Child Protection & Safeguarding Policy

Document control	
Document title	Child Protection & Safeguarding Policy
Author	Mr Sean Hatton
Document status	Pending approval
Approved by	DSL (pending approval from Education Committee Oct 2026)
Effective date	September 2026
Version	V.17
Date of next review	September 2027
Location	Website/OneNote/Network

Version	Author	Date	Changes
V.8	DSL	Nov. 2020	Updated Government guidance documents
V.9	DSL	Sept. 2021	Updated Government guidance documents
V.12	DSL	August 2022	Updated to reflect KCSIE Sept 2022
V.14	DSL	August 2023	Updated to reflect KCSIE Sept 2023
V.15	DSL	August 2024	Updated to reflect ISBA template, KCSIE 2024 changes (15.1 Approvals only)
V.16	DSL	Sept. 2025	Updated to reflect KCSIE 2025, changes to staffing in an interim year, further information on Operation Encompass
V.17	DSL	Sept 2026	Updated to reflect changes to KCSIE and WTTSC 2026

CONTENTS

Section		Page
1.	External Contacts	4
2.	School Contacts	6
3.	Policy Statement	7
5.	Definitions of child protection and safeguarding and types and signs of abuse	9
6.	Procedures for dealing with concerns about a child	9
7.	Contextual Safeguarding	11
8.	Family Help	11
9.	What staff should do if they have concerns about a child	13
10.	What staff should do if a child is in danger or at risk of harm	13
11.	What staff should do if a child is seen as at risk of radicalisation	13
12.	What staff should do if they discover an act of Female Genital Mutilation ("FGM")	14
13.	What staff should do if they discover a child is at risk from harm from serious violence	14
14.	How should staff respond to an incident of nudes/semi-nudes being shared by pupils	15
15.	What staff should do if a child is absent from education	17
16.	What staff should do if a child needs a social worker	18
17.	What staff should do if a child requires mental health support	18
18.	What staff should do if they have safeguarding concerns about a staff member	19
19.	What staff should do it they have concerns about safeguarding practices in the School	19
20.	Dealing with safeguarding concerns or allegations made about staff	24
21.	Procedure for managing allegations about supply teachers and contractors	27
22.	Dealing with concerns about organisations or individuals using school premises	28
23.	Dealing with concerns or allegations (that do not meet the harm threshold)	29
24.	Safer recruitment	30
25.	Management of safeguarding	31
26.	Training	33
27.	DSL and Safeguarding Team	34

28.	**Oversight of safeguarding (reviewing policies and procedures)**	**35**
29.	**The school's arrangements to fulfil other safeguarding responsibilities**	**35**
30.	**Filtering and monitoring**	**36**
31.	**Relationships Education and Relationships and Sex Education ("RSE")**	**37**
32.	**Looked after children (LAC) and Previously Looked After Children (PLAC)**	**38**
33.	**Arrangements for visiting speakers**	**38**
34.	**Arrangements for use of school premises for non-school activities**	**39**
35.	**Operation Encompass**	**39**
36.	**Use of mobile phones and cameras**	**40**
37.	**Appendix 1 – Signs and types of abuse**	**40**
38.	**Appendix 2 – Job description for the Designated Safeguarding Governor**	**55**
39.	**Appendix 3 – Termly Safeguarding check**	**56**
40.	**Appendix 4 - Glossary of abbreviations**	**57**

Luckley House School

September 2026

CHILD PROTECTION AND SAFEGUARDING POLICY

1. External Contacts

Local Authority Designated Officer Wokingham Borough Council (WBC)	TEL: 01189 746141 EMAIL: Lado@wokingham.gov.uk REFERRAL FORM: LADO FORM
Local Authority Children's Social Services	TEL: 0118 908 8002 EMAIL: triage@wokingham.gov.uk OUT OF HOURS EMERGENCY DUTY TEAM TEL: 01344 351999
Multi-Agency Safeguarding Hub	MARF: MARF FORM
Support and Advice about Extremism	Police Anti-terrorism hotline: 0800 789321 Emergency: 999 Non-emergency: 101 Information: www.thamesvalleypolice.uk Wokingham Borough Council Tel: 0118 974 6000 Email: BWSCP@westberks.gov.uk **Department for Education** NON-EMERGENCY NUMBER: 020 7340 7264 EMAIL: counter.extremism@education. gov.uk
NSPCC Whistleblowing Advice Line	ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 (Monday to Friday 8am to 8pm; weekends between 9am and 6pm) EMAIL: help@nspcc.org.uk

NSPCC Report Abuse in Education Advice Line	TEL: 0800 136 663 EMAIL: help@nspcc.org.uk
Disclosure and Barring Service	ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@dbs.gov.uk
Teaching Regulation Agency	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
Ofsted Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm) EMAIL: CIE@ofsted.gov.uk
Independent Schools Inspectorate	TEL: 0207 6000 100 EMAIL: concerns@isi.net

2. School Contacts

Governors	**Chair of Governors** Mrs Claire Tao **Nominated Safeguarding Governor** Revd George Curry The Chair and Safeguarding Governor can both be contacted through the Bursar Email: bursar@luckleyhouseschool.org
Designated Safeguarding Lead ("DSL") and Deputy Designated Safeguarding Lead ("DDSL")	**DSL:** Mr Sean Hatton **Tel:** 0118 9784175 or 07540 236 203 **Email:** cp.records@luckleyhouseschool.org • **DDSL's:** • Mr Matt Humphrey • Mrs Julie Rumble • Mr David Rose **Tel:** 0118 978 4175 **Email**: matthew.humphrey@luckleyhouseschool.org Julie.rumble@luckleyhouseschool.org David.rose@luckleyhouseschool.org •
Designated Teacher for Looked After Children	Mr Sean Hatton Tel: 0118 978 4175 Email: cp.records@luckleyhouseschool.org
Head	Mrs Claire Gilding-Brant Tel: 0118 978 4175 Email: LHShead@luckleyhouseschool.org

3. Policy Statement

This Policy applies to Luckley House School, including Day and Boarding communities. This Policy is reviewed and updated annually (as a minimum) and is available on the School website or staff share drive under LHS Policies.

This policy has regard to the following guidance and advice:

- *Keeping Children Safe in Education* (September 2026) ("*KCSIE*") – statutory guidance in force from 1 September 2026
    - *The School will comply with all applicable statutory requirements relating to disqualification from childcare activity and will follow the current Department for Education guidance where applicable. KCSIE also provides links to various toolkits and additional advice and support*
- *Working Together to Safeguard Children* (March 2026) ("*WTTSC*") – statutory guidance on multi-agency working to help, support and protect children and their families.
    - *WTTSC* refers to the non-statutory advice: *Information sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers* (May 2024)
- *Prevent Duty Guidance: Guidance for specified authorities in England and Wales December 2023.*
- *Relationships Education, Relationships, and Sex Education (RSE) and Health Education* (September 2026).
- *Behaviour in Schools (February 2024)*
- Children's Wellbeing and Schools Act 2026, including the statutory information-sharing duty relating to safeguarding and promoting the welfare of children
- *Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (July 2026)*
- *Children Missing Education (September 2025)*
- *Digital and technology standards in schools and colleges (March 2025)*
- *After school clubs, community activities, and tuition (safeguarding guidance for providers) (February 2026)*
- The Charity Commission guidance *Safeguarding and protecting people for charities and trustees* (June 2022)
- *The National Minimum Standards for Boarding Schools (May 2026) – applicable to the School's boarding provision and used alongside KCSIE 2026 and other relevant statutory guidance.*

This policy also considers the procedures and practice of Wokingham Borough Council (WBC) as part of the multi-agency safeguarding arrangements set up by the Berkshire West Safeguarding Children's Partnership.

Equality Act 2010

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 re-assignment, pregnancy and maternity, or sexual orientation. In the context of safeguarding, the School will consider how to support pupils about particular protected characteristics to meet their specific needs. The School will also consider their duty to make reasonable adjustments for disabled pupils.

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.

Inclusive and Anti-Discriminatory Safeguarding

The School recognises that discrimination, racism, prejudice and unequal treatment can affect children's experiences of safeguarding and may affect whether concerns are identified, reported and responded to appropriately.

Safeguarding practice will therefore be inclusive, anti-discriminatory and responsive to the individual circumstances of each child.

