Falkner House Child Protection, Safeguarding and Welfare Policy and Procedure

Available for parents to access on the school website and on request. Nursery – Year 6 including EYFS

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1. Designated Safeguarding Leads and Deputy Designated Safeguarding Leads - Internal

Designated Safeguarding Lead (DSL) *covering both sites but based at Penywern Road and including EYFS*	**Mrs Vanessa Woodward** Deputy Head 020 7373 2340 vwoodward@falknerhouse.co.uk
Board level lead on safeguarding *covering both sites and liaison between the two and including EYFS*	**Mrs Anita Griggs** Principal (member of the LLP[1]) 020 7373 4501 /2340 office20PR@falknerhouse.co.uk office@falknerhouse.co.uk
Deputy Designated Safeguarding Lead (DDSL) *covering both sites but based at Brechin Place and including EYFS*	**Miss Lisa Day** Head of Lower School 020 7373 4501 lday@falknerhouse.co.uk
Deputy Designated Safeguarding Lead (DDSL) *covering both sites but based at Brechin Place and including EYFS*	**Miss Rachel Mulloy** Year 1 Teacher 020 7373 4501 rmulloy@falknerhouse.co.uk
Deputy Designated Safeguarding Lead (DDSL) *covering both sites but based at Penywern Road and including EYFS*	**Mr Alun Roberts** Head of Science 020 7373 2340 aroberts@falknerhouse.co.uk
Designated Teacher for Looked After Children *covering both sites but based at Penywern Road*	**Mrs Vanessa Woodward** (contact details as above)

[1] The LLP is composed of the following members: Roy Griggs, Anita Griggs, Flavia Rogers, Eleanor Dixon, Cordelia Colec, Marina Wood.

2. Safeguarding and Child Protection Contacts – External

Bi - Borough (Royal Borough of Kensington and Chelsea (RBKC) and Westminster)

Tri-Borough (RBKC, Westminster and Hammersmith & Fulham (LBH&F))

Bi - Borough - Safeguarding and Child Protection Training, Consultation and Advice:

Hilary Shaw	07817 365 519	
Elaine Campbell	07712 236 508	elaine.campbell@rbkc.gov.uk
Di Donaldson	07890 397 061	di.donaldson@rbkc.gov.uk
Marissa Asli	07739 315 432	marissa.aslibangura@rbkc.gov.uk
Glen Peach Director of Family Service	07792 597 187	Glen.Peache@rbkc.gov.uk

Consultation & Advice about a child/young person resident in:

RBKC	020 7361 3013	socialservices@rbkc.gov.uk
Westminster	020 7641 4000	accesstochildrensservices@westminster.gov.uk
LBH&F	020 8753 6600	
	020 8748 8588	familyservices@lbhf.gov.uk

Local Authority Designated Officer (LADO) for referral and management of allegations against staff. LADO referrals are to be made to the following phone numbers/emails depending on the borough where the incident took place or where the employing agency is. The referral form to complete is embedded below. Referrals are dealt with by Child Protection Advisors who hold delegated LADO powers across the boroughs.

RBKC	020 7361 2120	kclado.enquiries@rbkc.gov.uk
LBH&F	020 8753 5125	LADO@lbhf.gov.uk
Westminster:	020 7641 7668	LADO@westminster.gov.uk

Local Safeguarding Children's Board (LSCP):

Victoria Harris	07739 315 388	victoria.harris@rbkc.gov.uk

PREVENT – Advice, guidance, training queries and referrals to Channel Panel:

RBKC	020 8753 5727	prevent3@rbkc.gov.uk

DfE PREVENT dedicated telephone helpline and mailbox for non-emergency advice for staff:

	020 7340 7264	counter.extremism@education.gov.uk
NSPCC	0808 800 5000	help@nspcc.org.uk
Police	020 8246 0826 (or 101)	

LSCP – is a partnership of the RBKC, Westminster, the clinical commissioning group and the police.

Bi-borough Children's Services & LA Officer Contacts

Sarah Newman	07966 183 716	snewman@westminster.gov.uk
Executive Director of Children's Services		

A full list of contact details is held by the school offices.

Falkner House Safeguarding Reporting Summary

Suspect a child is at risk of harm at home?

Option 1: Call Office
FHB 0207 373 2340
FHG 020 7373 4501



Designated Safeguarding Lead
Vanessa Woodward
vwoodward@falknerhouse.co.uk

↓ **DSL unavailable?**
Call office number above for:



FHB DDSL
Alun Roberts
aroberts@falknerhouse.co.uk



FHG DDSL
Lisa Day
lday@falknerhouse.co.uk



FHG DDSL
Mollie Gardner
pe@falknerhouse.co.uk



If neither DDSL available, contact Board Level Safeguarding Lead:
Anita Griggs
office@falknerhouse.co.uk

↓ **DSL and DDSL unavailable and child is at immediate risk?**

Call the relevant borough depending on the child's address. RBKC - 020 7361 3013, Westminster -020 7641 4000, Hammersmith & Fulham - 020 8753 6600

Concerned about the behaviour of staff?

Option 1: Call FHB/FHG office for relevant Headteacher



Headteacher FHG
Flavia Rogers
office@falknerhouse.co.uk
0207 373 4501



Headteacher FHB
Eleanor Dixon
office20pr@falknerhouse.co.uk
0207 373 2340

↓ **Headteacher unavailable?**
(or the person of concern is an LLP member)

Any concern about any of the LLP members should be reported to the LADO on:

0207 361 2120

or

out of hours email:
kclado.enquiries@rbkc.gov.uk
without informing Heads or LLP Members

Updated 05 March 2025

3. Policy Statement

This policy has regard to the following guidance and advice:

- Keeping Children Safe in Education (KCSIE) September 2026
- Working Together to Safeguard Children December 2026(WTSC)
- Prevent Duty Guidance for England and Wales (December 2023)
- Education (Independent School Standards) Regulations (2014) as amended
- What to do if you are worried a child is being abused – advice for practitioners (March 2015)
- Safeguarding children and young people (October 2018)
- Disqualification Under the Childcare Act (August 2018)
- Statutory framework for the Early Years Foundation Stage (2025)
- Children Missing Education (September 2016)
- Relationships Education, Relationships and Sex Education and Health Education (2025)
- The Equality Act (2010)
- The Human Rights Act (1998)
- DfE Guidance (2026)
- Child Sexual Exploitation, February 2017
- Sexual Harassment between Children in Schools and Colleges (2018)
- LSCP (Kensington and Chelsea – K&C)
- UKCCIS Guidance on Sexting in schools (2017)
- Use of social media for on-line radicalisation (July 2015)
- Cyber security standards for schools and colleges (2025)
- School Attendance (Pupil Registration) (England) Regulations (2024)
- Generative AI in education 2025
- Restrictive Interventions including the use of reasonable force in schools (April 2026)

Please also see the following Falkner House Policies:

- Behaviour (including Exclusion) and Anti-Bullying Policy
- PHSEE Policy and Curriculum
- Staff Code of Conduct (including the Internet and Data Privacy Code of Practice)
- Internet Policy
- Pupil i-pad code of conduct
- Recruitment, Selection and Disclosure Policy
- Whistleblowing Policy

All references to "the School" refer to Falkner House.

4. Aims

Falkner House is committed to safeguarding. Children learn best when they are healthy, safe and secure, when their individual needs are met, and when they have positive relationships with the adults caring for them. The safeguarding and welfare requirements are designed to help Falkner House create high quality settings which are welcoming, safe and stimulating, and where children are able to enjoy learning and grow in confidence.

