

The Online School UK



Safeguarding and Child Protection Policy & Procedures 2026-2027

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Reviewed By	Gemma Wheelwright- Rhodes and Effie Haywood
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1. Introduction to our Safeguarding and Child Protection Policy and Procedures

Designated Safeguarding Lead (DSL): Effie Haywood

This policy outlines safeguarding procedures, support tools for parents and students, and communication protocols for managing safeguarding concerns. It ensures a balanced approach, focusing on student safety while protecting staff from emotional burnout and unnecessary workloads. It also introduces professional support for students, parents, and staff, ensuring the well-being of all involved.

This policy applies to **all** individuals associated with the school.

Definition of Safeguarding

Safeguarding and promoting the welfare of children means protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Safeguarding is everyone's responsibility. All staff have a duty to identify concerns, respond appropriately, and share information with the Designated Safeguarding Lead (DSL) without delay. Safeguarding extends beyond child protection and includes creating a safe, inclusive and supportive environment where children are protected from abuse, neglect, exploitation and harm, both online and offline.

Child-Centred Approach

The welfare of the child is the school's paramount consideration. We recognise that every child has the right to feel safe, be heard and receive appropriate support at the earliest opportunity.

Our safeguarding practice is child-centred, meaning that the wishes, views and lived experiences of children are considered when making safeguarding decisions wherever appropriate. Staff are expected to maintain an attitude of 'it could happen here', remain

professionally curious, recognise that children may not always disclose abuse directly, and always act in the best interests of the child.

We are committed to providing a safeguarding culture where children feel listened to, respected and supported, and where concerns are acted upon promptly and proportionately through effective multi-agency working.

Using this Policy

This Safeguarding and Child Protection Policy should be read alongside all other relevant school policies and procedures that contribute to safeguarding and promoting the welfare of children.

These include, but are not limited to, the Staff Communication and Conduct Policy, Behaviour Policy, Online Safety and Acceptable Use Policy, Filtering and Monitoring Statement, Whistleblowing Policy, Attendance Policy, Safer Recruitment Policy, SEND Policy, Anti-Bullying Policy, Health and Safety Policy, Data Protection Policy and any other policies that support the school's safeguarding arrangements.

Where there is any uncertainty or inconsistency between policies, safeguarding and the welfare of the child will always take precedence. Staff are expected to be familiar with the policies relevant to their role and to follow them alongside this policy.

Legal and Statutory Framework

This policy is written in line with the most recent statutory guidance, including:

- Keeping Children Safe in Education (KCSIE 2026)
- Working Together to Safeguard Children (2018, updated update 2025)
- Children Act 1989 and 2004
- Education Act 2002
- Equality Act 2010
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Human Rights Act 1998
- GDPR Data Protection Act 2018

2. Staff Roles and Responsibilities

The **Designated Safeguarding Lead (DSL)** has overall day to day responsibility for child and staff protection and safeguarding. Which includes the referral of safeguarding concerns to outside agencies or authorities, where appropriate.

All **staff members, including the DDSL's**, share responsibility for safeguarding, being alert to risks and reporting concerns immediately.

We maintain a cohesive approach to safeguarding. Through clear communication and collective accountability, we uphold the highest standards of protection for all children, young people and staff.

Effie Haywood <i>Designated Safeguarding Lead</i>	effie@theonlineschool.uk	Internally, via Slack.
Gemma Wheelwright- Rhodes <i>Headteacher, Deputy DSL</i>	gemma@theonlineschool.uk	Internally, via Slack.
Marie Tunguia <i>Business Manager, Deputy DSL</i>	marie@theonlineschool.uk	Internally, via Slack.

Whole School Responsibilities

We ensure that all members of staff understand and fulfil their responsibilities so that safeguarding and child protection remain at the centre of our school culture.

To achieve this, the school will:

- follow safer recruitment processes to help prevent unsuitable individuals from working with children;
- maintain a Designated Safeguarding Lead (DSL) and Deputy DSL(s) with overall responsibility for safeguarding and child protection;
- ensure all staff receive annual safeguarding training, with the DSL completing refresher training at least every two years, alongside regular safeguarding updates throughout the academic year;
- review safeguarding policies and procedures annually, making amendments where required;
- provide pupils with trusted adults to whom they can disclose concerns, including Happiness Manager Leads, Happiness Manager Assistants and Teachers;

- provide children with clear information about how they can raise concerns for themselves or on behalf of their peers;
- embed online safety within safeguarding practice, supported by the Online Safety Policy;
- monitor attendance and engagement closely, recognising that poor attendance or disengagement may be an indicator of safeguarding concerns, particularly within an online school environment;
- engage effectively with local safeguarding partnerships and external agencies, including Children's Social Care, the Local Authority Designated Officer (LADO), the Police and health professionals where appropriate;
- ensure safeguarding decisions are always made in the best interests of the child.

All staff should understand that they must never assume somebody else has taken action. Where there is any doubt that appropriate action has been taken to safeguard a child, staff must continue to escalate their concerns until they are satisfied that the child is safe.

Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL), supported by the Deputy DSL(s), has lead responsibility for safeguarding and child protection within the school.

The DSL is responsible for:

- reviewing and collating safeguarding information relating to individual pupils;
- assessing risk and determining appropriate safeguarding actions;
- maintaining oversight of all safeguarding concerns and ensuring appropriate follow-up;
- making referrals to Children's Social Care, the Police and other external agencies where appropriate;
- working collaboratively with parents, carers, mentors and external professionals, unless doing so would place a child at increased risk of harm;
- ensuring safeguarding records are reviewed regularly and that ongoing concerns continue to be actively monitored;
- ensuring safeguarding information is transferred securely when pupils move schools;
- overseeing safeguarding training, policy implementation and compliance across the school.

It is also the responsibility of the DSL to know if a minor risk embeds into a bigger picture as a safeguarding risk. Information will be shared in line with the DfE Information Sharing Guidance (2024) and the Data Protection Act 2018, ensuring that information sharing supports timely and effective safeguarding action.

The DSL may make referrals to external agencies and services if necessary. However we acknowledge not all scenarios will follow this outcome and some may need long term monitoring, which thus will lead to an In Progress safeguarding log that is actively reviewed and edited. In all but the most exceptional circumstances, parents, carers and mentors will be made aware of the concerns felt for a child or young person at the earliest possible stage. In the event of a referral to social services being necessary, parents, carers and mentors will be informed and consent to this will be sought, unless there is a valid reason not to do so. These are stored securely inline with GDPR guidance.

DSL Availability and Cover

During term time, the Designated Safeguarding Lead (DSL), or a trained Deputy DSL, will be available during school hours for staff to discuss safeguarding concerns.

The school will maintain robust arrangements to ensure continuity of safeguarding leadership when the DSL is unavailable, including due to illness, leave or other unforeseen circumstances.

At least one appropriately trained Deputy DSL will be identified to provide safeguarding cover when the DSL is unavailable. Where necessary, additional arrangements will be put in place to ensure that safeguarding concerns can be reported, reviewed and acted upon without delay.

The school will maintain a secure method for staff to report safeguarding concerns when the DSL or Deputy DSL is unavailable, such as a confidential safeguarding mailbox or other secure reporting mechanism.

Where the DSL is unavailable outside normal school hours or during school holidays, appropriate arrangements will be in place for urgent safeguarding concerns to be escalated to the relevant children's social care or emergency services.

Escalation

Staff should feel able to clarify with the DSL and feel comfortable to be a part of the safeguarding journey, to be involved with the progression of the case they reported so that they can reassure themselves the child is safe, and their welfare is being considered.

This is integral to a whole school responsibility for safeguarding.

If following this process, the staff member remains concerned that appropriate action is not being taken, it is the responsibility of that staff member to seek further direct consultation from a different member of the Senior Leadership Team who will be able to discuss the concern and advise on appropriate action to be taken. This may include following our Whistleblowing policy in line with our Staff Communication and Conduct Policy.

Staff may also raise concerns directly with the NSPCC Whistleblowing Advice Line (0800 028 0285) if they feel unable to use the school procedures or feel safeguarding concerns have not been addressed properly.

Staff Professional Conduct and Safeguarding Responsibilities

All staff are expected to maintain the highest standards of professional conduct to safeguard children and maintain public confidence in the school.

Staff must:

- maintain appropriate professional boundaries with pupils at all times
- follow the school's Staff Communication and Conduct Policy and Acceptable Use arrangements
- use school-approved communication methods when interacting with pupils
- avoid one-to-one situations unless they are necessary, authorised and conducted in accordance with school procedures
- use mobile phones, cameras, recording devices and social media only in accordance with school policy
- ensure photographs, videos and recordings of pupils are taken, stored and shared only for authorised educational purposes i.e. school meet ups
- dress appropriately and behave as positive role models for children
- report any safeguarding concern, allegation or low-level concern relating to themselves or another member of staff immediately in accordance with school procedures
- understand that safeguarding responsibilities extend to their professional conduct both within and, where relevant, outside of school.

Detailed expectations relating to professional conduct, one-to-one working, physical contact, online communication, mobile phones, photography, dress code, gifts, social media and confidentiality are contained within the school's Staff Communication and Conduct Policy, which all staff must read, understand and agree to follow.

3. Safeguarding Culture and Principles

Our Safeguarding Culture

At The Online School UK, safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play in safeguarding children and promoting their welfare.

We recognise and embed that Safeguarding concerns should not be considered in isolation. Different forms of abuse, neglect, exploitation and vulnerability may overlap or interact with one another. Staff should consider the wider context of a child's circumstances and share information with the DSL where a pattern or combination of concerns becomes apparent.

We are committed to creating a strong safeguarding culture in which:

- the welfare of the child is paramount;
- safeguarding is embedded into every aspect of school life;
- children feel safe, respected and listened to;
- all concerns are taken seriously, regardless of how small they may initially appear;
- staff act immediately upon any safeguarding concern;
- early identification and intervention are prioritised;
- professional curiosity is encouraged;
- information is shared appropriately to protect children;
- safeguarding decisions are always made in the best interests of the child;
- safeguarding is considered within all aspects of learning, including online education.

Expectations of All Staff

All staff must:

- know how to recognise safeguarding concerns relating to children, staff or adults;
- act immediately by following the school's safeguarding procedures;
- know how to report safeguarding concerns safely and confidently;
- model safe, respectful and professional behaviour at all times;

- maintain appropriate professional boundaries in accordance with the Staff Communication and Conduct Policy
- support pupils to feel safe, valued and heard;
- recognise children who may benefit from Early Help or Family Help;
- recognise the signs of abuse, neglect, exploitation and contextual safeguarding concerns;
- understand how to respond to child-on-child abuse, including sexual violence and sexual harassment;
- understand the Prevent Duty and indicators of radicalisation;
- understand online safeguarding risks, including AI-generated abuse, technology-facilitated harm and emerging online risks.
- record safeguarding concerns accurately and securely;
- pay particular attention to students with additional vulnerabilities
- embed the school's CARE values into all aspects of their practice.

Professional Curiosity and the Voice of the Child

Staff are expected to maintain professional curiosity by respectfully questioning, observing and seeking clarification where something does not appear right or where concerns persist.

The wishes, views and feelings of children will be sought wherever appropriate and considered when making safeguarding decisions. Children should know who they can speak to if they have concerns about themselves or others.

Equality and Vulnerability

We recognise that some children are at greater risk of abuse, neglect or exploitation due to additional vulnerabilities. This may include children with SEND, children with mental health needs, young carers, children who are looked after or previously looked after, children experiencing domestic abuse, or those with protected characteristics.

Staff are expected to consider these additional vulnerabilities when identifying and responding to safeguarding concerns.

4. Safer Recruitment

The school is committed to ensuring that all staff, volunteers, contractors, trainee teachers, supply staff and other individuals working with or on behalf of the school are suitable to work with children. Safer recruitment practices are used to prevent individuals who may pose a risk to children from gaining access to them through their work or association with the school.

All recruitment and suitability procedures will be undertaken in accordance with *Keeping Children Safe in Education 2026* (KCSIE), relevant legislation, Department for Education guidance and the requirements of the Disclosure and Barring Service (DBS).

Safeguarding procedures apply to all individuals working in or on behalf of the school, including employees, volunteers, trainee teachers, supply staff, contractors and individuals employed or supplied by third-party organisations.

Pre-Employment and Pre-Engagement Checks

Before an individual begins work with children, the school will undertake the appropriate safeguarding and pre-employment checks required for their role.

These may include:

- verification of identity;
- verification of the right to work in the UK;
- appropriate checks of employment history and explanations for gaps in employment;
- verification of qualifications where relevant;
- obtaining and checking appropriate references;
- appropriate Disclosure and Barring Service (DBS) checks;
- barred list checks where legally required;
- checks relating to prohibition from teaching or other relevant restrictions where applicable;
- overseas criminal record or other relevant checks where required; and
- any other checks required by current KCSIE guidance or applicable legislation.

References will be obtained and verified in accordance with the school's safer recruitment procedures. The school will take reasonable steps to ensure that references provide appropriate information about an individual's suitability to work with children.

For individuals who have lived or worked overseas, the school will undertake appropriate additional checks in accordance with current KCSIE requirements. Where appropriate, equivalent safeguarding or criminal record checks may include relevant overseas systems such as PVG or NBI arrangements.

Disclosure and Barring Service (DBS) Checks

The school will undertake the appropriate level of DBS check according to the individual's role, responsibilities and whether their activities constitute regulated activity with children.

Where required, barred list checks will be completed before an individual undertakes regulated activity.

The school will not apply a single DBS requirement to all staff or volunteers. The level of check will be determined in accordance with current DBS guidance, KCSIE and the individual's duties.

Any information disclosed through DBS or other safeguarding checks will be considered appropriately and confidentially, taking account of relevant legislation, KCSIE guidance and the individual's suitability to work with children.

The school will ensure that DBS checks and associated safeguarding checks are completed and recorded within the timescales required by current KCSIE, DBS guidance and applicable legislation.

Overseas Staff

For staff members based outside of the UK, the school will complete appropriate identity verification and safeguarding checks to ensure suitability to work with children. As DBS checks are only available for individuals who meet UK eligibility requirements, overseas staff will complete appropriate safeguarding checks based on their country of residence.

For staff based in the Philippines, the school will require a National Bureau of Investigation (NBI) Clearance as part of the pre-employment safeguarding checks. The school will also conduct identity verification checks, including reviewing valid identification documents and completing an interview process to verify the individual's identity, experience, qualifications and suitability for the role.

The school will verify that overseas teaching staff have an appropriate teaching background, including reviewing relevant qualifications, teaching experience, previous employment history and references where applicable. This process ensures that staff have the necessary skills, experience and suitability to support students effectively.

Any information disclosed through NBI Clearance checks or other safeguarding checks will be considered appropriately and confidentially, taking account of relevant safeguarding requirements and applicable legislation.

