



BROMSGROVE SCHOOL

SAFEGUARDING CHILDREN POLICY (including Child Protection)

Author:	Senior DSL
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Next Review Due:	September 2027
Scope:	All Schools

SAFEGUARDING CHILDREN POLICY

Headmaster:	Mr Michael Punt
Chair of Governors:	Mr Michael Luckman
Safeguarding Governor:	Mrs Anne Cleary (Chair of Safeguarding and Wellbeing Committee and with responsibility for Prevent, Online Safety and Attendance), supported by Dr C Lidbury and Col M Ballard
Designated Safeguarding Lead, SPOC, Prevent, and Child Exploitation GET SAFE Lead:	Bromsgrove Senior School: Mrs J Boonnak (Senior DSL) Bromsgrove Prep School: Mrs V Sitlu (Prep DSL) Bromsgrove Pre-Prep School: Mr B Etty-Leal (Deputy Head) Winterfold School: Mr R Mitchell (Deputy Head)
Deputy Designated Safeguarding Leads:	Mr A McClure (Senior School) Miss Z Leech (Senior School) Mr S Matthews (Senior School) Mr M Marie (Prep: Headmaster) Mrs T Hill (Prep) Miss E Marrs (Pre-Prep) Mrs D Toms (Winterfold: Headmistress, Lead Deputy DSL) Mrs K Langston (Winterfold) Mrs B Miles (Winterfold) Mrs K Stark (Winterfold) Mrs T Wilson (Winterfold) Miss R Truswell (Winterfold)
Early Years Designated Safeguarding Lead:	Mr B Etty-Leal (Bromsgrove Pre-Prep: Deputy Head) Mr R Mitchell (Winterfold: Deputy Head)
Designated Person for Looked After Children:	Mrs J Boonnak

All DSLs and DDSLs are fully DSL trained.

This policy will be made available to parents on request and is available on the School website. This policy applies to all staff, governors and volunteers working in the School, including those in the Early Years Foundation Stage (EYFS) provision. It also applies to all pupils at the School.

Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development as well as promoting children's welfare by preventing concerns from escalating
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best possible outcomes.

Child Protection is a part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Safeguarding is everyone's responsibility and anyone can make a referral to external agencies.

The School recognises that boarders and boarding arrangements can present particular issues. We adhere to the National Minimum Standards for Boarding Schools, and associated policies and principles, which we apply specifically in the boarding context.

At the last full inspection (May 2026), it was found that all safeguarding and child protection requirements were met.

CONTACT INFORMATION

Internal Contacts

To speak to a safeguarding lead, call the School switchboard on 01527 579679 (Bromsgrove) or 01562 777234 (Winterfold). If urgent contact is needed at times when the switchboard is unstaffed, the Senior DSL, Julia Boonnak, may be called on 07468 726937, or contacted via Teams jboonnak@bromsgrove-school.co.uk.

The Chair of Governors, Mr Michael Luckman, may be contacted at mluckman@bromsgrove-school.co.uk.

External Contacts

Worcestershire Safeguarding Adviser	Denise Hannibal 01905 844436
Local Authority Designated Officer (LADO) (Worcestershire County Council)	01905 846221
Family Front Door (Worcestershire County Council)	01905 822666 (Mon–Fri 8.30am – 5.00pm) 01905 768020 (evenings and weekends)
Out of Hours Emergency Duty Team (Worcestershire County Council)	01905 768020
Police Public Protection Unit: 24hrs non-emergency Emergency	101 999
NSPCC Helpline	0808 800 5000
Channel/Prevent (West Mercia Police)	https://www.westmercia.police.uk/advice/advice-and-information/t/prevent/prevent/alpha/prevent-referral/
DfE dedicated helpline and mailbox for non-emergency advice for staff and governors, regarding radicalisation of children	020 7340 7264 Counter.extremism@education.gov.uk

To submit an online referral to children's social care please visit:
<https://www.worcestershire.gov.uk/childrens-social-care/refer-childrens-social-care>

Police guidance on when schools should call the police is available [here](#).

SUMMARY OF KEY POLICY CHANGES

These are the key changes in the September 2026 version of the policy, compared to the version dated September 2025:

- Changes to reflect the updated version of Keeping Children Safe in Education 2026
- Changes to the School's DSL and DDSL arrangements.

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1. INTRODUCTION

Bromsgrove School fully recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of children. 'Children' includes everyone under the age of 18.

Keeping Children Safe in Education 2026 defines safeguarding and promoting the welfare of children as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development as well as promoting children's welfare by preventing concerns from escalating
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

Safeguarding concerns may arise within the family, between children, within intimate relationships, in the community or extra-familial context, and online. Children may experience more than one form of harm simultaneously.

At Bromsgrove School we are committed to safeguarding children and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interests of the child and take action to enable all children to have the best outcomes.

The School's duty is to ensure that safeguarding permeates all activity and functions. This policy has been developed with regard to the statutory guidance Keeping Children Safe in Education 2026 (Department for Education) and should be read alongside the School's other safeguarding and related policies and procedures, including:

- Staff Codes of Conduct
- Whistleblowing Policy
- Low-Level Concerns Policy
- Concerns and Complaints Policy
- Supervision of Pupils Policy and associated procedures
- Attendance Policy
- Pupil Conduct and Behaviour Policy
- Anti-Bullying Policies
- Child-on-Child Abuse Policy
- Preventing Extremism and Radicalisation Policy
- Physical Intervention Policy
- Special Educational Needs and Disability (SEND) Policy
- Educational Visits Policy
- First Aid Policy
- Administration of Medicines Policy
- Health and Safety Policy
- Personal, Social, Health and Economic Education (PSHE) Policies
- Relationships and Sex Education Policies
- Photography and Video Policy
- Equal Opportunities Policy
- Acceptable Use of IT and Online Safety policies and procedures
- Intimate Care Policies
- Visiting Speakers Policy
- Changing Room Policy
- Swimming Pool Child Handling Policy

- Access to Premises Policy
- Wellbeing and Mental Health Policy
- Home Visits Policy

The above list is not exhaustive. Safeguarding considerations will be taken into account when developing or reviewing School policies, procedures and activities.

This policy has regard to the following legislation and guidance:

- Keeping Children Safe in Education September 2026
<https://www.gov.uk/government/publications/keeping-children-safe-in-education-2>
- The Education (Independent School Standards) Regulations 2014, and as subsequently amended, including the requirements relating to safeguarding and promoting pupils' welfare and to suitability of staff, supply staff and proprietors
- The Children Acts 1989 and 2004, which provide a framework for the care and protection of children
- Section 5B of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where, in the course of their professional duties, they discover that FGM appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, and relevant exceptions legislation, as applicable to safer recruitment and disclosure of criminal records, which outline when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Prevent Duty Guidance: Guidance for specified authorities in England and Wales Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- Charity Commission guidance on charity and trustee duties to safeguard children
<https://www.gov.uk/guidance/safeguarding-for-charities-and-trustees>
- Worcestershire Safeguarding Children Partnership (WSCP) local safeguarding arrangements, procedures and current threshold/levels-of-need guidance, together with applicable West Midlands safeguarding procedures
- DfE statutory guidance '[Relationships education, relationships and sex education \(RSE\) and health education](#)' July 2025
- the Teachers' Standards 2021 [Teachers' standards - GOV.UK \(www.gov.uk\)](#)
- Working Together to Safeguard Children 2026
- National Minimum Standards for Boarding Schools May 2026 [Boarding schools: national minimum standards - GOV.UK](#)
- Working Together to Improve School Attendance 2026 [Working together to improve school attendance - GOV.UK](#)

This policy applies to all staff, governors and volunteers working in the School and to visitors.

There are five main elements to our policy:

- ensuring we practise safer recruitment in checking the suitability of staff and volunteers to work with children
- raising awareness of child protection issues and equipping children with the skills needed to keep them safe, i.e. teaching them when to recognise when they are at risk and how to get help when they need it
- developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse

- supporting pupils who have been identified as requiring help, support or protection, including through universal or community-based early help, Family Help, child protection arrangements or other multi-agency plans
- establishing a safe environment in which children can learn and develop.

We recognise that, because of their day-to-day contact with children, School staff are well placed to identify concerns early and recognise indicators that a child may need help, support or protection. The School will therefore:

- establish and maintain an environment where children feel safe, secure, valued and respected and are encouraged to talk, believing they will be listened to
- ensure children know that there are adults in the School whom they can approach if they are worried or are in difficulty
- include within the curriculum, particularly through PSHE/RSE and appropriate teaching about online safety, opportunities which equip children with the knowledge and skills to recognise when they may be at risk of harm and know how and where to seek help
- operate safer recruitment procedures and ensure that all appropriate pre-appointment checks are undertaken on staff, volunteers and other relevant adults in accordance with Keeping Children Safe in Education 2026 and the Education (Independent School Standards) Regulations 2014

We seek to ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide to protect children from harm. The child's wishes and feelings will inform decision-making but will not prevent the School taking safeguarding action where this is necessary to protect the child or another child from harm. To this end, we will:

- ensure there are systems in place for children to express their views and give feedback e.g. through School/class councils, safety questionnaires, participation in anti-bullying and online safety events
- ensure that the child's thoughts/wishes and feelings are sought and recorded on all referrals.

2. PROCEDURES

We adhere to safeguarding and child protection procedures agreed locally through the Worcestershire Safeguarding Children Partnership (WSCP) and have regard to statutory guidance issued by the Department for Education (DfE).

Schools have a pivotal role to play in multi-agency safeguarding arrangements. Bromsgrove School will work with the three statutory safeguarding partners and other relevant agencies in accordance with Working Together to Safeguard Children 2026 and local safeguarding arrangements. The School recognises the importance of education providers being fully engaged in multi-agency arrangements to identify children's needs and provide appropriate help, support and protection.