Our prime aims are to:

- Look after the children in school
- Be alert and act appropriately to issues that may negatively impact on pupils that occur outside school
- Ensure that all staff act appropriately towards each other and the children
- Act always in the best interests of the children

Thus we:

1. Safeguard and promote the best interests of all of the children at the school.
2. Ensure that the children's wellbeing and welfare is at the heart of our approach to safeguarding.
3. Ensure that the school's welfare and safeguarding policy and its implementation is in line with recent legislation and guidance (listed above) and that it is regularly updated and monitored by the proprietors
4. Ensure that any concern a pupil may have will be dealt with in a friendly and supportive manner.
5. Actively address and support appropriate language and attitudes in school so as to avoid a culture of unacceptable behaviours, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
6. Ensure that any weaknesses or deficiencies in child protection arrangements are remedied without delay.
7. Teach pupils how to keep themselves safe and reduce risks online, at home, with their peers and with adults.
8. Ensure that each pupil will develop the understanding that staff can be trusted to help in any situation.
9. Provide a secure environment for pupils to talk to adults who can give help if and when required.
10. Ensure safe recruitment procedures (please see Recruitment, Selection and Disclosure Policy)

11. Create a culture of fairness, non-discrimination, vigilance in terms of all the pupils and staff at the school.
12. Create an environment and ethos where staff can raise concerns and are supported in any safeguarding role.
13. Train relevant staff in safer recruitment.
14. Deal with concerns about a child without delay and in accordance with local authority inter agency procedures and to give early help to children who may benefit from this by every means possible in and out of the classroom an atmosphere and teaching that promotes physical health (including oral hygiene) and mental health and wellbeing for both pupils and staff

5. Concerns About a Child

Falkner House has a duty to consider at all times 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, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Every person over the age of 16, with parental responsibilities, charge or care of a child under 16, has responsibilities with regard to the child's welfare, and can be held liable for failure to meet them. Action can be taken for failing to act upon the child's disclosure or upon justified concerns which had been expressed to a teacher or for encouraging, or turning a blind eye to, or failing to protect a child from abuse. The LLP members, headteachers and staff fall within the definition of those having "charge" or "care" of a child. Criminal liability arises if the adult: "wilfully assaults, ill-treats, neglects, abandons, or exposes him in a manner likely to cause unnecessary suffering or injury to health." This includes mental as well as physical health and applies whether or not harm actually occurred. It is sufficient that it was "likely" to occur.

Parents are encouraged to raise any concerns directly with Falkner House, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

Falkner House has arrangements for listening to children and providing early help. Situations may arise when the School may need to share information with children's social care without parental consent, for example, where notifying parents could increase the risk to the pupil.

Note: If an allegation involves a member of staff then the pupil's parents should only be informed with the LADO's consent.

5.1 Definitions of 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 the impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

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. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Abuse can be:

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

Please refer to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse.

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 take action and share information that might be critical in keeping children safe.

All staff should:

- listen and observe carefully and without judgment
- avoid asking leading questions or showing signs of disquiet, disbelief, anxiety or shock
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.

All concerns, discussions, and decisions (together with reasons) made under these procedures should be recorded in writing. 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. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. 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 KCSIE.

Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or a DDSL).

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide (although these may well be overridden by the school's duty to refer). 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 is also aware of the support, advice, and information available in the HSB toolkit developed by the Lucy Faithfull Foundation. The School operates its processes with the best interests of the pupil/s at heart.

6.1 Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL and DDSLs should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors (which could include SEND) are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so it is important that we provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

6.2 Early Help (as defined in paragraph 18 of KCSIE - set out in Appendix 2)

Early help means providing support as soon as a problem emerges at any point in a child's life. In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the Tri-Borough Local Assessment Protocol threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

Early help includes those who go frequently missing from education, home or care and those who have received multiple suspensions or are at risk of permanent exclusion

6.3 What the School does if there are concerns about a child

If staff (including LLP members, supply 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 DSL to agree a course of action. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe, and any pupil may approach any member of staff and seek advice or help. 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.

6.4 What the School does if a child is in danger or at risk of harm

Staff must be observant so as to recognise variations in pupil behaviour which may indicate emotional and physical concerns of abuse, as children may not feel ready or know how to tell someone they are being abused. All staff are to listen to children, to respond and act without delay when a child tells about concerns, or wishes to talk about a private problem. If there are any such concerns about a child, staff must liaise promptly, ideally with the DSL in the first instance.

Any individual teacher may also report directly and without delay to Social Services to discuss either the case itself or how best to proceed or refer. Staff may refer immediately to children's social care, a child who is in immediate danger or is at risk of harm (contact details below). Staff must report to the Police if a crime may have been committed.

Decisions to seek support for a child in need, or about whom there are concerns relating to radicalisation, are normally taken in consultation with parents and pupils. Where there are reasonable grounds to believe that a child is at risk of significant harm were parents to be involved at this stage, a referral will be made without consulting parents. Further discussions with parents will follow recommendations of the Social Services.

If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. 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. Staff should consider the immediate arrangements in place for the pupil's safety including whether or not the pupil is safe to return home at the end of the school day. Advice should be sought from Children's Social Care if there is any doubt.

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and sexual exploitation.

6.5 What the School does if a child is seen as at risk of radicalisation

Although the risk of extremism/radicalisation is assessed as low (for the reasons detailed below) the school is still highly aware of the dangers and actions that must be taken as part of Prevent duties. The DSL is responsible for Prevent and thus for identifying and protecting individual children who may be at risk of any form of radicalisation or being drawn into terrorism or extremist activity.

Any concerns whatsoever of the DSL will be noted on the Log and referred immediately to the Prevent Officer for schools in Kensington and Chelsea (details in external contacts above). The DSL oversees and coordinates Falkner House's implementation of the Prevent duty. The DSL has been trained in Prevent and provides suitable support and training to all members of staff. The DSL has made enquiries from the Prevent Officer as to WRAP and will follow their guidance.

The DSL is aware that a child missing from school could be being drawn into terrorism or extremist activity. By virtue of the young age of our pupils this would always be with the knowledge/ encouragement of their family. If the DSL has any such concerns the Prevent Officer would be contacted promptly.

The general level of risk has been assessed as low (as discussed with our Prevent Officer). This conclusion has been reached on account of the:

1. young age of the pupils
2. fact that there is a strong whistleblowing culture and all staff are fully aware of and endorse every aspect of the Prevent strategy and are well aware of the appropriate mechanisms to raise concerns;
3. fact that we would not tolerate any member of staff, visiting speaker or agency worker displaying extreme or divisive views/behaviours;
4. fact that no extremist or terrorist material has ever or would ever be displayed on school premises; which would never be made available to organisations supportive of terrorism etc.
5. school's close links with RBKC and comfort with sharing extremism related concerns externally
6. the moderation and conservatism of Falkner House families. Parents will have chosen Falkner House in part because we clearly endorse fundamental British values: democracy, free speech, tolerance, nonviolence etc.
7. the fact that children are taught to be alert to the risks associated with extremism and they are made aware, in an age appropriate fashion, of the dangers of social media and grooming in this context.
8. the strength of our IT policy

The Falkner House internet policy ensures that there is no access through the internet to terrorist or extremist activity in school. Home use of the Falkner House i-pads (Years 4, 5 and 6), including web

sites visited, is carefully monitored. The Falkner House Computing and PSHE policies cover the dangers of on-line grooming for radicalisation and children are taught how to stay safe on-line both in school and at home. Staff and children are thus made aware of the risks posed by the on-line activity of extremist and terrorist groups.

Proposals for visiting speakers are discussed with the DSL who follows the Visiting Speaker Policy to ensure they are both suitable and supervised at all times when on site. In practice all speakers will be well known to the school.

6.6 What the School does if a child has unexplainable and/or persistent absences from education (please also see the Attendance Policy)

Children who go missing or are absent from education, particularly persistently, can be a vital warning sign to a range of safeguarding issues, including abuse, neglect, sexual abuse and child sexual and/or criminal exploitation. It is therefore important that the School's response to such absence supports identifying such abuse and helps prevent the risk of them going missing in the future.

Falkner House asks all parents for at least two emergency contacts for their child. In the first instance, if a child is noted as absent in the register without prior authorisation, the school office will immediately contact the parents (by phone and then by email) to confirm the reasons for absence. They will then be given the appropriate code in the register. Patterns of absence are noted and parents contacted if necessary. Falkner House takes seriously the need for children to be at school.

The DSL would inform Social Services of any child who:

1. went missing from education or
2. fails to attend school regularly, or
3. has been absent without the school's permission for a continuous period of 10 school days or
4. misses a total of 15 school days (whether or not consecutive) over the school year for illness.