All overseas staff are expected to meet the same safeguarding standards as UK-based staff and will complete the school's safeguarding training and adhere to all safeguarding policies and procedures.

Regulated Activity and Volunteers

The school will determine whether an individual's role constitutes regulated activity with children in accordance with the current statutory definition.

The school recognises that the previous supervision exemption relating to regulated activity with children no longer applies. The school will therefore assess the activities undertaken by volunteers and other individuals carefully to determine whether they meet the definition of regulated activity.

Where a volunteer undertakes teaching, training, instructing or supervising of children for more than three days in any 30-day period or overnight, the school will consider the individual against the current requirements for regulated activity and undertake the appropriate safeguarding checks.

Volunteers undertaking regulated activity will be subject to the appropriate DBS and barred-list checks.

The Online School UK will ensure that volunteers who are not undertaking regulated activity are nevertheless subject to appropriate and proportionate safeguarding arrangements, including supervision and other checks where required.

All teaching applicants are required to complete the school's safeguarding verification process before being invited to deliver a trial lesson. Applicants must submit a standard DBS check (where eligible), relevant identification documents, references and any required safeguarding documentation through the school's platform.

The school will review and verify submitted documents, qualifications, references and teaching experience before allowing an applicant to progress to a trial lesson. This process ensures that individuals have been appropriately checked and are suitable to work with children before engaging in teaching activities.

Trainee Teachers, Supply Staff and Contractors

Safeguarding and safer recruitment procedures apply to all individuals working on behalf of the school, including self-employed contractors and any other individuals providing services to students.

The school does not currently employ trainee teachers or supply staff through agencies. Where self-employed teaching staff or contractors are engaged, the school will ensure that appropriate safeguarding checks and safer recruitment procedures are completed before they undertake any work with students.

All contractors and self-employed individuals who undertake regulated activity with children must complete the required safeguarding checks, including an Enhanced DBS check (with Children's Barred List check where applicable), identity verification, reference checks and any other required pre-employment checks.

The school will maintain responsibility for ensuring that safeguarding requirements are met and will not rely solely on an individual's self-employed status or any third-party organisation to confirm suitability.

Where a safeguarding concern arises regarding a contractor or self-employed individual working with students, the school will manage the concern in accordance with its safeguarding procedures and relevant statutory guidance.

Self-Employed Individuals

Where individuals provide services to the school on a self-employed basis, the school will apply the same safeguarding expectations and checks as it does for other members of staff. Self-employed status does not remove the requirement for appropriate safeguarding checks.

All staff engaged by the school who undertake regulated activity with children are required to hold a valid Enhanced DBS check (including a Children's Barred List check where applicable) before commencing work with students.

The school is responsible for managing and processing safeguarding checks, including verifying DBS documentation and maintaining appropriate records. No individual will be permitted to teach, support lessons, or undertake regulated activity with students until the required safeguarding checks have been completed and verified by the school.

The level of safeguarding checks required will be determined in accordance with the individual's role, responsibilities and current statutory guidance, including Keeping Children Safe in Education (KCSIE).

Visitors

The Online School UK school will apply proportionate safeguarding arrangements to visitors according to the nature and duration of their access to children and whether they are supervised.

Visitors who have regular, unsupervised or regulated activity contact with children will be subject to the appropriate safeguarding checks where required.

Visitors who do not require a DBS check will nevertheless be managed in accordance with the school's visitor and safeguarding procedures, including appropriate supervision and restrictions on access where necessary.

Due to our online nature, we are aware and recognise that Visitors look different for us. These may include but guest speakers in lessons, topic dependent i.e. Life Skills for Jobs or Careers

All Visitors will be required to read our Staff Communication and Conduct Policy before arrival. Ensuring understanding and commitment to compliance.

Work Experience

Where the school arranges or facilitates work experience opportunities, including online or virtual placements, safeguarding arrangements will be considered according to the nature of the placement, the age and needs of the students involved, the level of contact with children and whether the activity constitutes regulated activity.

The Online School UK will ensure that appropriate safeguarding expectations are established before students participate in any work experience activity. This may include reviewing the suitability of external contributors, ensuring appropriate supervision arrangements are in place, and confirming that online platforms and communication methods are appropriate and safe for students.

Where virtual work experience is provided in areas such as journalism, creative content, social media or other professional skills, the school will ensure that students are supported by appropriate staff oversight and that activities are conducted in line with the school's safeguarding, online safety and acceptable use procedures.

Where a work experience opportunity involves an external organisation or individual, the school will take reasonable steps to satisfy itself that appropriate safeguarding arrangements are in place and that students are appropriately protected throughout the experience.

Existing Staff and Volunteers – Ongoing Suitability

Safer recruitment does not end when an individual is appointed. The school will maintain ongoing awareness of the suitability of staff and volunteers to work with children.

The school will consider whether additional safeguarding checks are required where:

- an existing staff member or volunteer moves into a role involving regulated activity;
- an individual has a break in service of 12 weeks or more;
- an individual's responsibilities or access to children change significantly;
- relevant safeguarding concerns arise; or
- there is another reason to question an individual's suitability to work with children.

Where safeguarding concerns arise regarding an existing member of staff, volunteer, contractor, trainee teacher or supply worker, these will be managed in accordance with the school's safeguarding, allegations against staff, low-level concerns and whistleblowing procedures.

Single Central Record

The school maintains a Single Central Record (SCR) of the required recruitment and safeguarding checks for relevant staff and other individuals working in or on behalf of the school.

The SCR will contain the information required by current KCSIE guidance and will be maintained accurately and securely.

The SCR may include, where applicable:

- identity checks;
- right to work checks;
- qualifications;
- references;
- DBS checks;
- barred list checks;
- prohibition checks;
- overseas checks; and

- other required recruitment and safeguarding checks.

The SCR is reviewed regularly by the appropriate member of the senior leadership team and/or safeguarding lead to ensure that required checks have been completed and appropriately recorded.

Where the school maintains electronic staff profiles, relevant recruitment and safeguarding evidence may also be securely linked to the individual's staff record, subject to appropriate access controls and data protection requirements.

DBS Referrals

The school will make a referral to the Disclosure and Barring Service where the statutory criteria for referral are met.

This duty applies to relevant individuals working with children, including staff and volunteers undertaking regulated activity.

The school will ensure that decisions relating to suspension, dismissal, resignation, restriction of duties or other safeguarding action are considered in accordance with relevant legislation, KCSIE and local safeguarding procedures.

Safer Recruitment Records and Confidentiality

All recruitment and safeguarding checks will be recorded and retained securely in accordance with the school's data protection, record keeping and information security arrangements.

Safeguarding and recruitment information will be treated confidentially and accessed only by individuals with an appropriate professional need to know.

The school will ensure that safeguarding records are handled in accordance with the Data Protection Act 2018, UK GDPR, the Data (Use and Access) Act 2025 and relevant statutory guidance.

Training and Awareness

All staff involved in recruitment and selection will receive appropriate safer recruitment training or guidance to enable them to identify and manage safeguarding risks throughout the recruitment process.

All new staff and other relevant individuals will receive safeguarding induction appropriate to their role before or at the commencement of their work with children.

Existing staff receive annual safeguarding training and regular updates throughout the academic year, including updates when statutory safeguarding guidance changes.

As with all training at The Online School UK this is managed, delivered and tracked by the Designated Safeguarding Lead and recorded appropriately.

Commitment to Safer Recruitment

These procedures are intended to ensure that all individuals working with or on behalf of the school meet appropriate safeguarding and suitability requirements and that robust systems are in place to prevent unsuitable individuals from gaining access to children.

Safer recruitment is considered an essential part of the school's wider safeguarding culture and is reviewed regularly to ensure continued compliance with KCSIE 2026, legislation and relevant safeguarding guidance

Safer recruitment is considered an essential part of the school's wider safeguarding culture and is reviewed regularly to ensure continued compliance with Keeping Children Safe in Education, legislation and relevant safeguarding guidance

For further guidance on safer recruitment, staff can visit NSPCC on [Safer recruitment | NSPCC Learning](#)

5. Safeguarding Procedures and Action Protocols (Child Protection)

All safeguarding concerns, regardless of perceived severity, must be reported promptly and in line with the school's referral procedures. The Designated Safeguarding Lead (DSL) retains oversight of all internal concerns and ensures timely follow-up, escalation, and liaison with external agencies where required. Where safeguarding concerns are managed through internal support, the DSL will ensure that appropriate actions, support, monitoring

arrangements and review points are identified. Internal support should not prevent or delay referral to external agencies where statutory safeguarding thresholds are met.

Any unavoidable delays in reporting or action must be documented and justified. All records are stored securely and confidentially in accordance with the UK GDPR and Data Protection Act 2018. Staff should refer to this section for a general overview of categories of status and the below sections for guidance on specific categories of abuse, including physical, emotional, and sexual abuse, neglect, child exploitation, child-on-child abuse, online harms, and risks of radicalisation or extremism, and take action accordingly. When assessing risk level, all staff will know to be aware of and consider the vulnerability factors of our cohort.

Critical Status

- **Definition:** Immediate or high-risk situations where a student is in danger of self-harm, harm from others, criminal activity, or any form of imminent danger.
- **Action:** Bypass the DSL and immediately contact emergency services, child protection services, or the police. Log the incident on the safeguarding panel, for the DSL to follow up later. If the family is involved in causing the harm, only authorities should be contacted.
- **Team Communication:**
 - **Happiness Manager Team (HMAs and HMLs):** Notify HM in lesson discreetly to offer emotional support to the student and the class without alarming others.
 - **Parents:** Contact parents immediately unless they are involved in the concern. When necessary, notify authorities instead of parents.
 - **External Agency:** Reach out to relevant authorities or child protection services without delay.

High Status

- **Definition:** Recent harm, abuse, or safeguarding concerns (e.g., mention of suicidal thoughts, forced marriage, FGM, or potential harm in the near future). The situation is serious but not immediately life-threatening. ***Referring to a student who is not currently in contact with or working with any external agencies.***
- **Action:** Report the issue to the DSL within the hour and log on the internal safeguarding panel. The DSL will assess and decide whether external authorities need to be contacted within 24 hours. Phone calls may not be immediately necessary but should be handled by the end of the day.
- **Team Communication:**
 - **HMs:** Updated within 24 hours for emotional support and monitoring.

- **Teachers:** Informed discreetly to avoid triggersome topics during lessons.
- **Parents:** Informed sensitively by email or phone, unless implicated in the situation.

Where parental consent is not obtained due to safeguarding risk, the DSL will make decisions in the child's best interests and contact statutory services as required.

Medium Status

- **Definition:** Ongoing or recurring issues with external agency involvement, such as a history of harm, out-of-character behavior, or a potential risk within the next few days.
Referring to a student who is currently in contact with or working with external agencies.
- **Action:** Log and report to the DSL within the same working day and via the safeguarding panel. The DSL will update external agencies via email as needed and actions to be done within 48 hours.
- **Team Communication:**
 - **HMs and Teachers:** Receive updates on how to provide emotional and academic support to the student without overwhelming them.
 - **Parents:** Notified through email, offering ongoing support suggestions.

Low Status

- **Definition:** Low-level concerns such as mild anxiety, resolved past issues, or situations with no imminent risk.
- **Action:** Log and include in the **End-of-Week (EOW) report**. The DSL should be aware, but immediate action is not always required.
- **Team Communication:**
 - HMs should be updated in the weekly wrap-up to provide low-level pastoral support.
 - Teachers and parents do not need immediate notification unless issues escalate.

The DSL maintains oversight of all safeguarding concerns, regardless of status level, and ensures appropriate follow-up and escalation where necessary.

Simple Internal Decision Tree

Questions to ask yourself:

1. **Is the student or someone else in immediate danger (self-harm, weapon, abuse)?**
 - **Yes** → CRITICAL STATUS: Call Emergency Services or Authorities.
 - **No** → Proceed to the next question.
2. **Has there been recent harm, risk of harm, or significant issue?**
 - **Yes** → HIGH STATUS: Report to DSL, action within 24 hours.
 - **No** → Proceed to the next question.
3. **Is there a history of safeguarding issues with agency involvement?**
 - **Yes** → MEDIUM STATUS: Report to DSL, notify agencies or action in 48 hours.
 - **No** → Proceed to the next question.
4. **Is the concern a low-level issue (e.g., anxiety, or resolved past issue)?**
 - **Yes** → LOW STATUS: Log and summarise for weekly review.
 - **No** → Monitor and provide pastoral support as needed.

SOS – Immediate Safeguarding Concerns

The SOS process is used when an immediate safeguarding concern occurs during a lesson and a staff member requires urgent support to safely manage the situation. This may include incidents such as a child exposing themselves to a staff member on camera or other situations where immediate intervention is required.

Actions:

- Message the designated SOS channel on Slack as soon as it is safe to do so.
- A member of the SLT team will attend and take over teaching the class, allowing the staff member to step away from the situation.
- The staff member will have a 1:1 meeting with either the Headteacher or DSL to discuss what happened, ensure the appropriate safeguarding report is completed, and identify any further actions required.
- Staff will receive ongoing support following the incident, including a compulsory 1:1 follow-up with the school's Mental Health Practitioner. Further sessions will be offered where appropriate or requested.

The SOS process is intended to ensure that staff are not left to manage an immediate safeguarding concern alone and that both the child and staff member receive appropriate support and follow-up.

6. Whistleblowing- Allegations Against Staff Members

More detail can be found in our Senior Leadership Team Complaints section of our Complaints Policy and our Staff Communication and Conduct Policy. In addition, staff will annually receive information on Whistleblowing and reporting concerns about staff.

We recognise that it is possible for staff, no matter their position, to behave in a way that might cause harm to the students and take seriously any allegation received. Such allegations should be referred immediately to the Headteacher on gemma@theonlineschool.uk and thus the DSL to agree further action to be taken in respect of the student and staff member. If the allegation is about the Headteacher, the report will come directly to the DSL on effie@theonlineschool.uk who will confer with the LADO and act accordingly with any external agencies.

LADO

Any safeguarding concern or allegation involving a member of staff, supply teacher, trainee teacher, volunteer or contractor will be considered promptly against the relevant harm threshold.

Where appropriate, the school will consult with or refer the matter to the Local Authority Designated Officer (LADO) in accordance with local procedures. Where there is uncertainty about whether the harm threshold has been met, advice will be sought from the LADO

Allegations that may meet the harms threshold must be reported without delay and logged promptly to ensure swift action. Where the harms threshold is met, the DSL will report the matter to the Local Authority Designated Officer (LADO) in the staff member's local area, in line with statutory guidance. The DSL maintains oversight of all allegations, ensuring appropriate monitoring, investigation, and escalation as needed. All allegations are recorded and stored securely in line with GDPR.