The School will:

- ensure there is a Designated Safeguarding Lead (DSL) in each School, who will undertake regular and appropriate training and support for this role
- ensure there is a designated member of staff with responsibility for safeguarding children within the Early Years Foundation Stage (EYFS)
- ensure there are suitably trained members of staff who will act in the absence of the DSL
- ensure it has a nominated governor who will take leadership responsibility for the School's safeguarding arrangements; (names of the individuals referred to above are listed on page 1 of this policy)
- ensure every member of staff (including temporary and supply staff and volunteers) and the governing body knows the name of the DSL and any deputies and understands their role

- ensure that the DSL and/or a deputy DSL is always available during School hours for staff to discuss safeguarding concerns and that adequate and appropriate safeguarding cover arrangements are in place for out-of-hours and out-of-term activities
- ensure all staff and volunteers are alert to children and families who may benefit from additional help and support, including universal or community-based early help, Family Help, child protection arrangements or other multi-agency plans, and understand the role they may play in supporting multi-agency assessment and planning
- ensure all staff and volunteers understand their responsibilities to be alert to indicators of abuse, neglect and exploitation and to specific safeguarding issues, including those set out in Keeping Children Safe in Education 2026 and this policy, and maintain an attitude of 'it could happen here'
- ensure all staff and volunteers understand their responsibility to report safeguarding concerns promptly to the DSL or a deputy DSL and understand that any member of staff may make a referral directly to children's social care where necessary, particularly where they believe appropriate action has not been taken or where there is an immediate safeguarding concern
- make a referral to children's social care immediately where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, and work with children's social care, the police and other relevant agencies in accordance with Working Together to Safeguard Children 2026 and local safeguarding procedures. Where a child does not require statutory child protection intervention, the School will consider what other help or support may be appropriate, including universal or community-based early help and Family Help
- ensure parents understand the School's safeguarding and child protection responsibilities, including by making this policy publicly available on the School website
- respond promptly to unexplained absence involving a child subject to a child protection Plan, liaising with the child's social worker in accordance with the plan and local safeguarding arrangements
- promote an inclusive, anti-discriminatory culture where racism and other discriminatory behaviour are recognised, challenged and addressed as part of its safeguarding culture
- ensure that where School premises are hired or made available to organisations or individuals providing activities for children, appropriate arrangements are in place to ensure that they have suitable safeguarding and child protection policies and procedures and that appropriate action will be taken where safeguarding concerns arise
- ensure that community users organising activities for children are aware of, and understand the need for compliance with the School's child protection guidelines and procedures
- develop effective links with safeguarding partners and relevant agencies and co-operate with multi-agency safeguarding arrangements, assessments and plans as required, including attendance at strategy discussions, child protection conferences, core groups, Family Help meetings and other relevant multi-agency meetings
- promote safe professional practice and ensure staff understand the standards of conduct expected when working with children
- ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice and are aware of whistleblowing procedures and helplines
- keep written records of concerns about children, even where there is no need to refer the matter immediately
- ensure child protection records are kept securely and separately from the main pupil record, with access restricted to those who need the information for safeguarding purposes
- ensure that child protection files are transferred securely and separately from the main pupil file when a child moves to another school or college, within the timescales set out in Keeping Children Safe in Education, and that confirmation of receipt is obtained
- follow the procedures set out in Keeping Children Safe in Education and local safeguarding arrangements where an allegation is made against a member of staff or volunteer, including consultation with and referral to the Local Authority Designated Officer (LADO) where appropriate
- make a referral to the Disclosure and Barring Service (DBS) where the statutory referral criteria are met, including where a person has been removed from regulated activity because they have harmed or pose a risk of harm to a child, or would have been removed had they not resigned or otherwise ceased to provide their services, and consider referral to the Teaching Regulation Agency (TRA) where appropriate

- operate safer recruitment procedures in accordance with Keeping Children Safe in Education 2026 and ensure that staff involved in recruitment are appropriately trained in safer recruitment
- ensure that all staff receive appropriate safeguarding and child protection training, including online safety, and that governors receive appropriate safeguarding and child protection training to enable them to provide strategic challenge and assurance
- ensure that the Governing Body undertakes at least an annual review of the School's safeguarding and child protection policies, procedures and their effectiveness
- share information with safeguarding partners and other relevant agencies where this is necessary and proportionate to safeguard and promote the welfare of children, recognising that data protection law does not prevent appropriate information sharing for safeguarding purposes
- ensure that procedures will be reviewed and updated at least annually, or when an incident, new legislation or guidance requires the need for an interim review. We recognise the expertise our staff builds by undertaking safeguarding training and managing safeguarding concerns on a daily basis. We therefore invite staff to contribute to and shape this policy and associated safeguarding arrangements.

3. RESPONSIBILITIES

The Governing Body

The Governing Body will nominate a member to take leadership responsibility for safeguarding children who will liaise with the DSL and/or Headmaster in matters relating to safeguarding. It will ensure that:

- the Safeguarding Children (including Child Protection) Policy, procedures, and training are effective and comply with the law
- the Safeguarding (including Child Protection) Policy is reviewed at least annually, and in the event of new guidance or a significant incident, and made available publicly
- the Staff Code of Professional Conduct and the Support Staff Code of Conduct are in place and updated annually
- Governors receive appropriate safeguarding and child protection training, including in online safety, at induction. This training will equip them with the knowledge to provide strategic challenge and assure themselves that the safeguarding policies and procedures in place are effective and support a robust whole-School approach to safeguarding. Training will be regularly updated.
- the School operates safer recruitment practices, including the appropriate use of references and checks on new staff and volunteers
- staff and governors involved in recruitment are appropriately trained in safer recruitment
- procedures are in place for managing safeguarding concerns and allegations relating to staff, supply staff, volunteers and contractors, including low-level concerns
- there is a whole-school approach to safeguarding and processes and procedures operate within the best interests of the child
- the DSL takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) and does not delegate this responsibility
- the DSL and deputy DSL role is explicit in the role holders' job descriptions
- the DSLs and deputies undertake effective DSL training, refreshed every two years, and update their knowledge and skills at regular intervals
- the DSL has the appropriate status and authority within the School to carry out the duties of the post. The role carries a significant level of responsibility and the postholder should be given the additional time, funding, training, resources, and support needed to carry out the role effectively.
- that all staff and volunteers receive safeguarding and child protection training. (This will include reference to FGM, Prevent, Child Exploitation and online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction. The training should be updated when guidance changes and at least annually. Induction and training should be in line with any advice from the safeguarding partners.)

- all staff, including those who do not work directly with children, read at least Part One of Keeping Children Safe in Education 2026. The Part One overview may be used as a complementary quick-reference document but does not replace Part One
- all staff and volunteers are made aware of the School's arrangements for child protection and their responsibilities
- any deficiencies or weaknesses in safeguarding arrangements are brought to the attention of the Governing Body and addressed without delay
- the Chair of Governors (or, in the Chair's absence, the Vice Chair) acts as case manager where a safeguarding allegation is made against the Headmaster and liaises with the LADO in accordance with Keeping Children Safe in Education
- the Chair of the Safeguarding and Wellbeing Committee liaises regularly with the Senior DSL regarding safeguarding and child protection issues
- appropriate safeguarding responses are put in place where there are concerns relating to absence from education, including repeated, prolonged or unexplained absence and children missing education
- mechanisms are in place to assist all staff, including those who do not work directly with children, to understand and discharge their role and responsibilities as set out in Part One of Keeping Children Safe in Education 2026.
- the School contributes to inter-agency working in line with statutory guidance Working Together to Safeguard Children 2026, including appropriate universal or community-based early help, Family Help arrangements, child protection arrangements or other multi-agency plans for children and families who require additional support
- safeguarding arrangements take into account the procedures and practice of the Worcestershire Safeguarding Children Partnership (WCSP)
- termly reports on the effectiveness of the School's safeguarding procedures are presented to the governing body
- any returns requested by the LA/WSCP (e.g. s 175/157 audit, CSE audit) are completed in a timely manner to enable the WSCP to meet its statutory duties
- the School complies with its statutory safeguarding duties, including the Prevent duty and the mandatory reporting duty in relation to FGM. The Governing Body, working with the Headmaster and DSL, ensures that appropriate risk assessments are undertaken and proportionate measures are in place to address identified safeguarding risks
- relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, in accordance with current data protection legislation and the information-sharing provisions within Keeping Children Safe in Education 2026
- children are taught about safeguarding, including online safety, as part of a broad and balanced curriculum
- the filtering and monitoring systems in the School, which are informed in part, by the risk assessment required by the Prevent Duty, are appropriate. (The Department for Education has published filtering and monitoring standards which set out that schools should identify and assign roles and responsibilities to manage filtering and monitoring systems, review filtering and monitoring provision at least annually, block harmful and inappropriate content without unreasonably impacting teaching and learning and have effective monitoring strategies in place that meet their safeguarding needs.)
- the School maintains appropriate safeguarding oversight of any alternative provision placement, including obtaining relevant safeguarding information, maintaining appropriate contact with the pupil and provider, monitoring the suitability of the placement and responding promptly to safeguarding concerns. [Education for children with health needs who cannot attend school - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/education-for-children-with-health-needs-who-cannot-attend-school) provides further guidance.

The Headmaster

The Headmaster will ensure that:

- the Safeguarding policies and procedures are fully implemented and followed by all staff
- sufficient funding, support, time and resources are allocated to enable the DSL and other staff to discharge their responsibilities with regard to child protection

- all staff feel able to raise concerns about poor or unsafe practice and that these are handled sensitively and in accordance with the whistleblowing procedures. The NSPCC whistle blowing helpline number is also available (0800 028 0285)
- safeguarding allegations against staff, supply staff, volunteers and contractors are managed in accordance with Part Four of Keeping Children Safe in Education 2026, including consultation with and referral to the LADO where the harm threshold is met or where advice is required
- all staff understand their individual responsibility to act on safeguarding concerns and that any member of staff may make a referral directly to children's social care and/or contact the police where necessary. Staff should not assume that somebody else will take action to safeguard a child.