Staff should consider whether factors such as disability, SEND, race, ethnicity, religion or belief, sex, sexual orientation, gender reassignment, socioeconomic circumstances, care experience or other characteristics may affect a child's experience of harm or their ability to communicate concerns.

Staff must challenge discriminatory behaviour and must not allow stereotypes or assumptions to influence safeguarding decisions.

4. Concerns about a child

The School has a duty to always consider the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility. The School adopts a 'whole school' approach to safeguarding. This means involving everyone in the School, and ensuring that, safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Parents are encouraged to raise safeguarding concerns with the School so that they can be considered and acted upon appropriately. Parents may also contact the Independent Schools Inspectorate (ISI) where they wish to raise concerns about the School's safeguarding arrangements or where they consider that concerns have not been appropriately addressed.

The School has arrangements for listening to children and providing early help. Details of these arrangements are displayed in all classrooms. Pupils can also use Pupil Voice to report a concern.

The relevant response form can be found on the following link: Pupil Voice

5. Definitions of child protection and safeguarding and types and signs of abuse

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. Child protection is part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

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

- physical abuse;
- emotional abuse;
- sexual abuse; and/or
- neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

6. Procedures for dealing with concerns about a child

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will act and share information that might be critical in keeping children safe.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* (May 2024) supports staff who must make decisions about sharing information. The Board of Governors recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under the Data Protection Act 2018, the UK General Data Protection Regulation ("UK GDPR"), and the Data (Use and Access) Act 2025, must not be allowed to stand in the way of safeguarding and promoting the welfare of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe If in doubt about what information can and should be shared, staff should speak to the DSL. The School will comply with the statutory information-sharing duty

introduced by the Children's Wellbeing and Schools Act 2026 when the duty applies. Where staff hold information that they reasonably consider relevant to safeguarding or promoting the welfare of a child, they should share information in accordance with the statutory duty, applicable statutory guidance and the School's information-sharing procedures.

The Board of Governors will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that the lawful processing and sharing of personal data, including special category personal data, depends on the circumstances and the applicable lawful basis and processing condition. Staff should not assume that consent is always required, nor should they assume that safeguarding concerns automatically provide a lawful basis in every circumstance. Where there is uncertainty, staff should seek advice from the DSL and follow the School's data protection and information-sharing procedures.

When a child makes a disclosure or shares a safeguarding concern, staff should:

- listen carefully and remain calm;
- take the child seriously;
- allow the child to speak without interruption;
- avoid leading questions or attempting to investigate;
- use only open and necessary questions to establish sufficient information to safeguard the child;
- reassure the child that they have done the right thing by speaking to an adult;
- explain that the information cannot be kept secret and will need to be shared with appropriate people to keep them safe;
- avoid making promises that cannot be kept;
- consider the child's immediate safety and welfare;
- report the concern to the DSL as soon as possible; and
- make an accurate written record of what was said, using the child's own words where possible.

Staff must not delay responding to a disclosure because another member of staff is not immediately available.

Staff must not investigate the allegation themselves or seek to establish whether the allegation is true. Responsibility for assessment and investigation rests with the appropriate safeguarding agencies.

All concerns, discussions, and decisions (including the rationale for those decisions) made under these procedures should be recorded in writing. This includes instances where referrals were or were not made to another agency, such as children's social care or the Prevent programme. This will help if/when responding to any complaint about the way a case has been handled. 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. All concerns should be recorded *via* the My Concern platform. If My Concern cannot be accessed, then

a written record should be made including the date, time and place of the conversation and details of what was said and done by whom and in whose presence and signed by the person making it. Where the allegation relates to harmful sexual behaviours, the disclosure should be managed, if possible, with two members of staff present, preferably one of them being the DSL or DDSLs, however, a member of staff should not delay a disclosure whilst trying to find a second adult. The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts One and Two of KCSIE.

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are considered when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The School implements 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 interest is always central to the School's decision-making process.

7. Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

8. Family Help

Family Help is intended to provide children and families with timely, co-ordinated support before difficulties escalate to the point where statutory child protection intervention is required.

Family Help includes support provided through universal/community services and targeted support, including support provided under Section 17 of the Children Act 1989.

Staff should remain professionally curious about children and families who may benefit from additional help and should not wait for concerns to reach a child protection threshold before seeking appropriate support.

Any child may benefit from family help, but all staff should be particularly alert to the potential need for 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 showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement as association with organised crime groups or county lines
- Is frequently missing/goes missing from education, home or care
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, or in Alternative Provision or a Pupil Referral Unit
- Is misusing drugs and other alcohol themselves
- Is at risk of modern slavery, trafficking, and/or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending
- Is a privately fostered child
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage

Where a child or family may benefit from Family Help, staff should discuss the concern with the DSL. The DSL will consider the child's needs, the family's circumstances, existing support and the relevant local safeguarding threshold arrangements.

Where appropriate, the School will:

- work with the child and family to identify their needs;
- involve parents/carers wherever it is safe and appropriate to do so;
- coordinate with relevant education, health, social care and voluntary-sector services;
- contribute information to assessments and Family Help plans;
- monitor whether support is improving outcomes for the child; and
- escalate concerns where the child's needs are not being met or where the level of risk increases.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, the matter must be referred to children's social care in accordance with local safeguarding procedures. Family Help must not be used as a substitute for a child protection referral where the threshold for statutory intervention is met.

The School works within the safeguarding arrangements established by the Berkshire West Safeguarding Children Partnership (BWSCP) and Wokingham Borough Council. The School will follow current local safeguarding procedures, thresholds and referral arrangements published by these bodies.

9. What staff should do if they have concerns about a child

If staff (including governors, supply staff, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care.

As set out above, staff should not assume that somebody else will act and share information that might be critical to keep a child safe; they should maintain an attitude of "it could happen here". If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

10. What staff should do if a child is in danger or at risk of harm

If staff (including governors, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the police. Anyone can make a referral. Any such referral must be made immediately, or as quickly as reasonably practicable, of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Within one working day of receiving a referral, local authority children's social care should acknowledge receipt to the referrer and decide about the next steps and the type of response required. The referrer should follow up if this information is not forthcoming and should use local escalation procedures where concerns are not appropriately addressed. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School's Safeguarding Children Board is Berkshire West Safeguarding Children Partnership.

A full copy of their local procedures can be found at:

https://www.berkshirewestsafeguardingchildrenpartnership.org.uk/scp/wokingham/concerned-about-a-child-in-wokingham

For safeguarding concerns relating to a child in Wokingham, the School should contact Wokingham Borough Council's Children's Safeguarding and Social Care Team on **0118 908 8002** or **triage@wokingham.gov.uk**. In an emergency or where a child is in immediate danger, call **999**. Outside normal working hours, contact the Emergency Duty Service on **01344 351999**.

Where pupils are engaged in one-to-one teaching, the Staff Behaviour Policy has advice for staff such as peripatetic music teachers and sports staff regarding one-to-one contact and appropriate touch for the purposes of effective instruction. All classrooms have vision panels and teaching timetables are publicised *via* SIMS.

11. What staff should do if a child is seen as at risk of radicalisation

Staff should follow the School's normal referral processes when there are concerns about children who may be susceptible to radicalisation into terrorism. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999. Advice and support can also be sought from children's social care.

The School, in recognition that pupils may be susceptible to being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the police) which assess how their learners or staff may be at risk of being radicalised into terrorism, including online. Such risk assessments are discussed with the Head, DSL and DDSLs and governor responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to ensure that those at risk of radicalisation are identified, and appropriate support is provided and is regularly revised as needed.

12. What staff should do if they discover an act of Female Genital Mutilation ("FGM")

FGM is a form of child abuse and is illegal in the UK.

Where a member of staff has a concern that a child may be at risk of FGM, they should report the concern immediately to the DSL or a deputy and follow the School's safeguarding procedures.

Teachers have a specific statutory mandatory reporting duty. A teacher must personally report to the Police where they discover, either through disclosure by the victim or through visual evidence, that FGM appears to have been carried out on a girl under 18. Teachers should not examine pupils for signs of FGM.

The mandatory reporting duty does not apply to cases where FGM is only suspected or where a child is considered to be at risk of FGM. In these circumstances, staff should follow local safeguarding procedures, and the DSL should consider referral to children's social care and/or the Police as appropriate.

