



S. Anselm's
Prep School
Peak District

SAFEGUARDING AND CHILD PROTECTION POLICY

September 2026

Document control

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Contents

Main policy sections and appendices

1. Aims	4	22. Attendance, children absent from education and children missing education	10
2. Scope and application	4	23. Site security and safety	11
3. Regulatory framework	4	24. Boarding safeguarding	11
4. Publication and availability	5	25. Early Years and Little Puddings	11
5. Definitions	5	26. Children questioning their gender	12
6. Safeguarding leadership and responsibilities	5	27. Concerns or allegations about staff, volunteers, contractors and other adults	12
7. The School's whole-school safeguarding approach	6	28. Low-level concerns	12
8. Reporting obligations of staff	7	29. Whistleblowing	12
9. Responding to a disclosure or concern	7	30. Safer recruitment, volunteers and third parties	13
10. Action by the DSL	7	31. Information sharing, confidentiality and record keeping	13
11. Early Help and Family Help	7	32. Training and safeguarding education	14
12. Referrals to Children's Social Care and police	8	33. Monitoring, governance and review	14
13. Children who may be at greater risk of harm	8	Appendix A: Forms of abuse, neglect and exploitation and specific safeguarding risks	17
14. Child-on-child abuse	8	Appendix B: Staff quick guide - concern or disclosure about a child	17
15. Harmful sexual behaviour, sexual harassment and sexual violence	8	Appendix C: Child-on-child abuse / HSB response framework	18
16. Nudes and semi-nudes, including AI-generated or altered imagery	9	Appendix D: Adult concerns - harm threshold and low-level concerns	18
17. Extra-familial harm, exploitation, county lines and serious violence	9	Appendix E: Little Puddings / EYFS safeguarding essentials	18
18. Mental health and safeguarding	9	Appendix F: Boarding safeguarding essentials	19
19. Domestic abuse and Operation Encompass	9		
20. Prevent duty and radicalisation	10		
21. Online safety, generative AI, mobile devices, filtering and monitoring	10		

Key School contacts

Role	Named person	Contact
Designated Safeguarding Lead (DSL)	Alison Whawell	School: 01629 343434
Head	Hannah Cunningham	School: 01629 343434
Deputy DSL	Katie Baldwin	School: 01629 343434
Deputy DSL	Katrina Connell	School: 01629 343434
Deputy DSL	Sarah Woodward	School: 01629 343434
Deputy DSL	Laura Krautheim	School: 01629 343434
Safeguarding Trustee	Annabel McCallum	Via School: 01629 343434
Chair of Board of Trustees	Emma Harrison	Via School: 01629 343434
Head of Boarding	Rosemary Harrison	07557404704
Independent Listener	Lisa Donnelly	01629 816830
Independent Listener	Reverend Alan Isaacson	01629 816831
Independent Listener	Reverend Hilda Isaacson	01629 813832

Key external contacts

Service	When to use	Contact
Emergency services	Immediate danger / emergency	999
Call Derbyshire / Starting Point	Child suffering or at risk of significant harm; child protection referral	01629 533190
Starting Point professional advice line	Professional consultation on non-urgent thresholds / support (10am-4pm, Mon-Fri)	01629 535353
Derbyshire out-of-hours social care	Urgent social care outside normal hours	01629 532600
Police	Non-emergency police matter	101
Derbyshire LADO	Allegations/concerns about adults working or volunteering with children	Current Derbyshire LADO referral route; professional.allegations@derbyshire.gov.uk / Call Derbyshire 01629 533190
NSPCC	Advice / whistleblowing support	0808 800 5000; whistleblowing 0800 028 0285
Childline	Support for children	0800 1111
Independent Schools Inspectorate	Independent school inspectorate	020 7600 0100

Where a child lives outside Derbyshire, the DSL or referrer must contact the children's social care service for the child's home local authority. If there is uncertainty, advice should be sought without delaying protective action.

1. Aims

Safeguarding is central to life at S. Anselm's. The School cannot fulfil its educational aims unless children are safe, secure, listened to and well. Our motto, *Esse Quam Videri* - to be, rather than to seem to be - is reflected in a safeguarding culture that values integrity, openness, professional curiosity and action rather than reassurance based on assumption.

- promote the welfare, safety and wellbeing of every child, including babies and young children in Little Puddings, current boarders and, subject to approval, future pupils in Years 9-11;
- provide clear procedures for identifying, recording, reporting, assessing and referring concerns about a child;
- ensure all adults understand that safeguarding and promoting the welfare of children is everyone's responsibility;
- ensure pupils know how and where to seek help and are confident that concerns will be listened to and taken seriously;
- provide a clear framework for concerns and allegations about adults, including low-level concerns;
- maintain a zero-tolerance approach to sexual harassment and sexual violence while providing safeguarding support to all children involved;
- ensure consistent good practice across School, boarding, Little Puddings, trips, activities, clubs and out-of-hours provision;
- ensure effective multi-agency working, information sharing and professional challenge; and
- promote a whole-school culture of vigilance, equality, respectful relationships and continuous improvement.

2. Scope and application

This policy applies to the whole of S. Anselm's School, including Little Puddings Nursery, Pre-Prep, Prep, boarding, school transport, educational visits, residential trips, after-school provision, Saturday activities, holiday or commercial activities operated by the School, and activities organised by the School away from the site.