Policy Reading

All staff, annually, must read our Staff Communication and Conduct Policy and commit and agree to following it whilst in employment with us. Such steps have been taken to ensure safety between staff and students. Below list some of the ways we ensure this:

- All lessons and face-to-face interactions with students are recorded and the recording will be stored in our internal IT systems
- Staff and Students may only contact one another via our internal systems (live lessons and message board) which are monitored and electronically stored
- Staff commit to appropriate working hours to avoid out of hours communication

- Staff must not use personal devices, email, or social media to communicate with students.
- One-to-one interactions should be limited, pre-approved, and recorded where possible.
- Staff must immediately report any breach of these expectations to the DSL.

Safeguarding procedures apply to trainee teachers as well as employees, supply staff, volunteers and contractors. Concerns or allegations involving a trainee teacher will be managed in accordance with the school's safeguarding procedures and relevant local arrangements, including liaison with the training provider where appropriate.

Staff may also consult with external agencies if they feel internal measures are not being actioned appropriately with Whistleblowing. This can be done via **NSPCC Whistleblowing Advice Line (0800 028 0285)**.

7. Record Keeping

Recording Concerns

All safeguarding concerns, disclosures, allegations and welfare observations must be recorded promptly using the school's secure internal safeguarding panel.

Safeguarding records must be accurate, factual, objective and completed as soon as possible after the concern arises. Staff must avoid assumptions or opinions and should record:

- what was seen, heard or observed;
- the child's own words wherever possible;
- relevant evidence from lesson transcripts or other available information;
- dates, times and those present;
- actions taken;
- any immediate safeguarding measures implemented.

All safeguarding logs are assigned to the relevant child and automatically record the date, time and reporting member of staff, creating a clear safeguarding chronology to support effective decision making by the DSL.

All staff receive safeguarding training on completing safeguarding records appropriately and understand that safeguarding records may be disclosed as part of legal proceedings. Records should therefore always provide a fair, accurate and professional account of events.

Low-level concerns should also be recorded where appropriate, recognising that a pattern of concerns may indicate an increasing level of safeguarding risk.

Chronologies

The DSL maintains an ongoing chronology of safeguarding concerns for individual students where appropriate.

Chronologies enable the DSL to identify emerging patterns, repeated low-level concerns, cumulative risk and changes in a child's circumstances that may not be apparent from individual incidents alone.

All safeguarding decisions, actions, referrals, updates and outcomes are recorded chronologically to ensure continuity of safeguarding support and effective decision-making. The actions taken by the DSL will depend on the level of need and urgency of the concern. All safeguarding actions, decisions, referrals and reviews are recorded as dated chronological updates within the 'In Progress' safeguarding log using the school's agreed recording conventions (EDIT, name and date).

Confidentiality

Our school is committed to sharing safeguarding information only on a strict need-to-know basis with those who require the information to safeguard and promote the welfare of a child. Safeguarding information is confidential and will only be shared on a strict need-to-know basis with those who require the information to safeguard and promote the welfare of a child.

Neither parents, carers nor pupils have an automatic right of access to child protection records. Requests for information will be considered in accordance with safeguarding legislation, data protection law and relevant statutory guidance.

The school recognises that effective safeguarding sometimes requires confidential information to be shared without consent where there is a lawful basis to do so and where this is necessary to protect a child or another person from harm.

Information Sharing

The school recognises that effective safeguarding depends upon timely, appropriate and lawful information sharing.

We recognise that information will be shared where necessary to safeguard and promote the welfare of a child. Staff should understand that data protection legislation should never prevent appropriate safeguarding information from being shared where there is a lawful basis to do so.

Information-sharing decisions should be proportionate and consider:

- the safeguarding risk;
- the relevance and necessity of the information;
- who needs the information;
- the potential consequences of sharing or not sharing the information; and
- the child's best interests.

Where appropriate, the views of the child and parents/carers will be considered. However, safeguarding action will not be delayed where seeking consent may place a child or another person at increased risk or prejudice safeguarding action.

Significant information-sharing decisions, including the rationale for sharing or not sharing information, will be recorded securely within our internal safeguarding panel.

Secure Storage

All safeguarding records are stored securely within the school's Internal Safeguarding Panel. Access to safeguarding information is strictly restricted to authorised members of staff who require the information to fulfil their safeguarding responsibilities and is managed on a need-to-know basis.

The Designated Safeguarding Lead (DSL) controls access permissions and regularly reviews who can access individual safeguarding records. Where appropriate, access to specific records is restricted using the system's access controls to ensure confidentiality.

All safeguarding records are protected in accordance with the UK GDPR, the Data Protection Act 2018 and the school's data protection procedures. Appropriate technical and organisational measures are in place to maintain the confidentiality, integrity and security of safeguarding information.

Transfer of Records

When a pupil transfers to another school or education provider, the DSL will ensure that safeguarding records are transferred securely and promptly to the receiving Designated Safeguarding Lead in accordance with statutory guidance, wherever possible. Where the school

is unaware of the student's next destination, records will be retained securely until they can be transferred appropriately or disposed of in accordance with statutory guidance.

Where appropriate, the DSL will communicate directly with the receiving DSL to ensure continuity of safeguarding support and to discuss any ongoing risks, including concerns relating to child protection, exploitation, harmful behaviour, serious violence, Child Protection Plans, Child in Need Plans, Family Help involvement or ongoing Prevent/Channel support.

Where the school is unaware of the child's next educational setting, safeguarding records will be retained securely until they can be transferred appropriately or disposed of in accordance with statutory retention guidance.

Retention

Safeguarding records are retained in accordance with statutory retention guidance, the UK GDPR, the Data Protection Act 2018 and any other applicable legal requirements.

The school retains safeguarding records until the student reaches the age of 25, or for any longer period required by statutory guidance or ongoing legal proceedings. At the end of the retention period, records will be securely and confidentially destroyed.

DSL Responsibilities

The DSL regularly reviews safeguarding records to ensure that concerns are recorded accurately, actions are proportionate, safeguarding decisions are appropriately evidenced and cases are actively monitored until an appropriate outcome has been achieved. The DSL also undertakes regular safeguarding audits to ensure records are accurate, consistent, up to date and that actions have been completed within appropriate timescales. This is done via an EOW (End of Week) Report.

Following receipt of a safeguarding concern, the DSL will determine the appropriate level of response in accordance with the school's safeguarding thresholds and local safeguarding partnership procedures.

Actions may range from continued monitoring and pastoral support through to Family Help involvement, referral to Children's Social Care, police involvement or other statutory intervention.

All decisions, actions, rationale, referrals, discussions and outcomes are recorded within the safeguarding system using dated chronological updates. Cases remain under review until safeguarding risks have reduced or the matter has been appropriately concluded.

8. Recognition and Categories of Abuse and Risk

Staff must remember that child abuse, neglect, and exploitation can occur across all social groups, regardless of religion, culture, social class, or financial position. Children with disabilities are statistically more vulnerable. It is important to remember that abusers can be of any age, gender, or background. It is important to not allow personal preconceptions get in the way of recognising abuse or maltreatment. Staff should recognise abuse in context, considering cultural, societal, and familial norms while assessing the impact on the child.

Any concern or suspicion that a child may be suffering or at risk of suffering significant harm must be reported to the DSL immediately and recorded on the school's safeguarding system. Staff must not investigate concerns themselves but should provide a clear, factual account to the DSL for triage and escalation.

All staff should be familiar with the four main categories of abuse:

1. Physical Abuse

Definition: Causing physical harm or fabricating illness.

- Indicators in children: Bruising in unusual places, fractures, burns, signs of restraint, or repeated injuries.
- Indicators in parent/carer: Aggression, reluctance to seek medical help, over-involvement in care, history of violence.
- Indicators in family/environment: Domestic violence, substance misuse, prior unexplained deaths or injuries, social isolation.

Can include but not limited to: hitting, kicking, shaking, biting, burning, choking, poisoning, inappropriate physical restraint or other behaviours that cause or are likely to cause physical injury or significant harm. Staff should consider physical abuse alongside the wider context of a child's relationships, circumstances and experiences.

2. Emotional Abuse

Definition: Persistent emotional maltreatment affecting a child's development or wellbeing.

- Indicators in children: Low self-esteem, withdrawal, aggression, anxiety, self-harm, difficulty relating to peers.
- Indicators in parent/carer: Overly controlling, inconsistent care, scapegoating, inability to provide emotional support.
- Indicators in family/environment: Lack of support, social isolation, history of mental health issues, substance misuse, domestic abuse.

Can include but not limited to: persistent criticism, belittling, humiliation, name-calling or other verbal behaviours that cause or are likely to cause significant emotional harm. Staff should consider emotional abuse alongside the wider context of a child's relationships and experiences.

3. Neglect

Definition: Failure to meet a child's basic physical, emotional needs, supervisory or psychological.

- Indicators in children: Poor hygiene, inadequate clothing, frequent illness, developmental delays, emotional withdrawal.
- Indicators in parent/carer: Inability or unwillingness to provide food, shelter, medical care, or supervision.
- Indicators in family/environment: Unsafe home environment, social isolation, history of neglect or abuse, parental substance misuse.

Can include but not limited to: failing to provide adequate food, clothing, shelter, hygiene, supervision, medical care, education or emotional support, or other behaviours that cause or are likely to cause significant physical or emotional harm. Staff should consider neglect alongside the wider context of a child's needs, relationships and experiences.

4. Sexual Abuse

Definition: Forcing or enticing a child into sexual activity, including contact and non-contact acts.

Staff should be familiar with the current statutory definitions of sexual assault and assault by penetration and should report any concerns or disclosures involving sexual abuse immediately in accordance with the school's safeguarding procedures.

- Indicators in children: sexualised behaviour or knowledge inappropriate for age, unexplained injuries, STIs, self-harm, withdrawal, depression.
- Indicators in parent/carer: Grooming behaviour, sexual boundary violations, history of sexual offending.
- Indicators in family/environment: marginalisation, prior abuse in family, household members with sexual offending history.

Can include but not limited to: both non-contact and physical contact behaviours. Staff should remain alert to sexualised behaviour, inappropriate touching, sexual assault and other forms of physical or non-physical sexual harm, including where abuse occurs online.

Image based abuse - making or sharing nude images or semi nudes.

The school uses the terminology **“making or sharing of nudes or semi-nudes”** when referring to the creation, possession or distribution of sexual images or videos involving children. Staff should avoid using terminology such as “sexting” or “youth produced sexual imagery” when recording or discussing safeguarding concerns.

As a school, we recognise that this includes:

- photographs
- videos
- livestreams
- self-generated images
- images created by another person
- digitally altered images
- AI-generated images
- deepfakes/deep nudes

AI-Generated Images and Deepfakes

The school recognises that artificial intelligence (AI) and other digital technologies can be used to create, manipulate or alter images, videos or other content involving children, including the creation of fabricated nude or semi-nude images (“deepfakes” or “deep nudes”).

The creation, possession, sharing or distribution of an AI-generated or digitally altered nude or semi-nude image of a child will be treated as a safeguarding concern, regardless of whether the image is authentic or fabricated. Such content may cause significant harm to the child and may constitute abuse or an offence.

Staff must report any concern involving AI-generated or manipulated sexual images of a child immediately to the DSL or deputy DSL. Staff should not save, copy, forward or otherwise distribute such images. The DSL will assess the concern and follow the school's safeguarding procedures, including making referrals to external agencies where appropriate.

The school will also educate pupils about the risks associated with AI-generated and manipulated content, including deepfakes, image-based abuse, consent, privacy and the potential consequences of creating or sharing such material.

Additional Considerations:

- Abuse may be peer-on-peer, online, or via technology.
- Staff must consider emerging risks, such as online exploitation, cyberbullying, or radicalisation.
- Staff should not investigate concerns themselves. All concerns must be reported to the DSL immediately, recorded accurately, and escalated according to school safeguarding procedures.

As an online school, we are aware that the above indicators are not an exhaustive list. Signs and indicators in an online, rather than face to face environment, may be very different. Staff are given appropriate training and support at the start of each academic year and throughout, on identifying these signs in an online setting.

Additional Categories of Risk: Online and Contextual Risks

In addition to recognising abuse in the four main categories, staff should be aware of risks that can arise online or in specific contexts. The school follows KCSIE 2026 guidance on the 4Cs:

1. Content Risks (what children see)
Exposure to harmful material such as pornography, violent content, or extremist material.

2. Contact Risks (who children interact with)
Grooming, bullying, radicalisation, or inappropriate relationships online or in person.
3. Conduct Risks (what children do)
Harmful behaviours such as sharing inappropriate content, cyberbullying, or risky online activity. This can also include HSB, Harmful Sexual Behaviour, such as indecent or inappropriate exposure.
4. Commerce Risks (how children may be exploited)
Exploitation for financial gain or personal data, scams, in-app purchases, or trafficking.

Staff Responsibilities:

- Be vigilant for signs that a child may be at risk in any of these areas.
- Report any concerns to the DSL immediately using the usual reporting procedures.
- Promote safe and responsible use of technology in lessons and communications.
- Understand that online risks are treated with the same seriousness as other forms of abuse.
- Be apart of any and all training sessions, to keep up to date on relevant risks, signs and current trends.

Specific Safeguarding Issues

Staff are made aware of the following specific safeguarding issues. These issues are presented based on the legal and social context of the UK. For students outside the UK, we understand that there may be differences in approach in defining these safeguarding issues and in supporting students subject to them. We will seek advice where necessary when informing our practice of international students.

Child on Child Abuse (including harassment and violence)

Staff should be aware that children can abuse other children.

Child-on-child abuse is a safeguarding concern and may include physical, sexual,

emotional or online abuse, harassment, violence, bullying, exploitation and harmful sexual behaviour.

The school recognises that both the child who has experienced harm and the child alleged to have caused harm may have safeguarding needs. All reports will therefore be considered individually, with appropriate support, risk assessment and intervention provided.

Staff should recognise that child-on-child abuse can be prevented through early identification, effective supervision, appropriate education and a culture in which harmful behaviour is challenged.

Serious physical harm, threats or violence involving weapons must be treated as safeguarding concerns and escalated immediately.

It is essential that all staff understand that downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Examples may include:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Online grooming between peers
- Abuse in intimate relationships between peers i.e. coercive control between teenagers
- Physical abuse, which may also involve an online element that facilitates, threatens and/or encourages this abuse
- Sexual violence or assault, which may also involve an online element that facilitates, threatens and/or encourages this abuse
- Sexual harassment, such as sexual comments, remarks, jokes, touching and online sexual harassment aka. Harmful Sexual Behaviour (HSB)
- Causing someone to engage in sexual activity without consent including viewing sexual material
- Upskirting (taking a picture under a person’s clothing without them knowing)
- Initiation/hazing-type violence and rituals
- Image based abuse i.e. making or sharing nude images or semi nudes.