The Designated Safeguarding Leads

The DSLs will co-ordinate action on safeguarding and promoting the welfare of children within their own School setting. The DSL will be a member of the School's senior leadership team or hold an equivalent position of status and authority. The DSLs are responsible for:

- leading child protection induction training and whole staff training, as required
- providing a mechanism to ensure that all staff read and understand, and are able to discharge their role and responsibilities as set out in Part One of Keeping Children Safe in Education
- making use of current Worcestershire Safeguarding Children Partnership threshold/levels-of-need guidance when considering what level of help, support or protection is required, including universal/community-based early help, Family Help, child protection arrangements or other multi-agency plans and statutory children's social care intervention. Informal advice on borderline cases and as required will be sought from an adviser at the Family Front Door or at www.worcestershire.gov.uk/earlyhelp. The UK Government online tool [Report Child Abuse to Your Local Council](#) directs a person to the relevant local children's social care contact number
- referring a child to the Family Front Door when there are concerns about possible abuse and neglect. The DSL will contact the police in the case of serious harm in line with [Working Together to Safeguard Children](#). The NPCC's document '[When to call the police](#)' should help DSLs understand when they should consider calling the police and what to expect when they do
- responding to concerns about radicalisation in accordance with the School's Preventing Extremism and Radicalisation Policy, including making or supporting appropriate Prevent referrals
- liaising with the relevant Headmaster/Headmistress and other senior leaders as appropriate, ensuring that they are informed of safeguarding matters where this is necessary for the effective safeguarding of children, including ongoing section 47 enquiries and police investigations
- liaising with relevant pastoral, medical, SEND, wellbeing, attendance, looked-after-child and IT staff, and with external agencies where appropriate, on safeguarding matters
- keeping detailed, accurate, secure written records of all concerns, discussions and decisions made about children, including the use of body maps, and rationales for decision making, even where there is no need to refer the matter immediately. Note staff must only view parts of a child's body which are normally visible
- help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and School leadership staff
- ensuring safeguarding records are stored securely and separately from the main pupil record, with access restricted to those who require the information for safeguarding purposes
- ensuring that safeguarding information and child protection files are transferred securely, separately from the main pupil file and within the timescales set out in Keeping Children Safe in Education. The DSL will ensure that receipt is confirmed and will consider whether key safeguarding information should be shared with the receiving setting in advance so that appropriate support, risk assessment and safety planning can be in place before the child arrives
- responding promptly to unexplained absence involving a pupil subject to a child protection Plan and liaising with the child's social worker in accordance with the plan, identified risk and local safeguarding arrangements
- monitoring safeguarding concerns associated with absence from education, including repeated, prolonged or unexplained absence, and ensuring appropriate action in accordance with the Attendance Policy and relevant missing-child procedures

- developing effective links with safeguarding partners and other relevant professionals and co-operating with multi-agency safeguarding arrangements, assessments, child safeguarding practice reviews and plans, including strategy discussions, child protection conferences, core groups, Family Help meetings and other relevant multi-agency meetings
- contributing to assessments and providing a report to initial and review conferences which has been shared with parents first, whenever possible
- co-ordinating a programme of safety, health and well-being through the curriculum, including issues of protective behaviours, healthy relationships, staying safe online, and the active promotion of fundamental British values
- acting as a source of support, advice and expertise for all staff
- assisting the Senior DSL with annual safeguarding audits and with any safeguarding reports or returns requested by the local authority or WSCP

The job description for the Designated Safeguarding Leads and Deputies is in Appendix 4.

The Senior DSL

The Senior DSL will:

- co-ordinate safeguarding and child protection induction training for newly appointed staff
- co-ordinate DSL and DDSL training to provide them with the knowledge and skills to carry out the role
- co-ordinate action on safeguarding and promoting the welfare of children across all the Schools
- work with the individual DSLs and the safeguarding team attending regular safeguarding meetings
- co-ordinate safeguarding audits, reports and returns requested by the local authority/WSCP
- update the Safeguarding Children policy
- liaise with the Chair of Governors about all safeguarding changes to the policy
- collate the information required for termly Safeguarding and Welfare Committee meetings
- advise DSLs regarding whole-school induction presentation providing updates when necessary
- liaise with relevant IT and information-systems staff regarding online safety, filtering and monitoring systems, information security and other safeguarding-related technology requirements
- assist in the delivery of annual Governor safeguarding training
- provide strategic oversight and assurance across all Schools that safeguarding policies, procedures and practice are implemented consistently, identifying themes, emerging risks and areas for improvement.

4. STAFF OBLIGATIONS

All staff are required to read and understand at least Part One of Keeping Children Safe in Education 2026 and to confirm that they have done so.

All staff, including full-time, part-time, temporary and permanent staff, and all volunteers must comply with the School's relevant codes of conduct and safeguarding policies and procedures. Copies of these documents are available on NETconsent.

Staff and volunteers must inform the School promptly of any change in their circumstances that may affect their suitability to work with children or their ability to undertake their role safely.

All staff should be aware of the different forms of abuse, neglect and exploitation, including online harm, and of safeguarding issues and indicators that may suggest a child requires help, support or protection. These may include changes in behaviour or attendance, injuries, disclosures, online threats, drug and/or alcohol misuse, serious violence or criminal exploitation, radicalisation, and the consensual or non-consensual sharing of nude and semi-nude images and/or videos. Staff should recognise that safeguarding issues can overlap and that children may experience more than one form of harm.

Staff should be mindful of safeguarding considerations where pupils receive one-to-one teaching, coaching or tuition, particularly in performing arts, music and sports activities. Staff must follow the relevant School procedures for one-to-one working and seek advice from the DSL or relevant senior leader where circumstances create additional safeguarding risk.

Staff should exercise professional curiosity and should not accept explanations at face value where a child's presentation, behaviour, attendance, relationships, injuries, online activity or other circumstances indicate that they may be experiencing harm.

All staff and volunteers must act immediately where they have a safeguarding concern about a child. Concerns should be reported without delay to the DSL or a deputy DSL and recorded in accordance with the School's safeguarding procedures. If a child is in immediate danger or at risk of immediate serious harm, the police and/or children's social care should be contacted without delay. Staff should not assume that another person will take action.

Any member of staff may make a referral directly to children's social care where necessary and should inform the DSL as soon as practicable.

Staff must challenge inappropriate and abusive behaviour between children and must not dismiss safeguarding concerns as 'banter', 'part of growing up' or otherwise normalise harmful behaviour.

Staff must report any safeguarding concern or allegation about an adult working with children in accordance with the School's allegations and low-level concerns procedures.

5. TRAINING

On joining Bromsgrove School, all staff volunteers and Governors will be informed of the safeguarding children arrangements in place. They are provided with access to this policy, the School's safeguarding response to absence from education, as set out in the Attendance Policy and relevant supervision/missing-child procedures and the School's staff codes of conduct. They will be told who the DSL is, who acts in their absence and what this role includes.

The School uses online systems for the dissemination and acknowledgement of documentation such as KCSIE and School policies, and to support related training. Records from these systems are tracked and collated centrally.

The induction programme will include safeguarding information on recognising indicators of abuse, neglect and exploitation, including online harm; how to respond to a child who raises a concern or makes a disclosure; when and how to record and report a safeguarding concern; the School's referral procedures; and expectations relating to safe professional practice.

All staff should know how to respond supportively to a child who raises a safeguarding concern or reports abuse. Children should be reassured that they are being taken seriously, will be supported and kept safe, and should never be made to feel that they are creating a problem or be made to feel ashamed for making a report.

Volunteers, supply staff and other adults working regularly in the School will receive safeguarding information appropriate to their role, including how to access this policy, the identity of the DSL and deputies, and the procedures for reporting concerns. Visitors will receive safeguarding information proportionate to the nature and duration of their visit.

All staff will receive appropriate safeguarding and child protection training, including online safety and safe working practice, at induction. Training will be regularly updated in accordance with KCSIE and local safeguarding arrangements. In addition, all staff will receive safeguarding and child protection updates as required and at least annually.

Training will enable staff to recognise indicators of abuse, neglect and exploitation and will cover relevant safeguarding issues identified within KCSIE, this policy and local safeguarding arrangements, including

online safety, child-on-child abuse, sexual violence and sexual harassment, exploitation, Prevent and other emerging safeguarding risks.

Training will include how to recognise, record and report safeguarding concerns within School, when and how referrals may be made to children's social care or other statutory agencies, and the principle that any member of staff may make a referral where necessary.

Safeguarding training for staff working within the EYFS will also meet the requirements of the current Early Years Foundation Stage statutory framework.

All staff will receive online safety training which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

Staff should recognise that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. This should not prevent staff from having professional curiosity and speaking to the DSL where they have concerns about a child.

When considering a concern, staff and DSLs should consider the child's circumstances as a whole. Children may experience multiple or simultaneous forms of harm within the home, between children, within intimate relationships, in the community and online.

Staff should not investigate safeguarding concerns themselves. They should listen, clarify only where necessary, record the concern accurately and report it in accordance with this policy.

Staff will receive safeguarding and child protection updates (including relating to online safety) from the DSL as required, for example through half termly 7 Minute Briefings, but at least annually.

Staff with specific responsibility for safeguarding children i.e. all DSLs and Deputy DSLs, will undertake both single and inter-agency training at a level suitable to their role and responsibility, updated at least every two years. In addition to formal training the DSL and deputies will update their knowledge and skills via WSCP newsletters, briefings, network meetings and seminars, at regular intervals, at least annually.