It applies to all staff and adults working for or on behalf of the School, regardless of employment status, including employees, supply staff, contractors, self-employed instructors, visiting specialists, trainee teachers, students, volunteers and trustees.

For the purposes of this policy, a child is anyone under the age of 18. If the School's material change to extend the registered age range to 16 is approved, this policy will apply in full to pupils in Years 9-11 from the point each year group opens.

3. Regulatory framework

This policy has been reviewed against the current safeguarding framework in force in September 2026. In particular:

- Keeping Children Safe in Education 2026 (DfE), effective 1 September 2026;
- Working Together to Safeguard Children 2026 (DfE), updated March 2026;
- Information Sharing to Safeguard Children and Young People statutory guidance, published 10 September 2026, including the information-sharing duty commencing 30 September 2026;
- Statutory Framework for the Early Years Foundation Stage for group and school-based providers, effective 1 September 2026;
- National Minimum Standards for Boarding Schools, updated May 2026;
- Education (Independent School Standards) Regulations 2014;
- Children Act 1989 and Children Act 2004;
- Children and Social Work Act 2017;

- Safeguarding Vulnerable Groups Act 2006 and amendments, including the Crime and Policing Act 2026 changes to regulated activity from 1 September 2026;
- Childcare Act 2006 and childcare disqualification requirements;
- Counter-Terrorism and Security Act 2015 and current Prevent Duty guidance;
- Equality Act 2010 and Human Rights Act 1998;
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025;
- Working Together to Improve School Attendance and Children Missing Education statutory guidance; and
- current Derby and Derbyshire Safeguarding Children Partnership procedures, thresholds, escalation and allegations-against-professionals procedures.

The School will follow KCSIE where it uses 'must'. Where KCSIE uses 'should', the expectation will be followed unless there is a good reason not to do so, and the rationale for any departure will be capable of explanation and, where appropriate, recorded.

4. Publication and availability

The current approved version will be published on the School website and made available to parents on request. Staff will have access to the controlled version through School systems. Reasonable steps will be taken to provide the policy in an accessible format where required.

5. Definitions

Safeguarding and promoting the welfare of children means providing help and support as soon as problems emerge; protecting children from maltreatment within or outside the home, including online; preventing impairment of mental and physical health or development; ensuring children grow up with safe and effective care; and taking action to enable all children to have the best outcomes.

Child protection is part of safeguarding and refers to activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

A safeguarding concern should be interpreted broadly. Staff do not need proof, certainty or a particular threshold before sharing a concern with the DSL.

DSL means Designated Safeguarding Lead. References to the DSL include a trained Deputy DSL where appropriate, but ultimate lead responsibility remains with the DSL.

Child-on-child abuse means abuse by one child or children against another child or children. It can occur inside or outside School and online.

6. Safeguarding leadership and responsibilities

6.1 Board of Trustees

The Board of Trustees has overall strategic responsibility for safeguarding and will ensure the School complies with its statutory duties, adopts a whole-school approach, has appropriate policies and systems, provides appropriate resources and training, and receives sufficient information to test and assure itself that safeguarding arrangements are effective.

- appoint a Board-level safeguarding lead who is appropriately trained;
- ensure all Trustees receive safeguarding and child protection training, including online safety, on induction and regularly thereafter;
- ensure the DSL has sufficient status, authority, time, funding, training, resources and support;

- ensure appropriate filtering and monitoring systems are in place and their effectiveness is reviewed at least annually;
- ensure safeguarding is considered in boarding, premises, contractors, visitors, lettings, third-party use and off-site activity;
- undertake and minute an annual review of safeguarding policy, procedures and implementation; and
- ensure weaknesses are remedied without delay.

6.2 Head

The Head has overall responsibility for leadership and management of safeguarding within the School. The Head is the case manager for allegations concerning staff unless the allegation is about the Head, in which case the Chair of the Board of Trustees acts as case manager.

6.3 Designated Safeguarding Lead

The DSL is a senior member of staff with lead responsibility for safeguarding and child protection, including online safety and understanding the School's filtering and monitoring systems and processes. The DSL's role reflects Annex B of KCSIE 2026.

- manage referrals to children's social care, police, Channel and other agencies as appropriate;
- advise and support staff and ensure concerns are responded to promptly;
- liaise with the Head about significant issues, police investigations and the need for an appropriate adult where applicable;
- manage safeguarding records and secure transfer of child protection files;
- ensure robust DSL/DDSL cover during School hours and clear arrangements for boarding, trips and out-of-hours activity;
- lead or coordinate safeguarding training and updates;
- promote educational outcomes of children with a social worker;
- lead safeguarding aspects of online safety, filtering and monitoring, generative AI and emerging technological risks;
- ensure children's views, wishes and lived experience are understood and considered; and
- provide or arrange support and reflective supervision for staff managing safeguarding concerns.

6.4 Deputy DSLs and other leaders

Deputy DSLs are trained to the required standard and may carry out DSL functions with delegated authority or in the DSL's absence. Lead responsibility cannot be delegated away from the DSL.

6.5 Safeguarding Trustee

The Safeguarding Trustee provides strategic oversight, challenge and support rather than operational case management. The Trustee meets regularly with the DSL and reports appropriately to the Board while maintaining confidentiality.