All "starters and leavers" aged over five years old at Falkner House at non-standard 'in year' transition points, are notified to the relevant Admissions Team at RBK&C via the s2s website. The team will be informed by the Bursar immediately when:

- The school is about to delete a pupil's name from the admission register. Details will be given to the team of the pupil's residence, the name of the person with whom they reside,

the date from which they will reside there, and then name of the destination school (if this information can reasonably be obtained and new home address if the pupil is moving to a new school.

- The school is registering a new pupil. Details will be given to the team of the pupil's address and previous school (where they can reasonably obtain this information).
- A child has not arrived at the school as expected (the school having already carried out our own checks).

6.7 What the School does if a child requires mental health support

Warning signs which indicate that a pupil may be experiencing mental health or emotional wellbeing difficulties should always be taken seriously and reported to the Designated Safeguarding Lead (DSL) in the first instance, in accordance with this policy. The headteachers are the Mental Health Leads on each site who will involve the appropriate staff so as to give pastoral support. In terms of external support, parents are directed towards CYPMHS (CAHMS as was) or external psychological advice.

Staff should be aware that mental health concerns may constitute a safeguarding issue in their own right, particularly where there is a risk of harm to the child. This may include, for example, self-harm, eating disorders, suicidal ideation or a risk of suicide. Mental health concerns may also be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. If a child is struggling with their mental health, there are likely to be potential warning signs which education staff are well placed to recognise. Possible warning signs include:

- Physical signs of harm or injuries that are repeated or appear non-accidental
- Panic attacks
- Increased isolation from friends or family, or becoming socially withdrawn
- Changes in activity, behaviour or mood
- A decline in academic engagement or performance
- Talking or joking about self-harm or suicide
- Expressing feelings of failure, uselessness or loss of hope
- Lateness to, or absence from, school

If a pupil discloses concerns about their own mental health, or that of another pupil, the member of staff's response should be calm, supportive and non-judgemental. Staff should listen carefully, avoid making assumptions, and focus on the pupil's immediate emotional and physical safety rather than seeking to explore the reasons behind the disclosure. Staff should not attempt to make a diagnosis. However, they are well placed to identify behaviours that may indicate that a child is experiencing, or is

at risk of developing, mental health difficulties (which may be influenced by additional needs, including SEND).

Where there is a risk of harm to the child, including self-harm or suicidal ideation, this must be treated as a safeguarding concern and acted upon immediately in line with this policy. The DSL will consider all concerns and determine the appropriate course of action. This may include providing support within the school, working with parents, and, where appropriate, seeking advice from or making referrals to external services.

Falkner House promotes a culture in which pupils feel able to talk openly about their wellbeing and where staff are encouraged to share concerns appropriately. While informal opportunities to share information may arise, these do not replace the need to follow the school's formal safeguarding procedures. The School recognises the importance of early identification and intervention and will work with parents, and external agencies where appropriate, to support the wellbeing of pupils. This may include consideration of external support, such as therapeutic services, where this is in the best interests of the child. The School will ensure that staff receive regular training and updates to support their understanding of mental health and emotional wellbeing, and their role in identifying and responding to concerns.

6.8 What staff should do if they have concerns that children are at risk of sexual harassment

Staff are aware of the importance of:

1. making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
2. not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
3. challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts.

A staff member would never dismiss or tolerate such behaviours, as it risks normalising them and can be seen as being the first step on a slippery slope. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Despite the above, staff are trained to explain to children that the law is there to protect rather than criminalise them. If staff have a concern about a child or a child makes a report to them, they should speak to the DSL/ DDSL, and record the report in writing on the Log.

6.9 How staff should respond to an incident of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes being shared by pupils

All members of staff in an education setting have a duty to recognise and refer any incidents involving self-generated intimate images and/or videos (including those generated using AI) and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'self-generated intimate images' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This includes AI generated material eg. deepfakes. 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 self-generated intimate images 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.

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, in order to minimise further distress or trauma to them. If staff are notified or become aware of an incident of self-generated intimate images being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible. The member of staff, following the DfE's confiscation guidance, should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy, print, share, store or save the imagery themselves, or ask a child to share or download the imagery.

The DSL will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (March 2024).

All incidents relating to self-generated intimate images being shared will be recorded, whether they have been referred externally or not. In the event the incident is not reported externally, the School will record the reason for doing so and ensure it is signed off by the Headteacher. Records will be kept in line with statutory requirements set out in KCSIE and local safeguarding procedures. No copies of imagery will be taken or retained.

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

6.10 What staff should do if they have safeguarding concerns about another staff member

If staff have safeguarding concerns about another staff member (including supply staff, agency staff, volunteers and contractors), then this should be referred to the Headteacher. Where there are concerns about the Headteacher or any member of the LLP, this should be referred directly to the LADO (in accordance with the procedures below regarding managing allegations of abuse against staff (including supply staff, agency staff, volunteers, and contractors).

6.11 What staff should do if they have concerns about safeguarding practices at Falkner House

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 Policy. 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 External Contacts page at the start of this policy.

7. Arrangements for dealing with Child on Child Allegations including bullying (see also the Behaviour (including Exclusion) and Anti-Bullying Policy)

Child on child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse. Abuse is defined as being when a young person is exploited, bullied and/or harmed by their peers who are the same or similar age (everyone directly involved in child on child abuse is under the age of 18). It can be entirely online. It can occur in school or out of school and can also be hidden so staff must be vigilant and report concerns.

Abuse is generally motivated by prejudice or perceived vulnerability e.g., on grounds of age, appearance, race, religion, colour, culture, sex, gender, homophobia, special educational needs (SEND) and disability, or because a child is adopted or is a carer or because they are new to the school or seem to be either shy or with no friends. Falkner House staff know that children with SEN or disabilities or with protected characteristics or who identify as LGBTQ+ must not be unlawfully discriminated against and indeed can face additional challenges e.g. communication difficulties and may be more at risk from harm or bullying and may need additional support, safe spaces and reasonable adjustments made for them.

Falkner House has a zero-tolerance approach to abuse, and it can never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviour, misogyny, and an unsafe environment for children. Pupils bags and outer clothing may be searched by the headteacher or DSL team if there are concerns that unauthorised or unacceptable items are being brought into school e.g electronic devices, knives, money etc. Respect and kindness are central Falkner House school values which underpin the very ethos of the school. All child-on-child abuse is unacceptable and will be taken seriously.

For further information surrounding Falkner House's approach to child on child abuse, including sanctions, please see the Falkner House Behaviour (including Exclusion) and Anti-Bullying Policy, which details the school's disciplinary policy including the use of reasonable force, and procedures that apply. Clearly there is a range of "bad behaviour": incidents are dealt with by staff and noted in the individual pupil notes while more serious episodes of bad behaviour are also noted in the school Log[2]. In the case of suspected child on child abuse a member of the DSL team should be informed. All staff are trained in how to recognise and manage child on child abuse. Both the perpetrator and the victim should be treated as being at risk but equally the victim will always be closely and sympathetically supported by the school staff. As necessary, the DSL will inform social services and the parents of the victim and the alleged perpetrator. The DSL may wish to discuss with the victim and their parents whether there should be police involvement.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges and may be more prone to child on child group isolation or bullying (including prejudice-based bullying) than other children, without outwardly showing any signs.

[2] The Log details every incident of notable behaviour including bullying, recording the date, what happened, pupils involved, sanctions, rationale, and any other relevant information.