Staff with relevant leadership or specialist safeguarding responsibilities will undertake additional training appropriate to their roles. Learning from specialist training will be shared with relevant staff and incorporated into School safeguarding practice and training where appropriate.

Governors receive annual safeguarding training, including online safety.

Volunteers will receive safeguarding induction and training proportionate to their role, level of responsibility and contact with children.

Training will ensure staff understand the School's safeguarding referral processes, including community-based early help, Family Help, children's social care and emergency/police referrals, and know when and how concerns should be escalated.

Training will reinforce that data protection law does not prevent appropriate information sharing for safeguarding purposes and that staff should seek advice from the DSL where they are uncertain.

Senior Pupils

Senior pupils who hold positions of responsibility, such as Monitors, will be briefed on appropriate safeguarding procedures. They will be encouraged to report promptly to a member of staff or the DSL any safeguarding concern or information shared with them by another pupil. They will not be expected to investigate concerns or take responsibility for managing safeguarding matters themselves.

6. MANAGING CONCERNS

a) Teachers and other staff in schools are in a unique position to observe children's behaviour over time and often develop close and trusting relationships with pupils. If a child discloses directly to a member of staff, the following advice to staff will be followed:

- listen carefully to what is said
- do not promise confidentiality
- ask only open questions such as:
 - "Could you tell me what happened?"
 - "Please explain what you mean when you say...?"
 - "Can you describe the person?" or "Can you describe the place?"
- do not ask questions which may be considered to suggest what might have happened, or who has perpetrated the abuse, e.g. 'Did your Dad hit you?'
- do not force the child to repeat what he/she said in front of another person.

b) Do not begin an investigation – for example by asking the child to record what happened in writing or taking a photograph of any injuries. Concerns should be recorded electronically on MyConcern, or if needed, on Form 1 (see appendix) with visible injuries noted on a body map (available on NETconsent under Safeguarding). Photographs of bruising or injuries should not be taken.

c) Bromsgrove School adheres to child protection procedures that have been agreed locally through the WSCP (<https://www.safeguardingworcestershire.org.uk/>). Where we identify children and families in need of support, we will carry out our responsibilities in accordance with the [West Midlands Safeguarding Procedures](#) and the [WSCP Levels of Need Guidance](#). Universal or community-based early help, Family Help, child protection arrangements or other multi-agency plans may be offered directly through school provision or via referral to an external support agency. Safeguarding arrangements take into account the procedures and practice of the local authority and the WSCP.

d) Every member of staff, including volunteers working with children at our School, is advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy. They should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR). In addition, the DfE Data Protection Guidance for schools [Data protection in schools - Guidance - GOV.UK \(www.gov.uk\)](#) can help staff and governors understand how to comply with data protection law, develop data policies and processes, know what staff and pupil data to keep, and follow good practices for preventing personal data breaches. If in any doubt about sharing information, staff should speak to the DSL or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

e) All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

f) It is not the responsibility of School staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.

g) The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our School. Any member of staff or visitor to the

School who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to a Deputy DSL. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff or children's social care.

h) **All concerns about a child or young person should be reported without delay and recorded using MyConcern or if necessary using the written Form (see Appendix).**

i) Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from Children's Services as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.

j) All referrals will be made in line with [local procedures](#).

k) If, at any point, a child has suffered significant harm or is likely to suffer significant harm, a referral should be made to Children's Services immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Head. Concerns should always lead to help for the child at some point.

l) If a child who is in need of additional support would benefit from universal or community-based early help, Family Help, child protection arrangements or other multi-agency plans, each section of the School will use its own early help provision in conjunction with the Worcestershire provision that highlights services available.

m) Staff should always follow the reporting procedures outlined in this policy in the first instance. At all stages, staff should keep the child's circumstances under review (involving the DSL, or deputies, as required) and re-refer if appropriate, to ensure the child's circumstances improve – the child's best interest must always come first. However, they may also share information directly with Children's Services, or the police if:

- the situation is an emergency and the designated senior person, their deputy and the Head are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil's safety.

n) Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Head or the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point they should contact Children's Services directly with their concerns.

o) Parental consent is not required to make a referral.

Please see the flowchart in appendix 3 for an illustration of the actions to be taken where there is a concern about a child.

7. INFORMATION SHARING AND CONFIDENTIALITY

Information sharing is vital in identifying and tackling all forms of abuse. Staff are proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to children's social care. The arrangements in place set out the processes and principles for sharing information within the School and with Worcestershire County Council Children's Social Care, and other safeguarding partners, organisations, agencies or practitioners as required.

Data protection law does not prevent the sharing of information for the purposes of keeping children safe. Staff should share information where this is necessary and proportionate to safeguard a child and should not allow concerns about data protection to prevent appropriate safeguarding action. Where staff are uncertain about whether information should be shared, they should seek advice from the DSL; however, this should not delay necessary action where a child may be at risk.

- All personal information will be processed fairly and lawfully in line with our duties under legislation and government guidance. The School is aware of the updated Government non-statutory guidance [Information Sharing: advice for practitioners providing safeguarding services](#) (DfE, September 2026).
- Staff will have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR, and referred to in KCSIE 2026. For example:
 - safeguarding of children at risk allows practitioners to share information without consent where there is a good reason to do so under certain circumstances, for example where the failure to do so would result in a child being placed at risk of harm
 - a child's data would be withheld in response to a subject access request if there was a risk of serious harm.

We recognise that all matters relating to child protection are confidential.

The DSL and other senior staff will disclose any information about a pupil to other members of staff on a need-to-know basis only. Information sharing should be with the right people between and within agencies, and use appropriately secure channels.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being. Staff must be mindful that early information sharing is vital for the effective identification, assessment and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care.

Keeping Children Safe in Education (2026) states: 'The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.'

When a child about whom concerns have been raised and/or recorded leaves the School, the safeguarding records are also transferred either via MyConcern or other secure means. Records will be transferred separately from other records, to the DSL in the receiving educational setting, within 5 days for an in-year transfer or within the first 5 days of the start of a new term, to allow the new school to have support in place for when the child arrives. Confirmation of receipt will be obtained.

The Governors of Bromsgrove School take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers, and contractors.

8. COMMUNICATION WITH PARENTS

- We recognise that good communication with parents is crucial in order to safeguard and promote the welfare of children effectively.
- We will undertake appropriate discussion with parents prior to formal involvement of another agency unless to do so could place the child or an adult at further risk of harm or could impede a criminal investigation.
- We will ensure that parents have an understanding of the responsibilities placed on the School and staff to safeguard children and their duty to co-operate with other agencies in this respect.
- Parents/carers will normally be informed about safeguarding concerns and referrals unless doing so may place the child or another person at increased risk, prejudice an investigation, or otherwise be contrary to the child's welfare.

9. RECORD KEEPING

- Any member of staff receiving a disclosure of abuse from a child or young person, or noticing signs or symptoms of possible abuse, will make notes as soon as possible (within the hour, if possible) writing down exactly what was said, using the child's own words as far as possible. All notes should be timed, dated and signed, with name printed alongside the signature. Concerns will be recorded using the School's safeguarding children recording system.
- Records should include a clear and comprehensive summary of the concern and relevant context, what was seen, heard or disclosed, details of how the concern was followed up and resolved, a note of any action taken, details of any information shared and with whom, decisions reached with the rationale for them and the outcome with any next steps.
- Records should distinguish between fact, direct observation, information reported by another person and professional opinion. Where appropriate, the child's own words should be recorded accurately.
- All records of a child protection nature will be passed to the DSL including case conference or core group minutes, child protection plans and written records of any concerns. Child protection records are kept securely under lock and key or password protected, with only appropriate persons having access to them.
- Any referrals made to other agencies, including referrals to children's social care, will be copied prior to sending, and stored in the child's child protection file.
- The DSL will maintain and regularly audit the School's child protection records, ensuring that each stand-alone file includes a chronology of significant events and that information and contact details are accurate and up to date.
- The DSL may copy child protection records generated by the School prior to transfer and retain for as long as is necessary (normally date of birth plus 25 years), where there is justification for believing that the records may be required as evidence of the School's involvement with the child for statutory purposes (e.g. court cases or serious case reviews). When the records are no longer required, they will be securely disposed of.
- A record of low-level concerns and allegations against staff is kept in a confidential file by the Headmaster.

10. SUPPORTING CHILDREN

Staff working with children are advised to maintain an attitude of 'it could happen here', where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

We act immediately when concerned for a child's welfare, follow this safeguarding policy and communicate with the DSL. Support will be child-centred, inclusive and anti-discriminatory, taking account of the child's individual needs, identity, culture, communication needs, family circumstances and lived experience. Staff should recognise and challenge racism, discrimination and other forms of prejudice where these affect a child's safety or wellbeing.

Options then include:

- Managing support for the child internally via the School's early help provision
- Undertaking a universal or community-based early help, Family Help, child protection arrangements or other multi-agency plans assessment via children's social care
- Making a referral to child statutory services as the child might be in need, is suffering harm, or is likely to suffer harm.

The School's early help provision includes but is not limited to:

- the 'Where do I turn?' advice booklet
- the houses' pastoral teams
- qualified mental health first aiders
- a director of wellbeing based in the wellbeing hub

- qualified wellbeing practitioners based in the Wellbeing Hub
- qualified nurses in the Boarders' Clinic and Wellbeing Hub.

Any child may benefit from universal or community-based early help, Family Help, child protection arrangements or other multi-agency plans, but all staff should be particularly alert to the potential need for such help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health, and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home, or care
- has experienced multiple suspensions, is at risk of being permanently excluded from the School, and in Alternative Provision or a Pupil Referral Unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. We acknowledge that school may be the only stable, secure and predictable element in the lives of children who have been abused or who are at risk of harm. We are aware that research shows that at School their behaviour may be challenging and defiant or they may be withdrawn.

