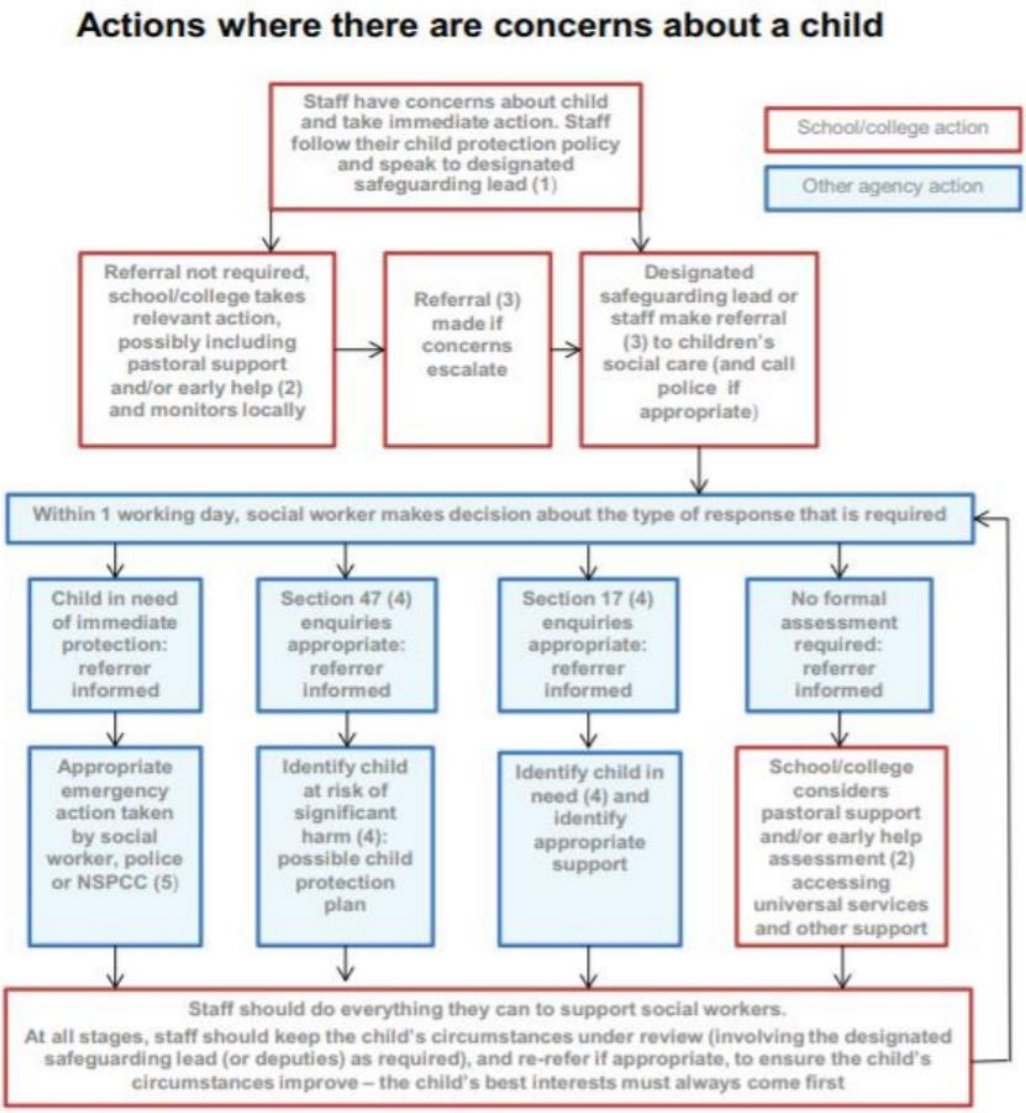
In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age may be observed.

Appendix Three - BSCP Continuum of Need



https://www.buckssafeguarding.org.uk/childrenpartnership/professinals/continuum-of-need/

Appendix Four - Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.

(5) This could include applying for an Emergency Protection Order (EPO).