7.1 Steps to minimise the risk of child on child abuse

- Careful supervision of the children at all times minimises the risk of child on child abuse. The school recognises that even if there are no reported cases of child on child abuse, such abuse may still be taking place and is simply not being reported, but again, the culture of careful supervision of the children is designed to minimise this risk wherever possible.
- All staff and pupils are educated about this issue. This includes:
    - regular training on the nature, prevalence and effect of child on child abuse, and how to prevent, identify and respond to it.
    - Educating children about the nature and prevalence of child on child abuse via PSHE and the wider curriculum. Pupils understand what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. Pupils are regularly informed about the School's approach to such issues, including its zero tolerance policy towards all forms of child-on-child abuse including racism, derogatory behavior and other forms of physical violence and conflict.
- Ensuring that all child on child abuse issues are fed back to the headteacher so that they can identify and address any concerning trends and pupils who may be in need of additional support (eg. adapting break times, playground play partners or bus partners when the children go offsite).
- Challenging the attitudes that underlie such abuse (both inside and outside the classroom).
- Creating conditions in which our pupils can aspire to and realise safe and healthy relationships
- Fostering a culture of openness and communication to encourage children to confidently report abuse, knowing their concerns will be treated seriously no matter to whom they report the matter. Pupils have many avenues to report worries or concerns, such as anonymous notes on teachers' desks, there are assemblies addressing who to talk to if you have a concern or worry, PSHE lessons and teacher/child diaries.
- Monitoring: staff on duty in the playground are equipped with accident/incident report forms so that they may record any notable incidents. Reports are collated on a weekly basis so that patterns can be established.

7.2 Procedures to be followed in the event of child on child abuse

Staff should follow the procedures set out in the Falkner House Behaviour (including Exclusion) and Anti-Bullying Policy.

If a member of staff has concerns regarding child on child abuse they must inform the headteacher / class teacher. The headteacher and /or class teacher may then discuss the matter with the children concerned in order to have all possible details. The adult reporting the concerns will promptly record the details on the relevant children's pupil notes. Significant incidents will be reported to parents and their views sought. In serious cases the headteacher will liaise with the DSL and consider whether it is appropriate to also record the matter on the Log, and whether the DSL should contact Social Services and or the police.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures above.

7.3 Reflecting on patterns

The School will reflect on reported concerns, including the decisions made and actions taken, in order 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 amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

7.4 False, unsubstantiated, unfounded or malicious reports

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 Headteacher will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's Behaviour policy.

8. Arrangements for dealing with safeguarding concerns or allegations of abuse regarding teachers including trainee teachers, supply staff and other staff (also including the headteachers, LLP members, DSL, volunteers and contractors)

The School's procedures for managing allegations against staff (including supply staff, trainee teachers, volunteers and contractors) who are currently working in the School whether in a paid or unpaid

capacity follows DfE statutory guidance and applies when staff (including volunteers) have (or are alleged to have):

- behaved in a way that has harmed or may have harmed a child or adult at risk;
- possibly committed a criminal offence against or related to a child or adult at risk;
- behaved towards a child or children or adult/s at risk in a way that indicates they may pose a risk of harm to children or adults at risk;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children or adults at risk (this behaviour includes inside and outside of the workplace)

Allegations that **do not** meet the above harms test should be dealt with using the School's procedure for handling low level concerns set out at section 10 of this policy.

When dealing with allegations 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. Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the Headteacher, or in her absence the board member in charge of safeguarding. If the allegation involves supply staff, trainee teachers and contractors the relevant agency / institution must be kept fully informed and involved. Where the Headteacher or member of the LLP is the subject of the allegation or concern, the Headteacher **must not** be informed of the allegation prior to contact with the LADO. However, staff may consider discussing any concerns with the DSL (who is independent of the LLP) and may make any referral via them.
2. The Headteacher will take the matter seriously and report to the LADO without delay. The school will not undertake any investigations of an allegation without prior consultation with the LADO, or in the most serious cases the police, so as not to jeopardise statutory investigations. A course of action must be agreed upon with the LADO. In a case of serious harm, the police are to be informed from the outset and in this situation, the LADO should also be informed within one working day. Discussions should be recorded in writing and communication with both the individual and the parents of the relevant child / children agreed.
3. Careful consideration, with due weight given to the LADO's views must be given as to whether suspension is warranted. Every effort must be made to maintain confidentiality and to avoid unwanted publicity. These restrictions apply up to the point where the accused person is

charged with an offence, or the DfE / Teaching Regulation Agency (TRA) publish information about an investigation or decision in a disciplinary case.

4. In the event of enquiries being made by other parents, they should be told only that an allegation of misconduct has been made against a member of staff and that it is being investigated. No further information is to be given without legal advice. If there has been a substantiated allegation against a member of staff (including trainee teachers), then the LADO will be involved to help determine any possible improvements to policy or practice to help prevent similar events in the future. Where an allegation is made against a supply teacher or contractor, the headteacher will take the lead and immediately contact both the agency concerned and the LADO. The school will continue to support any investigation that is required.
5. Any such allegations against Members of the LLP (which include the principal and two headteachers) must be immediately reported to the LADO within one working day (contact details below). The LADO will then advise how to proceed.
6. All concerns, including what might seem to be low level concerns, (see below) about adults working with children need to be taken seriously with consultation with the LADO if there is doubt as to the seriousness of the issue. In the case of supply staff/ contractors low level concerns should be reported to their employers. Such concerns must be shared with the headteacher or principal who must record, deal and take appropriate action. All staff should be clear as to what constitutes appropriate behaviour and be prepared to report them.

8.1 Reporting to the Disclosure and Barring Service (DBS) or Teaching Regulation Agency (TRA)

The school will report promptly (offering as much evidence about the circumstances of the case as possible) any person (employed, contracted, volunteer or student) to the DBS whose services are no longer used for regulated activity when DBS referral criteria are met – i.e. who has harmed or posed risk of harm to a child and who has been removed from working (paid or unpaid) with children, or would have been removed had he or she not left earlier. Compromise agreements cannot be used to prevent a referral to the DBS when such a referral is legally required. The school will also consider making a referral to the TRA where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate.

9. Arrangements for dealing with Low-Level Concerns or allegations (ie. that do not meet the harms test) about teachers and other staff (including the Headteacher, LLP member, supply staff, volunteers and contractors

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with Falkner House's staff code of conduct, including inappropriate conduct outside of work. The term 'low level' concern does not mean that it is insignificant, it means that the adult's behaviour towards a child or adult at risk does not meet the harm threshold.

Concerns could include staff being over-friendly with children, having favourites, taking photographs of children on their mobile phone, engaging with children on a 1:1 basis in a secluded area or behind a closed door, humiliating children or using inappropriate sexualised, intimidating or offensive language.

Low level concerns may arise in several ways and from a number of sources including suspicion, complaint, or disclosure made by a child, parent or other adult within or outside of the organisation.

Falkner House encourages a culture of openness, trust and transparency in which the school's values and expected behaviour (as set out in the Staff Code of Conduct) are lived, monitored and reinforced every day. Staff must share all concerns with the Headteacher without delay so they can be recorded and dealt with appropriately, sensitively and in a timely manner. The nature of the school means that staff know that they would be supported and assisted emotionally and practically through the process. Where a low-level concern is raised about the Headteacher or any LLP member, it should be referred to the LADO directly.

The Headteacher may choose to collaborate with the DSL regarding next steps, depending on the nature of the low-level concern (bearing in mind the ownership structure of Falkner House). If the headteacher / DSL is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern meets the threshold or an allegation of harm, they would consult with the LADO where thresholds for an allegation may be met or where there is uncertainty as to whether the matter constitutes a low-level concern or an allegation.

Staff (and self referral is an important possibility) do not need to be able to determine whether their concern is a low-level concern, or if it should be referred to the local authority, or indeed whether it meets the threshold of an allegation. Once the concern has been shared, the headteacher (or DSL) will consider thresholds in consultation with the LADO where appropriate

If the concern has been raised via a third party, the headteacher should collect as much evidence as possible by speaking directly to the person who raised the concern, (unless it has been raised anonymously) and to the individual involved and any witnesses. The information collected will help them to categorise the type of behaviour and determine what further action may be required. Reports of low level concerns about supply staff and contractors should be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

All reported low level concerns are noted by the headteacher in the school Log with dates, details of the concern, the context in which the concern arose, rationale and action taken. The name of the individual sharing their concerns is noted and if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. The Log is regularly reviewed by the Headteacher and the board so that patterns of inappropriate, problematic or concerning behaviour can be identified, and managed so as to avoid recurrences.

It is always important to consider whether there are wider cultural issues within the school that have enabled the behaviour to occur in which case appropriate policies might need to be revised, or extra training delivered to minimise the risk of it happening again. Lessons can and should be learnt from all cases and concerns even those that are found to be unsubstantiated. There is provision for mediation and dispute resolution where necessary as well as transparency and accountability in relation to how concerns are received and handled.