The School will endeavour to support all children by:

- encouraging self-esteem and self-assertiveness through the curriculum, as well as promoting respectful relationships, challenging bullying and humiliating behaviour
- promoting a positive, supportive and secure environment giving pupils a sense of being valued
- a consistently applied School behaviour policy which is aimed at supporting vulnerable pupils
- ensuring that children know that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred. All staff should be able to reassure victims that they are being taken seriously, and they will be supported and kept safe. A victim should never be given the impression they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report
- liaising with other agencies that support the pupil such as children's social care, Child and Adolescent Mental Health Service (CAMHS), Educational Psychology Service and those agencies involved in the safeguarding of children
- the use of Universal or community-based early help, Family Help, child protection arrangements or other multi-agency plans services, through the Family Front Door, when appropriate
- notifying children's social care immediately there is a significant concern
- providing continuing support to a child about whom there have been concerns who leaves the School by ensuring that appropriate information is forwarded under confidential cover to the child's new setting.

The School will also apply the relevant safeguarding and checking requirements in KCSIE to alternative provision, work experience and other placements involving pupils, where applicable.

11. SUPPORTING AND SUPERVISION OF STAFF

We recognise that staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

We support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support such as counselling or regular supervision, as appropriate.

We will enable supervision for the DSL through network meetings, direct consultation with the Safeguarding in Education Adviser and qualified safeguarding supervisors in order to promote best practice and challenge unsatisfactory or poor practice.

In order to reduce the risk of allegations being made against staff, and ensure that staff are competent, confident and safe to work with children, they will be made aware of safer working practice guidance and will be given opportunities in training to develop their understanding of what constitutes safe and unsafe behaviour.

12. SAFER RECRUITMENT AND SELECTION OF STAFF

The School has a written recruitment and selection policy statement and procedures linking explicitly to this policy. The statement is included in all job advertisements, publicity material, recruitment websites, and candidate information packs. Those involved in the recruitment and employment of staff to work with children will receive appropriate safer recruitment training covering, as a minimum, the principles set out in Part Three of Keeping Children Safe in Education 2026.

The recruitment process is robust in seeking to establish the commitment of candidates to support the School's measures to safeguard children and to identify, deter or reject people who might pose a risk of harm to children or are otherwise unsuited to work with them.

Regulated activity in relation to children is defined in accordance with the Safeguarding Vulnerable Groups Act 2006, as amended, and Keeping Children Safe in Education 2026. From 1 September 2026, supervision does not prevent teaching, training, instructing, caring for or supervising children from being regulated activity where the relevant frequency or period conditions are met. Regulated activity also includes certain personal and intimate care activities and specified overnight activity.

Where exceptionally a person begins work in regulated activity before the enhanced DBS certificate is available, the School will undertake the required children's barred list check and a written risk assessment and will put appropriate safeguarding arrangements in place pending receipt of the DBS certificate.

The School will comply with the requirements of the Childcare Act 2006 and current statutory guidance on disqualification in relation to relevant early and later years childcare and the management of such childcare.

Appointing New Staff

When appointing new staff, the School will:

- verify their identity
- obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below) (where the School retains a copy of a DBS certificate, there will be a valid reason for doing so and it will not normally be retained for longer than six months, in accordance with data protection requirements.)
- obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- verify their mental and physical fitness to carry out their work responsibilities

- verify their right to work in the UK. The School will keep a copy of this verification for the duration of the member of staff's employment and retain it according to the School's Information and Records Retention Policy
- verify their professional qualifications, as appropriate
- ensure they are not subject to a prohibition order if they are employed to be a teacher
- carry out such additional checks as the School considers appropriate for applicants who have lived or worked outside the UK so that relevant events occurring outside the UK can be considered. This may include overseas criminal records checks and, for teaching roles, information from relevant professional regulatory authorities where available
- check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the Secretary of State
- obtain a full employment history, identify and explore any gaps, inconsistencies or frequent changes of employment or location, and ensure that any concerns are satisfactorily resolved before appointment
- normally require applicants to complete a School application form. A curriculum vitae may be submitted alongside the application form but will not be accepted as a substitute for it.
- will make clear its commitment to safeguarding in its recruitment information. Where a role involves regulated activity with children, applicants will be informed that it is an offence for a person who is barred from such activity to apply for the role. Applicants will also be directed to the School's safeguarding policy and policy on the recruitment of ex-offenders.
- ask shortlisted candidates to complete an appropriate self-declaration regarding criminal records and other information relevant to their suitability to work with children, in accordance with current Ministry of Justice and KCSIE requirements. This information will be requested after shortlisting and will not be used to determine who is shortlisted.

Staff and volunteers who provide early years or later years childcare and managers of such childcare are covered by the [disqualification regulations of the Childcare Act 2006](#) and are required to declare relevant information.

In addition, we will carry out an online search as part of our due diligence on shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview. We will inform candidates that online searches may be done as part of due diligence checks. Any information identified will be considered fairly, proportionately and only insofar as it is relevant to the applicant's suitability for the role and/or to work with children.

References are requested and scrutinised for all candidates prior to interview and any discrepancies or concerns are raised and discussed during interview, including for any volunteers and internal candidates. References are always requested directly from the referee and verified as being from a senior person with appropriate authority; electronic references are checked to ensure they originate from a legitimate source. Where specific questions have not been answered satisfactorily or insufficient information is provided, the referee will be contacted directly for further clarification. Where references are not forthcoming, despite reminders, the candidate will be asked to provide an alternative referee. References will include the candidate's current employer and, where relevant, the employer from the last time the candidate worked with children. The School will compare reference information with the application form, establish the reason for leaving the current or most recent employment and satisfactorily resolve any discrepancies or safeguarding concerns before confirming appointment.

Interviews are used to explore potential areas of concern and to determine the applicant's suitability to work with children. Interviews will include structured questions that explore the candidate's motivation for working with children, relevant experience, safeguarding understanding and any gaps or concerns identified during the recruitment process. Areas that may be concerning and lead to further probing include:

- implication that adults and children are equal
- lack of recognition and/or understanding of the vulnerability of children
- inappropriate idealisation of children

- inadequate understanding of appropriate boundaries between adults and children
- indicators of negative safeguarding behaviours.

The same checks are carried out for new staff who have lived or worked outside the UK, even if they have never been to the UK. In addition, the School will make further checks as appropriate so any relevant event that occurred outside the UK can be considered.

Existing Staff

The School ensures that appropriate suitability and vetting checks have been undertaken for existing staff in accordance with the requirements applicable to their role, including identity, right to work, qualifications, DBS and children's barred list information where required.

The School uses the Department for Education's "Check a teacher's record" service, where applicable, to confirm relevant teaching qualifications and to identify any prohibition orders, sanctions or restrictions.

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- where the individual has received a caution or conviction for a relevant offence
- if there is reason to believe that the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009
- if the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Having regard to the [Early Years Foundation Stage Statutory Framework](#) and the statutory guidance for the [Disqualification under the Childcare Act 2006](#), the School will notify Ofsted of any significant event that may affect the suitability of a person in regular contact with children, including disqualification, as soon as reasonably practicable, but, in any event within 14 days of becoming aware of the information. When required, the School will provide Ofsted with details of any order, conviction, determination or other ground for disqualification, including dates, the relevant authority and supporting documentation.

Agency, Supply and Third-Party Staff

We will obtain written notification from any agency or third-party organisation supplying staff that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

The School will ensure that appropriate DBS and other suitability checks are undertaken for contractors according to the nature of their role, their level of contact with children and whether the work constitutes regulated activity. Contractors for whom the School has not received appropriate assurance regarding required checks will not be permitted to engage in regulated activity and will be appropriately supervised while on site.

The School checks the identity of all contractors and their staff on arrival at the School.

Trainee/Student Teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children. If trainee teachers are engaging in regulated activity relating to children an enhanced DBS check will be obtained.

Volunteers

The School will undertake a risk assessment and apply appropriate safer recruitment checks for volunteers, taking account of the nature and frequency of the activity, the level of contact with children and whether the role constitutes regulated activity.

An enhanced DBS check with children's barred list information will be obtained for volunteers who engage in regulated activity with children. From 1 September 2026, supervision does not prevent a volunteer from being in regulated activity where the relevant nature and frequency/period conditions are met.

For volunteers whose activities do not constitute regulated activity, the School will consider whether an enhanced DBS check without barred list information or another level of check is appropriate and legally available, taking account of the nature of the role and the opportunity for contact with children.

No person who is barred from working with children will be permitted to undertake regulated activity.

Governance

Members of the Governing Body are subject to an enhanced DBS check without barred list check and are checked to ensure they are not disqualified from holding office under a section 128 direction. They will have an enhanced DBS check with barred list information if working in regulated activity.

Single Central Register

The School maintains a single central record of recruitment checks for audit purposes which is checked and updated regularly and records all the recruitment checks undertaken by the School. Copies of these checks, where appropriate, will be held in individuals' personnel files. Copies of DBS certificates are not retained for more than six months. The SCR is monitored and checked by the Headmaster and Safeguarding Governor on a regular basis.

13. ALLEGATIONS AGAINST STAFF

Part Four of Keeping Children Safe in Education 2026 sets out two levels of safeguarding concerns or allegations about adults working in or on behalf of schools:

- concerns or allegations that may meet the harm threshold; and
- concerns or allegations that do not meet the harm threshold, referred to as low-level concerns.

We recognise that a safeguarding concern or allegation may arise in relation to any adult working in or on behalf of the School, including staff, supply teachers, trainee teachers, volunteers and contractors.

If such an allegation is made, the member of staff receiving the allegation will immediately inform the Headmaster, unless the allegation concerns the Headmaster, in which case the Chair of Governors will be informed immediately. In such circumstances, the Headmaster would not be informed.

The Headmaster, as case manager, will determine whether the concern or allegation may meet the harm threshold or should be managed as a low-level concern, consulting the LADO where necessary or where there is any doubt.