Appendix Five - Useful Contacts and Information Resource

NSPCC https://www.nspcc.org.uk/	0800 800 5000
Childline https://www.childline.org.uk/	0800 11 11
Kidscape – Parent Advice Line (bullying) Mon-Wed from 9.30am to 2.30pm https://www.kidscape.org.uk/	0207 823 5430
Female Genital Mutilation Helpline (NSPCC) https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/female-genital-mutilation-fgm/	0800 028 3550 fgm.help@nspcc.org.uk
Samaritans – Helpline https://www.samaritans.org/	116 123
Forced Marriages Unit – Foreign and Commonwealth Office Forced marriage – gov.uk	0207 008 0151
Crimestoppers https://crimestoppers-uk.org/	0800 555 111
RU Safe? Barnardos – Children/Young People Sexual Exploitation Service https://www.barnardos.org.uk/what-we-do/services/rusafe-bucks-exploitation-service	01494 785 552
CEOP – Child Exploitation and Online Protection	https://www.ceop.police.uk/Safety-Centre/
Lucy Faithfull Foundation's 'Shore Space'.	https://shorespace.org.uk/

Appendix Six - Job Description – Assistant Head (Safeguarding and Pupil Welfare)



Job description – Assistant Head (Safeguarding and Pupil Welfare)

Aim: The Assistant Head (Safeguarding and Pupil Welfare) is a member of the School's Executive Leadership Team. As the Designated Safeguarding Lead (DSL) this member of staff has lead responsibility for dealing with safeguarding and child protection issues, including online safety, managing referrals, raising awareness, providing training and advice to staff, liaising with the Local Authority and working with other agencies where required. In addition, this role works closely with the Deputy Head (Pastoral) on a broad range of aspects in relation to pastoral care as well as leading on the Health Centre and School's Counselling provision.

Accommodation: This is a residential role. Accommodation is provided and the post holder is required to be in residence on site during term time. Senior leaders are required to be at work during some of the School holidays.

Reports to: The Headmistress

Areas of Responsibility:

Leadership and Management

- Be a visible presence and lead by example, providing inspiration and motivation. Embody for pupils, staff, Council, parents and the wider community our shared vision, purpose and strong leadership of the School.
- Responsible for leadership in matters relating to safeguarding and child protection throughout the School, assisting the Headmistress and the Executive Leadership Team to create a culture of safeguarding across the School.
- Formulate and review the sections of the Strategic Plan relating to safeguarding, child protection and pupil welfare.
- Where requested to do so, attend meetings of Council and take a role on relevant sub-committees.
- Lead and manage the Safeguarding Team which includes Deputy DSLs.
- Liaise closely with the Housemistresses, attending their meetings as appropriate and maintaining close contact with boarding houses through regular informal visits.

- Lead on all aspects of Online Safety and to liaise with the Bursar and Head of IT on the technical provision of filtering and monitoring.
- To oversee the Peer Coaching Service, run by the Chaplain.
- Liaise closely with the Deputy Head (Pastoral) on pupil welfare to help promote educational outcomes by sharing information about welfare, safeguarding and child protection issues that pupils, including pupils with a social worker, are experiencing, or have experienced with teachers and house staff. Working with the Learning Enhancement Team to understand their academic attainment and additional support required.
- Lead on all aspects of Counselling provision and line manage the Health Centre to have oversight and strategic input to the work of our Schools Doctors and Nurses. Acting as the lead for Inclusion and Diversity.
- Be responsible for the oversight of the needs of all pupils on significant bursaries, acting as a point of contact for them and their parents both before their arrival at Wycombe Abbey and once they are at the School (working closely with the Director of Admissions, Housemistresses and Tutors, as required).
- Have oversight of welfare plans for individual pupils, working closely with Housemistresses and Tutors, as required and chairing Case Conferences with all interested parties (including parents) as necessary.
- Oversee communications with parents which relate to welfare and safeguarding.
- Keep comprehensive written records.
- Liaise closely with HR regarding the appointment of staff in relation to safeguarding.