Unless there is good reason not to, teachers should also discuss a mandatory report with the DSL or deputy and involve children's social care as appropriate.

13. What staff should do if they discover a child is at risk from harm from serious violence

All staff should be aware of indicators that may signal that a child is at risk from, or involved in, serious violence. These may include increased or persistent absence, changes in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm or a significant change in wellbeing, unexplained injuries or signs of assault, possession of weapons, increased involvement in offending or anti-social behaviour, or association with individuals or groups known to be involved in criminal activity.

Staff should also be alert to the increased vulnerability of children experiencing disrupted education, including repeated suspensions, permanent exclusion or periods in alternative provision.

Where staff have concerns, they should speak to the DSL or deputy as soon as possible. The DSL will consider whether Family Help, children's social care, the Police or another specialist service should be involved.

Where there is an immediate threat to a child or others, staff should contact the Police on 999.
The School will consider the wider contextual factors affecting the child and will share relevant information with safeguarding partners where necessary to protect the child and others.

14. How should staff respond to an incident of nudes/semi-nudes being shared by pupils

What nudes and semi-nudes are:

Many professionals may refer to 'nudes and semi-nudes' as:

- Youth produced sexual imagery or 'youth involved' sexual imagery
- Indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18.
- 'Sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images
- Image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes. Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, to minimise further distress or trauma to them.

Responding to nudes and semi-nudes

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by persons under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's Airdrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or

via closed social media accounts. The images, videos or live streams may include more than one child. The term ‘nudes’ is used as it is most recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include ‘dick pics’ or ‘pics’.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible. Staff should not intentionally view, copy, print, forward, save or store nudes or semi-nudes. Staff should not ask a child to show, send, download or forward the imagery.

If imagery is shown to a member of staff unexpectedly, they should not continue viewing it and should report the incident immediately to the DSL. The DSL will determine the appropriate safeguarding response in accordance with the current UKCIS guidance and the School's procedures.

The DSL will follow the UKCIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (March 2024) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns
- Speaking with the children involved, where appropriate, to establish the information necessary to assess safeguarding risk and provide support. Staff should avoid detailed questioning about the imagery and should not ask a child to show, send, download or forward the image or video
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children’s social care and/or the police, who would take the lead in deciding when they should be informed
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.

An immediate referral to Police and/or children’s social care through the MASH or equivalent will be made if any of the following points apply:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs)
- There is evidence of financial extortion, blackmail or threats to distribute images, including where the child has been coerced into sending money or further images
- The images or videos suggests the content depicts sexual acts which are unusual for the young person’s developmental stage or are violent
- The images involve sexual acts and any child or young person in the images or videos is under 13

- There is reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming

The same safeguarding procedures apply where an image has been digitally manipulated or generated using artificial intelligence, including where a child's face or identity has been superimposed onto sexual imagery. Such material should be treated seriously as a safeguarding concern and should not be viewed, copied, saved or shared by staff.

If none of the above apply, the School may decide to respond to the incident without involving the police or children's social care. All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. The decision to respond to an incident without involving the police or children's social care will only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the School's pastoral support and disciplinary framework. Any decision in this regard will be made by the DSL (or equivalent) with input from the Head. The decision will be made and recorded in line with this Policy and will be based on consideration of the best interests of any child or young person involved. Any decision will take into account proportionality as well as the welfare and protection of any child or young person. The decision will be reviewed throughout the process of responding to the incident. If doubts remain local safeguarding arrangements will be followed.

This guidance does not apply to the sharing of images of persons under 18 by an adult over 18 as this constitutes child sexual abuse. If staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

15. What staff should do if a child is absent from education

Children who are absent from education particularly on repeat occasions and/or for prolonged periods, and children missing education can act as a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is important that the School's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

The School distinguishes between persistent or prolonged absence from School and children missing from education (CME). A child may remain on the School roll while being absent and may nevertheless present a safeguarding concern.

The School's procedures for unauthorised absence and for dealing with children who are absent, repeatedly and/or for prolonged periods, and children missing from education are managed in accordance with the Missing Pupil Policy & Procedures to be used for searching for and, if necessary, reporting any pupil missing from education. Further details can also be found at Appendix 1 of this policy. If a child is missing from a lesson, then staff will use the whereabouts@luckleyhouseschool.org to ascertain the location of a pupil.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to contact a responsible adult particularly when a child who is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safeguarding concern.

The School will follow Wokingham Borough Council's current Children Missing Education procedures. This includes notifying the Council where a pupil fails to attend regularly or has been absent without permission for 10 days or more, in accordance with the Council's current requirements.

This reporting requirement should not be interpreted as a safeguarding threshold. Where absence gives rise to concerns about a child's welfare, safety or whereabouts, staff must act immediately in accordance with the School's safeguarding procedures and should not wait until the 10-day reporting point.

When working with local authority children's services where school absence indicates safeguarding concerns the School will have regard to the DfE guidance *'Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (July 2026)*

16. What staff should do if a child needs a social worker

Where the School knows that a child is receiving Family Help, has an allocated social worker or is subject to a Child in Need or Child Protection Plan, this information should inform safeguarding and welfare decisions.

The School will work with the child's lead practitioner, social worker and other relevant professionals to support the child's safety, welfare, attendance and educational outcomes.

Information about a child's involvement with Family Help or children's social care should be handled sensitively and shared only with those who need it to safeguard and support the child.

Where relevant, staff should consider how the child's circumstances affect their attendance, behaviour, learning, mental health and vulnerability to further harm.

17. What staff should do if a child requires mental health support

The School has an important role to play in supporting the mental health and wellbeing of its pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE *Mental Health and Behaviour in Schools* guidance. Staff should use current Department for Education, NHS and other relevant evidence-based guidance when supporting pupils with mental health and wellbeing needs.

18. What staff should do if they have safeguarding concerns about a staff member

Any safeguarding concern or allegation that a member of staff, supply staff, agency worker, volunteer or contractor may 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; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm,

must be reported immediately in accordance with the School's procedures for managing allegations against adults.

The concern should normally be reported to the Head. Where the concern relates to the Head, it should be reported directly to the Chair of Governors and the LADO.

The School will consult the LADO in accordance with local procedures and will not undertake its own investigation where doing so could interfere with a potential safeguarding or police investigation.

Where there is an immediate risk to a child, the police and/or children's social care should be contacted without delay.

19. What staff should do it they have concerns about safeguarding practices in the School

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found in the staff handbook. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

Arrangements for dealing with child-on-child allegations (including child-on-child sexual violence and sexual harassment) Child on child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual harassment, 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. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

These arrangements apply to all reports and concerns of child-on-child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

The School takes a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them.

The School acknowledges that even if there have been no reported cases of child-on-child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report 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 by children.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child-on-child abuse and can recognise the indicators and signs of child-on-child abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.
The School will consider whether an incident forms part of a wider pattern of behaviour, whether there may be additional victims or witnesses, and whether there are wider contextual or environmental factors contributing to the behaviour.

Patterns of harmful behaviour will be shared with relevant safeguarding leaders and, where appropriate, children's social care, the police or other safeguarding partners so that the wider risk can be understood and addressed.
The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children such as accessing the School Counsellor. The School also recognises that certain children may face

additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The School recognises that pupils can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. As a School with boarding pupils, staff need to be aware that pupils can be particularly vulnerable in a boarding setting and should be alert to pupil relationships and the potential for child-on-child abuse. Boarders are separated by sex in the boarding house, and rooms are only shared age appropriately, with entry restricted to those living in the house. Entry systems are time limited. Staff are trained, aware and vigilant. The School will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding.

The School ensures that boarders have access to trusted adults and appropriate opportunities to raise safeguarding concerns. Pupils can speak to boarding staff, the DSL or a deputy, the Independent Listener or another trusted adult. The School will ensure that pupils know how to access these routes and will make appropriate arrangements where a pupil has a preference about whom they wish to speak to.

When joining, each Boarder is taken through a Boarders Induction. They are briefed on device use (including mobile phone, laptop and any other internet enabled devices), hand in times of all devices and most importantly, appropriate online activity. This is reinforced through the School's online safety programme within Life Skills as well as the Acceptable Use Policy. The School uses appropriate filtering and monitoring systems to reduce the risk of pupils accessing harmful or inappropriate online content through School-managed systems. The School recognises that filtering and monitoring cannot eliminate all risks, particularly where pupils use personal devices, mobile data or other networks, and therefore combines technical controls with supervision, education, reporting mechanisms and appropriate safeguarding responses. Again, Staff, Students and Parents are trained, aware and vigilant of the potential warning signs of inappropriate device use.