CONCERNS OR ALLEGATIONS THAT MAY MEET THE HARM THRESHOLD

The case manager will undertake only such initial basic enquiries as are permitted by local procedures to establish the facts necessary for consideration by the LADO, taking care not to jeopardise any future police or children's social care investigation. The case manager will then discuss the nature, content and context of the concern or allegation with the LADO and agree the appropriate course of action before any substantive investigation is undertaken.

The School will follow Part Four of Keeping Children Safe in Education 2026 and current Worcestershire/West Midlands local safeguarding procedures for managing allegations about adults working with children.

These procedures will be followed where it is alleged that anyone working in the School, including supply teachers and volunteers, has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This could include behaviour that may have happened outside of school that might make an individual unsuitable to work with children; this is known as transferable risk.

Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken and if in any doubt, seek advice from the local authority designated officer (LADO).

This relates to members of staff, supply staff, volunteers and contractors who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place. Where an adult reports that they were abused as a child, they will be advised to report the allegation to the police. Non-recent allegations made by a child will be reported to the LADO in accordance with local procedures. Abuse may be reported regardless of how long ago it occurred.

Schools and colleges as employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide them with a named contact if they are suspended. Where the school or college are not the employer of an individual they still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties, this includes supply teachers, volunteers and contractors. It is essential that any allegation of abuse made against a teacher, other member of staff, volunteer or contractor in a school or college is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

A case manager, usually the Headmaster, will be the lead unless it is they who are the subject of an allegation, in which case it will be led by the Chair of Governors.

Supply Teachers, Trainee Teachers and Contractors

In some circumstances the Schools may have to consider an allegation against an individual not directly employed by the School, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business.

Whilst the School is not the employer of agency supply teachers, we will ensure allegations are dealt with properly. We will not cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The School will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Where the individual is supplied or employed by a third-party organisation, the School shares safeguarding responsibility with that organisation. The School remains responsible for gathering the facts and managing the safeguarding process, while working closely with the employer or provider, which will normally lead on any employment or disciplinary action.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school or college will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Agency supply teachers, whilst not employed by the School, are under the supervision, direction and control of the Governing Body when working in the School. They should be advised to seek suitable support for themselves.

The School will ensure that relevant information held by an agency, training provider or contractor, including any previous concerns or allegations, is considered as part of the safeguarding process, subject to appropriate information sharing requirements. The relevant employer/provider will be involved in meetings and kept appropriately informed.

Where a concern or allegation relates to a trainee teacher placed at the School, the same safeguarding procedures will apply and the relevant initial teacher training provider will be involved in the process in the same way as an employment agency or other third-party provider.

Where a safeguarding allegation relates to an individual or organisation using School premises to provide activities for children, the School will follow its safeguarding procedures and local allegations-management arrangements, including informing the LADO where appropriate.

Allegations concerning a governor will be managed in accordance with local procedures. Where an allegation is substantiated, the Governing Body will consider any action required in relation to the governor's continued office.

The case manager will be guided by the LADO in all matters relating to the case, including suspension, sharing of information and any follow up investigation.

The Initial Response to an Allegation

When the School identifies a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency they will contact children's social care and as appropriate the police immediately as explained in Part One of KCSIE.

There are two aspects to consider when an allegation is made:

1. **Looking after the welfare of the child.** The designated safeguarding lead (DSL) is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part One of KCSIE 2026.
2. **Investigating and supporting the person subject to the allegation.** The case manager should discuss with the LADO the nature, content and context of the allegation and agree a course of action.

When dealing with allegations, the School will:

- apply common sense and judgement
- deal with allegations quickly, fairly and consistently, and
- provide effective protection for the child and support the person subject to the allegation.

Bromsgrove School will ensure they understand the local authority arrangements for managing allegations, including the contact details and what information the LADO will require when an allegation is made. Before contacting the LADO, the School will conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation, being careful not to jeopardise any further police investigation. For example:

- Was the individual in the School at the time of the allegations?
- Did the individual, or could they have, come into contact with the child?
- Are there any witnesses? and
- Was there any CCTV footage?

These are just a sample of example questions and the School is familiar with the initial information the LADO will require.

When to inform the individual of the allegation will be considered carefully on a case-by-case basis, with guidance as required from the LADO, and if appropriate, children's social care and the police.

If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's social care will be convened in accordance with the statutory guidance [Working Together to Safeguard Children](#).

Where the circumstances raise concerns about the welfare of other children, including children within the adult's family or wider community, the case manager will consult the DSL and consider whether further safeguarding action or referral to children's social care is required.

If the allegation is about physical contact, for example restraint, the strategy discussion or initial evaluation with the LADO should take into account that teachers and other school staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour. Further information about the use of reasonable force can be found in part two of KCSIE.

No Further Action

Where the initial discussion leads to no further action, the case manager and the LADO should:

- record the decision and justification for it, and
- agree on what information should be put in writing to the individual concerned and by whom.

Further Enquiries

Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The case manager will monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals depending on the complexity of the case.

Wherever possible, the first review should take place no later than four weeks after the initial assessment. Dates for subsequent reviews, should be set at the review meeting if the investigation continues. The LADO will provide advice and guidance when considering allegations against adults working with children. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the School or a combination of these.

Where the nature or complexity of the allegation requires it, or where there is insufficient appropriate internal independence or resource, the School will secure an appropriately independent investigator.

These procedures aim primarily to protect children from abuse at the same time as protecting staff and volunteers from false, malicious or unfounded allegations. The procedures follow Part Four of KCSIE.

The School will not cease an investigation simply because the individual resigns, leaves or otherwise ceases to provide their services. Every effort will be made to reach and record an outcome where the allegation has a bearing on the safety or welfare of children.

No settlement agreement will prevent the School from completing appropriate safeguarding enquiries, making any required DBS referral, considering a referral to the Teaching Regulation Authority (TRA), or providing an appropriate factual reference. A settlement agreement will not be used where an allegation indicates that an individual poses a risk of harm to children or may be unsuitable to work with children.

Disclosure of Information

- The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted and, if appropriate, children's social care and the police.
- The parents of the pupil involved will be informed of the allegation as soon as possible if they do not already know of it, although where external agencies are involved, the case manager will not inform the accused or the parents until it has been agreed what information can be disclosed. Parents will be kept informed of the progress of the case, only in relation to their child; no information can be shared regarding the member of staff.
- The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

- Investigations will usually be undertaken by a senior member of staff, under the guidance of the LADO. However, depending on the nature and complexity of an allegation, the investigation may instead be conducted by external agencies, such as social services or the police. In some cases, the LADO may ask for further enquiries to be made before a formal decision is reached about how to proceed. When this occurs, the LADO will provide specific guidance as how and by whom the investigation should be conducted.
- Where an external agency is conducting the investigation rather than the School, the School will cooperate fully with external investigators. No internal investigation into possible breaches of the School's disciplinary code will commence until any external investigation or criminal proceedings are complete.
- The School will take the lead in any investigation involving a supply teacher to ensure that the allegation is dealt with properly and to recognise the fact that the agency would not have direct access to children or other school staff. They would therefore not be able to collect the facts or liaise with the LADO. The School will ensure that agency is fully involved in the management of any allegations.
- The School will not cease its investigations if the person involved leaves, resigns, ceases to provide their services or refuses to cooperate. Records will be kept of the nature of the allegation and any supporting evidence used to determine whether or not, on the basis of information available, the allegation is substantiated. The person involved will be notified in writing of the outcome of investigation process.
- In accordance with DfE statutory guidance, the following definitions will be used when determining the outcome of allegation investigations:
 - substantiated: there is sufficient evidence to prove the allegation
 - malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject to the allegation
 - false: there is sufficient evidence to disprove the allegation
 - unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
 - unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Support

- The School has a duty of care towards its employees and will ensure that effective support is provided for anyone facing such an allegation. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available.
- The School will also provide access to counselling or medical advice, where appropriate.
- The School will not prevent social contact with work colleagues and friends, when staff are suspended, unless there is reason to believe this may prejudice the gathering of evidence.
- Support will also be offered to the pupil(s) affected and their parents/guardians. The School will consult with children's social services, or the police as appropriate, as to how this can be done in the most appropriate and effective way. The School will follow closely the guidance set out in Part 4 of KCSIE.

Suspension

- Suspension will not be an automatic response to an allegation and will only be considered in a case where there is cause to suspect a pupil or other pupils at the School is or are at risk of harm or the allegation is so serious that it might be grounds for dismissal. The School will consider whether the result that would be achieved by suspension could be obtained by alternative arrangements, such as redeployment. A member of staff will only be suspended if there is no reasonable alternative. The School will balance the need to ensure the safety and welfare of the pupil with the need for a full and fair investigation. The LADO will be consulted as to the appropriate action to take.
- If suspension is deemed appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons for the suspension. The School will ensure that the suspended person is given the contact details for the representative who has been appointed to keep him or her informed about the progress of the case.

- If the allegation is against a member of the residential boarding staff and that member of staff is suspended from duty as a result of the allegation, the School will provide alternative accommodation for that member of staff for the duration of the investigation. Likewise, if the member of staff is residential on the School site, alternative accommodation will be provided.
- If it is decided that the person who has been suspended should return to work, the School will consider how to facilitate this; for example, whether a phased return would be appropriate. The School may provide a mentor and will also consider how to manage contact with the pupil who made the allegation.
- Where suspension is considered necessary, the rationale will record the alternatives considered and why they were rejected.
- Written confirmation of suspension and the reasons for it will be provided as soon as practicable and normally within one working day.
- Where the School is notified that an interim prohibition order has been made by the Secretary of State, it will take immediate action to ensure that the individual does not undertake teaching work in breach of that order.

Confidentiality

The School will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality to ensure a fair investigation with minimum impact for all parties.