Inspection

- Work with the ELT and other staff to prepare the School for inspection with respect to the relevant areas of responsibility
- Keep abreast of developments in inspection criteria and implement plans to achieve excellence against the standards required

Manage Referrals

- Refer cases of suspected abuse to the Local Authority children's social care as required
- Refer cases to the Channel programme where there is a radicalisation concern as required
- Provide support for staff who are involved in cases requiring referral
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- Refer cases where a crime may have been committed to the Police as required
- Ensure that the School reviews its practice after each significant case by conducting 'lessons learned' exercises.

Work With Others

- Liaise closely with the Head regarding all safeguarding and child protection issues
- Liaise closely with the members of Governing Council responsible for safeguarding and for pupil welfare
- Liaise with the Chair of Governing Council ("case manager" as per Part four of KCSIE) and the Local Authority Designated Officer in cases which concern a staff member
- Liaise with staff on matters of safety and safeguarding (including online and digital safety)
- Act as a source of support, advice and expertise for all staff.

Training

The DSL should undergo training to provide the knowledge and skills required to carry out the role. This training should be updated at least every two years.

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

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to, and understands, the School's Safeguarding and Child Protection Policy and Procedures, especially new and part-time staff
- Be alert to the specific needs of vulnerable pupils
- Understand relevant data protection legislation and regulations, especially UK GDPR and DPA2018
- Understand the importance of information sharing, both within School, and with the three safeguarding partners, other agencies, organisations and practitioners
- Keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. Including instances where referrals were or were not made to another agency
- Understand and support the School with regard to the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation
- Understand the unique risks associated with online safety and work with relevant IT experts to keep children safe whilst they are online at school
- Take steps to address the additional risks that vulnerable children face online, for example, from online bullying, grooming and radicalisation
- Encourage a culture among all staff of listening to children and taking account of their wishes and feelings.
- Responsible for safeguarding and child protection training and resources

Raise Awareness

- Ensure the School's child protection policies are known, understood and used appropriately
- Ensure the School's Safeguarding and Child Protection Policy and Procedures are reviewed annually (as a minimum), and the implementation is reviewed regularly
- Ensure the Safeguarding and Child Protection Policy and Procedures are available publicly and parents are aware that referrals about suspected abuse or neglect may be made and the role of the School in this

Child Protection File

- Where children leave the School, ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.
- In addition to the child protection file, the Designated Safeguarding Lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

- During term time the Pupil Welfare/Designated Safeguarding Lead (or a DDSL) should always be available for staff in the School to discuss any safeguarding concerns.
- The Pupil Welfare/Designated Safeguarding Lead is also responsible to ensure that a member of the team is available during periods of absence and holiday periods as required.
- Manage the DSL Team rota for checking the shared email address: dsl@wycombeabbey.com
- Any other reasonable tasks as required by the Head.

Person Specification

Specialist Knowledge and Experience

- Successful track record leading and managing in a pastoral capacity
- Experience of managing at a senior level
- Proven ability to innovate and implement change at a senior level
- Commitment to educational excellence and the boarding ethos
- Proven ability to deal effectively and appropriately with highly sensitive issues.

Leadership

- Effective team management skills
- Sets high ethical, personal and professional standards

Resilience

- Proven ability to remain calm and self-controlled under pressure and to keep difficulties in perspective.
- Reacts well to change and is a driver of change.
- Seeks out and tackles demanding issues.

Motivation and flexibility

- Enthusiastic and motivated approach. Able to adapt to changing demands and conditions and maintain a

positive outlook.

Organisation

- Highly effective organisational flair with attention to detail and intellectual flexibility.
- Able to provide a sense of balance in complex situations and resilient to pressures.

Communication

- A highly effective communicator at all levels, adapting style to suit the audience.

Creativity and Innovation

- Creates new and imaginative approaches to work-related issues. Identifies fresh approaches and shows a willingness to question traditional assumptions.

Special Conditions.

- Post holder will be subject to an enhanced Disclosure and Barring Service check.