6.6 All staff

Every member of staff has a duty to safeguard children and promote their welfare. Staff must know reporting routes, maintain professional curiosity, act promptly, record concerns accurately, share information appropriately and follow up if they believe action has not been taken. Staff must never assume someone else will act.

7. The School's whole-school safeguarding approach

S. Anselm's maintains an attitude of 'it could happen here'. A warm, informal culture must never become a reason to overlook boundaries, minimise concerns or rely on familiarity.

- listen to children and create trusted, accessible ways to raise concerns;

- act on early signs of abuse, neglect, exploitation or distress and reassess when situations do not improve;
- challenge discrimination, racism, misogyny, misandry, prejudice and derogatory behaviour where these affect safety or belonging;
- consider risks inside and outside the home, online and in the wider community;
- recognise that absence of reports does not mean abuse is not occurring;
- consider power imbalances, group dynamics, age, SEND, disability, sex, sexual orientation, language, boarding status and other vulnerabilities;
- work proactively with parents while recognising that parental involvement may sometimes increase risk;
- share information lawfully, proportionately and promptly; and
- challenge inaction or professional disagreement through local escalation routes where necessary.

8. Reporting obligations of staff

Any member of staff who has a safeguarding concern about a child must report it to the DSL or a DDSL immediately or as soon as practically possible and record it through the School's approved safeguarding route. CPOMS is the principal child-protection record. Pastoral information may be recorded on iSAMs Wellbeing Manager, but information that is or becomes safeguarding information must be escalated and reflected in CPOMS.

If DSL/DDSLS are unavailable and a child is suffering or likely to suffer harm, staff must not delay. They should contact Children's Social Care and/or police directly and inform the DSL as soon as practicable afterwards.

Teachers must personally report to police any known case where they discover, through disclosure or visual evidence, that FGM appears to have been carried out on a girl under 18. They must also inform the DSL.

Concerns about an adult's behaviour are reported under sections 27 and 28, not through the child concern route alone.

9. Responding to a disclosure or concern

- Listen carefully and allow the child to speak freely.
- Take the child seriously; do not express disbelief, shock or judgement.
- Reassure the child that they have done the right thing by speaking and that support is available.
- Do not promise confidentiality.
- Use open prompts only where clarification is genuinely necessary; do not ask leading or repeated questions.
- Do not criticise or confront the person alleged to have caused harm.
- Explain what will happen next in language the child can understand.
- Consider immediate safety, medical need and whether the child is frightened of going home or contact with another person.
- Make a factual written record as soon as possible, using the child's own words where important.
- Report to the DSL/DDSL without delay and preserve original contemporaneous notes.

Staff should not ask a child to repeat their account simply for confirmation. Communication needs, SEND and English-language barriers must be accommodated.

10. Action by the DSL

On receiving a concern, the DSL/DDSL will consider immediate safety, wishes and feelings, context, history and pattern, local thresholds and whether other children may be at risk. Action may include internal support, Family Help, professional consultation, referral under sections 17 or 47 Children Act 1989, police, Channel/Prevent, medical assessment, specialist services, risk-and-needs assessment and safety planning.

The DSL will record the decision, action and rationale, keep concerns under review and challenge delay or inaction by external agencies where necessary.

11. Early Help and Family Help

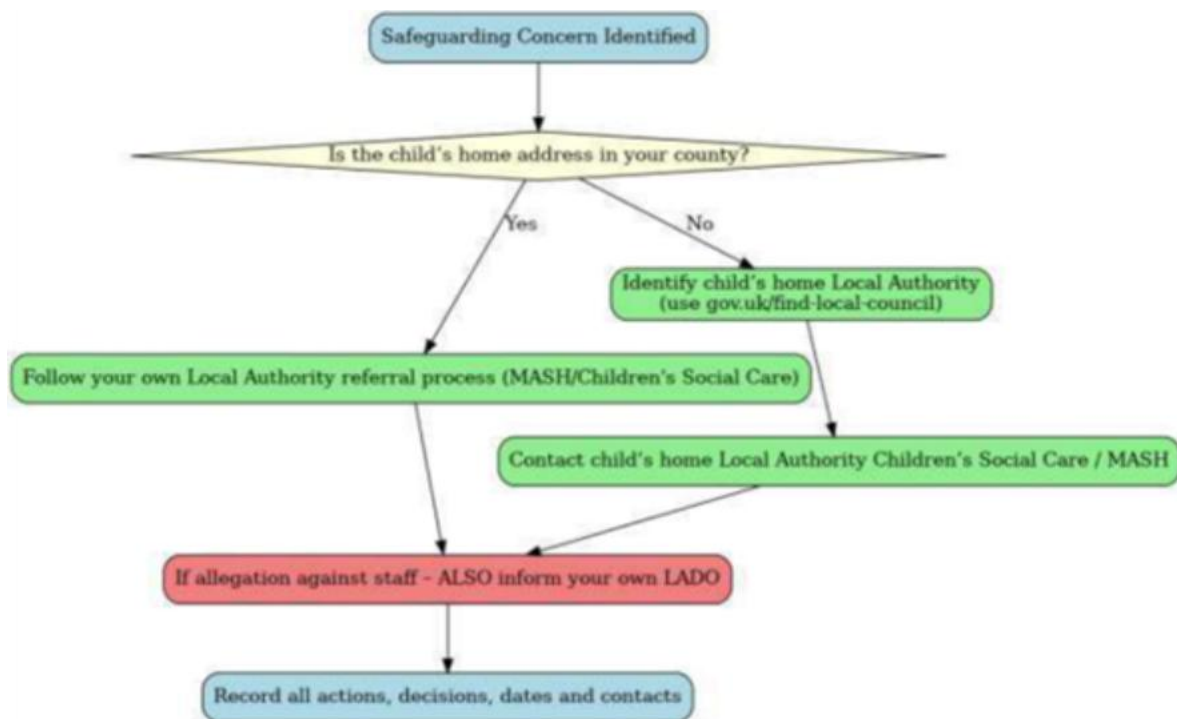
The School recognises that help provided early is more effective than responding only when problems have escalated. Staff should identify needs early and discuss concerns with the DSL. Support may be provided through School pastoral systems, community services, Early Help or Family Help arrangements according to need and local thresholds.