A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence to publish information that could lead to the identification of a member of staff who is the subject of an allegation before they are charged with an offence. Publication includes any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public.

Unsubstantiated, Unfounded, False or Malicious Allegations

Where an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider whether the child and/or person who made the allegation may require help or protection, including whether a referral to children's social care is appropriate. Where an allegation is shown to have been deliberately invented or malicious, the School will consider whether disciplinary action is appropriate in accordance with the Pupil Conduct and Behaviour Policy. If a parent has made a deliberately invented or malicious allegation the Headmaster will consider whether to require that parent to withdraw their child or children from the School, on the basis that they have treated the Headmaster or a member of staff unreasonably.

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

Substantiated Allegations

If an allegation is substantiated and the member of staff, contractor or volunteer is dismissed because they are unsuitable to work with children a report to the Disclosure and Barring Service will be made promptly, and in any event within one month of the person leaving the School.

Settlement agreements, including a form of words for a reference, will not be used in cases where a member of staff, volunteer or contractor resigns or ceases to provide his or her services, where there are allegations that indicate the person is a risk or poses a risk of harm to children. Resignation or ceasing to provide services will not prevent a referral being made to the Disclosure and Barring Service where appropriate.

If a teacher has been dismissed, or would have been dismissed had they not resigned, in cases involving unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction for a relevant offence, the School will give separate consideration to whether a referral should be made to the TRA. The School will follow the advice set out in the TRA documents: Teacher misconduct: information for teachers and Teacher misconduct: the prohibition of teachers (as updated from time to time) to decide whether a referral should be made.

At the conclusion of a case in which an allegation is substantiated, the LADO will review the circumstances of the case with the case manager to determine whether any improvements could be made to the School's procedures to prevent the occurrence of similar events in the future. Consideration will also be given to how the investigation process was managed, including, where appropriate, the use of suspension of the accused. The case manager will produce a written report that will be presented to the governors without delay.

Record Keeping and References

Details of allegations that are found to be malicious or false will be removed from personnel records. For all other allegations, a comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any actions taken and decisions reached will be kept on the employee's file. A copy of this summary will be provided to the individual concerned. Such records will be retained at least until the employee reaches the normal pension age (or for a period of ten years from the date of the allegation, if this is longer).

When providing employer references, the School will provide a reference in a timely manner and will not refer to any allegation or history of allegations where the allegation(s) have been proven to be false, unfounded, unsubstantiated, false or malicious.

Substantiated allegations should be included in references, provided that the information is factual and does not include opinions.

At the conclusion of a case, the case manager and, where involved, the LADO will consider whether any lessons can be learned or improvements made to School procedures, practice, training or safeguarding arrangements. This will include consideration of any decision to suspend and whether alternative arrangements could have been used.

LOW-LEVEL CONCERNS (CONCERNS THAT DO NOT MEET THE HARMS THRESHOLD)

Bromsgrove School has processes to deal with concerns (allegations) which do not meet the harm threshold set out above. Concerns may arise in several ways and form a number of sources. For example, suspicion, complaint, or disclosure made by a child, parent or other adult within or outside of the School, or as a result of vetting checks undertaken.

The overarching aim is to facilitate a culture in which the School values and expected behaviours which are set out in the Staff Code of Conduct are lived, constantly monitored, and reinforced by all staff. The intention of the policy is therefore to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines
- ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in the Code of Conduct
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst on the other hand protecting staff from false allegations or misunderstandings.

The Headmaster should collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. Written records will be kept of all reported low-level concerns by the Headmaster liaising with the DSL as appropriate. These records include details of the concern, the context in which the concern arose, and any actions taken. These records are reviewed by the DSL on a termly basis to determine if potential patterns of concerning, problematic behaviour exist and how these should be addressed through changes to policies and procedures or extra training. Further details are included in the School's Low-Level Concerns Policy.

What is a Low-Level Concern?

The term low-level concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phones
- engaging a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language
- humiliating children.

It is crucial that any such concerns, including those which do not meet the allegation/harms threshold (see part four, section one of KCSIE) are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of the School from potential false allegations or misunderstandings.

Low-level concerns may arise from a range of sources, including observations, complaints, disclosures or information arising from recruitment or vetting processes.

Where there is any doubt as to whether a concern meets the harm threshold, advice will be sought from the LADO.

Sharing Low-Level Concerns

The School will ensure they create an environment where staff are encouraged and feel confident to self-refer where for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Where a low-level concern relates to a person employed by a supply agency or contractor to work in the School, that concern should also be shared with the Headmaster. It should then be recorded in accordance with the School’s low-level concern/staff code of conduct and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

Recording Low-Level Concerns

All low-level concerns should be recorded in writing by the Headmaster. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted. If the individual wishes to remain anonymous then that should be respected as far as reasonably possible. The School will decide where these records are kept, but they will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the School will decide on a course of action, either through its disciplinary procedures or if a concern meets the harms threshold, refer it to the LADO.

The School will decide how long they retain such information and will follow recommendations that it is retained at least until the individual leaves the School employment.

References

Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference such as misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern, or group of concerns, has met the threshold to the LADO and found to be substantiated, it should be referred to in a reference.

14. WHISTLEBLOWING

The School has a Whistleblowing Policy, which sets out the procedures through which staff may raise concerns about wrongdoing, poor or unsafe practice and potential failures in the School's safeguarding arrangements.

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding arrangements and should know that genuine concerns will be taken seriously.

Concerns or allegations about the conduct of an individual adult working in or on behalf of the School should normally be reported through the procedures in Section 13, including the low-level concerns procedure.

Whistleblowing procedures are principally intended for concerns about wrongdoing, poor or unsafe practice or failures in the School's safeguarding arrangements, including where normal reporting routes are not appropriate or have not resulted in adequate action.

Nothing in the School's internal reporting or whistleblowing procedures prevents any member of staff from making a direct safeguarding referral to children's social care, the police or another appropriate statutory agency where this is necessary to safeguard a child. Safeguarding whistleblowing concerns may be raised through the routes set out in the School's Whistleblowing Policy, including with the Headmaster, Bursar or Chair of Governors as appropriate.

Whistleblowing concerns about any Head should be immediately reported to the Chair of Governors directly or via the Bursar in accordance with the Whistleblowing Policy. Where the concern is a safeguarding allegation or concern about the Head's conduct towards children, the procedures in Section 13 will apply.

Where the normal internal reporting route is inappropriate because the person who would ordinarily receive the concern is implicated, or where there is another conflict of interest, the concern should be raised through an alternative route set out in the Whistleblowing Policy or with an appropriate external body.

Where a staff member feels unable to raise a safeguarding concern with the School, or believes that a genuine concern is not being addressed, they may contact the NSPCC Whistleblowing Advice Line on 0800 028 0285.

No member of staff or volunteer should suffer detriment for raising a genuine safeguarding concern in good faith. The School will take genuine safeguarding whistleblowing concerns seriously and respond in accordance with the Whistleblowing Policy and safeguarding procedures.

Where a staff member remains concerned that appropriate safeguarding action has not been taken, they should follow the School's challenge and escalation procedures and/or use an appropriate external reporting route.

15. COMPLAINTS OR CONCERNS EXPRESSED BY PUPILS, PARENTS, STAFF OR VOLUNTEERS

We recognise that listening to children is an important and essential part of safeguarding them against abuse and neglect. To this end, any expression of dissatisfaction or disquiet in relation to an individual child will be listened to and acted upon in order to safeguard his/her welfare.

We will also seek to ensure that the child or adult who makes a complaint is informed about not only the action the School will take, but also the length of time that will be required to resolve the complaint. The School will also endeavour to keep the child or adult regularly informed as to the progress of his/her complaint. The School's complaints procedures are readily available.

16. RESTRICTIVE INTERVENTIONS AND THE USE OF REASONABLE FORCE

The School's Physical Intervention Policy reflects current Department for Education guidance on restrictive interventions, including the use of reasonable force. The School seeks to minimise the need for restrictive interventions through prevention, early support and de-escalation. Restrictive intervention should be used only where necessary and where a less restrictive response would not adequately manage the risk.

All members of School staff have a legal power to use reasonable force in certain circumstances to prevent or stop a pupil from causing injury to themselves or others, committing a criminal offence, damaging property or causing disorder among pupils. Where reasonable force is used, staff must use no more force than is necessary for the least amount of time, taking account of the circumstances and the need to protect the safety and dignity of the pupil and others. Force or other restrictive intervention must never be used as a punishment.

When considering or using restrictive intervention, staff will take account of the individual pupil's circumstances, including their age, SEND, communication needs, sensory sensitivities, medical needs and other vulnerabilities. The School will seek to identify triggers, use preventative and de-escalation strategies and make reasonable adjustments where appropriate in order to minimise the need for restrictive intervention. Restrictive intervention must not be used in a way that compromises a pupil's airway, breathing or circulation or otherwise creates an avoidable risk of injury.

The School will ensure that every significant incident involving the use of force by a member of staff is recorded in writing as soon as practicable after the event, in accordance with statutory requirements and the School's Physical Intervention Policy. The staff member or members involved should make the record and should endeavour to do so no later than the same day. Parents will be informed in writing of each significant incident as soon as practicable, and the School will endeavour to do so no later than the same day, subject to statutory safeguarding exceptions.

Incidents involving seclusion or restraint, including restraint that does not involve direct physical contact, will be recorded and reported in accordance with statutory requirements. Seclusion will not be used as a punishment and will only be used as a safety measure in accordance with the School's Physical Intervention Policy.

The DSL for each School will have appropriate oversight of records of restrictive intervention and will ensure that any safeguarding concerns arising from an incident are considered and acted upon. Any concern that force or another restrictive intervention may have been excessive, inappropriate or punitive will be managed under the School's safeguarding procedures, including the procedures in Section 13 where appropriate.