The School takes steps to minimise the risk of child-on-child abuse through supervision, education in the form of PSHCE (life skills) and assemblies. This is in addition to the provision of Sixth Form mentoring and the knowledge that adults in the School can be approached with early concerns. Where an issue of pupil behaviour or bullying gives reasonable cause to suspect that a pupil is suffering, or is likely to suffer, significant harm, staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour Policies.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from WBC and Berkshire West Safeguarding Partnership on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s). If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of WBC and Berkshire West Safeguarding Partnership, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from WBC and Berkshire West Safeguarding Partnership and/ or the police as appropriate. The School will have regard to the procedures always set out in KCSIE. Where an allegation of child-on-child abuse is made, the School will undertake an appropriate safeguarding risk assessment and consider the safety and welfare of all pupils involved.
Suspension, separation, changes to timetables, boarding arrangements or other protective measures may be considered where necessary and proportionate. Such measures will not be automatic and will

take account of the circumstances of the case, the needs of the victim, the alleged perpetrator and other pupils, and any advice from children's social care or the police.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL or DDSLs who should consider parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL or DDSLs will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help and may make the necessary referral in accordance with WBC and Berkshire West Safeguarding Partnership.

The School's approach to incidents involving the sharing of nudes and semi nudes, formally known as sexting, is the use of technology to generate images or videos made by pupils under the age of 18 of other pupils where images are of a sexual nature and are indecent. The content can vary from text messages to images of nudity or partial nudity to sexual images or video. These images are then shared between pupils or adults and with people they may not even know. Pupils are not always aware that their actions are illegal, and the increasing use of smart phones has made the practice much more commonplace.

Staff should not access, view, copy, save, forward or delete any nudes or semi-nudes on a device.
The incident should be reported immediately to the DSL. The DSL will determine whether the device needs to be searched, secured or confiscated in accordance with the School's searching and confiscation procedures and current UKCIS guidance. They should also make a record of the incident in accordance with record keeping procedures.
Where the police need to secure a device as part of an investigation, the School will follow police advice regarding preservation of evidence. Staff should not delete or attempt to alter potentially relevant evidence.

The School will follow the UKCIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (March 2024) when responding to an allegation that nudes and/or semi-nudes have been shared.

In the event of disclosures about child-on-child abuse, all children involved (both victim(s) and alleged perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims and alleged perpetrators will be offered support, which could be from a number of different people such as the School Nurse, the School Counsellor, or a member of the School pastoral team, and will be in accordance with the best interests and, where possible, with the wishes of the pupils involved. Support from external agencies will be sought as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim
- whether there may have been other victims
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they 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 or have their experience minimised.

The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

The School will consider intra familial harms and whether any support for siblings is necessary following an incident.

The School will keep a written record of all concerns, discussions and decisions made.

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic of inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour policy.

20. Dealing with safeguarding concerns or allegations made about staff

The School's procedures for managing concerns or allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity follows DfE statutory guidance and Berkshire West Safeguarding Children Partnership arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a child, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that raises safeguarding concerns about their suitability to work with children, including behaviour that may have happened outside of school.

In this section reference to 'allegations' also covers concerns. Allegations that do not meet the above harm test should be dealt with using the School's procedure for handling low level concerns set out below.

Allegations

Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.

Where an allegation or concern appears to meet the threshold for managing allegations against an adult, the Case Manager should immediately discuss the matter with the LADO. The School should not undertake an investigation or conduct detailed enquiries before consulting the LADO, as this could prejudice a subsequent statutory investigation.
The Case Manager and LADO will consider the nature, content and context of the allegation and agree the appropriate course of action, including whether further enquiries should be undertaken by the School, an independent investigator, children's social care and/or the police.

When dealing with an allegation about a staff member the School will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

1. All allegations which appear to meet the above reporting criteria are to be reported straightaway to the Case Manager, who is usually the Head. Where the Head is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the Chair of Governors and the LADO. However, staff may consider discussing any concerns with the DSL and make may any referral *via* the DSL.
2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content, and context of the allegation and agree a course of action including any involvement of the Police. Where the Case Manager deems there to be an immediate risk to

pupils or there is evidence of a possible criminal offence, then they may involve the Police immediately. All discussions should be recorded in writing and any communication with both the individual and the parents of the pupil or pupils, agreed. The LADO must be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria, or that are made directly to the Police or Children's Social Care. The DSL is responsible for ensuring the child is not at risk.

3. Where the Case Manager is concerned about the welfare of other pupils in the community or the member of staff's family, they will discuss these concerns with the Designated Officer and make a risk assessment of the situation, it may be necessary for the Designated Officer to make a referral to Children's Social Care.
4. When to inform the individual who is the subject of the allegation, will be considered on a case-by-case basis and the guidance from the Designated Officer and, if appropriate, with the Police or Children's Social Care. Subject to any objection, the Case Manager will ensure the individual who is subject to the allegation is informed as soon as possible and given an explanation of the likely course of action. The Case Manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff: -

    - redeployment within the School so that the individual does not have direct contact with the child or children concerned
    - providing an assistant to be present when the individual has contact with children
    - re-deploying to alternative work in the School so the individual does not have unsupervised access to children
    - moving the child or children to classes where they will not meet the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes account of their views. It should be made making it clear that this is not a punishment, and parents have been consulted, or
    - temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The Case Manager will give due weight to the views of the LADO, *WTTSC* and *KCSIE* when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The Case Manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

1. Where a member of the boarding staff is suspended pending an investigation, the Case Manager will consider whether arrangements for alternative accommodation away from children should be made.
2. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
3. The Case Manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.
4. The Case Manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove the allegation), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).
5. The Case Manager will monitor the progress of the case to ensure that it is dealt with as quickly as possible, consistent with a thorough and fair process. Review points will be agreed with the LADO and will take account of the complexity and circumstances of the case. Any significant delay will be identified, recorded and addressed. The Case Manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. Where the statutory conditions for referral are met, the School will make a referral to the Disclosure and Barring Service (DBS) without delay. The School will consider whether a DBS referral is required where an individual has been removed from regulated activity, or would have been removed had they not left, and the relevant statutory criteria are met, including where the individual has harmed or poses a risk of harm to a child. The School will not allow an individual's resignation or decision to cease providing services to prevent a DBS referral where the statutory referral criteria are met. The School will also consider whether a referral to the Teaching Regulation Agency is required in relation to a teacher where the relevant statutory criteria are met. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
6. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or

unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

7. Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.
8. The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.[109] Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the Case Manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. All records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer. Records should be reviewed at the end of the retention period in case it is necessary to keep it for longer.

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 DSL should consider whether the child and/or the person who has made the allegation needs help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

21. Procedure for managing allegations about supply teachers and contractors

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead, but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across several schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are considered by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers.[118] This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left the School first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

22. Dealing with concerns about organisations or individuals using school premises

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). Where the School becomes aware of a safeguarding concern or allegation relating to an organisation or individual using the School's premises, the School will take appropriate safeguarding action and, where the allegation meets the relevant threshold, consult the LADO. Where the activity is operated independently by an external organisation, responsibility for managing allegations relating to that organisation's staff will normally remain with the organisation and its own safeguarding procedures, subject to any advice or direction from the LADO, police or children's social care.

The School will ensure that appropriate safeguarding arrangements are in place before permitting organisations to use its premises for activities involving children.

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations. 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 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. The School will expect, where appropriate, providers to fully comply with the current *Department for Education safeguarding guidance for providers of after-school clubs, community activities and tuition* and will seek assurance in this regard.

The School has arrangements in place for the use of school premises for non-school activities including the availability of the DSL or DDSLs and how they can be contacted. The following email address should be used cp.records@luckleyhouseschool.org or this number 07931 468 339. If a child is in immediate danger, then the Police should be contacted.

23. Dealing with concerns or allegations (that do not meet the harm threshold)

A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the standards of professional behaviour expected of staff, including the School's Staff Code of Conduct, and may include inappropriate conduct outside of work; and does not meet the harm threshold for an allegation requiring a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a "nagging doubt". 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 enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed 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.