Where S. Anselm's is asked to contribute to an assessment or plan, staff will work with relevant agencies, the child and family, share information appropriately, and continue support unless advised otherwise.

12. Referrals to Children's Social Care and police

Where a child is suffering or is likely to suffer significant harm, a referral to Children's Social Care and, where appropriate, police must be made immediately. In Derbyshire, urgent child-protection concerns are reported through Call Derbyshire on 01629 533190. In an emergency call 999.

Anyone can make a referral. Parents will normally be informed and involved, but the DSL may consult Children's Social Care, police or LADO before doing so where informing a parent could increase risk or interfere with an investigation.



13. Children who may be at greater risk of harm

- SEND, disability, communication needs or medical conditions;
- mental health needs, self-harm, eating difficulties or suicidal thoughts;
- young caring responsibilities;
- looked-after, previously looked-after, kinship care, private fostering or social-worker involvement;
- domestic abuse, parental substance misuse, parental mental ill-health, imprisonment or offending;

- frequent or persistent absence, missing episodes, suspensions, part-time timetables or alternative provision;
- bullying, discrimination, racism, misogyny, homophobia or other prejudice;
- children who are lesbian, gay or bisexual, or perceived to be;
- children questioning their gender;
- radicalisation, exploitation, trafficking, modern slavery, forced marriage or FGM;
- boarders and children living away from families;
- babies and non-verbal children; and
- family instability, temporary accommodation or significant financial/housing stress.

Staff must avoid attributing changes in behaviour, mood or injury automatically to disability, diagnosis or family circumstance. Concerns are assessed on their own merits with professional curiosity and a child-centred approach.

14. Child-on-child abuse

S. Anselm's recognises that children can abuse other children and that this can occur inside or outside School and online. It is never dismissed as banter, part of growing up, a relationship problem or children simply needing to sort it out themselves.

It may include bullying and cyberbullying; physical abuse; sexual violence or harassment; harmful sexual behaviour; abuse in intimate relationships; coercive control; prejudice-based abuse; initiation or hazing; exploitation; threats involving weapons; and making or sharing nudes or semi-nudes, including AI-generated or digitally altered images.

The School maintains zero tolerance of sexual harassment and sexual violence: behaviour is never ignored, normalised or excused, while responses remain child-centred, proportionate and informed by safeguarding risk, age and development.

15. Harmful sexual behaviour, sexual harassment and sexual violence

Reports will be responded to in accordance with Part Five of KCSIE 2026 and local procedures. The DSL/DDSL will consider immediate safety and support and, where appropriate, complete a risk-and-needs assessment.

- the child who has been harmed and their wishes, safety and support needs;
- the child alleged to have caused harm, including their safeguarding needs;
- other possible victims or children at risk;
- ages, developmental stages, SEND/communication needs and power imbalance;
- whether behaviour is isolated or part of a pattern;
- whether a criminal offence may have occurred;
- online contact, coercion, exploitation and wider peer/group dynamics;
- contact in lessons, activities, boarding, transport, changing areas, social time and online; and
- appropriate separation or supervision without unnecessarily disadvantaging the child who reported harm.

Protective action will not be delayed simply because police enquiries are ongoing. Risk assessments and support plans will be reviewed as circumstances change.

16. Nudes and semi-nudes, including AI-generated or altered imagery

Making or sharing nudes and semi-nudes involving a person under 18 is a safeguarding issue whether imagery is self-generated, created by another person, digitally altered or wholly generated using artificial intelligence.

- Staff report immediately to the DSL/DDSL and reassure the child.
- Staff must not ask a child to send or show them an image and must not print, copy, forward, save or distribute an illegal image.

- An image should not be viewed unless there is a clear and unavoidable safeguarding reason, managed by the DSL in accordance with current guidance.
- The DSL will assess coercion, grooming, blackmail, sexual extortion, financial motivation, power imbalance, ages, SEND, distribution, online posting, AI manipulation, bullying, retaliation and risk of further harm.
- Parents are normally involved unless doing so would increase risk or prejudice a police/social-care response.
- Police and/or Children's Social Care will be involved where thresholds are met.

17. Extra-familial harm, exploitation, county lines and serious violence

Staff must consider the wider context in which harm occurs. Abuse and exploitation may be associated with peer groups, neighbourhoods, transport, online spaces, organised crime, gangs or adults outside the family. Children may be vulnerable to more than one form of harm at the same time.