The school uses the terminology “**making or sharing of nudes or semi-nudes**” when referring to the creation, possession or distribution of sexual images or videos involving children. Staff should avoid using terminology such as “sexting” or “youth produced sexual imagery” when

recording or discussing safeguarding concerns.

As a school, we recognise that this includes:

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The creation, possession, sharing or distribution of an AI-generated or digitally altered nude or semi-nude image of a child will be treated as a safeguarding concern, regardless of whether the image is authentic or fabricated. Such content may cause significant harm to the child and may constitute abuse or an offence.

Staff must report any concern involving AI-generated or manipulated sexual images of a child immediately to the DSL or deputy DSL. Staff should not save, copy, forward or otherwise distribute such images. The DSL will assess the concern and follow the school's safeguarding procedures, including making referrals to external agencies where appropriate.

The school will also educate pupils about the risks associated with AI-generated and manipulated content, including deepfakes, image-based abuse, consent, privacy and the potential consequences of creating or sharing such material.

Our school's safeguarding policy, behaviour policy, anti-bullying policy and out of school conduct policy are in place to support us if these incidents occur.

Harmful Sexual Behaviour

When considering harmful sexual behaviour, the school will take account of the age, developmental stage, relative maturity, power dynamics and individual circumstances of the children involved. Behaviour should not be assessed solely by reference to chronological age.

The school recognises harmful sexual behaviour as existing on a continuum from inappropriate or problematic sexual behaviour through to sexual harassment and sexual violence. Harmful sexual behaviour may occur online, face-to-face, verbally or physically and may occur inside or outside the school environment.

The school will respond to harmful sexual behaviour as a safeguarding matter and will seek to identify and intervene early to prevent escalation.

The school adopts a zero-tolerance approach to sexual harassment and sexual violence. Such behaviour will never be dismissed as “banter”, “just having a laugh”, “part of growing up” or similar.

Staff are expected to challenge and report inappropriate sexualised or misogynistic behaviour and to recognise that the absence of reported incidents does not necessarily mean that such behaviour is not occurring.

Any incident involving the making or sharing of nudes or semi-nudes by children will receive a safeguarding response, regardless of whether the sharing appears to have been consensual or non-consensual. The school's response will be proportionate and will consider the age, development and circumstances of the children involved, including coercion, exploitation, vulnerability and any wider safeguarding concerns.

Racism and Discriminatory Behaviour

The school recognises that racism, prejudice and discriminatory behaviour can be forms of child-on-child abuse and may have a significant impact on a child's safety, wellbeing and ability to access education.

Discriminatory behaviour may relate to race, ethnicity, nationality, religion or belief, sex, disability, sexual orientation, gender reassignment or any other protected characteristic. This may include racist or discriminatory language, slurs, harassment, bullying, exclusion, stereotyping, threats, intimidation or derogatory comments. Such behaviour may occur in lessons, private or group communications, social media, gaming platforms or other online spaces connected with the school.

The school will not dismiss racist or discriminatory behaviour as “banter”, a joke or normal disagreement where it causes, or has the potential to cause, harm. Staff should consider the circumstances, frequency, severity and impact of the behaviour and whether it forms part of a wider pattern of bullying, harassment or abuse.

Any member of staff who becomes aware of, or suspects, racist or discriminatory behaviour involving a pupil must report the concern to the DSL or deputy DSL in accordance with the school's safeguarding procedures. The school will consider the safeguarding and support needs

of all children involved and will take appropriate action in accordance with the Behaviour, Anti-Bullying and Equality, Diversity and Inclusion policies.

Where appropriate, incidents will be recorded and monitored to identify patterns, repeat behaviour, group dynamics or wider safeguarding concerns.

Misogyny

The school recognises misogyny, including misogynistic attitudes, language and behaviours, as a potential safeguarding concern. Staff should be alert to misogyny and recognise that harmful attitudes can form part of a continuum that may escalate into harassment, sexual violence or other harmful sexual behaviour.

Concerns should be reported and responded to in accordance with the school's safeguarding procedures.

The school recognises that as well as misogyny, misandry and other gender-based prejudice or harmful attitudes may contribute to bullying, harassment, harmful sexual behaviour or violence. Staff should challenge inappropriate behaviour and report safeguarding concerns in accordance with school procedures.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, physical, sexual and emotional abuse, stalking, coercive or controlling behaviour and financial exploitation.

Staff should recognise that children can be victims of domestic abuse, including where they see, hear or experience its effects within their household or wider family relationships. This may result in the child being harmed. Or, children may suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of these can have a detrimental and long-term impact on their health, wellbeing, development and ability to learn.

Operation Encompass

The school recognises Operation Encompass as an important safeguarding mechanism for supporting children affected by domestic abuse.

Operation Encompass is a statutory notification process through which the police notify a child's educational setting when they have reasonable grounds to believe that the child may be a victim of domestic abuse. This includes children connected to a household who may not have been physically present when the domestic abuse incident occurred.

Where the school receives an Operation Encompass notification, the information will be passed promptly and securely to the DSL or deputy DSL. The DSL will consider the information alongside the child's existing safeguarding information and determine what action, support or referral may be appropriate.

The school will take the child's circumstances, views, behaviour and presentation into account when considering the appropriate response. Information received through Operation Encompass will be treated as confidential and handled in accordance with safeguarding and data protection requirements.

Operation Encompass notifications do not replace the school's normal safeguarding procedures. Where the information indicates that a child may be at risk of harm or requires additional safeguarding support, the DSL will follow the school's child protection procedures and consider whether a referral to children's social care or the police is required.

The school will maintain appropriate records of Operation Encompass notifications, decisions and actions taken on the internal safeguarding pane.

Abuse of Position of Trust

All staff are aware that they are in a position of trust with pupils. Any sexual relationship or inappropriate communication between a member of staff and a pupil under 18 is a criminal offence, regardless of consent. Staff must uphold professional boundaries at all times, including in online communication and during live lessons.

Child-to-parent or caregiver abuse

The school recognises that abuse may also occur from a child towards a parent, carer or other caregiver. Such behaviour may be linked to wider safeguarding, family, behavioural, mental health or contextual concerns. Staff should report concerns to the DSL where they believe a child or family member may require safeguarding support.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) are forms of abuse in which an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. This may involve an exchange for something the child needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator, and/or through violence or the threat of violence.

CCE and CSE may be committed or facilitated by individuals, organised networks or gangs. A child may identify themselves as being part of such a group while nevertheless experiencing exploitation, coercion or harm. CCE and CSE can affect both boys and girls and may involve children being moved or trafficked for the purpose of exploitation. Such exploitation may constitute modern slavery.

Children cannot give informed consent to being exploited, abused or trafficked. A child who is being criminally exploited should be recognised and treated as a victim, even where they have been involved in criminal activity as a result of coercion or exploitation.

Where a potential victim of CCE or CSE is identified, the DSL will consider the need for a child protection referral and, where appropriate, a referral under the National Referral Mechanism (NRM) in accordance with relevant statutory guidance and local safeguarding procedures.

Child Sexual Exploitation (CSE)

CSE involves a child being coerced, manipulated or deceived into sexual activity or sexual exploitation by an individual or group. It may involve an exchange for money, goods, gifts, accommodation, protection, affection, status or something else the child needs or wants. It may also involve violence, threats, coercion or manipulation, and may take place online or offline.

Staff should be alert to indicators that a child may be experiencing sexual exploitation. These may include, but are not limited to:

- a history of abuse or neglect;
- substance misuse;
- being looked after or previously looked after;
- inappropriate or sexualised behaviour;
- changes in emotional or mental wellbeing;
- unexplained gifts, money, possessions or accommodation;
- having multiple mobile phones or unexplained changes in phone use;
- relationships with significantly older individuals;
- unexplained absences or going missing;

- sexual health concerns, including sexually transmitted infections or pregnancy;
- involvement in exploitative relationships or groups; and
- online activity or communication which may indicate grooming or sexual exploitation.

All staff receive safeguarding training which includes awareness of the indicators of CSE. Any concern that a child may be experiencing or at risk of CSE must be reported to the DSL or deputy DSL without delay.

Child Criminal Exploitation (CCE)

CCE occurs where a child is coerced, manipulated or deceived into taking part in criminal activity for the benefit of another person or group. It may involve gangs or organised criminal networks and can include drug supply, theft, shoplifting, fraud, vehicle crime, criminal damage or serious violence.

Specific forms of CCE may include county lines, in which organised criminal groups use dedicated telephone lines or other methods to facilitate the supply of drugs or other criminal activity, often exploiting children and vulnerable people.

Children may be threatened with violence, intimidated, exploited through debt or coerced into carrying weapons such as knives. They may also be forced or manipulated into committing serious violence against others.

Indicators that a child may be experiencing CCE may include, but are not limited to:

- unexplained money, gifts, possessions or expensive items;
- associating with gangs, organised criminal groups or individuals involved in criminal activity;
- use of gang-related language or symbols;
- talking about drugs, weapons, violence or unexplained amounts of cash;
- possessing multiple mobile phones or unexplained changes in phone use;
- going missing from home or education, particularly repeatedly or for prolonged periods;
- unexplained injuries;
- carrying a weapon or expressing a need to carry a weapon for protection;
- sudden changes in behaviour, friendship groups or appearance;
- involvement in criminal activity or contact with the police; and
- signs of coercion, intimidation, threats or debt.

Staff should remember that girls can also be victims of CCE and that indicators may present differently.

If a member of staff becomes concerned that a child may be experiencing or at risk of CCE, this must be reported to the DSL or deputy DSL without delay. The DSL will assess the concern and follow the school's safeguarding and local multi-agency procedures, including consideration of referral to children's social care, the police and/or the National Referral Mechanism where appropriate.

Modern Slavery and Human Trafficking

Children may be victims of modern slavery, trafficking and exploitation. This may include forced labour, domestic servitude, criminal exploitation, sexual exploitation or other forms of exploitation. Children may be trafficked within the UK or across international borders and may be controlled, coerced, deceived, threatened or moved for the purpose of exploitation.

Staff should be alert to indicators that a child may be experiencing modern slavery or trafficking. These may include unexplained travel or movements, frequent changes of address or accommodation, unexplained possessions or money, signs of fear or anxiety, appearing to be controlled or monitored by another person, reluctance to speak openly, unexplained injuries, going missing, or involvement in criminal or sexual activity where there are indications of coercion or exploitation.

A child may be a victim of modern slavery or trafficking even where they appear to have participated in criminal activity or other harmful behaviour as a result of coercion, manipulation or exploitation. Staff should therefore consider the child's safeguarding needs and not assume that involvement in criminal activity means that the child is not a victim.

Any concern that a child may be experiencing modern slavery, human trafficking or exploitation must be reported immediately to the DSL. The DSL will assess the concern and follow relevant local safeguarding procedures, including consideration of referral to children's social care, the police and, where appropriate, the **National Referral Mechanism (NRM)**.

Violent / Serious Crime

The school recognises that some children may be at increased risk of involvement in, or becoming victims of, serious violence. Serious violence may be associated with child criminal exploitation (CCE), county lines, gang involvement, weapons, coercion, threats or other forms of abuse and exploitation.

All staff should be alert to indicators that a child may be involved in, or at risk from, serious violence. These may include, but are not limited to:

- frequent or unexplained absences from education or home
- significant changes in behaviour, emotional wellbeing or presentation
- significant changes in friendship groups or associations with older individuals or groups
- associations with individuals or groups involved in criminal activity
- a significant decline in educational performance or engagement
- unexplained gifts, money or new possessions
- unexplained injuries or signs of assault
- possession of, or concerns about access to, weapons
- threats or expressions of fear relating to violence
- involvement in criminal activity or offending
- exposure to criminal exploitation, coercion, threats or violence
- going missing or unexplained periods away from home or education
- involvement with gangs or organised criminal groups.

Staff should recognise that there may be other contextual indicators and that individual indicators should be considered alongside the child's wider circumstances and other safeguarding information.

Risk factors associated with involvement in serious violence may include previous experience of maltreatment, involvement in offending, frequent absence from education, exclusion, and other vulnerabilities. Some groups may be statistically more likely to experience or become involved in serious violence; however, staff must avoid making assumptions about an individual child based solely on demographic characteristics.

Any concern that a child may be at risk of, or involved in, serious violence must be reported to the DSL without delay. The DSL will consider the child's safeguarding needs and, where appropriate, make referrals to children's social care, the police or other relevant agencies.

The school will consider the relationship between serious violence, child criminal exploitation, county lines, child sexual exploitation, trafficking and other forms of abuse when assessing concerns.

Advice for schools and colleges is provided in the Home Office Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

Gang Involvement and Criminal Activity

Staff should be aware of the indicators which may signal that children are at risk from or are involved with serious violent crime, either through participation in or as victims of gang violence. These may include:

- becoming withdrawn from family
- a change in friendships or relationships with older individuals or groups
- a sudden loss of interest in school – decline in attendance or academic achievement
- using new or unknown slang words
- holding unexplained money or possessions
- staying out unusually late without reason
- a sudden change in appearance, including dressing in a particular style or 'uniform'
- a new nickname
- signs of assault or unexplained injuries
- increased use of social networking sites
- starting to adopt codes of group behaviour e.g. ways of talking and hand signs
- expressing aggressive or intimidating views towards other groups of young people some of whom may have been friends in the past
- expressing fear about entering certain areas or being concerned by the presence of unknown people in their neighbourhood

In such a case a staff member becomes concerned about anything above, the DSL will normally consult the child's parents and carers. If the child is based in the UK, the DSL will contact the Local Authority's Children's Social Care Service or police for the area in which the child is currently located.

Radicalisation and Extremism

Radicalisation- a process of someone being encouraged to adopt extreme views or support terrorism. Leading to rejected shared values

Extremism- refers to holding or acting on views that promote hate, violence, or intolerance, particularly those that threaten the safety and rights of others.

Indicators in a child:

- talks of extremist material online
- Isolation
- Loneliness
- identity confusion
- talks about societal injustice
- fixation on certain ideology
- using extremist language or slogans
- supporting violence
- having hostility

Staff will undertake Prevent Duty Training issued by HM Government as appropriate in line with safeguarding training. Staff will know how to raise a concern to the DSL and the DSL, if necessary, will make a Prevent Referral and alert the Police. Staff will know they can seek advice or support by email at counter-extremism@education.gsi.gov.uk

Prevent Lead: Effie Haywood

Honour Based Violence

Honour Based Abuse is violence or abuse committed to protect or defend the "honour" of a family or community. This usually always stems from deep rooted cultural, religious, or social beliefs about family reputation, especially related to behavior, relationships, or gender roles.