10. Management of Safeguarding

The DSL and DDSLs' contact details can be found on the Internal Contacts page at the start of this policy. The DDSLs are the people to whom reports should be made in the absence of the DSL, ensuring there is the required cover for the role at all times. Neither DDSL nor the DSL is a member of the LLP.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School (including online safety and understanding the filtering and monitoring systems and processes in place). This is explicit in the role holder's job description and the DSL has the appropriate status and authority within the school to carry out the duties of the post. The DSL's responsibility is to:

- maintain an overview of safeguarding within the School (with due regard to KCSIE, ensuring all duties are included),
- to open channels of communication with local statutory agencies,
- (where relevant) to proactively consult DSLs of different settings when there are transfers, in advance of a child moving settings

- refer incidents to third parties (including the local authority children's services, the DBS, 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 must meet responsibilities under the Safeguarding Vulnerable Groups Act 2006. The DSL works with the members of the LLP to review and update the School's safeguarding policy. The role of DSL carries a significant level of responsibility, and she is given additional time, funding, training, resources and support so as to carry out the role effectively. The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services. The DSL ensures that (if relevant) any external centres etc. used by the school have safe recruitment practices and safeguarding procedures in place. Any members of the School involved in recruitment are appropriately trained in safer recruitment processes.

During term time, the DSL and/or a DDSL will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. For out of hours/out of term activities, staff and pupils should contact the Board Level Lead: Mrs Anita Griggs, who is a member of the LLP and has specific responsibility overviewing safeguarding and Child Protection.

Full details of the DSL's role can be found at Annex C of KCSIE (copied in full below in Appendix 3).

11. Training

11.1 All Staff (including EYFS)

All new staff are provided with induction training that includes:

- Falkner House Child Protection and Safeguarding Policy and Procedures (including the policy and procedures to deal with child on child abuse)
- Information about the identity and roles of the DSL and DDSLs
- Falkner House Behaviour (including Exclusion) and Anti-Bullying Policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- Falkner House Staff Code of Conduct which includes online safety and the School's Whistleblowing procedure

- The safeguarding response to children who go missing from education;
- Falkner House Internet Policy (including roles and responsibilities in relation to filtering and monitoring)
- Health and safety issues (including mental health and allergies)
- A copy of KCSIE
- Information about emergency evacuation procedures
- Helping children and staff with mental health issues

All staff (including the headteachers who are not DDSLs) are also required to:

- Read, be aware of and comply with the Falkner House Safeguarding and Child Protection Policy and Procedures (includes Whistleblowing and children Missing in Education), KCSIE part 1 and the Falkner House staff Code of Conduct which includes online safety. Staff must also be aware of all other Falkner House policies, with particular regard to the Behaviour Policy and the Internet Policy. If KCSIE is updated by the Department for Education, staff will be updated on the changes via INSET days.
- Receive appropriate safeguarding and child protection training which is regularly updated in line with the LSCP's guidance. This training includes mental health, online safety (how to recognise online risk indicators, how to respond to incidents, expectations, applicable roles and responsibilities in relation to filtering and monitoring). Training will also include *Prevent* awareness training and training in how to manage a report of child on child sexual violence and harassment.
- In addition, all staff members (including those in the EYFS) receive safeguarding and child protection updates (via email and staff meetings) as required, but at least annually, to provide them with the relevant skills and knowledge to safeguard children effectively. The DSL leads on ensuring that regular safeguarding and child protection updates are circulated to all staff. Safeguarding training for staff, including online safety training, will be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training and curriculum planning.
- Undertake regular refresher updates, at least annually (which takes account of any staff turnover or changes in national or local guidance), to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via, for example, one to one discussions, termly INSET days and staff meetings.

11.2 DSL Team (DSL, DDSL, Board Level Lead)

The DSL team receives updated child protection training including inter–agency training every two years and training in the LSCP approach to *Prevent* duties. If considered necessary, staff complete this on-line training so as to give them the knowledge and confidence to identify children at risk of being drawn into terrorism, to challenge extremist ideas and to know how to refer children and young people for further help.

In addition to their formal training, the DSL team's knowledge and skills are updated at least annually to keep up with any developments relevant to their roles. In particular, the School will support the DSL in developing her 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 DDSLs are trained to the same level as the DSL.

11.3 Oversight of Safeguarding, Including Arrangements for Reviewing Policies and Procedures

Mrs Griggs is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements at Falkner House. She is the school Principal and a member of the LLP.

Members of the LLP receive appropriate safeguarding and child protection (including online) training. This training is regularly reviewed and updated to equip them with the knowledge to provide strategic challenges to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. The School draws on the expertise of staff, including the DSLs, in shaping the School's safeguarding arrangements and policies. In addition, guidance is sought by external consultants when reviewing policy, procedures etc. on an annual basis to ensure both compliance and best practice. In addition, careful note is taken of advice notes from Farrar and Co, ISA, ISC as well as updates from Andrew Hall and our local authority. The board gives final approval to any revisions.

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.

There is an annual meeting of the members of the LLP together with all the DDSLs to discuss and review the Child Protection and Safeguarding Policy, (with advice from an external consultant) including the effectiveness of procedures and their implementation, lessons learnt and the 'Falkner House Log'.

12. Arrangements to fulfil other safeguarding responsibilities

12.1 Teaching children how to keep safe

The School ensures that all pupils are taught about safeguarding, including online safety, in assemblies, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and its associated risks. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

Falkner House is aware of its duty to build resilience to radicalisation both now and in the future for our pupils as they move on to secondary school. In addition, the PSHE syllabus and promotion of fundamental British values teaches pupils to manage risk, resist pressure, make safer choices and seek help if necessary. Our teaching across the curriculum focuses where appropriate on the values of democracy, diversity, mutual respect and the good management of contentious issues.

Internet safety (including when children are online at home) is an integral part of the School's IT curriculum and also embedded in PSHE and and Relationships and Sex Education ("RSE"). The children are taught to recognise when they are at risk and how to get help when they need it. Their welfare in the widest sense of the word – their happiness as well as safety is paramount.

12.2 Online Safety including filtering and monitoring

Please also see the School Internet Policy and Behaviour (including Exclusion) and Anti-Bullying Policy.

The school recognises the importance of safeguarding children from potentially harmful and inappropriate online material. Teaching children how to keep safe online is therefore a whole-school responsibility which is underpinned by the School's systems, culture, and education. It is an integral part of the school computing and PSHE and RSE curriculum (see Falkner House PSHSE and RSE

Policy, syllabus and schemes of work). Throughout computing lessons pupils are taught how to use the laptops responsibly.

They will understand that at school they must:

1. Only access sites and material that have been approved by the teacher and that are relevant to their schoolwork
2. Log on to the school's computer network using their username and password and they must not allow any other pupil to use their username and password
3. Log off at the end of each session.
4. Not at any time log on to any internet chatroom or similar facility which may result in their personal details being disclosed or may identify them to persons unknown
5. Understand that the school and its Internet Service Provider can, at any time, access and monitor their usage of the computer.
6. Not download anything from the internet unless given permission by a teacher
7. Only send and receive emails, or open attachments under the supervision of a teacher
8. Report any incidence of bad language or distasteful images to a teacher if they come across them accidentally
9. Always be themselves and will not pretend to be anyone or anything they are not
10. Realise that unkind actions like posting photos, snide comments, meanness or bullying online are totally unacceptable
11. Only use generative AI tools on the School's devices/systems in specific and supervised circumstances.

Pupils are also taught both in their computing and PSHE and RSE lessons and whenever appropriate, similar guidelines apply when out of school (replacing guidance of a teacher with guidance from a parent or responsible adult). The dangers of cyberbullying, generative AI and sexting are discussed with pupils and with parents (in annual tech talks) as are the risks of being bullied, groomed, abused or radicalised on-line. Appendix 1 of the Staff Code of Conduct sets out in greater detail how the school recognises and guards against the dangers of AI.