Indicators may include missing episodes, unexplained money or possessions, multiple phones, changes in friendship groups, older associates, injuries, weapons, deteriorating attendance or performance, secrecy, substance misuse, sexual-health concerns or significant changes in wellbeing.

18. Mental health and safeguarding

Mental-health difficulties can be a sign or consequence of abuse, neglect or exploitation and can themselves become safeguarding concerns where there is risk of harm. Concerns involving self-harm, eating disorders, suicidal thoughts or risk of suicide require prompt safeguarding assessment.

The DSL will liaise as appropriate with the School Nurse, SENCO, pastoral leads, School counsellor and external services. The counsellor's professional confidentiality does not override safeguarding duties: safeguarding concerns arising through counselling must be shared with the DSL in accordance with agreed protocols and explained to pupils at the outset.

19. Domestic abuse and Operation Encompass

Children can be victims of domestic abuse in their own right where they see, hear or experience its effects. Operation Encompass is the statutory police-to-education notification arrangement for children in education from Reception onwards. Notifications received by S. Anselm's will be managed by the DSL/DDSL as confidential safeguarding information and used to consider timely support.

Operation Encompass does not replace normal safeguarding referrals. The statutory duty does not extend to early-years settings below Reception, although police may choose to notify them.

20. Prevent duty and radicalisation

The School has due regard to the need to prevent children from being drawn into terrorism. Radicalisation concerns are safeguarding concerns and are reported to the DSL/Prevent lead.

The School maintains a Prevent risk assessment and action plan, provides staff training, teaches pupils to think critically and respectfully about controversial issues, manages visiting speakers and external organisations carefully, and uses filtering and monitoring arrangements to reduce exposure to harmful extremist content.

21. Online safety, generative AI, mobile devices, filtering and monitoring

Online safety is a running and interrelated safeguarding theme across policy, curriculum, staff training, parental engagement and the DSL's responsibilities. Risks include content, contact, conduct and commerce.

21.1 Filtering and monitoring

- The Board will ensure appropriate filtering and monitoring systems are in place and meet current DfE expectations.
- The DSL will understand the systems and processes and safeguarding alerts will be escalated promptly.
- Effectiveness will be reviewed and documented at least annually with appropriate IT support.
- Review will consider relevant devices, users, locations and networks and balance safeguarding with legitimate teaching and learning.
- Staff will receive training on their roles and responsibilities.

21.2 Generative AI

Where generative AI is used, the School will consider safeguarding, data protection, intellectual property, age appropriateness, accuracy, bias, harmful/manipulated content and product safety. Identifiable pupil information, safeguarding information or special-category data must not be uploaded to an AI tool unless the School has expressly approved the system and processing arrangement.

21.3 Mobile phones and smart devices

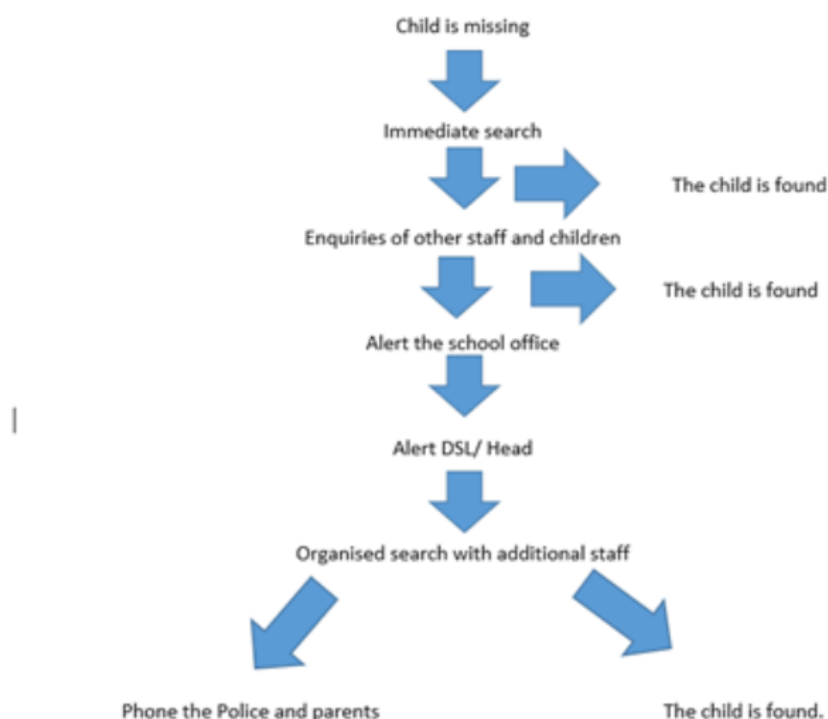
S. Anselm's is a phone-free school for pupils during the normal School day, subject to defined exceptions for medical, accessibility or other agreed needs. If Years 9-11 open, expectations for older pupils will remain safeguarding-led and any age-specific arrangements will be set out clearly in the Online Safety / Acceptable Use policy rather than assumed to become less restrictive.

22. Attendance, children absent from education and children missing education

Absence can be a safeguarding indicator. The School will monitor attendance and punctuality, identify patterns of persistent or severe absence, follow up unexplained absence on the same day and consider links to abuse, neglect, exploitation, mental health, bullying, family difficulty or other risk.