Child Protection Statement

The post holder's responsibility for promoting and safeguarding the welfare of children and young persons for whom s/he is responsible, or with whom s/he comes into contact will be to adhere to and ensure compliance with the School's Child Protection Policy Statement at all times. If in the course of carrying out the duties of the post the post holder becomes aware of any actual or potential risks to the safety or welfare of children in the School s/he must report any concerns to the Headmistress or nominated safeguarding council member or Chair of Council.

The School values of Trust, Encouragement, Mutual Respect, Dynamism, Excellence, Innovation, Service and Balance should be followed to enhance working relationships and to benefit the whole School community.

The duties and responsibilities contained within this job description may change from time to time according to the requirements of the role. This document is not intended to have a contractual effect.

Appendix Seven

Arrangements for the Hire of School premises involving children

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation (Hirer) has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the School roll.

The School will ensure that the DSL or DDSL can be contacted and/or is available at all times the School premises are in use, whether that activity is a School or non-school activity and regardless of whether the children attending are on the school roll.

The School will ensure that safeguarding requirements are included in any agreement for use of the school premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and that failure by the provider to comply with this will lead to termination of the agreement. When considering the safeguarding arrangements any providers have in place the School will have regard to the DfE's non-statutory guidance *Keeping children safe in out-of-school settings* (April 2022*) and After school clubs, community activities, and tuition (safeguarding for providers)* February 2026).

The School will ensure that all Hirers, irrespective of whether in term time or non-term time, have the following documentation and checks in place. The requirement is detailed in the formal contract for all Hiring and Lettings of the School facilities.

1. Health and Safety

   Hirers Health and Safety Policy
   Hirers Risk Assessments for each activity, use of accommodation
   Hirers Fire Safety and evacuation Plan
   Written confirmation that the Hirer has at least one emergency contact for each child and that the Hirer has recorded any medical conditions and allergies for staff and students.

2. Safeguarding and Child protection

   Hirers Safeguarding and Child Protection policy including procedures for dealing with safeguarding incidents
   Written confirmation from the Hirer of the following:
   - All staff having read and understood the Hirer's Safeguarding and Child Protection policy
   - All staff having received training on issues that can put children at risk of harm
   - That there is a clear procedure on what to do if there is a concern about a member of staff
   - The name(s) of an appointed, qualified, Designated Safeguarding Lead

3. Suitability of staff and volunteers

   A list of all staff and regular Visitors on site
   Written confirmation that all staff attending the site have been subject to all necessary Safer Recruitment checks including DBS vetting, Right to Work in the UK, Overseas Checks, Qualifications and References, and that no adverse issues have arisen from these checks.

Staff Code of Conduct Policy – read and understood by all staff

4. Governance

A clear complaints procedure
Whistleblowing Policy

Dealing with safeguarding concerns and allegations

The School may receive an allegation or concern relating to an incident that happened when an individual or organisation was using the School premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the School will follow this Safeguarding and Child Protection policy and procedures, including informing the LADO.

Contractors on Site

Hirers are made aware that the School undertakes essential maintenance, building refurbishments and site builds during the School holidays, during their hire period, and that they are responsible for the supervision of their children and participants at all times. As a minimum the School has the following arrangements in place when employing contractors to work on site during the holidays. Further information is detailed in the *Access to Site Policy*.

Each individual contractor will:

- produce an ID on arrival;
- sign in on arrival and departure so there is a record of who is on-site;
- display a visitor lanyard (white or green), depending on their task and frequency of visit
- receive a site briefing which includes safeguarding, H&S, fire alarm, welfare facilities, out-of-bounds areas;
- read and acknowledge understanding of the Contractor Handbook – Rules and Guidance;
- read and acknowledge understanding of the Safeguarding and Child Protection procedures for Contractors; and
- where appropriate to the works, provide a written risk assessment/method statement outlining risks and mitigations.

Member of Staff	Bursar/ DSL
Last Review Date	August 2026

Version - HIRERSAFE/v6/2026