Parents are a crucial part of this process: they are told of the school's internet monitoring and filtering systems (which are set out in our Internet Policy) and what their child is being asked to do on-line, what sites they may use at school and which members of staff they may be interacting with on-line (as per our Internet Policy). There is regular, active communication with parents as to how to help keep their child safe on the internet, to support them in understanding online risks and provide relevant guidance/materials (further outlined in our Internet Policy). **Pupils are not allowed personal**

mobile devices at school (aside from their school iPad which is only used in the classroom or in supervised homework) or on trips etc.

Members of staff must report matters to the DSL and the IT team if they:

- Witness or suspect unsuitable material (including new content or contacts) has been accessed
- Can access unsuitable material.
- Are teaching topics which could create unusual activity on the filtering logs.
- Notice a failure in the software or a potential for the abuse of the system.
- Perceive unreasonable restrictions that affect teaching and learning or administrative tasks.
- Notice abbreviations or misspellings that allow access to restricted material.

Members of staff must confiscate any pupil-owned device with inappropriate material and pass that on to the DSL. Members of staff should not look at the content of the device or seek to carry out their own investigation. As part of the above processes the School has appropriate filtering and monitoring systems in place. As set out in the Internet Policy, the Governing Body has overall strategic responsibility for filtering and monitoring systems and processes at the School.

The DSL has lead responsibility for safeguarding and online safety, including oversight of filtering and monitoring systems, reviewing safeguarding concerns identified through those systems, and ensuring that concerns are acted upon appropriately. The Head of IT is responsible for the day-to-day management and operation of the School's filtering and monitoring systems, working closely with the DSL and Headteacher.

As part of the Head of IT's day-to-day management of online safety, their responsibilities include:

- Procuring appropriate filtering and monitoring systems
- Documenting decisions on what is blocked or allowed and why
- Identifying risk
- Ensuring that blocking does not unreasonably impact teaching and learning
- Reviewing the effectiveness of provision at least annually
- Ensuring that there are effective safeguarding systems in place that meet the safeguarding needs of pupils
- overseeing and acting on filtering and monitoring reports and checking the filtering and monitoring systems to ensure, to the best of her ability, that pupils and staff are safe online, bearing in mind the use and impact of Generative AI as well as static content.

The DSL will determine what action, if any, is required in response to safeguarding concerns identified through filtering or monitoring systems.

Together with the DSL and the Headteachers, the Head of IT is also responsible for making sure that all staff:

- Understand their role
- Are appropriately trained
- Follow policies, processes and procedures
- Act on reports and concerns

The Head of IT will produce a written effectiveness review on at least an annual basis or when:

- A safeguarding risk is identified
- There is a change in working practice
- New technology is introduced

This annual written review will be circulated to and discussed with the Headteachers and the Board who will review at the annual Board Meeting the effectiveness of the filtering and monitoring system.

Filtering systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online, including misinformation, disinformation and fake news (content risk); reduce the risk of children being subjected to harmful online interaction with others including via generative AI, commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing 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 (conduct risk). The School recognises that some children have unlimited and unrestricted access at home to the internet via mobile phones 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 undetected. It is a strong recommendation that parents and guardians do not allow pupils access to any personal devices when not under adult supervision, in accordance with the School's Internet Policy.

The School recognises that in the case of extended remote learning and where there is provision made for pupils to study on site, risks can include the same online risks (although mitigated by the School's built-in securities and firewalls). The School fully complies with the Department for Education's published filtering and monitoring standards, as set out in the Internet Policy, with due regard also to the Cyber security standards for schools and colleges (2025).

12.3 Staff interaction with pupils and use of technology including cameras (including EYFS)

Please see the Falkner House Staff Code of Conduct, the Falkner House School Internet Policy and the Falkner House PSHE and RSE policy syllabus and schemes of work, and the EYFS Policy. The school computing curriculum also details internet safety in and out of school.

The use of devices capable of taking photographs, recording audio/video, accessing the internet, or sharing/transmitting data presents potential safeguarding risks and must be appropriately managed. For the purpose of this policy, devices with imaging and sharing capabilities include: mobile phones, smartphones, tablets, smartwatches, laptops, wearable technology, cameras, and any device capable of:

- taking photographs;
- recording video/audio;
- accessing the internet; or
- sharing/transmitting content electronically

Staff should turn off devices capable of taking photographs, recording audio/video, accessing the internet, or sharing/transmitting data at all times except during lunch or mid-morning breaks. Any phone conversations should be held in private so as not to disturb other staff. During work hours minimal use of personal mobile phones at work is permitted, for example important or urgent communications with family. If staff use a personal device while at school they may only access sites and material that are appropriate. Any personal devices that may be brought into school must only contain material that is appropriate. If staff access the school shared files remotely through a personal device, they must sign out when finished.

- The children should not see staff with their personal devices either in school or out on trips. The only exception to this is use of the school mobile when on a trip or at PE.
- Staff should not share their personal details with parents or mobiles; this includes personal mobile phone numbers.
- When logging into Google Drive for the first time on school devices, staff will need to enter a two-factor authentication code which will be received on a personal mobile phone. Staff will try to ensure that they are logged onto any new devices before or after the school day begins to avoid carrying their phones around.
- Photographs of pupils by staff should only be taken using a school device in connection with normal school activities e.g. trips, sporting events, or for academic purposes. Any such 'school photographs' must immediately be deleted from the device once they have been promptly uploaded to the school website, the school's IT system or sent to the relevant parent. No 'school

photograph' is to be uploaded to any social media site or to any website without authorisation from the Headteacher.

- If members of the public are observed photographing / videoing Falkner House pupils in the playground or off-site staff should politely ask them to stop.

12.4 Arrangements for health & safety, extended school activities and educational visits

Please also see the Falkner House Risk Assessment, Health & Safety, Allergy and Medical Conditions and First Aid Policies, Educational Visits Policy, Catering & Food Hygiene Policy & School Dog Policy. The EYFS policy and procedures details the School's provision on safer eating requirements within the Nursery and Reception settings.

In terms of physical safety, the following is routine:

- Risk assessments are reviewed at least annually (and acted on) for all aspects of school life including school visits
- Registers are taken before the start of morning and afternoon school.
- Children or adults leaving the school during the school day e.g. for a medical appointment have to sign in and out in the office. Parents are called immediately in the case of an unexplained absence.
- Regular fire and lockdown practices are held
- There are secure external doors and locks on windows
- All reasonable steps are taken to prevent unauthorised persons entering the premises, and all visitors have their identity checked
- The school undertakes an enhanced DBS check and other required checks on all employees and all those over 16 who look after children or who live on the premises, to ensure they are suitable to fulfil the requirements of their role or who are likely to have regular contact with children) are suitable. People whose suitability has not been checked, including through a DBS check, are not allowed to have unsupervised contact with children being cared for. Falkner House records information about staff qualifications and the identity checks and vetting processes that have been completed (including the criminal records disclosure, reference number, the date a disclosure was obtained and details of who obtained it) as part of the SCR. Staff are told that they must disclose any convictions, cautions, court orders, reprimands and warnings which may affect their suitability to work with children (whether received before or during their employment at the setting).
- Children never leave the premises unsupervised and are only released into the care of individuals after prior notification to the school by the parent who are required to notify school in advance if anyone other than parent or known carer is to collect their child.

- Teachers are prohibited from being under the influence of alcohol or any other substance which may affect their ability to care for children. If teachers are taking medication which may affect their ability to care for children, those teachers should seek medical advice. Those teachers only work directly with children if medical advice confirms that the medication is unlikely to impair that staff member's ability to look after children properly.
- All medication on the premises (including in handbags etc.) are stored securely and out of reach of children at all times.
- Medical protocols are updated annually, for all children with significant medical conditions or needs and relevant medical information from the child's doctor or doctors is requested as supporting information.
- For pupils with severe allergies - in accordance with government guidelines, the School has spare AAIs available for emergency use. All children who have an AAI prescribed by their doctor have two available for use (one primary, one spare) within individual medical packs kept in the staffroom. These are kept in an unlocked cupboard, so they are always available. The spare AAIs will be taken with any off-site activity such as away fixtures or educational visits.
- Only first names of children are used when publishing photographs so as to preserve identity
- Particular care is taken when children are engaged in one on one teaching – either academic, music or sport. Staff are given additional training, music rooms all have glass internal windows / doors and doors are generally kept open during individual lessons.
- On occasions where the boys and girls are together on the same premises, separate toilets are provided for boys and girls aged 8 and over (apart from where individual toilets are in a room that can be locked from the inside, intended for use by one pupil at a time). If a child did not want to use the toilet designated for their biological sex, the School would consider providing alternative toilet facilities, eg. self-contained individual toilets.