If a child is missing from School or boarding without explanation, staff will follow the missing-child procedure immediately. The response will be risk-based, with urgent police and parental involvement where circumstances indicate vulnerability or risk of harm.

For future Years 9-11, increasing independence, travel to and from School, off-site activities, work-related learning or appointments will not reduce the School's duty to account for pupils during the School day. Any authorised independent movement will be risk assessed, recorded and communicated.



Search Checklist

· Pre-prep garden and nursery	· Top field
· Boys/girls cloakrooms	· Astroturf and footpath
· Secret garden	· Bottom courts and play area
· Heads Lawn	· Staff and parent car parks
· Boarding House	· Sports hall and changing rooms
· Classroom/form rooms	· Swimming pool and changing rooms
· Art rooms/ music	· Innovation Centre
· Dining room	· Stanedge Road
· Forest fun area	· Sheds and ground offices
· New Block and Upper Cottage	· Hargreaves Hall
· Learning Support	· Library

23. Site security and safety

The School maintains procedures for emergency situations, including lockdown, evacuation and critical incidents. Access control, visitors, contractors, changing areas, toilets, secluded areas and supervision arrangements are reviewed as pupil age, numbers and use of the site change.

24. Boarding safeguarding

Boarders may have additional vulnerabilities because they are living away from their families and spend extended time in the School's care. Boarding safeguarding must meet KCSIE 2026 and the National Minimum Standards for Boarding Schools and be integrated with the whole-School safeguarding system.

- Boarders know how to contact boarding staff, DSL/DDSLs, Independent Listeners and external sources of help.
- Safeguarding and pastoral information is shared securely between day and boarding staff.

- Dormitories, bathrooms, evening activities and supervision are risk assessed for peer dynamics, privacy, bullying, HSB and opportunities for harm to go unnoticed.
- Boarding staff receive role-specific safeguarding training and know out-of-hours safeguarding routes.
- The School maintains at least one Independent Listener who is outside staff and those responsible for leadership/governance.
- Visitors to staff residential accommodation are managed so they do not have unsupervised contact with pupils.
- Overnight accommodation complies with KCSIE 2026 requirements concerning biological sex, privacy, safety and dignity.

25. Early Years and Little Puddings

Little Puddings and all School-based EYFS provision operate within this whole-School safeguarding policy and the current EYFS statutory framework. Babies and very young children require particularly attentive safeguarding because they may be non-verbal, entirely dependent on adults for care and unable to explain harm or unmet need.

- All EYFS staff receive safeguarding induction and training meeting current EYFS criteria, with records maintained.
- Staff suitability is kept under review and relevant DBS, qualification, disqualification and safer-recruitment requirements are met.
- Unexplained bruising or injury in a non-mobile baby is treated with high professional concern and referred to the DSL immediately.
- Safer sleep arrangements comply with the statutory EYFS framework effective from 1 September 2026.
- Personal mobile phones, smart watches and recording devices are not used while staff are directly caring for children; authorised devices are used for images/observations.
- Registered childcare will not be provided on premises where a banned dog breed is kept or present, in accordance with the 2026 EYFS framework.
- Allegations of harm or suitability concerns about adults in the EYFS are managed through LADO and Ofsted notification requirements as applicable, including the required notification timescale.

26. Children questioning their gender

S. Anselm's will support children who are questioning their gender with care, dignity and a safeguarding-led, whole-child approach. Bullying, harassment and discriminatory behaviour will not be tolerated.

In line with KCSIE 2026, the School will not initiate social transition. Where a child or parent requests changes or support relating to social transition, individual staff must not make unilateral changes. The request will be considered through a documented process involving the Head and DSL, with parents/carers actively involved in the vast majority of cases unless this would create a safeguarding risk.

Decision-making will consider the child's best interests and the interests of other children, including mental health, SEND/neurodiversity, family and peer relationships, bullying, relevant professional advice, equality and human-rights duties, and age and development. Primary-age requests require particular caution.

The School will comply with KCSIE 2026 requirements concerning toilets, changing, boarding/residential accommodation and relevant single-sex sport. Biological sex will be recorded accurately where recorded, and relevant staff will have information needed to discharge safeguarding duties. Where a child speaks confidentially about feelings but does not request changes, normal confidentiality and safeguarding rules apply.

27. Concerns or allegations about staff, volunteers, contractors and other adults

All concerns about adults working in or on behalf of the School must be taken seriously and reported promptly. The harm threshold is met where it is alleged that an adult has harmed or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved in a way indicating risk of harm; or behaved in a way indicating they may not be suitable to work with children.

A concern that may meet the harm threshold must be reported immediately to the Head. If about the Head, it must be reported to the Chair without informing the Head. The case manager will consult the LADO before conducting an internal investigation where the threshold may be met.

Suspension is not automatic. The School will fulfil statutory DBS referral duties and consider Teaching Regulation Agency referrals where relevant.

28. Low-level concerns

A low-level concern is any concern, however small, that an adult working in or on behalf of the School may have acted inconsistently with the Staff Code of Conduct but does not meet the harm threshold. Low-level does not mean insignificant.