The School has a separate Low-Level Concerns Policy which enables all staff to share concerns – no matter how small – about their own or another member of staff's behaviour. If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a more collaborate decision-making approach.

The Staff Behaviour Policy can be found in the Staff Handbook. The aim of the policy is to provide clear guidance about the standards of appropriate behaviour and actions to not place pupils at risk of harm or staff at risk of allegation of harm to pupils. All staff are expected to comply with the standards contained with this policy.

The procedure for sharing confidentially any such concerns is set out in the Low-Level Concerns Policy. The Head is the ultimate decision-maker in respect of all low-level concerns. The Head will consult the DSL and, where appropriate, the LADO or other relevant safeguarding professionals when assessing or responding to a low-level concern.

Staff must share all concerns with the Head without delay so that they can be recorded and dealt with appropriately, sensitively, and proportionately, and in a timely manner. Staff can also use confide (sister platform to My Concern) to report any low-level concerns. Where a low-level concern is raised about the Head, it should be referred to the Chair of Governors.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

Where a low-level concern is raised by a third party, the Head will establish sufficient information to understand the concern and determine the appropriate response. This may include speaking to the person who raised the concern, the individual involved and relevant witnesses.
If information gathered indicates that the concern may meet the harm threshold, the Head will stop the low-level concern process and consult the LADO without delay.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. The information will be retained until the individual has left employment, unless a longer retention period is required for a specific legal, safeguarding or regulatory reason.

Low-level concerns will not automatically be included in employment references. Where information about a concern is relevant to the person's suitability for employment and would reasonably be expected to be disclosed in a reference, the School will consider whether and how it should be included, taking account of the outcome of the concern, any pattern of behaviour and applicable employment, safeguarding and data protection requirements.

The School will also reflect on reported concerns to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. A series of low-level concerns about the same individual should not be considered in isolation. The School will consider whether the cumulative pattern indicates that the harm threshold may now be met and, where appropriate, will consult the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a more collaborate decision-making approach.

24. Safer recruitment

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are

unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.

Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. The level of DBS check required will depend on the duties and responsibilities of the role and the applicable legislation. Where a role involves regulated activity with children, the School will obtain the appropriate enhanced DBS check with children's barred-list information before the individual undertakes regulated activity, subject to the applicable statutory provisions. Where a role does not involve regulated activity, the School will obtain the appropriate level of DBS check permitted for that role. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Where a DBS certificate has not been received before an individual starts work, the School will undertake an appropriate risk assessment and put in place suitable supervision arrangements until the required checks have been completed. The individual will not undertake regulated activity requiring a barred-list check until the appropriate barred-list information has been obtained.

As part of the shortlisting process, the School will carry out an online search on shortlisted candidates as part of its due diligence. This may help to identify any incidents or issues that have happened and are publicly available online, which the School may want to explore with an applicant at interview. This forms part of the School's wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with pupils are set out in the Recruitment & Selection Policy.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils, are suitable and appropriately supervised are set out in the Visiting Speaker Policy.

The Schools procedures for managing contractors attending the School site can be found in the Contractor Policy.

25. Management of safeguarding

The DSL is Mr Sean Hatton. He meets with the Head, Mrs Claire Gilding-Brant, on a weekly basis. The DDSLs are Mr Matt Humphrey, Mr David Rose and Mrs Julie Rumble. This group meet weekly too.

The DSL and DDSL's contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in

carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL will also take lead responsibility for online safety and understanding the filtering and monitoring systems and processes the School have in place. The DSL works with the governors to review and update the School's safeguarding policy.

Where a pupil leaves the School, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.
Where safeguarding information is received about a pupil joining the School, the DSL will ensure that the information is reviewed promptly and that relevant staff are informed on a need-to-know basis so that appropriate safeguarding support and risk-management arrangements are in place.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. All staff have a personal and professional responsibility to report safeguarding concerns promptly to the DSL or a DDSL. Where a member of staff believes that a referral to children's social care or the police is required, they must not delay that referral while waiting for the DSL to act. Staff should inform the DSL or DDSL of the referral as soon as possible.

During term time, the DSL and/or a DDSLs will always be available during school hours for staff in the School to discuss any safeguarding concerns. For out of hours/term activities, the contact details of the DSL phone are supplied to supervising staff.

The DSL or DDSLs should liaise with local safeguarding partners and work with other agencies in line with *WTTSC*. "*NPCC When to call the police: guidance for schools and colleges*" (npcc.police.uk) can assist the DSL or DDSL understand when they should consider calling the police and what to expect when they do. If the School has questions about any police investigation, it will ask the police. The DSL or DDSLs will also be responsible for liaising with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health. The DSL and DDSLs should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.

The DSL will ensure that the School understands and contributes appropriately to Family Help arrangements where pupils and families are receiving support. This includes contributing relevant information to assessments, plans and reviews and working constructively with the child's lead practitioner and other agencies.

Whilst the Head should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse, exploitation and neglect, are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Full details of the DSL's role can be found at Annex B of *KCSIE*.

26. Training

Induction and training are in line with advice from Berkshire West Safeguarding Children Partnership.

All Staff

All new staff will be provided with induction training that includes[155]:

- The child protection and safeguarding policy (including the policy and procedures to deal with child-on-child abuse)
- The role and identity of the DSL, DDSLs and other members of the safeguarding team
- The behaviour management policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- The staff code of conduct including the School's whistleblowing procedure and the acceptable use policy, staff/pupil relationships and communications including the use of social media
- The safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing education
- The E-Safety policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- A copy of Part one KCSIE
- Temporary staff and volunteers are provided with a summary leaflet with the key aspects of this policy explained along with photos of the DSL and the DDSL. Any individuals working directly with pupils and not under constant supervision, will have undergone all the recruitment checks applicable to permanent staff. They will also have completed safeguarding training.

All staff are also required to:

- Read Part One of KCSIE and confirm that they have done so; each time Part One of KCSIE is updated by the Department for Education, staff will be updated on the changes through briefings, by email, and by specially convened meetings as appropriate
- Understand key information contained in Part One of KCSIE; the School will ensure staff understanding by targeted INSET, spot quizzes in briefings, and individual interviews with the Governor with responsibility for safeguarding
- Receive training in safeguarding and child protection regularly in line with advice from Berkshire West Safeguarding Children Partnership; training will include online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and harmful sexual behaviours (including child on child sexual violence and harassment). It will also include Prevent awareness training to equip staff to understand the factors that lead people to support terrorist ideologies or engage in terrorist related activity, be able to recognise susceptibility to terrorism and be aware of what action to take in response, including the School's internal Prevent arrangements.
- Undertake regular informal update training at least annually to provide them with relevant skills and knowledge; the School provides these *via* emails, e-bulletins, and staff meetings.

All staff attend focused safeguarding updates at the start of each term in addition to the informal updates.

The Board of Governors will ensure that all governors receive appropriate safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated. Governors will receive appropriate safeguarding updates when significant changes to legislation, statutory guidance, local safeguarding arrangements or School safeguarding procedures occur. Governors should also read and maintain familiarity with the relevant sections of Part Two of KCSIE concerning the management of safeguarding.

The Board of Governors are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection Act 2018, the UK GDPR, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention. The Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
In addition, The Board of Governors complies with the DfE's Data Protection guidance for schools, ensuring school staff, governors and trustees 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.

27. DSL and Safeguarding Team

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children susceptible to radicalisation, record keeping and promoting a culture of listening to children, training in the Berkshire West Safeguarding Partnership approach to *Prevent* duties and harmful sexual behaviours. The DSL also receives more in-depth training, including on extremist and terrorist ideologies, how to make referrals and how to work with Channel panels. This training is updated at least every two years, enabling the DSL to support other staff on Prevent matters and update them on relevant issues. Further details of the required training content for the DSL are set out in Annex B of *KCSIE.*

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the School will support the DSL in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

The School will ensure that the DSL has sufficient time, funding, resources and appropriate support to fulfil their safeguarding responsibilities effectively. This includes sufficient time to manage referrals,

attend multi-agency meetings, maintain safeguarding records, provide supervision and support to staff, undertake training and maintain oversight of safeguarding practice across the School.

The DDSLs are trained to the appropriate level to deputise for the DSL when required and have sufficient authority and access to safeguarding information to act effectively. The DDSLs will work closely with the DSL to ensure continuity of safeguarding leadership.