In terms of emotional safety, the following is routine:

- There is always a happy atmosphere within the school and all children are taught that they can talk to any adult regarding any matter.
- To this end, there is a clear no-bullying culture supported by the Behaviour Policy, and kindness to others is regarded as paramount. The school promotes an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of their safeguarding responsibilities.
- The staff understand what to look out for in terms of mental health issues, and what to do in the event of any concerns. The children feel secure because there is very close contact between school and home and the leadership is always prepared to suggest that parents seek external professional advice from a specialist or therapist if this seems appropriate.

- The staff are alert for the particular potential difficulties for children with SEN, who may need intimate care, be more isolated from their peers, and more dependent on adults for their care.
- Staff are alert to the possibility of Fabricated Illness – hence the need to check supporting medical information.

In terms of children questioning their gender:

- The school will comply with the Equality and Human Rights Act
- Bullying is not tolerated.
- Fairness and safety for all children is considered
- The school will take a "very careful approach" when considering requests for support with social transition and will not initiate social transition
- The school will work with parents and ensure that they are actively involved in the "vast majority" of cases . Their views will be treated with importance.
- Accommodating social transition will be treated with caution and full social transition is likely to be agreed very rarely. Access to toilets and showers will be carefully considered.
- Where there are no safety concerns and a child were to make a request relating to how they participate in sport, the School would consider the request in light of the advice on "considering requests for support with social transition".
- Support will be given or those who wish to de-transition
- The DSL will conduct at least annual reviews.

12.5 Legal concerns:

- **Defamation** - One of the main concerns quoted by adults in their reluctance to report suspicions of abuse is the fear that the person suspected will sue them for defamation if the allegation turns out to be unfounded. To be defamatory, a statement must first of all be untrue. Even if subsequently shown to be untrue, the statement will be protected by "qualified privilege" if it is made to the appropriate authority in response to a duty whether legal, moral or social or in the protection of an interest.
- **Breach of Confidence** - If certain conditions are met, information may be regarded as confidential. Passing on confidential information without permission could lead to an action for breach of confidence. If the conditions listed below are satisfied and an action is raised, it would be a defence to show that the information was passed on in pursuit of the public interest. As there is a clear public interest in the protection of children, it is difficult to envisage any such action succeeding. Information would be regarded as confidential if:
    - The information disclosed was confidential in character (e.g. not a matter of public record, such as a person's age)

- Disclosure has or would cause actual harm to the person whose confidence was breached
- One could infer that the confider did not want the information passed on.

- **Confidentiality -** Confidentiality is an important issue for children, parents and professionals. Children and parents may wish to raise or share concerns but be fearful of setting in train a series of events, which may have far-reaching and unwanted consequences. They may seek an assurance of confidentiality before expressing their concerns. Staff will also be concerned because they do not want to lose the trust of those who may have sought their help. Neither do they wish to feel responsible for initiating what might be seen as uncomfortable procedures, but they recognise they have a responsibility towards the children. Problems may arise when a child consults a member of staff about a problem and does not want that information to be shared with parents. Whilst staff will try to encourage children to share the information with parents, there may be circumstances in which any pressure to pass the information on could result in the child keeping the problem to themselves, or not sharing concerns in the future. Whilst every effort will be made to respect a desire for confidentiality, if serious concerns arise about a child's welfare, it may be necessary for that information to be passed on to the appropriate authorities. It will be made clear to those seeking advice that the staff member may not be able to promise confidentiality but that they will not breach the confidence without letting the person know that they intend to do so. The policy of Falkner House is to work in partnership with parents in order to promote the welfare of children and to build up relationships of trust with children. Children and parents should feel able to raise concerns about safety and welfare with the school in the knowledge that these will be dealt with sensitively. Due to the nature of such concerns, the school will operate on the presumption that anything imparted in confidence will be treated in confidence.

  This is subject to three qualifications: -

  1. Anything imparted "in confidence" to a member of staff or an associate of the school may be shared with a restricted number of colleagues, if that person feels in need of support and guidance
  2. If serious concerns are raised about the safety or welfare of a child, the person approached may be obliged, in terms of the school's child protection procedures, to pass that information on to the DSL. In these circumstances, the person approached would not, except in an emergency, breach the confidence without letting the child know their intentions
  3. Falkner House School will, of course, pass on information when legally obliged so to do.

APPENDIX 1 - SIGNS AND TYPES OF ABUSE

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. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children, and staff should be aware that being subjected to harassment, violence or abuse may breach children's rights under the Human Rights Act. Staff should always consider contextual matters such as the wider environmental factors in a child's life that may be a threat to their safety and or welfare. The DSL will appoint an appropriate and trained member of staff to have responsibility for the welfare and progress of any Looked after Child. Staff must keep abreast of concerns to check whether matters are improving. Staff should all be aware that SEND children or children with or certain medical or physical health conditions can face additional safeguarding challenges both online and offline.

Additional barriers can exist when recognising abuse, neglect, exploitation and modern slavery in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Knowing what to look for is vital to the early identification of any kind of abuse, including neglect. All staff should be aware of indicators of abuse so that they are able to identify cases of children who may be in need of help or protection. The training that the staff receive enables them to identify signs of

possible abuse and neglect at the earliest opportunity, and to respond in a timely and appropriate way with early evidence based interventions and to share information quickly and to challenge inaction. If unsure, staff should always speak to the DSL (or DDSL). All school staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Child on Child Abuse

Child on Child abuse most likely includes, but may not be limited to:

1. Bullying (including cyberbullying, prejudice-based and discriminatory bullying) can be defined as the exercise of power by an individual or group over another individual or group in a manner that causes hurt (physical or emotional). It can include;
    - Name calling, banter, taunting, teasing, insulting, "snide" remarks, putting people down. This could include but is not limited to: comments mocking protected characteristics including disabilities, religions, discriminatory behaviour (including racism, faith-targeted abuse, and other prejudice-based incidents), being adopted, appearances, cultures or of a homophobic, sexual/sexist or racist nature
    - Intimidating, isolating or exclusion from a group
    - Spreading false rumours or writing unkind or malicious notes (including cyber bullying i.e. social networking, sexting, email or text messages) about fellow pupils or staff
    - Taking, damaging or hiding belongings
    - Physical abuse (which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm)
    - Emotional abuse,
    - Inappropriate sexualised behaviour, sexual violence or harassment,
    - Initiation rites or hazing behaviour either in person or remotely e.g. by the use of banter.
    - **Cyber / online bullying** (on the internet or on mobile phones): Unpleasant comments or photographs can be placed on social networking sites or sent via mobile phones.
        - **In school:** As access to such sites is barred at Falkner House, as are mobile phones, such activity is unlikely to take place on school premises or in school time. Pupils are taught within school not only how to keep themselves safe online (see PSHE Policy, curriculum and schemes of work) but also that unpleasant comments made electronically do indeed constitute bullying and such cyber bullying is totally unacceptable. Please also see the Falkner House Internet Policy and pupil iPad Code of Conduct which details the school Computing infrastructure and roles and responsibilities. In addition pupils are only allowed to use their iPads, or school laptops in the presence of school staff and in connection with their school work.

- **Out of school:** School policy is that parents are asked to involve themselves closely with their child's cyber activities and to monitor their use of the internet and emails etc. Advice to parents on this topic is given by annual talks, with a summary in our Parent Go to guide - Tech.

2. physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
3. physical assault and harm, or the threat of harm with a weapon;
4. harmful sexual behaviour, including misogyny, sexual violence and sexual harassment
5. sexual violence such as rape, assault by penetration and sexual assault;
6. 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;
7. sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
8. abuse in intimate personal relationships between children (also known as teenage relationship abuse)
9. upskirting, typically involving taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
10. consensual and non-consensual sharing of self-generated intimate images or videos including those generated by AI (also known as sexting);
11. emotional abuse – the importance of children's self-esteem and self-confidence is paramount at Falkner House.
12. prejudice-based harm: all staff should recognise that children may experience prejudice-based harm including racism, faith-based prejudice/faith-targeted abuse, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.