- Low-level concerns are reported to the Head in accordance with the Low-level Concerns Policy.
- If the concern is about the Head, it is reported to the Chair.
- Staff are encouraged to self-report situations that could be misinterpreted or where they believe they may have fallen below expected standards.
- Records include context, action, decision and rationale and are reviewed for patterns.
- Where a pattern or new information suggests the harm threshold may be met, the LADO will be consulted.

29. Whistleblowing

Staff must be able to raise concerns about poor or unsafe safeguarding practice and potential failures in the School's arrangements. Concerns should be raised through the Whistleblowing Policy. Staff may use the NSPCC whistleblowing helpline or contact appropriate external authorities where they feel unable to raise a concern internally or believe it has not been addressed.

30. Safer recruitment, volunteers and third parties

The School practises safer recruitment and maintains a Single Central Record in accordance with KCSIE and its Recruitment and Safer Recruitment Policy.

- identity, right to work, employment history, references, qualifications and required prohibition/restriction checks are completed as applicable;
- enhanced DBS and children's barred-list information are obtained where eligible and required;
- appropriate overseas checks are considered where a person has lived or worked abroad;
- online searches are carried out as part of due diligence for shortlisted candidates in accordance with KCSIE;
- at least one person on each recruitment panel has completed safer-recruitment training;
- identity is checked on arrival for agency workers, contractors, trainees and others where appropriate;
- agencies and training providers provide written confirmation of checks required of them; and
- contractors and visitors without required checks are not permitted unsupervised access to children or regulated activity.

30.1 Volunteers and the 2026 regulated-activity change

From 1 September 2026 the supervision exemption from regulated activity has been removed. Volunteers who teach, train, instruct, care for or supervise children frequently, on more than three days in a 30-day period, or overnight are in regulated activity and require the appropriate enhanced DBS check with children's barred-list information. All volunteers on overnight School trips are in regulated activity. Occasional volunteers who do not meet the frequency or overnight conditions are assessed under the applicable KCSIE arrangements.

31. Information sharing, confidentiality and record keeping

31.1 Information sharing

Information sharing is essential to effective safeguarding. Data-protection law does not prevent lawful and proportionate sharing to protect a child. Staff must not allow fear about data protection to stand in the way of safeguarding.

The School will have regard to the statutory Information Sharing to Safeguard Children and Young People guidance published on 10 September 2026. The new information-sharing duty under section 16LA of the Children Act 2004 comes into force on 30 September 2026; the School will ensure relevant safeguarding arrangements, staff awareness and data-sharing practice reflect the duty from that date.

31.2 Confidentiality

Safeguarding information is confidential but not secret. Staff cannot promise a child or adult that information will be kept to themselves. Information is shared only with those who need it to safeguard children or meet legal/regulatory obligations.

31.3 Recording systems

CPOMS is the principal safeguarding record for child-protection concerns. iSAMs Wellbeing Manager is used for wider pastoral/wellbeing information. Records must be factual, accurate, dated and attributable and distinguish observation, the child's words, professional opinion and information from other sources.

31.4 Transfer of child-protection files

When a child leaves, the DSL/DDSL will transfer the child-protection file separately and securely from the main pupil file as soon as possible and within five days for an in-year transfer or within the first five days of the start of a new term. Confirmation of receipt will be obtained.

32. Training and safeguarding education

32.1 Staff induction and training

All staff, including those who do not work directly with children, will read and understand Part One of KCSIE 2026 in full. The Part One overview may be used as a quick reference but does not replace Part One.

Induction covers this policy; DSL/DDSLs; Staff Code of Conduct; Behaviour and Anti-Bullying; absence; online safety/filtering/monitoring; whistleblowing; low-level concerns; child-on-child abuse/HSB; reporting and recording; Prevent; and role-specific procedures.

All staff receive safeguarding and child-protection updates at least annually and more frequently as required. DSLs/DDSLs undertake role training at least every two years and refresh knowledge and skills at least annually. Trustees receive safeguarding and online-safety training on induction and regular updates.

32.2 Teaching pupils about safeguarding

Pupils are taught how to keep themselves and others safe through planned, age-appropriate PSHE/RSE, online safety, assemblies, pastoral work and the wider curriculum. Teaching includes healthy and respectful relationships, boundaries, consent, anti-bullying and discrimination, online risks, image sharing, seeking help and harmful sexual behaviour.

33. Monitoring, governance and review

The DSL will monitor implementation throughout the year and report themes, training, referrals, online-safety issues, child-on-child concerns, lessons learned and actions to the Head and Safeguarding Trustee in a manner that protects confidentiality.

- The DSL and Safeguarding Trustee will meet regularly.
- The School will complete relevant safeguarding audits and use findings to drive improvement.
- Filtering and monitoring effectiveness will be reviewed and documented at least annually.
- Safeguarding practice in boarding and Little Puddings will be included in quality assurance.
- Preparation for Years 9-11 will be a standing safeguarding-readiness item during the material-change implementation period.
- Any significant safeguarding incident, complaint or weakness will prompt review of relevant procedures and learning.
- The Board will conduct and minute a formal annual review of this policy and safeguarding implementation.
- This policy will be updated sooner where legislation, KCSIE, EYFS, boarding standards, local procedures or School circumstances change.

Appendix A: Forms of abuse, neglect and exploitation and specific safeguarding risks

Physical abuse

May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, including fabricating or inducing illness.