28. Oversight of safeguarding (reviewing policies and procedures)

The Revd George Curry is the Board of Governors' Designated Safeguarding Governor and takes the lead in relation to safeguarding arrangements in the School on behalf of the Board.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, including lessons learnt. This takes place annually by the Board of Governors' Designated Safeguarding Governor. It is first scrutinised by the Education Committee which then recommends it for approval. The School draws on the expertise of staff, including the DSL, in shaping the School's safeguarding arrangements and policies.

The School's safeguarding policies and procedures should be transparent, clear, and easy to understand for staff, pupils, students, parents, and carers.

If there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

29. The school's arrangements to fulfil other safeguarding responsibilities

Teaching children how to keep safe

The Board of Governors ensures that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHE (Life Skills) to help children to adjust their behaviours, both inside and outside of School, to reduce risks and build resilience, including to radicalisation and extremism. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

Safeguarding education will also support pupils to recognise unhealthy and abusive relationships, coercive or controlling behaviour, sexual harassment, exploitation, harmful sexual behaviour, online abuse and other forms of extra-familial harm.

The School will recognise that children may experience multiple or overlapping forms of harm and will provide age-appropriate education that helps children understand how to seek help and report concerns.

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 children with SEND might be needed.

Internet safety (including when children are online at home) is an integral part of the School's ICT curriculum and is also embedded in PSHE and RSE.

30. Filtering and monitoring

The school has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the schools IT system. The school's systems are Dual Sophos 3100 XGS running in capital HA and Lightspeed filtering and monitoring software. Please also refer to the *'Meeting digital and technology standards'* document managed by the DSL and the schools IT Services Team.

Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories (**content risk**); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes (**contact risk);** restrict access to online risks such as online gambling, inappropriate advertising, phishing and/or financial scams (**commerce risk**); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying (**conduct risk)**.

The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.

The School ensures compliance with the DfE's 'filtering and monitoring standards for schools' by;

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing the filtering and monitoring provision at least annually.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

The School utilises the DfE's 'plan technology for your school' service to self-assess compliance against the filtering and monitoring standards and ensures that any recommendations are incorporated as appropriate.

The School has regard to the DfE's guidance 'Generative AI: product safety expectations' when considering how the filtering and monitoring arrangements in place apply to the use of generative AI

within education. The School ensures that any Generative AI products effectively and reliably prevent access to harmful and inappropriate content by pupils by:

- integrating the highest standards of filtering possible within the product, and
- using additional filtering solutions that work on top of an AI product.

The School recognises that generative AI can create additional safeguarding risks, including the generation or manipulation of sexualised images of children, deepfakes, non-consensual intimate imagery, misinformation, impersonation, harassment, exploitation and other harmful content.
The School's safeguarding, online safety and AI policies will therefore address both the risks presented by AI products and the potential misuse of AI by pupils or other individuals to cause harm.

Filtering and monitoring alerts will be reviewed and acted upon in accordance with the School's safeguarding and online safety procedures.

Where monitoring identifies activity that may indicate a safeguarding concern, the information will be assessed by appropriately trained staff and, where necessary, referred to the DSL or DDSL. The School will maintain appropriate records of significant safeguarding-related monitoring concerns and actions taken.

The School will ensure that monitoring arrangements are proportionate, regularly reviewed and sufficiently responsive to emerging safeguarding risks.

Further detail of the Schools policy and procedures in relation to online safety can be found in the School's E-Safety Policy which also includes detail on the use of mobile and smart technology in School, including the School's management of the associated risks, and the School's filtering and monitoring arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking online learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

31. Relationships Education and Relationships and Sex Education ("RSE")

The School understands that children and young people need knowledge and skills that will enable them to make informed and ethical decisions about their wellbeing, health and relationships.

The School's Relationships Education/RSE curriculum is delivered as part of a whole school approach to wellbeing and positive relationships that prepares children for life in modern Britain and aims to create a culture where sexism, misogyny/misandry, homophobia, biphobia, and sexual violence/harassment are recognised, challenged and never accepted as normal or inevitable. The School focusses on building positive attitudes and skills, promoting healthy norms about relationships, including sexual relationships where relevant, and about health, including mental health. The School recognises that discussions about sensitive topics in Relationships Education/RSE can lead to increased safeguarding reports. All staff know what to do if they have concerns that a pupil is being neglected or abused, including those who have seen, heard or experienced the effects of domestic abuse.

The School has regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching Relationships Education.

The School's RSE Policy sets out the curriculum content, how and when it will be taught, and who is responsible for teaching it, including any external providers the School will use. The School proactively engages and consults parents in the development and review of this policy. Parents will be informed of their right to request that their child is withdrawn from sex education.

32. Looked after children (LAC) and Previously Looked After Children (PLAC)

The Board of Governors ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority. Mr Sean Hatton is the designated member of staff who has responsibility for the welfare and progress of Looked after Children and Previously Looked After Children. The School ensures that the designated member of staff receives appropriate training to carry out their role.

33. Arrangements for visiting speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and the British values of democracy

The School will undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will consider any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to respect and support the School's safeguarding, equality, inclusion and behavioural expectations. Where appropriate, sessions should support pupils' understanding of democracy, the rule of law, individual liberty, mutual respect and tolerance, and should not promote discrimination, hatred, extremism or other harmful or unlawful activity. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a School employee. On attending the School, visiting speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Privacy Notice.

For arrangements for 1:1 tuition, staff should ensure that they are teaching in a room with either a viewing panel on the door, the door left open, or a window which sees into the classroom.

34. Arrangements for use of school premises for non-school activities

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations.

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 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 appropriate safeguarding arrangements and a clear safeguarding contact and escalation route are in place whenever the School premises are used for activities involving children. Where an activity is operated independently by an external provider, the provider will remain responsible for its own safeguarding arrangements and will be required to have appropriate procedures for responding to safeguarding concerns and allegations. The School will ensure that the DSL or an appropriate safeguarding contact can be contacted where the circumstances require the School's involvement as follows:

- 07540 236 203 (DSL phone number)
- Cp.records@luckleyhouseschool.org

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 to do so 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 *'After school clubs, community activities, and tuition (safeguarding guidance for providers)' (September 2023)*.

For arrangements for off-site tuition or performances away from the school, parental permission is sought for example, a licence agreement for pupils involved in TV and films.

35. Operation Encompass

The School is part of Operation Encompass, a national police and early intervention safeguarding partnership which supports children who experience domestic abuse.

Through Operation Encompass the police are required to share information with the School about **all** police attended domestic abuse incidents which involve any of our children who are related to either of the adults involved in the incident. This sharing of information should occur prior to the start of the next school day. The notification should be sent to the DSL (known as the Key Adult) and inform us about the context of the incident and will include the child's perspective.

The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information. The School will use Operation Encompass information to inform appropriate safeguarding support and decision-making for affected children. Information received will

be shared only with those who need it to safeguard and support the child and will be handled in accordance with applicable safeguarding and information-sharing requirements.

The School's DSL and their deputies have completed the National Online Operation Encompass Key Adult training. All staff are encouraged undertake the online training. The DSL will provide training for all staff and Governors about Operation Encompass, the prevalence of domestic abuse and the impact of this abuse on children.

We ensure our parents are fully aware that we are an Operation Encompass setting including when a new child joins the School.

The Safeguarding Governor reports on Operation Encompass in the termly report to Governors. All information is anonymised for these reports.

36. Use of mobile phones and cameras

The School's policy on the use of mobile phones and cameras in the setting can be found in the School's Behaviour Management Policy for pupils. For members of staff, there is clear guidance provided in the Staff Handbook.

Any use of mobile phones, cameras or recording equipment that gives rise to a safeguarding concern must be reported in accordance with this policy and, where appropriate, to the DSL.

37. Appendix 1 – Signs and types of abuse

All School staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. Therefore, staff should always be vigilant and always raise any concerns with the DSL or any member of the Safeguarding Team

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but

especially the DSL or any member of the Safeguarding Team, should consider whether children are at risk of abuse or exploitation in situations outside the home. This is often referred to as "extra-familial harm.' Extra-familial harm can occur in a range of extra-familial contexts, including in school, peer groups, or within community/public spaces, and/or online. Children may experience this type of harm from other children and/or from adults. Forms of extra-familial harm include exploitation by criminal and organised crime groups and individuals (such as county lines and financial exploitation), serious violence, modern slavery and trafficking, online harm, sexual exploitation, teenage relationship abuse, and the influences of extremism which could lead to radicalisation. Children of all ages can experience extra-familial harm.