The following practices linked to Honour Based Violence are illegal in the UK:

Female Genital Mutilation- includes the physical act of Female Genital Mutilation (FGM). This is a form of child abuse and a method of violence against women and girls which is recognised by UNICEF as an internationally recognised human rights violation.

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. Threats can be physical or emotional and psychological. A lack of free and full consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Forcing a person into a marriage is a crime in the United Kingdom.

School staff can also contact the Forced Marriage Unit, if they need advice or information: contact +44 (0)20 7008 0151 or email fm@fcdo.gov.uk

Additional Vulnerabilities

Due to our cohort of students, we ensure extra context is always obtained when identifying one of these additional barriers to ensure appropriate safeguarding steps are taken, in the form of community-based Early Help, targeted Early Help delivered through Family Help and support beyond, if and where necessary.

KCSIE 2026 emphasises the importance of recognising that some children may face additional barriers to recognising or reporting abuse. These vulnerabilities can arise from personal circumstances, social situations, or protected characteristics. Staff should be proactive in identifying and responding to these vulnerabilities, ensuring all children receive equal protection and support. In our safeguarding training, we highlight the significance of the fact that some students may be at an increased risk of abuse or face additional barriers which make them less likely to disclose abuse. We are committed to ensuring that all students receive equal protection, regardless of their circumstances or the barriers they face. We therefore ensure we are extra alert to and have training on students who meet the criteria of any of the following:

- are 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 a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviour
- shows signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups
- 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 or in Alternative Provision or Pupil Referral Unit
- is in a family circumstance presenting challenges, such as substance abuse, adult mental health problems or domestic abuse
- is misusing drugs or alcohol themselves
- is showing early signs of abuse, neglect and/or exploitation
- 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 or has previously been fostered or looked after
- is vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality, for example children who identify as LGBTQ+, or a child who does not have English as a first language
- is at risk of honour or faith based abuse such as Female Genital Mutilation (FGM) or Forced Marriage
- privately fostered child

Staff should remain alert to changes in behaviour, presentation, attendance, relationships, communication or engagement which may indicate that a child is experiencing abuse, neglect or exploitation. Staff should consider the wider context of a child's circumstances and recognise that safeguarding concerns may overlap or present in less visible ways.

Mental Health and Safeguarding

Mental health difficulties can, in some circumstances, be an indicator that a child has experienced or is at risk of abuse, neglect, exploitation or other safeguarding concerns. The

school recognises that mental health difficulties may also arise for reasons unrelated to abuse or neglect and should not automatically be treated as evidence of a safeguarding concern.

Staff should be alert to changes in a child's emotional wellbeing, behaviour or presentation, including signs of anxiety, depression, self-harm, eating difficulties or disorders, suicidal thoughts or attempts, significant withdrawal, changes in behaviour, or other concerning changes in presentation.

Staff should not attempt to diagnose a mental health condition. Where a member of staff has a concern about a child's mental health, they should consider whether there may also be safeguarding concerns and report these to the DSL or deputy DSL in accordance with the school's safeguarding procedures. Where appropriate, the school will support the child to access suitable pastoral, mental health or specialist services.

Where there is an immediate concern that a child is at risk of serious harm, including a risk of suicide or significant self-harm, staff must follow the school's safeguarding and emergency procedures without delay

Young Carers and Safeguarding

Staff should be alert to the needs of young carers and recognise that caring responsibilities may affect attendance, attainment, behaviour, wellbeing and safeguarding. Early identification is important so that young carers can receive appropriate support from school and external services.

Children with SEND, disabilities or health conditions and Safeguarding

The school recognises that children with SEND, disabilities or certain medical or physical health conditions may experience additional barriers to recognising, communicating or reporting abuse, neglect and exploitation.

Staff should avoid assuming that changes in behaviour, mood or presentation are solely attributable to a child's SEND or medical condition. Staff should remain professionally curious and consider whether further safeguarding exploration is required.

Additional barriers may include communication difficulties, increased dependence on adults, social isolation, bullying, difficulty distinguishing fact from fiction online and difficulties understanding or reporting harmful experiences.

Safeguarding concerns involving a child with SEND will be considered in liaison with the DSL and SENCO or appropriate SEND lead.

Children with Medical Conditions and Safeguarding

The school recognises that children with medical conditions may experience additional safeguarding vulnerabilities. A medical incident will not automatically constitute a safeguarding concern; however, staff should report concerns where a child's medical needs are repeatedly unmet, essential medication is not provided, or there are other circumstances suggesting that the child may be at increased risk of neglect, abuse or exploitation.

LGB Children and Safeguarding

Being lesbian, gay or bisexual is not in itself a safeguarding concern. However, children may experience increased vulnerability through discriminatory, homophobic, biphobic or other bullying or abuse. Such concerns will be taken seriously and responded to through the school's safeguarding and behaviour procedures.

Children questioning their gender

The school recognises that children questioning their gender may experience additional vulnerabilities, including bullying, discrimination, difficulties within family or peer relationships and mental health or psychosocial concerns.

Staff should respond sensitively, maintain professional curiosity and consider the child's wider circumstances and safeguarding needs. Any safeguarding concerns should be reported to the DSL.

The school's approach to requests relating to social transition, single-sex spaces and related matters is set out in the school's relevant policy and statutory guidance.

Temporary Accommodation

Staff should be alert to changes in a child's accommodation or living circumstances which may increase safeguarding vulnerability. Where information suggests that a child may be living in temporary accommodation or experiencing housing instability, concerns should be shared with the DSL so that appropriate safeguarding, attendance and external support can be considered.

International Safeguarding

With students around the world, all with variations in safeguarding laws and processes, it is a difficult landscape to navigate. As a school team, our main role is to report any concerns, however small, to our safeguarding team. The safeguarding team will take any concerns forward and report these to the relevant authorities where appropriate and where possible.

If needed, the DSL will work with international authorities and organisations to find the appropriate course of action and alternatives to UK services. The DSL may seek advice from [Child Helpline International](#) as a first point of contact. The DSL will, where necessary, liaise with local child protection authorities, embassies, or international safeguarding organisations to ensure any report aligns with both UK statutory duties and local legal frameworks.

The DSL also sources and maintains a bank of international safeguarding resources for students and families. These are shared alongside UK-based materials to ensure cohesive and unbiased support.

Contextual Safeguarding

There are many factors outside of school that can influence safeguarding incidents or behaviours. When looking into safeguarding incidents or behaviours, all staff – particularly the DSL – will consider the wider context. School staff, particularly Happiness Managers and Year Group Leads, are key in providing as much information as possible during the referral process, to allow assessment of any abuse to be in a holistic context, considering the safeguarding background of the child and all the available evidence.

9. Online Safety

Online safety is an integral part of safeguarding and child protection. The school recognises that technology is embedded in children's lives and that safeguarding risks can occur online, offline, or across both environments.

The school adopts a whole-school approach to online safety that aims to:

- protect children from inappropriate, illegal and harmful online content and activity;
- educate children about online risks and develop their digital resilience;
- ensure staff understand their responsibilities when working with children online;
- provide appropriate filtering and monitoring arrangements;
- identify, respond to and escalate online safeguarding concerns;

- support parents and carers to understand and manage online risks; and
- ensure that online safety arrangements are regularly reviewed and adapted as technology and risks develop.

The school's approach to online safety is informed by *Keeping Children Safe in Education 2026*, the Department for Education's filtering and monitoring standards, relevant data protection legislation and guidance, and other relevant statutory guidance.

Online Safety Risks – The Four Cs

The school recognises that online safeguarding risks are considerable and continually evolving. These can be categorised into four broad areas:

Content – what children may see

Children may be exposed to illegal, inappropriate or harmful content, including pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation, fake news and conspiracy theories.

Contact – who children interact with

Children may experience harmful online interactions with other users or with generative AI applications that simulate such interactions. Risks may include peer pressure, bullying, grooming, exploitation, coercion, adults posing as children, financial exploitation and inappropriate commercial contact.

Conduct – what children do online

Children may engage in or be affected by online behaviour that increases the likelihood of harm. This includes cyberbullying, harmful sexual behaviour, making or sharing nudes or semi-nudes, sharing pornography or other explicit material, harassment, sexual violence, and the creation or distribution of digitally altered or AI-generated sexualised images.

Commerce – how children may be exploited financially

Children may experience online financial risks including gambling, inappropriate advertising, phishing, scams, fraud, financial exploitation, in-app purchases and other forms of financial manipulation.

The school recognises that these risks may overlap and that a safeguarding concern may involve more than one category.

Staff Responsibilities and Professional Conduct Online

All staff have a responsibility to contribute to children's online safety.

Staff must:

- follow the school's Online Safety Policy, Acceptable Use arrangements and Staff Communication and Conduct Policy;
- maintain professional boundaries in all online interactions with pupils;
- use school-approved systems, accounts and communication channels when communicating with pupils;
- not use personal email accounts, personal social media accounts or other inappropriate personal communication channels to communicate with pupils;
- not share personal contact details with pupils unless specifically authorised and necessary for safeguarding or educational purposes;
- use school-approved devices and systems wherever possible when working with pupils online;
- maintain confidentiality and protect personal and safeguarding information;
- never intentionally access, share, download or distribute inappropriate or harmful material using school systems;
- report concerns about online harm, inappropriate content, online abuse, cyberbullying, grooming, exploitation, harmful sexual behaviour or misuse of technology through the school's safeguarding procedures;
- act immediately where an online concern may indicate that a child is at risk of harm;
- avoid investigating online safeguarding concerns themselves and instead preserve relevant information appropriately and refer the concern to the DSL;
- challenge inappropriate online behaviour where it is safe and appropriate to do so; and
- model safe, respectful and responsible digital behaviour for pupils.

Staff must understand that safeguarding responsibilities apply equally where a child is learning, communicating or interacting remotely.

Where staff identify an online safeguarding concern, they must report this to the DSL or deputy without delay and in accordance with the school's safeguarding procedures.

Generative Artificial Intelligence

The school recognises both the educational opportunities and safeguarding risks associated with Generative Artificial Intelligence (AI). Staff should use AI tools responsibly and in accordance with school data protection, online safety and acceptable-use arrangements.

Staff must consider risks including inappropriate content, misinformation, privacy and personal data, manipulation, exploitation, discriminatory content and AI-generated or altered images and media involving children.

Any safeguarding concern involving the use of Generative AI must be reported through the school's safeguarding procedures.

The school recognises the educational potential of generative artificial intelligence (AI) tools but also acknowledges the safeguarding and ethical risks they may pose. In line with *Keeping Children Safe in Education (KCSIE) 2026* and the *Filtering and Monitoring Standards (DfE, 2024)*, the school ensures that filtering and monitoring systems are in place to reduce exposure to harmful content and to identify potential risks, including those that may arise through AI use.

The school will consider the safe and effective use of AI in accordance with current Department for Education guidance, including guidance relating to generative AI in education.

Potential safeguarding risks associated with AI include:

- exposure to inappropriate, harmful or illegal content;
- AI-generated or digitally altered sexualised images involving children;
- deepfakes and other manipulated images, video or audio;
- inappropriate or harmful interactions with AI applications;
- grooming, manipulation, coercion or exploitation facilitated by AI;
- misinformation and disinformation;
- discriminatory, hateful or extremist content;
- inaccurate or misleading information;
- emotional dependency or inappropriate relationships with AI systems;
- privacy and personal-data risks;
- inappropriate use of children's images, personal information or other sensitive data;
- intellectual property concerns; and
- misuse of AI to facilitate bullying, harassment, fraud or other harmful behaviour.

The school will assess the safeguarding and legal implications of AI tools before introducing or approving their use.

Where AI tools are used for teaching, learning or other school purposes, staff must follow the school's acceptable-use, data protection and information security arrangements.

Staff must not enter confidential, sensitive or personally identifiable information about pupils into an AI system unless the tool has been appropriately approved for that purpose and its use complies with the school's data protection and information security requirements.

AI-generated content must not automatically be treated as accurate, reliable or safe. Staff should support pupils to question, verify and critically evaluate AI-generated information.

Any safeguarding concern involving Generative AI must be reported through the school's safeguarding procedures.

AI-Generated Images, Deepfakes and Nudes/Semi-Nudes

The school recognises that AI and other technologies can be used to create, manipulate or distribute realistic images, video or audio involving children.

This includes AI-generated or digitally altered sexualised images, sometimes described as deepfakes, deepnudes or nudification.

The school treats concerns involving the creation, possession or distribution of sexual images or videos involving children as safeguarding concerns and responds in accordance with its procedures for child-on-child abuse, harmful sexual behaviour and the making or sharing of nudes and semi-nudes.

The school uses the terminology "**making or sharing nudes or semi-nudes**" when referring to sexual images or videos involving children. Staff should avoid using the term "sexting" when recording or discussing safeguarding concerns.

Staff must not forward, share, download or unnecessarily retain sexual images involving children.

Where staff encounter or receive information about an image or video involving a child, they should not attempt to investigate the matter themselves. The concern must be reported immediately to the DSL, who will determine the appropriate safeguarding and external referral response.

Filtering and Monitoring

Schools must ensure that filtering and monitoring systems are in place to reduce exposure to harmful content and to identify risks. These duties apply equally when pupils use generative AI tools (e.g. ChatGPT, image generators, coding assistants).

Filtering: Access to inappropriate or harmful material must be blocked, even if pupils try to generate it through AI prompts.

Monitoring: Pupil use of AI platforms should be supervised and logged so that concerning

patterns or content can be identified.

The school recognises that filtering systems may not identify every harmful or AI-generated piece of content and that monitoring systems may have technical limitations. Filtering and monitoring therefore form part of, rather than replace, the school's wider safeguarding arrangements.

Where monitoring or filtering identifies a safeguarding concern, this will be considered and acted upon by the DSL or appropriate safeguarding staff in accordance with the school's safeguarding procedures.

Filtering and Monitoring Review

The effectiveness of the school's filtering and monitoring arrangements will be reviewed at least once every academic year. The review will be led by the member of the Senior Leadership Team responsible for filtering and monitoring, with support from the DSL and appropriate IT support.

Reviews will include checks that filtering and monitoring arrangements are functioning appropriately across relevant internet-connected devices and locations. Records of these checks and any actions arising will be maintained.

Any safeguarding concern identified through filtering or monitoring will be considered by the DSL in accordance with the school's safeguarding procedures.

The review will consider:

- whether filtering is working as intended;
- whether monitoring is identifying relevant risks;
- whether users can be appropriately identified;
- whether safeguarding alerts are reaching the appropriate staff;
- the use and risks associated with Generative AI;
- technical limitations of the school's systems;
- online safeguarding incidents and trends;
- pupil risk profiles;
- whether staff understand the reporting process; and
- whether any changes or improvements are required.

A record of the review, checks undertaken and actions arising will be maintained.

Any significant safeguarding concerns identified through filtering or monitoring will be reported to the DSL without delay.