Domestic abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological, physical, sexual, financial and emotional.

Exposure to domestic abuse and/or violence (including where they see, hear or experience its effects) 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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. Advice on identifying children who are affected by domestic abuse and how they can be helped is available at: *NSPCC- UK domestic-abuse Signs Symptoms Effects, Refuge - what is domestic violence/effects of domestic violence on children and Safelives: young people and domestic abuse*.

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 verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may 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 from 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, 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.

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, for example, 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 13 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.

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. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Sexual abuse

Involves forcing, causing or enticing a child 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of the School's policy and procedures for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

School staff must be aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

1. Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
2. Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
3. Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or

penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual violence and harassment between children

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur in families and between siblings. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing and need support. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Sexual harassment: 'unwanted conduct of a sexual nature' that can occur online and offline in the context of child on child sexual harassment. 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. Whilst not intended to be an exhaustive list, sexual harassment can include:

1. sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
1. sexual "jokes" or taunting;
2. physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
3. online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
    - consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of self-generated intimate images, or sexting);
    - sexualised online bullying;
    - unwanted sexual comments and messages, including, on social media; •
    - sexual exploitation; coercion and threats; and

- upskirting which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

Sanctions, support and management are detailed in the school's Behaviour (including Exclusion) and Anti-Bullying Policy. Such abuse may become a safeguarding issue and would then be dealt with in accordance with school protocol, liaising with statutory safeguarding partners.

Child sexual exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the 18 financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology. Like all forms of child sex abuse, child sexual exploitation:

1. can affect any child or young person (male or female) under the age of 18 years, including 16 and 17-year olds who can legally consent to have sex
2. can still be abuse even if the sexual activity appears consensual;
3. can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity; • can take place in person or via technology, or a combination of both;
4. can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
5. 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);
6. can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse;
7. is typified by some form of power imbalance in favour of those perpetrating the abuse. 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.

Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;

- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- 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.

Child criminal exploitation: county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity, drug networks or gangs grooming and exploiting children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism15 should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

1. can affect any child or young person (male or female) under the age of 18 years;
2. can affect any vulnerable adult over the age of 18 years;
3. can still be exploitation even if the activity appears consensual;
4. can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
5. can be perpetrated by individuals or groups, males or females, and young people or adults; and
6. is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Specific safeguarding issues

Children and the court system and children with family members in prison

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are age appropriate guides to support children 5-11-year olds. The guides explain each step of the process, 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 which can be stressful for children. The Ministry of Justice has an online child arrangements information tool with clear and concise information on the dispute resolution service. C.200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Serious violence

All staff should be aware that concerns relating to serious violence, although uncommon in a primary setting, may arise and should be treated as a safeguarding matter. All staff should be alert to indicators which may suggest that a child is at risk of harm, or may be exposed to or influenced by harmful behaviour outside of school. These may include increased absence from school, potential risk factors, a change in friendships or relationships with older individuals or groups, a significant decline in engagement or performance, changes in behaviour or wellbeing, signs of self-harm, or signs of assault or unexplained injuries. Unexplained gifts or new possessions may also indicate that a child has been approached by, or is connected to, individuals who may pose a risk.

Staff should be alert to any situation where a child may be in (or intend to be in) possession of an item or weapon which could be used to cause harm, or where there are concerns that a child may be at risk of harm from others. Any such concerns must be reported immediately to the Designated Safeguarding Lead (DSL) in accordance with this policy who must assess the risk promptly and take appropriate action. All staff should recognise that children who display concerning or harmful behaviour may themselves be vulnerable or at risk of harm. A supportive, child-centred approach should be taken, ensuring that the needs of all children involved are carefully considered.

The DSL will consider all concerns and determine the appropriate course of action. This may include providing early support within the school, working with parents, or seeking advice from, or making referrals to, external agencies where appropriate. The school recognises the importance of early identification and intervention. Staff should seek to address concerns at an early stage, support pupils in developing positive relationships, and ensure that children feel safe and able to speak to a trusted adult.

All staff should be aware of the associated risks and the measures in place to manage these. Further advice for schools is available from relevant government guidance on preventing youth violence and protecting children from exploitation.

So called honour based violence (HBV) including female genital mutilation and forced marriage.

So-called HBV encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. 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. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV. If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Female genital mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. It is mandatory and a statutory duty for teachers to report to the police cases where they discover that an act of FGM appears to have been carried out on a girl under the age of 18. Unless the teacher has good reason not to, they should still consider and discuss such a case with the school's DSL and involve children's social care as appropriate. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures**.**

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into 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. Any form of marriage for someone under 18 is illegal. 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 as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis.

APPENDIX 2 -KCSIE Definition of Early Help (Para 18)

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help to families is more effective in promoting the welfare of children than reacting later. Early help is a universal and community based service. Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

•is disabled or has certain health conditions and has specific additional needs
• has special educational needs (whether or not they have a statutory Education, Health and Care plan)
• has a mental health need
• is a young carer
• is pregnant and or is a parent themselves
• has exhibited early signs of abusive, violent and/or harmful behaviours
• is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
• is frequently missing/goes missing from education, home or care
• has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
• is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
• is at risk of being radicalised into terrorism
• has a parent or carer in custody, or is affected by parental offending
• is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse. Family Help can be of assistance in such circumstances.
• is misusing alcohol and other drugs themselves
• is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
• is a privately fostered child.

APPENDIX 3 - KCSIE Annex C:
Role of the designated safeguarding lead (DSL)

The proprietor has ensured an appropriate senior member of the school staff, has been appointed to the role of designated safeguarding lead. The DSL should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description. The DSL has the appropriate status and authority within the school or college to carry out the duties of the post. The role of the DSL carries a significant level of responsibility, and has been given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

Deputy designated safeguarding leads (DDSLs)

It is a matter for individual schools and colleges as to whether they choose to have one or more DDSLs. Any deputies should be trained to the same standard as the DSL and the role should be explicit in their job description. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL this lead responsibility should not be delegated.

Availability

During term time the DSL (or a deputy) should always be available (during school or college hours) for staff in the school ~~or college~~ to discuss any safeguarding concerns. Whilst generally speaking the DSL (or a deputy) would be expected to be available in person, it is a matter for individual schools, working with the DSL, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools aand the DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Manage referrals

The DSLis expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police

Working with others

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff
- have a confidential shared mailbox and email a/c.
- act as a point of contact with the safeguarding partners
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- as required, liaise with the "case manager" (as per Part four) of KCSIE and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these

issues might be having on children's attendance, engagement and achievement at school or college. This includes:

- ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
- supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome[3]

They should ensure the file is only accessed by those who need to see it and where the file or content within is shared, this happens in line with information sharing advice set out in this guidance.

Where children leave the school or college (including in year transfers) the dDSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCOs) or the named person with oversight for SEND in colleges, are aware as required.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving particularly where

[3] We recognise that in some settings there may be a different strategic lead for promoting the educational outcomes of children who have or have had a social worker, particularly in larger schools or colleges. Where this is the case, it is important that the DSL works closely with the lead to provide strategic oversight for the outcomes of these children and young people.

the information would support an assessment of risk to others in the school as well as the individual pupil. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme and can have that support in place for when the child arrives or incidents that may indicate concerns about serious violence or harmful behaviours. More information on the child protection file is in Annex B. It would be good practice for a conversation to take place between the designated safeguarding leads at both settings, where there are issues or concerns

Raising awareness

The DSL should:

- ensure each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part-time staff
- ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- help promote educational outcomes by sharing information about welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff

Training, knowledge and skills

The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) should also undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements[4]

[4] Full details in Chapter one of Working Together to Safeguard Children.

- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers[5]
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- can recognise the additional risks that children with SEND face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

[5] Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children.

Providing support to staff

Training should support the DSL in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that all children feel heard and understood. Therefore DSLs (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them, and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025.
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.