Multiple and overlapping harms

Children may experience more than one form of abuse, exploitation or safeguarding harm at the same time. For example, a child experiencing domestic abuse may also experience neglect, emotional abuse, harmful sexual behaviour, exploitation, substance misuse or mental health difficulties.

Staff should avoid considering safeguarding concerns in isolation and should consider the wider context of the child's life, including family circumstances, peer relationships, community environments and online activity. Where multiple concerns are present, these should be shared with the DSL so that the overall pattern of risk can be considered.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL or any member of the Safeguarding Team

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

Emotional abuse: the persistent emotional 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 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. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, coercive or controlling behaviour, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing, causing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child-on-child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children are more likely to know their abuser than not. Under-13s can never legally consent to sexual activity. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

The Centre of Expertise on Child Sexual Abuse has introduced new resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours. There are also the below resources available:

Tackling Child Sexual Abuse Strategy – Home Office policy paper
Together we can stop child sexual abuse – HM Government campaign

Sexual harassment: is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Sexual violence: refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

Child-on-child sexual violence and/or harassment: Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing

a single child or group of children. Child-on-child sexual violence and harassment can affect children of any sex, gender, age or background. While evidence indicates that girls are disproportionately affected by some forms of sexual violence and harassment and boys are disproportionately represented among perpetrators, staff must avoid assumptions based on sex or gender and assess each concern on its individual circumstances. Violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

Harmful sexual behaviour: problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

The Lucy Faithfull Foundation has developed a harmful sexual behaviour toolkit, which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about harmful sexual behaviour by children, internet safety, sexual development and preventing child sexual abuse.

The NSPCC provides free and independent advice about harmful sexual behaviour: NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework.

Beyond Referrals - The Contextual Safeguarding programme based at the University of Durham provides a school self-assessment toolkit and guidance for addressing harmful sexual behaviour in schools.

StopItNow – Preventing harmful sexual behaviour in children provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

Statutory duty to report child sexual abuse

The School recognises its legal obligations under the Crime and Policing Act 2026 relating to the reporting of suspected child sexual abuse.

Adults undertaking relevant regulated activity with children must comply with the statutory duty to report where they have reason to suspect that a relevant child sex offence may have been committed, subject to the exceptions and requirements set out in legislation and applicable statutory guidance.

Where a member of staff becomes aware of a disclosure or other information that may trigger the statutory duty, they must act promptly. Staff should inform the DSL or DDSL immediately so that the School can ensure that the concern is appropriately reported to the police or local authority where required.

The statutory duty does not replace the School's existing safeguarding procedures. Staff must continue to report safeguarding concerns to the DSL and must take immediate action where a child is at risk of harm.

No member of staff should delay or prevent a report being made where the statutory reporting duty applies. The School will ensure that staff receive appropriate training and guidance on the operation of the duty and any statutory exceptions.

Sharing of nudes and/or semi-nudes: the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's Airdrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or are sometimes referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'. Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- Children and young people find nudes and semi-nudes online and share them claiming to be from a peer

- Children and young people digitally manipulate an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new nude or semi-nude image of a young person

- Images created or shared are used to abuse or blackmail peers. Situations could include:

    - Children and young people selling nudes or semi-nudes of others online

    - Children and young people coercing a peer into sharing a nude or semi-nude to blackmail them for money, further images, or force them into illegal activity

    - Children and young people hacking a peer's account to share images more widely without consent to publicly shame

- Children and young people create and share a nude or semi-nude with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The UKCIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (February 2024) sets out the classification of incidents, and how each should be handled.

Upskirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

Neglect: 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.

Prejudice-based harm: all staff must recognise that racism, faith-based prejudice, and other forms of discriminatory behaviour can significantly affect a child's welfare, wellbeing and sense of safety, and should be recognised as a safeguarding harm.

Serious violence: indicators which may signal that children are at risk from or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm 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. Children may also be recruited, groomed or exploited through online platforms, social media, gaming platforms or messaging services. Staff should consider online activity alongside changes in attendance, friendships, behaviour, possessions, wellbeing or associations when assessing possible involvement in serious violence or criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, unexplainable and/or persistent absences from education and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, the sharing of nudes and semi-nudes, and upskirting.

Safeguarding issues can also be linked to, for example:

- children being absent, repeatedly and/or for prolonged periods,
- children missing from education;
- child sexual exploitation;

- domestic violence;
- fabricated or induced illness;
- faith abuse (including ostracism of families);
- female genital mutilation; forced marriage;
- gangs and youth violence;
- gender-based violence / violence against women and girls;
- hate;
- mental health;
- preventing radicalisation;
- relationship abuse;
- consensual and non-consensual sharing of nudes and semi-nudes;
- and trafficking.

This list is not exhaustive. Safeguarding concerns may involve multiple overlapping forms of harm and staff should refer any concern to the DSL even where it does not fall clearly within one of these categories

Child sexual exploitation (CSE): CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual activity, including online . It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any persons (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The below CCE indicators can also be indicators of CSE, as can:

- Children who have older boyfriends or girlfriends, and
- Children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners*".

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Child criminal exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into taking part in any criminal activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also 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 can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

The School recognises that child criminal exploitation can include coercion, control, debt bondage, violence, threats, trafficking, forced criminality, county lines activity and exploitation through accommodation or other environments. Staff should consider whether a child may be a victim of exploitation even where they appear to be involved voluntarily or have committed offences themselves.

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts, money, or new possessions
- Children who associate with other children involved in exploitation
- Children who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late, and
- Children who regularly miss school or education or do not take part in education.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain them in education.

County lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of "deal line".

This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home;
- that have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Modern Slavery: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. 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 2025)*".

Cybercrime: is 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). 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; and,
- 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.

Children with particular skills and an interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy), 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 policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general online safety.

Where cyber-related behaviour indicates that a child may be being exploited, groomed, coerced, involved in criminal activity or at risk of harm, the matter should be treated as a safeguarding concern and referred to the DSL. Staff should not assume that technically skilled or risky online behaviour is solely a disciplinary or IT issue.

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

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse, exploitation and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance and progress at school.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL or DDSLs.

More information can be found in the Mental health and behaviour in schools guidance. The School has regard to current Department for Education guidance on promoting and supporting mental health and wellbeing in schools and colleges and will use current resources from the Department of Health and Social Care, Office for Health Improvement and Disparities (OHID), NHS and other appropriate professional bodies.

'Honour based' abuse (HBA): encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL or any member of the Safeguarding Team who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care.

Where a teacher, in the course of their professional duties, is informed by a girl under 18 that FGM has been carried out on her or identifies signs which appear to show that FGM has been carried out, the teacher must make a report to the police in accordance with the statutory mandatory reporting duty.

The teacher should also inform the DSL as soon as possible and the School will make any further safeguarding referrals required. The duty does not apply to suspected cases where FGM has not been disclosed or visually identified; in such circumstances staff must follow the School's safeguarding procedures and consult the DSL without delay.

Teachers must not conduct any examination of a child for the purpose of identifying FGM.

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.

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

not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in the *Multi-agency guidelines: Handling cases of forced marriage (last updated April 2023)*. Further information on forced marriage is available in guidance published on gov.uk and by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

Radicalisation: is the process of a person legitimising support for, or use of, terrorist violence.

Extremism: The Government's current definition of extremism should be used when assessing concerns about extremist ideology or activity. The School will have regard to the current Prevent duty guidance for England and Wales and any subsequent Government guidance or definitions.
Staff should not make assumptions about a child's susceptibility to radicalisation based on their religion, ethnicity, political views, background or protected characteristics. Concerns should be assessed on the available evidence and in accordance with the School's Prevent and safeguarding procedures.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. However, it is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alerted to changes in children's behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be susceptible and act proportionately, which may include making a Prevent referral.

Designated safeguarding leads and other senior leaders in the School should familiarise themselves with the revised Prevent duty guidance: for England and Wales especially paragraphs 141-210, which are specifically concerned with education. Staff should contact the DSL or any member of the Safeguarding Team who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

Special educational needs and/or disabilities (SEND), or pupils with certain health conditions: Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

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 being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- 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.