Filtering and Monitoring at Home – Guidance for Parents and Carers

As an online school, the school recognises that pupils may access the internet using devices and networks outside the school's control. Parents and carers therefore have an important role in helping children use technology safely and appropriately at home.

Parents and carers are encouraged to:

- use the parental controls and safety settings available on home broadband services, mobile networks, operating systems, devices, apps and online platforms
- use age-appropriate content filters and restrictions to reduce children's access to harmful or inappropriate content
- establish appropriate rules and boundaries for internet, gaming, social media and device use
- regularly review the apps, websites, games and online services being used by their child and check the age ratings and privacy settings
- consider enabling SafeSearch and child-friendly settings on search engines, video platforms and other commonly used services
- keep devices and software updated and use appropriate security measures, including strong passwords and multi-factor authentication where available
- talk regularly with their child about what they do online, who they communicate with and what to do if something makes them feel uncomfortable, frightened or unsafe
- encourage children to report concerning content, contact or behaviour rather than responding to or engaging with it
- consider the child's age, maturity, needs and circumstances when deciding what level of supervision and monitoring is appropriate

Parents and carers should be aware that filtering and parental controls cannot prevent every online risk. They should therefore be used alongside regular conversations with children, appropriate supervision and education about online safety. Older children should also be supported to develop the skills and judgement needed to manage online risks independently.

Where parents or carers have concerns about content, contact or behaviour online, they should consider reporting the concern through the relevant platform and, where appropriate, seek advice or make a report to the appropriate safeguarding or law-enforcement organisation.

The school will signpost parents and carers to trusted sources of information and support, including:

- **NSPCC** – advice for parents and carers about keeping children safe online, including parental controls, online gaming, social media and other online risks.
- **Child Exploitation and Online Protection (CEOP)** – information and reporting routes for concerns about a child being sexually abused or exploited online or being groomed online.

- **Childline** – confidential support and advice for children and young people.
- **UK Safer Internet Centre** – advice and resources for parents, carers, children and schools about online safety.
- **Internet Matters** – practical guidance for parents and carers on parental controls, online platforms, gaming and children's online safety.

Parents and carers should contact the school if they have a safeguarding concern relating to their child's online activity. Concerns should be reported to the Designated Safeguarding Lead (DSL) or deputy DSL in accordance with the school's safeguarding procedures.

Staff Response to Online Safeguarding Concerns

Where a member of staff becomes aware of an online safeguarding concern, they must:

1. **Act immediately** where there is an immediate risk of harm.
2. **Report the concern to the DSL or deputy without delay.**
3. **Record the concern factually and accurately** in accordance with the school's safeguarding recording procedures.
4. **Preserve relevant information appropriately** where this can be done safely and without unnecessarily viewing, downloading or sharing harmful material.
5. **Not investigate the concern themselves.**
6. **Follow the school's procedures for child-on-child abuse, harmful sexual behaviour, exploitation, radicalisation, online abuse or other safeguarding concerns as appropriate.**
7. **Escalate the concern** if they believe appropriate safeguarding action has not been taken, in accordance with the school's safeguarding and whistleblowing procedures.

Where an online concern indicates that a child may be at immediate risk of harm, the school's normal safeguarding and emergency referral arrangements apply.

Mobile Phones and Personal Devices

As an online school, the school recognises that pupils may use mobile phones, tablets and other personal devices to access lessons and communicate with staff and other pupils. The school therefore promotes the safe, responsible and respectful use of personal devices rather than applying a blanket prohibition on their use.

Pupils must not use personal devices to record, photograph, screenshot, livestream or otherwise capture lessons, staff or other pupils without appropriate permission. Pupils must not share recordings, screenshots, photographs, lesson materials or personal information relating to other

pupils or staff without permission.

Pupils must not use mobile phones or other personal devices during lessons to engage in bullying, harassment, discriminatory behaviour, sexual harassment, harmful sexual behaviour, inappropriate communication, unauthorised recording or any other activity that could place themselves or others at risk.

Private messaging between pupils and staff must take place only through school-approved communication systems and in accordance with the Staff Code of Conduct and Acceptable Use Policy (the message board and private messages). Staff must not use personal messaging applications or personal social media accounts to communicate with pupils unless specifically authorised in accordance with school procedures.

The school recognises that mobile phones and personal devices can be used to facilitate safeguarding concerns, including cyberbullying, grooming, sexual harassment, sharing of nudes or semi-nudes, creation or distribution of AI-generated or manipulated images, exploitation and other forms of child-on-child abuse. Concerns relating to the misuse of a mobile phone or personal device must be reported to the DSL or deputy DSL in accordance with the school's safeguarding procedures.

Where a pupil uses a personal device inappropriately, the school will respond in accordance with our Behaviour and Acceptable Use policies and will consider whether the incident raises any safeguarding concerns requiring referral to the DSL or external agencies.

Online Safety Education and Digital Resilience

Online safety education is embedded across the curriculum and pastoral provision and is revisited regularly.

Pupils are supported to develop the knowledge, skills and confidence to:

- recognise online risks;
- respond appropriately to harmful or upsetting content;
- identify manipulation, grooming and exploitation;
- understand consent and respectful online behaviour;
- understand the risks associated with sharing images and personal information;
- recognise misinformation and disinformation;
- use Generative AI safely and critically;
- understand that AI-generated content may be inaccurate, biased or harmful;
- report concerns involving themselves or their peers; and
- seek help from trusted adults.

Online safety is addressed through appropriate curriculum and pastoral opportunities, including Life Skills, Debate Club, Internet Safety Day and other age-appropriate activities.

The school will ensure that online safety education reflects the changing nature of technology and emerging safeguarding risks.

Support for Parents and Carers for Screen Time

The school recognises that parents and carers play an important role in helping children develop safe and healthy online behaviours. As an online school, the school will provide parents and carers with information and signposting to appropriate resources to help them understand online risks, parental controls, age-appropriate online activity, digital wellbeing and healthy approaches to screen time.

Parents and carers will be encouraged to discuss online safety with their children, establish appropriate boundaries for device and internet use, use parental controls where appropriate, and seek support where they have concerns about their child's online activity or wellbeing.

The school will signpost parents and carers to current Department for Education and other trusted online-safety resources, including relevant guidance on screen time and children's digital wellbeing.

Cyber Crime and Technology-Enabled Offending

The school recognises that children may be exposed to or involved in cyber-related offending, including unauthorised access, hacking, malicious activity, fraud, phishing, data theft or other activity that may constitute an offence.

Concerns about cyber crime or serious misuse of technology will be considered as potential safeguarding concerns where they involve a risk to a child or others.

Staff must report concerns involving serious cyber-related behaviour through the school's safeguarding and online safety procedures.

The school will work with appropriate external agencies where required.

Cybercrime

Cybercrime is criminal activity committed using computers or the internet. It may be cyber-enabled, where technology facilitates or increases the scale or speed of an offence, or cyber-dependent, where the offence can only be committed using a computer or network.

Staff should be aware that children may become involved in cybercrime intentionally or without fully understanding the legal, ethical or safeguarding implications of their actions. Children with particular skills or interests in computing and technology may be at risk of being drawn into cyber-dependent crime.

Examples of cyber-dependent crime include:

- unauthorised access to computer systems or accounts, including hacking
- attempting to access or alter school systems, files, grades or assessment materials without permission
- denial-of-service (DoS) or distributed denial-of-service (DDoS) attacks
- creating, supplying or obtaining malware, including viruses, spyware, ransomware, botnets or Remote Access Trojans
- deliberately bypassing or attempting to compromise school security systems.

Staff should also be alert to cyber-enabled criminal activity, including online fraud, exploitation and other criminal activity facilitated through digital technologies.

Any concern that a child may be involved in, or at risk of being drawn into, cybercrime should be reported to the DSL or deputy DSL. The DSL will consider the child's safeguarding needs and whether support or referral to an appropriate agency is required.

Where appropriate, the DSL should consider whether referral to the Cyber Choices programme is appropriate. Cyber Choices is a preventative police programme intended to support young people who may be at risk of committing, or being drawn into, low-level cyber-dependent offences and to help divert their technical skills towards positive and lawful activities.

The school will distinguish between malicious or deliberate cybercrime and age-appropriate exploration of technology. Concerns will be assessed on an individual basis, taking account of the child's age, understanding, intent, vulnerability and the circumstances of the behaviour.

10. Attendance

As a school, we are committed to taking appropriate action in relation to a child who has unexplainable and/or persistent absences from education. Due to our cohort of students, we

recognise that inconsistent absence is not always a concern and as a school we do not enforce attendance. However, we recognise that absence from education may indicate safeguarding concerns such as neglect, exploitation, forced marriage, FGM, or mental health difficulties.

Staff are alert to these risks and will escalate concerns to the DSL without delay.

We pride ourselves on open communication with families in identifying genuine reasons for absence and reporting these on our Authorised Absence Panel. In line with our statutory duty, where a child is missing education or leaves our roll without confirmation of another school place, the DSL will try to obtain this information from the families. If this communication does not provide adequate information, the Local Authority in the area of the child, will be notified.

We are also committed to following KCSIE 2026 where Working Together to Improve School Attendance as statutory guidance and support families with unidentified patterns in the child's attendance. Where patterns of absence persist despite engagement with parents/carers, the DSL will escalate concerns through Early Help, Children's Social Care, or other appropriate agencies.

Definitions:

Children absent from education are defined as those who are of a compulsory school age, are registered with a school setting, but do not attend for prolonged periods and/or repeat occasions. This relates to children who have unexplainable and/or persistent absences from education.

Children missing from education (CME) are defined as those who are of a compulsory school age but are either not registered at a school or else not receiving suitable education in place of a school setting

The school recognises that children missing education (CME) are at increased risk of abuse, neglect, exploitation, radicalisation, mental health difficulties and poor educational outcomes. Staff should understand that prolonged or unexplained absence, disengagement from learning, or an inability to establish a child's whereabouts may be indicators of safeguarding concerns requiring immediate action.

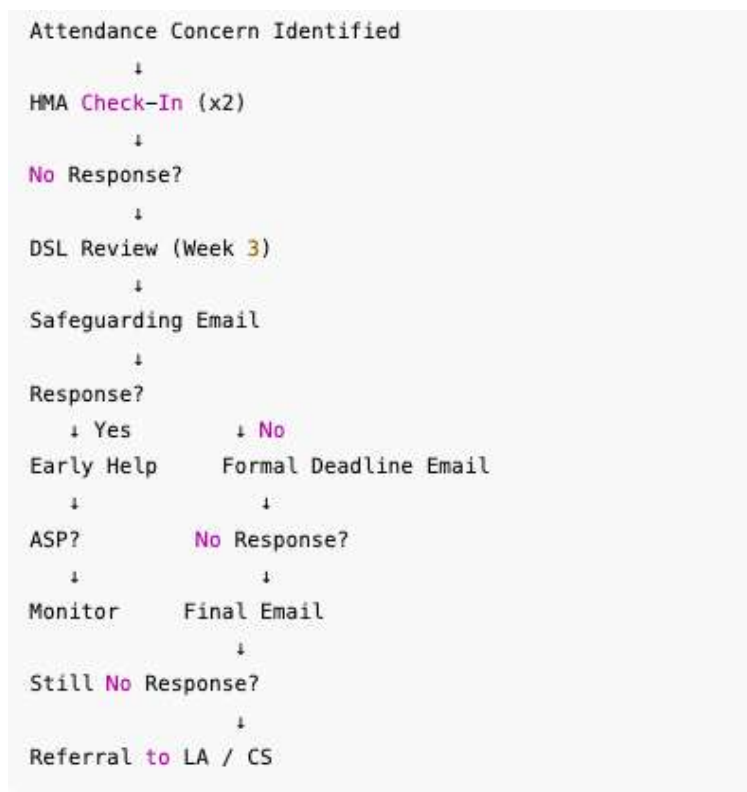
The school will investigate unexplained absences promptly, maintain appropriate records, and work with parents, local authorities and other agencies to establish the child's whereabouts. Where there is reason to believe a child is missing education or may be at risk of harm, the DSL will make appropriate referrals in accordance with local safeguarding partnership procedures and statutory guidance.

At our school, we take the following steps for children who would be considered to be absent from education:

- Follow our school's attendance policy in relation to recognising, responding to and supporting students who may be suffering harm
- Contact the child's parents or carers to establish the reasons for missed absences and record these on the students data and safeguarding file. If the concern is resolved, no further action will be taken
- Year Leads and Happiness Manager Assistants will work with the DSL to monitor attendance weekly and notify the DSL when a repeated pattern occurs (2 instances of unexplained absence which are therefore unauthorised)
- Authorised Absences will be logged but still monitored, noting any patterns
- If the DSL has a concern that breaches into safeguarding, this will be identified and reported in a timely manner, at which point the DSL will seek to work with the parent to resolve the pattern.
- If unresolved, concerns will be referred to Early Help, Children's Social Care, or the Local Authority in line with statutory guidance.
- For online learners, engagement with lessons, log-ins, and pastoral interactions are monitored as part of attendance tracking. Any patterns suggesting risk of harm (including CSE, CCE, radicalisation, or exploitation) are reported to the DSL.

Our Attendance Policy outlines detailed guidance on how attendance concerns are monitored, assessed and responded to in line with safeguarding responsibilities, including early help and escalation processes. Please refer here for further understanding.

Where relevant, the school will work with the **Virtual School Head and other professionals** to support the attendance, welfare and educational outcomes of looked-after and previously looked-after children.



11. Tools and Support for Parents and Carers

Parents are integral to our safeguarding framework. This section outlines tools and support available to parents for managing their child's emotional wellbeing and accessing additional support. The school recognises that parents and carers are usually the primary source of support for children and works in partnership with families wherever it is safe and appropriate to do so. The welfare of the child remains the school's paramount consideration and, where necessary, safeguarding action will be taken even where parents or carers disagree with professional advice.

All interventions, including counselling and Early Help, operate within the school's safeguarding and child protection framework. Any concerns arising from these interactions are reported immediately to the Designated Safeguarding Lead (DSL) in line with statutory guidance. Information is shared only on a need-to-know basis, in compliance with UK GDPR and KCSIE 2026. We work in collaboration with the parents for effective safeguarding and therefore our list below is not exhaustive as we are always developing new support means.

Where a child is subject to statutory intervention (such as Early Help, Child in Need, or Child Protection), the DSL or Deputy DSL will attend multi-agency meetings and contribute to statutory assessments. The school will ensure the child's views are represented and that appropriate information is shared in line with safeguarding guidance.

Early Help refers to families who require additional support, the school will work with them and, where appropriate, make referrals for Early Help in line with local safeguarding partnership arrangements. The below tools outline the ways we as a school intervene in Early Help support of families.