Emotional abuse

Persistent emotional maltreatment causing severe and adverse effects on emotional development. It can include humiliation, belittling, developmentally inappropriate expectations, overprotection, witnessing ill-treatment, serious bullying and exploitation.

Sexual abuse

Involves forcing, causing or inciting a child to take part in sexual activities, whether or not the child understands what is happening. It may involve contact or non-contact activity, online abuse, grooming, sexual imagery or technology-facilitated abuse.

Neglect

Persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of health or development.

Specific safeguarding risks

- child-on-child abuse and harmful sexual behaviour
- bullying and cyberbullying
- domestic abuse and teenage relationship abuse
- mental health and self-harm/suicide risk
- CCE/CSE, county lines, gangs and serious violence
- modern slavery and trafficking
- radicalisation and extremism
- FGM, forced marriage and honour/faith-based abuse
- online grooming, sexual extortion, harmful content, cybercrime and AI-enabled abuse
- private fostering
- children missing education / persistent absence
- young carers
- SEND, disability or medical conditions
- looked-after/previously looked-after children and children with a social worker
- parental offending/imprisonment, substance misuse or mental ill-health
- racism, discrimination, misogyny, homophobia and prejudice-related harm
- fabricated or induced illness
- children questioning their gender and LGB children where bullying/isolation creates vulnerability
- babies and non-verbal children
- boarding/residential vulnerabilities

Appendix B: Staff quick guide - concern or disclosure about a child

1. If there is immediate danger or urgent medical need, call 999 / emergency services and then inform the DSL.
2. Listen. Stay calm. Take the child seriously. Do not investigate or ask leading questions.
3. Do not promise confidentiality. Explain that you need to share with people who can help.

4. Reassure the child that speaking up was the right thing to do. Do not blame or shame them.
5. Consider immediate safety: going home, contact with another child/adult, medical need, online risk, boarding arrangements.
6. Report to the DSL/DDSL immediately. If they are unavailable and the child may be at risk of harm, contact Children's Social Care/police directly and do not delay.
7. Record promptly and factually on CPOMS or the approved paper route. Use the child's own words where important. Preserve original notes.
8. Do not discuss the concern widely. Share only on a need-to-know basis.
9. Follow up if you do not know that action has been taken.

Appendix C: Child-on-child abuse / HSB response framework

1. Immediate safety and medical needs; preserve evidence and avoid repeated questioning.
2. Listen to the child's wishes and feelings and explain next steps.
3. Assess whether behaviour may be abusive, harmful, developmentally inappropriate or criminal and whether other children may be at risk.
4. Complete and record a risk-and-needs assessment where required.
5. Consider Children's Social Care, police, Family Help and specialist HSB advice according to risk and threshold.
6. Plan separation, supervision, timetable/boarding/transport arrangements and online-contact controls where required.
7. Provide support to the child harmed and the child alleged to have caused harm.
8. Consider any behaviour/disciplinary response separately from safeguarding support.
9. Review risk assessment and support regularly and respond to retaliation, bullying, rumours or further online sharing.
10. Consider wider peer, cultural or environmental issues and whether whole-School education/intervention is needed.

Appendix D: Adult concerns - harm threshold and low-level concerns

Possible harm-threshold concern: report immediately to the Head (or Chair if about the Head). Do not investigate. The case manager consults the LADO where the threshold may be met.

Low-level concern: report to the Head under the School's low-level concerns process. Record context, action and rationale. Review for patterns and escalate if cumulative or new information may meet the harm threshold.

If unsure: report it. Staff are not expected to decide whether the harm threshold is met before sharing a concern.

Appendix E: Little Puddings / EYFS safeguarding essentials

- Babies and non-verbal children require heightened observation and professional curiosity.
- Every child has a key person and care is delivered through warm, responsive and consistent relationships.
- Safer sleep follows the statutory EYFS framework effective from 1 September 2026.
- Bottle feeding and mealtimes are actively supervised; allergy and choking procedures are followed.
- Intimate care and nappy changing are respectful, safe and hygienic.

- Unexplained bruising or injury in a non-mobile baby is reported immediately to the DSL.
- Personal phones, smart watches and cameras are not used while directly caring for children.
- Visitors are signed in and supervised unless appropriately checked.
- Accidents, medication and existing injuries are recorded accurately and patterns reviewed.
- Staff receive EYFS safeguarding training and required paediatric first-aid coverage.
- Allegations/suitability concerns are reported promptly through School, LADO and Ofsted routes as required.

Appendix F: Boarding safeguarding essentials

- Boarders know who they can speak to in School and independently, including the Independent Listener and Childline.
- Day and boarding staff share relevant safeguarding information securely and promptly.
- Roll checks, supervision and handovers enable staff to account for pupils and identify unexplained absence quickly.
- Dormitory, bathroom, changing, evening, activity and social arrangements are risk assessed for privacy, peer dynamics, bullying and HSB.
- Boarding staff receive role-specific safeguarding training and know the out-of-hours DSL/DDSL route.
- Independent Listener contact details are displayed and accessible without pupils needing permission.
- Resident adults or family members who are not appointed staff do not undertake duties or have unsupervised access to boarders unless properly appointed, risk assessed and checked.
- Overnight accommodation and facilities comply with KCSIE 2026 and the National Minimum Standards for Boarding Schools.
- The School reviews boarding safeguarding as numbers, staffing, use of rooms or residential arrangements change.