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

Staff should avoid assuming that a change in behaviour, presentation, communication or emotional wellbeing is attributable solely to a child's SEND or health condition. Any unexplained or significant change should be considered in the context of safeguarding as well as the child's individual needs.

Lesbian, gay, bisexual or gender questioning: 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 pupil who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

When supporting a gender questioning child, the School will take a cautious approach and consider the broad range of the pupils individual needs, in partnership with the parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

When supporting a child who is questioning their gender, the School will have regard to the relevant provisions of the current version of KCSIE, together with its safeguarding, equality and other relevant policies. The School will consider the individual circumstances and best interests of the child, relevant safeguarding risks, the views and wishes of the child, the involvement of parents where appropriate, and any relevant clinical or professional advice. The School will also consider the impact of decisions on the safety, privacy, dignity and wellbeing of the child and other pupils and will respond to bullying, harassment or discriminatory behaviour in accordance with its policies.

Risks can be compounded where children lack trusted adults with whom they can be open. The School endeavours to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Domestic abuse: The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

Operation Encompass: Operation Encompass is a safeguarding partnership through which police share information with schools about relevant domestic abuse incidents involving children.
The School's detailed arrangements for receiving, recording and responding to Operation Encompass notifications are set out in section 36 of this policy.

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to local safeguarding partners where a child has been harmed or is at risk of harm, in accordance with this policy.

Children who are absent from school: A child being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education is a potential indicator of a range of

safeguarding issues such as abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who are absent, particularly persistently or for prolonged periods. The School's procedure for dealing with children who are absent and/or missing can be found in the School's Missing Pupil Policy. All unexplained absences will be followed up in accordance with this policy in Section 4, Duty to report.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2024. This will assist the local authority to:

a) fulfil its duty to identify children of compulsory school age who are missing from education; and
b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, exploitation or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority and the local authority where the child is normally resident of any pupil who fails to attend school regularly or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority. These intervals are termly or following a period of more than 20 consecutive days.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child being absent and/or becoming a child missing education in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

Child abduction and community safety incidents: 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); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system: Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two

age-appropriate guides to support children 5–11-year-olds and 12–17-year-olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

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

Children with family members in prison: Children with a parent or other family member in prison may experience poverty, stigma, isolation, disrupted relationships and emotional or mental health difficulties. Staff should be alert to the potential impact on the child's welfare, attendance, behaviour and educational engagement.
Where appropriate, the School will work with the child, family and relevant agencies to provide support and will consider whether the child requires help or protection under the School's safeguarding procedures.
The School will have regard to current national guidance and support resources for children and families affected by imprisonment, including the Prisoners' Families Helpline where appropriate.

38. Appendix 2 – Job description for the Designated Safeguarding Governor

The Board of Governors is ultimately responsible for the effective management of safeguarding in the School. As part of discharging this responsibility, they nominate a Designated Safeguarding Governor to work with the Designated Safeguarding Leads and other senior staff to review the School's safeguarding policy, procedures and practices.

The Designated Safeguarding Governor's role is strategic and provides challenge and assurance to the Board. The Governor should not undertake operational safeguarding case management or investigate individual safeguarding concerns or allegations.

Key Responsibilities include:

- Maintain regular contact with the Designated Leads for safeguarding
- Champion the promotion of well-being and safeguarding issues at the highest level
- ensure that the Governing Body puts in place a suitable Child Protection & Safeguarding Policy and associated procedures which have proper regard to prevailing regulations, guidance, standards, and advice
- Provide strategic challenge and assurance regarding online safety, including filtering and monitoring arrangements, the effectiveness of safeguarding responses to monitoring alerts, and the School's wider approach to keeping children safe online.
- Conduct an annual review of safeguarding procedures and practices
- Seek assurance that safeguarding policies and procedures are implemented effectively in practice and that learning from safeguarding incidents, complaints, reviews and external scrutiny is used to improve practice.
- Receive appropriate anonymised safeguarding information and analysis to identify themes, patterns, emerging risks and disproportionality, while maintaining appropriate confidentiality and avoiding involvement in individual case management
- Seek assurance that children and young people are able to contribute to the development and review of safeguarding arrangements and that their views, experiences and concerns inform safeguarding practice where appropriate
- Seek assurance that the School's safeguarding culture is inclusive and anti-discriminatory and that safeguarding arrangements take account of the different vulnerabilities and experiences of pupils
- Report regularly to the Board of Governors on safeguarding matters
- Ensure that child safeguarding training is in place for all staff and relevant additional training is undertaken as required
- Undertake appropriate safeguarding training and maintain an up-to-date knowledge of safeguarding requirements
- Maintain and develop the understanding of the whole governing body on safeguarding issues.

Ensure that any deficiencies in safeguarding practice brought to the Board's attention are appropriately addressed, with effective action plans, oversight and follow-up where required. Ensure that all Governors receive appropriate safeguarding and child protection training at induction and that this training is regularly updated, including relevant updates on online safety, Prevent and changes to statutory guidance.

39. Appendix 3 – Termly Safeguarding check

Term_____

Date_____

- ☐ General discussion with DSL
- ☐ Overview of the INSET Safeguarding update (Insert topic: _____)
  - ☐ Receive anonymised/aggregated information on the number, nature and destination of safeguarding referrals and any significant themes or patterns arising. Check that safeguarding

information, including child protection files and relevant risk information, is transferred securely and promptly when pupils join or leave the School, and that appropriate confirmation of receipt is obtained.

- Receive an update on any significant Prevent, radicalisation or extremism concerns, including the effectiveness of the School's Prevent arrangements and any learning arising from referrals. Receive assurance that persistent/severe absence and children missing education are being monitored as potential safeguarding indicators and that appropriate referrals and escalation are made when required.
- Receive an anonymised update on significant child-on-child abuse concerns, including sexual violence, sexual harassment and harmful sexual behaviour, together with any relevant themes, actions and learning".
- Brief conversation with a member of staff to test their understanding of the School's safeguarding arrangements, including how to report a concern, the role of the DSL/DDSL, information sharing, online safety, Prevent and the procedures for allegations against adults.
- Seek evidence that pupils know how to report safeguarding concerns, know who the DSL/DDSLs are and have accessible routes to seek help.
- Receive assurance that filtering and monitoring systems are operational, regularly reviewed and appropriately configured, that relevant alerts are being reviewed and acted upon, and that any identified weaknesses have been addressed.
- Receive an anonymised update on any significant contact with the LADO, including the effectiveness of the School's arrangements for managing allegations against adults and any relevant learning.
- Receive assurance from the Head that all safeguarding concerns and allegations relating to staff, volunteers, contractors and other adults have been managed in accordance with the School's procedures and, where applicable, the LADO process. To include Low Level Concerns.

Undertake an appropriate sample check of the Single Central Record and a minimum of three associated recruitment/personnel records, in liaison with the appropriate HR lead, to provide assurance that required safer-recruitment checks are complete and accurately recorded.

Signed_____ Date_____

The Revd George Curry

_____ Date_____

Mr Sean Hatton, Deputy Head (Pastoral) and DSL

40. Appendix 4 - Glossary of abbreviations

BWSCP	Berkshire West Safeguarding Children's Partnership
Channel	The duty set out in the Counter Terrorism and Security Act 2015 to provide support for people vulnerable to being drawn into terrorism.
CSE	Child Sexual Exploitation
DBS	Disclosure and Barring Service
DDSL	Deputy Designated Safeguarding Lead
DfE	Department for Education

DSL	Designated Safeguarding Lead
EHCP	Education, Health and Care Plan
FGM	Female Genital Mutilation
IICSA	Independent Inquiry into Child Sexual Abuse
INSET	In-Service Training
ISI	Independent Schools Inspectorate
KCSIE	Keeping Children Safe in Education
LADO	Local Authority Designated Officer
NSPCC	National Society for the Prevention of Cruelty to Children
PSHE	Personal, Social and Health Education
RSE	Relationships and Sex Education
SEND	Special Educational Needs and/or Disabilities
SVSH	Sexual Violence and Sexual Harassment
TRA	Teaching Regulation Agency
UK GDPR	UK General Data Protection Regulation
WBC	Wokingham Borough Council
WTTSC	Working Together to Safeguard Children