Working in Partnership with Parents

- We encourage parents to raise concerns early.
- Parents are encouraged to share changes in family circumstances.
- We will keep parents informed wherever safe to do so.
- We recognise some parents may also need support.
- The child's wishes and feelings are considered.
- We will work openly unless doing so would place a child at risk.

Support Tools Based on Concern Type

The school will provide parents and carers with appropriate information and resources to support children's online safety, including guidance relating to healthy and safe use of screens and digital devices.

Universal Support

Most children will have their needs met through universal services, including education, primary healthcare and community support. The school will continue to provide pastoral support, monitor wellbeing and work collaboratively with parents where additional needs are identified.

Family Help

Where children or families would benefit from additional support beyond universal services, the DSL may consider referral to Family Help in accordance with local safeguarding partnership

arrangements. Staff may contribute to Family Help assessments, meetings and support plans where appropriate.

Behaviour

The school recognises that changes in behaviour may be an indicator of an underlying safeguarding concern, unmet need, Special Educational Needs and Disabilities (SEND), mental health difficulty, abuse, neglect or exploitation. Staff should not view behaviour in isolation but consider whether it may be communicating that a child needs additional support.

Where behavioural concerns are identified, staff must follow the school's safeguarding procedures and report concerns to the Designated Safeguarding Lead (DSL). The school will work collaboratively with parents, carers and relevant professionals to identify the underlying causes and provide appropriate support.

Where appropriate, the SEND Lead may work alongside staff and parents to develop a Steps Plan or other targeted support strategies. Our Behaviour Policy is designed to understand, support and improve behaviour through early intervention rather than punishment, ensuring that safeguarding remains central to all decision-making.

Attendance and Engagement

The school recognises that poor attendance, persistent absence, reduced engagement or unexplained changes in participation may be indicators of abuse, neglect, exploitation, emotional wellbeing concerns or other safeguarding risks.

Parents and carers are encouraged to inform the school promptly where attendance or engagement may be affected by safeguarding concerns, health needs or significant family circumstances so that appropriate support can be considered at the earliest opportunity.

Where attendance or engagement gives rise to safeguarding concerns, the school will work collaboratively with parents, carers and relevant agencies to identify the underlying causes and determine the most appropriate level of support. This may include continued universal support, referral to Family Help services or, where statutory safeguarding thresholds are met, referral to Children's Social Care.

Online Safety

The school recognises that online safety is an essential part of safeguarding and works in partnership with parents and carers to promote children's safe, healthy and responsible use of technology.

Parents and carers will be provided with appropriate information, advice and resources throughout the academic year to support online safety at home. This includes guidance on social media, gaming, live streaming, privacy settings, cyberbullying, online exploitation, scams, generative artificial intelligence (AI), and the safe use of digital devices.

The school encourages parents and carers to maintain open conversations with their child about online activity and to report any concerns to the school at the earliest opportunity. Where significant online safeguarding concerns are identified, the school will work collaboratively with parents wherever it is safe and appropriate to do so. Where informing parents may increase the risk of harm to a child, safeguarding action will be taken in accordance with statutory guidance.

Further information can be found within the school's Online Safety Policy and Filtering and Monitoring Statement

Screen Time

The school recognises that parents and carers play an important role in helping children develop safe and healthy online behaviours. As an online school, the school will provide parents and carers with information and signposting to appropriate resources to help them understand online risks, parental controls, age-appropriate online activity, digital wellbeing and healthy approaches to screen time.

Parents and carers will be encouraged to discuss online safety with their children, establish appropriate boundaries for device and internet use, use parental controls where appropriate, and seek support where they have concerns about their child's online activity or wellbeing.

The school will signpost parents and carers to current Department for Education and other trusted online-safety resources, including relevant guidance on screen time and children's digital wellbeing.

Counselling

For more complex issues, parents can access our affiliated therapist at a reasonable cost to provide professional support for their children. Alternatively, some students can be referred for free of charge counselling by the DSL.

This service, no matter the route that students and families take, helps students with issues beyond what we can offer as an educational institution.

Referral Process

- Referrals for counselling support will be made by the Designated Safeguarding Lead (DSL), Effie.
- The DSL will liaise with both the child and parent/carer when choosing a day and time slot.
- The DSL will assess the needs of the child and refer students appropriately for a certain number of sessions. These may be weekly (for up to five sessions a half term) or bi weekly (for up to three sessions a half term).
- All sessions will be 50 minutes long and conducted via our Big Blue Button classroom. Online counselling sessions follow the same safeguarding expectations as school-based sessions. The DSL retains oversight of platform access, safeguarding reporting remains unchanged, and technical issues that may affect safety are logged.
- Private counselling support does not require a referral by the DSL and can be done individually by the parent/ carer and their child.

Consent and Confidentiality

- Written parental/carer consent must be obtained before **referral** sessions commence via email when liaising with the DSL. However, parental or child consent is not required where there are safeguarding concerns that meet the threshold for referral to statutory agencies. In such cases, the DSL will share relevant information with Children's Social Care, the police, or other statutory partners, in line with statutory guidance.
- Students will always be made aware of how counselling records are managed and what information may be shared. They will be supported to understand their rights and who they can talk to if they are worried about their safety.
- The counsellor will maintain appropriate confidentiality, in line with safeguarding policies of our school. Detailed information may be shared with the DSL or safeguarding team where there is a risk of harm.
- Sessions will be recorded. They are securely stored on our internal IT system and only accessible to the counsellor and DSL, other access is restricted. Session recordings will only be viewed if there is a safeguarding concern or legal requirement. Recordings will

not be used for any other reason.

- Where it is considered that seeking parental consent may place a child at risk of harm, the DSL may proceed without parental knowledge, in line with safeguarding guidance.
- The views and wishes of the child will always be considered in the referral process
- The counsellor will work within ethical guidelines and safeguarding requirements as defined by their professional body. e.g., **BACP, UKCP, HCPC**
- All **detailed** counselling notes are stored separately, securely and accessed only by the counsellor.
- All **brief** counselling notes are stored securely on our internal safeguarding panel and only available to view by the DSL.

School Counsellor – Information Sharing Protocol

Our counsellors follow the same safeguarding escalation routes as other staff. Staff should not attempt to manage complex safeguarding issues alone which is why we have access to this provision.

Termonology:

Detailed session notes (private therapy- paid)- the private, in depth, professional records of the counsellor which are kept securely in line with GDPR guidelines and only accessed by the counsellor; not shared with anyone in the school or family. Small amounts of this information may be shared if it constitutes a safeguarding exception.

Brief session notes (referral therapy- free)- the brief and limited information the counsellor chooses to share, only with the DSL. With a focus on wellbeing support of that student and not disclosing therapeutic detail. These are shared inline with GDPR standards and are a brief summary to inform our safeguarding practice as a school and support the individual child.

All records are managed in line with the **UK GDPR / Data Protection Act 2018** and statutory retention guidance.

Information shared with external agencies will be relevant, proportionate, accurate and limited to what is necessary to safeguard the child.

Confidentiality of Detailed Session Notes

- All detailed session notes are the private, professional records of the counsellor.
- Detailed session notes are kept on a separate device by the counsellor, with non identifiable information on the clients apart from initials for differentiation. The device is password protected and stored in the location where the counsellor practices from. The notes are saved onto a cloud which is an encrypted system.
- Detailed notes are not shared with staff, leadership, or parents. Brief details of these may be shared if a safeguarding exception is noted.

Safeguarding Exceptions

- If a student discloses information that indicates:
 - risk of harm to self,
 - risk of harm to others,
 - risk of abuse or neglect,
 - or any safeguarding concern, the counsellor will inform the Designated Safeguarding Lead (DSL) as soon as possible.
- Only relevant details are shared (what the risk is, what action is needed), not full counselling notes.

Wider Pastoral Support

- With the student's and/or parents knowledge and consent (where appropriate), the counsellor may share limited information with the DSL if it supports the student's wellbeing (e.g. exam arrangements, classroom adjustments, communication with parents needed, bullying, support areas). This will be done in the form of brief session notes.
- The focus remains on supporting the student, not disclosing therapeutic detail.

- Brief session notes will be recorded securely via our internal safeguarding panel and only accessible and viewable by the DSL, if needed.
- The counsellor will provide summaries of common themes or wellbeing trends at the end of each half term, during the half term review with the DSL (e.g. stress before exams, friendship issues, bullying trends).
- This half term review aims to inform whole-school pastoral planning as well as next steps and adjustments for the next round of counselling sessions. However will exclude all personal and identifiable information of the children.

This counselling provision operates in full alignment with our school's Safeguarding and Child Protection Policies as well as Staff Communication and Conduct Policy. Any disclosures or concerns arising from sessions will be referred directly to the DSL and the usual reporting and referral steps, as outlined in this policy on the Safeguarding Categories section, will be taken.

Counselling support forms part of the school's wider safeguarding and pastoral offer and does not replace statutory safeguarding procedures where a child is at risk of harm.

Signposting to External Agencies

Community Support

The school may signpost families to:

- Local authority services
- Family Hubs
- Domestic abuse services
- Bereavement support
- Young carers services
- SEND Information Advice and Support Services
- Food support
- Financial advice
- Housing support
- Youth organisations
- Faith/community organisations where appropriate

Resources

Mind
YoungMinds
Family Lives
NSPCC
CEOP
Internet Matters
Childline
NHS Every Mind Matters
Anna Freud
Local Family Hub

Where families are based overseas, the DSL will consider safeguarding responsibilities under English statutory guidance alongside any appropriate local safeguarding arrangements. Where necessary, advice will be sought from relevant authorities or agencies to ensure children receive appropriate protection.

12. Communication of Updates, Reporting and Information Sharing

All safeguarding communication is handled in line with the current version of Keeping Children Safe in Education, GDPR, the Data Protection Act, and the school's Safeguarding and Child Protection Policy. Weekly and End-of-Week (EOW) reports summarise open and closed cases, support provided, and cases requiring additional resources. Critical or high-risk issues must be escalated immediately, within statutory timeframes, and external agencies notified where required. Parent updates are provided sensitively, except where informing parents may increase risk. All communication is logged in the internal Safeguarding Panel to ensure a secure audit trail.

Effective safeguarding relies upon timely, proportionate and secure communication. The school has established reporting procedures to ensure safeguarding information is shared with the appropriate people, at the appropriate time, while maintaining confidentiality and complying with statutory guidance.

Safeguarding Updates Procedure

Weekly and End-of-Week (EOW) Reports:

The DSL will prepare a summary of:

- Open safeguarding cases, current status, and progress.
- Closed cases, including reasons why and action taken in line with our schools policy
- Evaluation of support provided to students and parents.
- Cases requiring additional time or resources.
- Reports are shared with the senior team, mainly the Headteacher, and relevant staff if appropriate, without overburdening others.

Urgent Concerns:

- Critical or high-risk safeguarding issues must be reported **immediately**, outside scheduled reports, to ensure timely intervention.

Parent Communication

- **High-priority cases:** Parents are updated regularly but concisely, preferably via email.
- **Scheduled calls:** Phone calls should be time-limited (e.g., 15–20 minutes) to ensure focus on critical safeguarding matters.
- **External agencies:** Where statutory agencies are involved, updates are provided in line with their protocols.

The wishes and feelings of the child will be considered, where appropriate, when communicating with parents or carers.

Documentation

- All internal and external communications are **securely logged** in the internal Safeguarding Panel system to maintain a clear audit trail. This includes emails or phone

calls regarding safeguarding matters.

Cross-Reference to Safeguarding Processes

All communication and reporting of safeguarding concerns is intrinsically linked to the procedures outlined in other sections of this policy.

This section should be read alongside:

- Record Keeping
- Responding to Safeguarding Procedures and Action Protocols
- Whistleblowing
- External Referrals and Multi Agency Working
- Tools and Support for Parents and Carers

By cross-referencing these sections, staff are supported in ensuring that all safeguarding communication is timely, proportionate, secure, and consistent with the current version of KCSIE requirements.

13. External Referrals and Multi Agency working

The school recognises that safeguarding children is a shared responsibility and that effective safeguarding requires coordinated working between education, children's social care, health, police and other relevant agencies.

When safeguarding concerns exceed the capacity of the schools internal support systems, we will work constructively with the local safeguarding partnership, local authority children's social care, health services, police and other relevant agencies to ensure children receive the right help at the right time.

The school will follow the current local safeguarding partnership arrangements, threshold documents, referral pathways, escalation procedures and relevant statutory guidance, including *Keeping Children Safe in Education 2026* and *Working Together to Safeguard Children 2026*.

No member of staff should delay taking safeguarding action because they are uncertain about which external service is most appropriate. Staff should report concerns immediately to the DSL or deputy, who will determine the appropriate response.

Principles of Multi-Agency Safeguarding

The school will:

- maintain a child-centred approach and ensure that the best interests of the child remain central to safeguarding decisions;
- recognise that no single professional or agency will have a complete picture of a child's needs or circumstances;
- share relevant information promptly and appropriately where this is necessary to safeguard and promote a child's welfare;
- work collaboratively with other agencies and professionals;
- contribute relevant information to assessments, meetings, plans and reviews;
- maintain professional curiosity where a child's circumstances do not improve;
- challenge or escalate concerns where the response from another agency is not sufficient to safeguard the child; and
- keep safeguarding concerns under review until the school is satisfied that appropriate action has been taken and the child's welfare is being effectively supported.

The school recognises that safeguarding concerns may involve harm occurring inside or outside the family home, including online and within the wider community. Referrals and multi-agency assessments should therefore provide relevant information about contextual and extra-familial risks where appropriate.

Universal Services (Tier 1)

Most children will have their needs met through **universal services** such as education, primary healthcare and community services.

Where concerns are low level or emerging, the school will continue to monitor the child's welfare, provide pastoral support where appropriate and work with parents/carers to prevent concerns from escalating.

Family Help and Targeted Support (Tier 2)

The school recognises that some children and families require additional targeted support beyond universal services. Where appropriate, the DSL may refer or contribute to **Family Help** services in accordance with local safeguarding partnership arrangements.

Family Help may include coordinated support from education, health, local authority services or voluntary organisations where a child would benefit from additional intervention but does not currently meet the threshold for statutory children's social care intervention.

School staff may contribute to Family Help assessments, meetings and plans where appropriate. Staff should understand the school's local arrangements for Family Help, including:

- the criteria and level of need for referral;
- the relevant local referral pathway;
- the distinction between targeted early help and statutory children's social care services;
- the role of the DSL and other professionals in supporting Family Help assessments; and
- the circumstances in which concerns should be escalated to children's social care.

Where appropriate, the DSL or deputy will liaise with other agencies and support the establishment of an inter-agency Family Help assessment.

Family Help cases will be kept under regular review. If the child's situation does not improve, deteriorates or additional safeguarding concerns emerge, consideration will be given to referral to local authority children's social care in accordance with local thresholds and procedures.

Children's Social Care (Tier 3)

Where a child is suffering, or is likely to suffer, significant harm, the DSL will make an immediate referral to Children's Social Care and/or the Police in accordance with local safeguarding procedures.

Children's Social Care may provide support under:

- Section 17 of the Children Act 1989 where a child is assessed as being in need.
- Section 47 of the Children Act 1989 where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

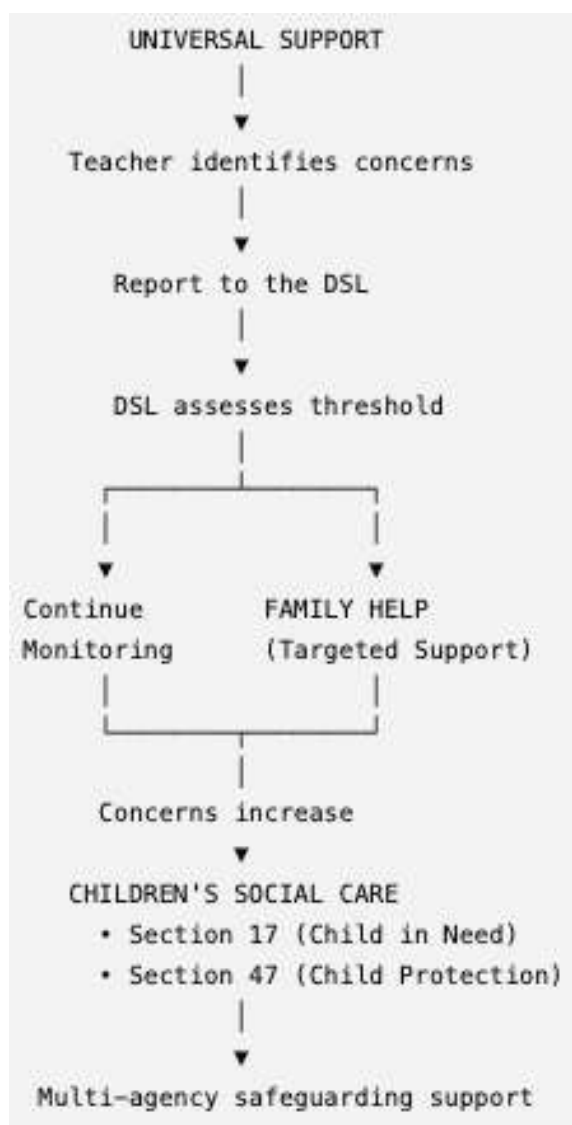
The school will fully support any assessment, Child in Need Plan, Child Protection Plan or other statutory safeguarding process.

The school will provide children's social care with as much relevant information as possible to support assessment and decision-making. This may include information about:

- the nature and history of concerns;
- the child's views and wishes;
- parental or family circumstances;
- attendance and engagement;
- previous safeguarding concerns;
- known risks within the child's home, community or online environment;
- concerns relating to exploitation or extra-familial harm;
- information from other professionals; and
- actions already taken by the school.

Where a referral is made, the school will record the referral, the information provided, the date and time, the agency contacted, the response received and any subsequent action.

Where a referral is made, the DSL will monitor the outcome and follow local escalation procedures if the school believes the child's needs have not been appropriately addressed.



Police Referrals and Immediate Risk

Where there is an immediate risk of significant harm, a serious offence or another situation requiring urgent intervention, the school will contact the police and/or emergency services as appropriate.

Where a safeguarding concern may involve a criminal offence, the DSL will consider whether a police referral is required in accordance with KCSIE, Working Together and local procedures.

Staff should not delay emergency action while waiting for the DSL where immediate intervention is required.

The DSL will work with the police and other agencies to ensure that safeguarding action is coordinated and that the child's welfare remains the primary consideration.

Specialist and Other External Services

Depending on the needs and circumstances of the child, the school may work with or refer to a range of specialist services, including:

- local authority children's social care
- Family Help and early support services
- the police
- health services
- CAMHS/CYPMHS or other specialist mental health services
- LADO services in relation to allegations against adults working with children
- Prevent and Channel
- MARAC or domestic abuse services
- MASH or the relevant local safeguarding front door
- services supporting children affected by exploitation
- services supporting children affected by substance misuse
- bereavement services
- specialist therapeutic services
- SEND and disability services
- youth services
- voluntary and community organisations
- other specialist services appropriate to the child's needs.

The school recognises that the purpose and threshold for each service differ. The DSL will determine the appropriate pathway in accordance with local arrangements and professional advice.

The school will not treat therapeutic or counselling support as a substitute for statutory safeguarding action where a child is at risk of harm

Supporting Multi-Agency Assessments

The school recognises that making a referral is not the end of its safeguarding responsibility.

Following a referral, staff should expect to support children's social care and other agencies in carrying out assessments, investigations and safeguarding plans.

The DSL or deputy will:

- provide relevant information to support assessment;
- participate in strategy discussions, child protection conferences, core groups, professional meetings and other multi-agency meetings where appropriate;
- contribute to assessments and plans;
- provide information about the child's presentation, attendance, behaviour, wellbeing and engagement;
- ensure that the child's views and wishes are appropriately represented;
- maintain communication with relevant professionals;
- monitor the school's agreed actions;
- contribute to reviews of safeguarding plans; and
- ensure that safeguarding information is shared appropriately with relevant staff on a need-to-know basis.

Where another agency requests information or assistance in relation to a safeguarding assessment, staff should cooperate promptly and should not assume that another professional will provide information that may be critical to safeguarding the child.

Information Sharing and Consent

The school recognises that effective information sharing is fundamental to safeguarding.

Data protection legislation does not prevent the sharing of information where this is necessary to keep children safe and promote their welfare.

Staff must not allow uncertainty about data protection or consent to prevent appropriate safeguarding information from being shared.

Where staff are uncertain about whether information should be shared, they should speak to the DSL or deputy without delay.

The DSL will ensure that information shared is relevant, necessary, accurate, proportionate and shared with the appropriate person or agency.

Parental consent will be sought where appropriate; however, safeguarding action will not be delayed where consent has not been obtained.

The school may share safeguarding information without parental consent where there is a lawful basis to do so and where sharing is necessary to protect a child or promote their welfare.

Where appropriate, the DSL will consider whether informing parents/carers or seeking consent could increase risk to the child, another person or the safeguarding process.

The rationale for significant decisions about information sharing, consent and parental notification will be recorded.

The school will comply with relevant information-sharing legislation and statutory guidance, including the information-sharing requirements coming into force during 2026.

Recording and Monitoring External Referrals

All external safeguarding referrals, communications, decisions and actions will be recorded securely within the school's safeguarding recording system.

Records should include:

- the original concern;
- the date and time of referral;
- the agency or professional contacted;
- information shared;
- the reason for the referral;
- the decision made by the DSL;
- any response received;
- actions agreed;
- follow-up undertaken;
- professional challenge or escalation where required; and
- the outcome for the child.

The DSL will monitor the progress and outcome of external referrals and ensure that cases remain under review.

Where a referral does not result in statutory intervention, the school will consider whether Family Help, targeted support, pastoral support or other intervention is appropriate and whether the child's situation requires continued monitoring.

The school will consider re-referral or escalation where the child's circumstances do not improve or new safeguarding information emerges.

Professional Challenge, Escalation and Follow-Up

The school will not assume that a referral has resulted in appropriate safeguarding action simply because it has been submitted.

Where the school does not receive an appropriate acknowledgement or response following a safeguarding referral, the referrer or DSL will follow up with the relevant agency.

Where the child's circumstances do not improve, concerns increase, or the school considers that the response has not adequately addressed the safeguarding risk, the DSL will use the relevant local escalation and professional challenge procedures.

The school will maintain a culture in which staff are expected to professionally challenge decisions or responses where necessary and where doing so is in the best interests of the child.

Where a concern remains unresolved, the DSL may seek advice from senior leaders, local authority children's social care, the local safeguarding partnership or another appropriate safeguarding professional.

Any professional challenge or escalation will be recorded, including:

- the concern raised;
- the agency or professional contacted;
- the response received;
- actions agreed;
- further escalation undertaken where required; and
- the outcome for the child.

Specific Multi-Agency Pathways

The school will maintain clear procedures for specific safeguarding pathways, including:

LADO: Concerns and allegations relating to adults working with children will be managed in accordance with the school's allegations against staff procedures and referred to the LADO where the relevant threshold is met.

Prevent/Channel: Concerns relating to radicalisation or vulnerability to terrorism will be managed in accordance with the Prevent Duty, local referral arrangements and the school's safeguarding procedures.

MARAC: Where domestic abuse creates a significant risk to a child or family, the school will work with relevant domestic abuse and multi-agency arrangements, including MARAC where appropriate.

MASH / Local Safeguarding Front Door: Where the local authority operates a MASH or equivalent safeguarding front door, referrals and requests for advice will follow the locally published process.

Health and Mental Health Services: Where a child's mental health, physical health or disability needs require specialist intervention, the school will work with relevant health professionals. Mental health or therapeutic referral will not replace safeguarding action where there is a concern about abuse, neglect or exploitation.

The school will ensure that external referrals and multi-agency working remain child-centred, timely, proportionate, well-recorded and subject to appropriate follow-up and professional challenge

Professional Therapy and Counselling

The school may signpost families towards appropriate therapeutic, counselling or mental health services.

Where appropriate and within the school's professional remit, the DSL may support a family with referral letters or relevant documentation to assist in accessing external services.

School staff, including Happiness Managers, are not expected to provide clinical therapy or diagnose mental health conditions. Their role is to provide appropriate pastoral support, identify concerns, report safeguarding issues and signpost or refer to appropriately qualified professionals.

Therapeutic or counselling support will not replace statutory safeguarding intervention where a child is suffering, or is likely to suffer, harm.

- Parents may access the school's **affiliated therapists** at a cost for complex emotional, behavioural, or mental health needs. Or, the DSL may refer a child to the free version of the service. More details on this can be found in the "Tools for Parents" section of the policy.
- The DSL may **support the family by providing referral letters** or other documentation to assist with accessing external services (e.g., CAMHS, CYPMHS).
- In some cases, the DSL may **make a referral to a private therapist directly on behalf of the family**, ensuring appropriate professional support is provided. This can include but is not limited to online therapy services such as Stop Breathe Think.

Cross-Reference to Safeguarding Processes

External referrals and multi-agency working should be read alongside:

- **Section 3 – Record Keeping:** recording referrals, decisions, information sharing, outcomes and escalation;
- **Section 4 – Safeguarding Categories:** determining the urgency and level of response;
- **Section 6 – Attendance:** considering whether attendance or absence indicates wider safeguarding concerns;
- **Section 7 – Tools and Support for Parents and Carers:** signposting and family support;
- **Section 9 – Online Safety:** online and technology-enabled safeguarding concerns;
- **Section 10 – Training and Policy Review:** staff awareness of local referral pathways;
- **Whistleblowing:** escalation where safeguarding practice or external responses are considered inadequate; and
- **Allegations Against Staff / Low-Level Concerns:** concerns involving adults working with children..

By cross-referencing these sections, staff are supported to ensure that external referrals are timely, appropriate, secure, and consistent with KCSIE 2026 and statutory safeguarding guidance.

14. Emotional Well-Being, Mental and Balanced Workload for Staff

Staff involved in safeguarding cases are supported through access to professional therapy, supervision, and debriefing. The Happiness Manager Team (HMAs and HMLs) provide pastoral support to students but should not manage complex psychological needs. Staff are reminded that their role is to support and signpost, not provide therapy. Parent communication should be focused, concise, and non-urgent calls minimised to maintain staff wellbeing and ensure safeguarding records are accurate and up-to-date.

All staff are encouraged to raise concerns about their own emotional wellbeing with the DSL without fear of reprisal, ensuring a safe and sustainable safeguarding culture. The DSL monitors staff workload and ensures access to emotional support where needed.

Emotional Support for Staff:

- The Happiness Manager Team (HMs): While providing emotional support to students is essential, HMs must distribute attention equitably and avoid managing complex psychological needs, which should be referred to professional therapists.
- In-House Therapy for Staff: HMs, the DSL, and other staff dealing with safeguarding cases are encouraged to access the in-house therapist regularly. This service supports emotional decompression and maintains morale after handling sensitive or distressing cases.
- Supervision and Debriefing: Staff working with complex cases should have access to supervision or debriefing sessions with the DSL or qualified professional to reflect on cases and maintain resilience.

Managing Time on Parent Calls:

- Minimising Non-Critical Calls: Staff should schedule focused, brief calls with parents regarding safeguarding to avoid emotional fatigue and maintain efficiency.
- Prioritising Administrative Work: Reducing time on non-urgent calls allows staff to maintain up-to-date safeguarding logs and complete essential administrative duties, ensuring cases are processed effectively.

Training and Boundaries:

- All staff receive regular safeguarding training and are reminded that their role is to support and signpost, not provide professional counselling.

15. Training and Policy Review

Staff Training

- Induction Training: All new staff receive safeguarding induction training on joining the school. This involves our Foundations and Frameworks, Reporting and Key Platforms, Safeguarding and Child Protection, SEND, Admin Panel, Big Blue Button and Department Meetings.
- Annual Safeguarding Training: All staff, including the Happiness Manager Teams, teachers, recruitment and leadership team, complete safeguarding training at least once a year to remain up-to-date with statutory requirements, online school-specific strategies, and emerging safeguarding risks (e.g., online safety, exploitation, mental health).
- Annual Safeguarding Policy reading: All staff must read, understand and commit to follow our school policies to remain up-to-date with statutory requirements. These policies include but are not limited to: Safeguarding and Child Protection Policy and Procedures, Staff Communication and Conduct Policy, Online Safety, Acceptable Use, Behaviour.
- Role-Specific Training: Training is tailored where appropriate for DSLs, deputies, SEN leads, and staff working closely with vulnerable students.
- DSL Responsibilities: The DSL regularly reviews their practice, ensures knowledge and procedures are current, delivers annual training to staff, and refreshes their own training at least every two years alongside Prevent training. The DSL also develops their own practice and education as they see fit. This may be via courses, research or events.

All members of staff, including those who do not work directly with children, are expected to read Part One of Keeping Children Safe in Education. The school will provide staff with access to the current version of KCSIE as part of induction and annual safeguarding arrangements. Staff will be supported to understand and discharge their safeguarding responsibilities.

Annual Policy Review:

- The safeguarding policy is reviewed at least annually or following significant safeguarding events to ensure alignment with best practice and legal obligations.
- Feedback from staff, parents, and students is considered in each review.
- Outcomes of the review are recorded, and any updated policy is communicated to all staff to ensure awareness of changes and responsibilities. Staff must read this policy at the start of every academic year.