Staff who are likely to need to use reasonable force or other restrictive interventions will receive appropriate training in their safe and lawful use and in prevention and de-escalation. Appropriate support will be provided following an incident to pupils and staff involved, and incidents will be reviewed where appropriate to identify learning and reduce the likelihood of recurrence.

The School recognises that appropriate physical contact is a normal and sometimes necessary part of working with children. Staff will follow safe working practice guidance and maintain appropriate

professional boundaries. The School does not operate a 'no contact' policy, recognising that this could prevent staff from appropriately supporting and protecting pupils.

17. ABUSE OF POSITION OF TRUST

We recognise that as adults working in Bromsgrove School, we are in a relationship of trust with pupils in our care and acknowledge that it could be considered a criminal offence to abuse that trust.

We acknowledge that the principle of equality embedded in the legislation of the Sexual Offenders Act 2003 applies irrespective of sexual orientation: neither homosexual nor heterosexual relationships are acceptable within a position of trust.

We recognise that the legislation is intended to protect young people in education who are over the age of consent but under 18 years of age.

18. PHOTOGRAPHY AND USE OF IMAGES (INCLUDING MOBILE DEVICES)

In compliance with the UK General Data Protection Regulation (UK GDPR) and The Data Protection Act 2018, parents who accept a place for their child at the School are invited to indicate agreement and give consent to the School using images of their child/children as set out in this policy by signing the Acceptance Form. However, parents should be aware that certain uses of their child's images may be necessary or unavoidable (for example, our use of CCTV for security purposes and identification of pupils for internal administrative purposes).

The welfare and protection of children is paramount and consideration should always be given to whether the use of photography will place children at risk. Images may be used to harm children, for example as a preliminary to 'grooming' or by displaying them inappropriately on the internet, particularly social networking sites. Many pupils own, or have access to, handheld devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.

Staff must be mindful of safeguarding issues when taking and using photographs and videos.

Consent For Photographs To Be Taken

- Below Year 7, we would not use images of children for whom parents have not given permission. In the case of group activities where one child is not allowed to have their image used, we would use Photoshop to alter the image accordingly.
- From Year 7, we would always check that the pupils themselves give consent for their photo to be taken and used. However, in the case of any pupils whose parents had previously not given consent, we would make contact with the parents and seek written consent.
- Consent will always be sought for the public use of images of looked after children of any age. Consent should be sought from those with parental responsibility, which, in the case of looked after children, may include the local authority.
- A list of all children who are not allowed to have their images used is stored on our pupil database and our marketing department keep an up-to-date list.
- We would ask for specific consent and record this consent if we were to want to use a photograph with a pupil's full name whether on the website or a news story/publication and if we were to do a feature on a named individual pupil in an advertising campaign.
- Formal consent would be sought if we were to consider using a photograph on a billboard, banner etc.

EYFS

Photographs are regularly taken, on School-based devices, by staff during indoor and outdoor play to form part of each child's digital record on the School's EYFS secure online learning platform and may also be displayed on walls or within other development records for children and parents to look through in order to evidence learning and development. Photographs taken of the children should be part of planned activities.

The use of mobile phones, personal cameras, and all personal electronic devices with imagery and sharing capabilities is prohibited in all areas of the EYFS, including all toilet and nappy changing areas.

When photographs may be taken by parents as part of planned performances:

- parents are asked not to take photographs of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.
- parents are reminded that such images are for personal use only. Images which may identify other pupils should not be made accessible to others via the internet (for example on Facebook) or published in any other way.

Staff receive full training on appropriate use of the School's and their own photographic equipment and the storage of images. Full details can be found in the Photography and Video Policy.

19. STAFF/PUPIL RELATIONSHIPS

Further guidance for staff is given in the Staff Code of Professional Conduct and the Support Staff Code of Conduct, which should be read in conjunction with this Safeguarding Policy.

The School provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

20. GUIDELINES FOR STAFF IN RELATION TO PUPILS' BOARDING HOUSES

Boarding schools have additional factors to consider with regard to safeguarding, and must be alert to the extra vulnerabilities of SEND children, inappropriate pupil relationships and the potential for child-on-child abuse.

Given the understandable public sensitivity to the issue of relationships between teachers and pupils, it is important that our staff should have the security of agreed guidelines, especially in the carrying out of boarding duties. As a co-educational boarding school, we must exercise close and appropriate control of the boys and girls under our charge, and this includes supervision of dormitory areas. On the other hand, we must be aware of the virtue of sound relationships, sensible practices and of the possibility of misunderstanding and even of malicious allegations.

The following guidelines are offered as a help to finding the required balance in this difficult but important area of our work.

When Not On Duty

Male and female members of staff are free to enter boarding Houses at any time (to leave a message, give prep etc.) and should do so if they hear a disturbance or have any other misgivings. However, members of staff should communicate directly with the Houseparent or duty tutor about any matters of concern.

In the normal course of events, male members of staff should not enter girls' Houses. If they are concerned about possible disorder, they should notify a female member of staff or a girl monitor as soon as possible. Only if there is clear evidence that a boy has entered a girls' House or if there is an obvious crisis, should a male member of staff intrude, and then he should if at all possible, be accompanied by a female member of staff or House monitor.

For female members of staff, the above guidelines also apply in reverse.

It is acknowledged that some male members of staff tutor in girls' Houses and vice-versa. Houseparents should offer clear guidance on access to pupils and pupil areas, in accordance with this policy.

Housemothers – by the nature of their role during the daytime – will need to visit pupils who are unwell and confined to bed.

Guidelines for 'Opposite Sex' Tutors

It is perfectly reasonable to expect 'opposite sex' tutors to be present in boarders' areas at certain times; indeed it is a necessary part of fulfilling our duty of care. However, this is a potentially sensitive area and it is essential that we follow appropriate, sensible guidelines to protect boarders and staff. What follows is therefore good practice.

At the beginning of the year the Houseparent must address the House on this matter. Boarders must be informed that there will be times when a tutor of the opposite sex needs to visit their rooms. This will certainly happen during prep times and various times during a weekend duty. However, this would not happen once pupils were getting ready for bed except in an emergency.

In the Prep School Boarding House the Houseparent and all resident staff will, at times, need access to areas occupied by the opposite sex pupils, e.g. during wake-up, bedtime, changing etc.

Boarders must be told of the procedures published below, that it is their responsibility to respond accordingly and always to be dressed appropriately during prep time in order to avoid embarrassment.

If a member of staff is at all unhappy with the conduct of a pupil with regard to this policy, they should report it immediately to the Houseparent and record it.

Procedure

- Boarders will be informed of the member of staff on duty (weekdays and weekends.)
- When visiting a room, the tutor must knock and wait for a response. If there is no response, the tutor knocks a second time. If there is still no response, the tutor should open the door and announce their presence before entering.
- The tutor must never enter a room and close the door behind them. Common practice must be to stand in the doorway. If a tutor needs a longer conversation, this could take place in a communal area or the tutor's office with the door open.
- Staff should be particularly mindful of these procedures at weekends when fewer pupils may be in the House and there is a more relaxed atmosphere.
- It is incumbent on Houseparents to ensure that protocols are in place so that tutors on duty are aware of any pupils who may be ill in bed.
- Please also note that these procedures should apply generally when duty staff visit rooms irrespective of 'opposite sex' or 'same sex'.

When On Duty

There are two particular situations which might give rise to concern:

- One to one encounters between staff and single pupils should, if possible, take place on neutral territory (a public room or area in a boarding House). Pressure of room space may occasionally necessitate such encounters in staff/study bedrooms, but when this occurs, an open door policy prevents misunderstandings. Such encounters should be brief.
- A member of staff of one sex should never be in an area where members of the opposite sex are changing for games or other activities, washing, showering and visiting the washrooms and lavatories, or preparing for bed or having gone to bed. There will be times when this is necessary in the Prep School boarding House.

Staff should only visit dormitories of the other sex during prep and for specific duties, but before bedtime and then only those dormitory areas which include prep work places. These visits should be regular and well publicised.

If a boarder has gone to bed early, e.g. because of sickness, this information must be available for the tutor on duty so that discretion may be exercised by both parties.

Public areas within Houses and House Common Rooms may be visited freely by tutors of either sex when on duty.

Washing/showering and lavatory areas in female boarding Houses should only be visited in direct emergency by a male member of staff or Houseparent and only then with another colleague, if at all possible (and vice versa).

In girls' Houses, where a husband and wife team may operate in 'loco parentis', or where the husband of the Houseparent may be in residence, it is impossible to give an undertaking that they will never be in a girls boarding section of the House or even in the study/dormitory area. However, in order to ensure privacy for the girls, the husband of the husband and wife team should not enter the dormitory areas when the girls are present, other than in dire emergency. In the Senior School, the dormitory area should be the sole concern of the Housemistress (and/or resident female tutor); there will be staff of the opposite sex working in the dormitories in the Prep School House. Tutoring of girls by male teachers should take place in a room set aside for the purpose, or in a common room, which of course must never be locked.

House Monitors

It is incumbent on Houseparents to offer clear instructions as to the role of House Monitors in relationship to House Duties especially with regard to bedtimes and good order at those times.

Finally, staff should act sensibly and responsibly in order to protect themselves from misunderstandings and also in case, as sometimes happens, a pupil develops a dangerous enthusiasm for a member of staff. It is appreciated that the layout of Houses does differ but principles remain the same. The above guidance is offered as a framework in which relationships can be handled in a way consonant with the friendly, intimate and relaxed style of the School.

21. HEALTH AND SAFETY

Our Health and Safety policy reflects the consideration we give to the safeguarding of our children both within the school environment and when away from the School, for example when undertaking School trips and visits.

Risk Assessments are undertaken and reviewed regularly, in respect of site security, risk of children being drawn into terrorism or exposed to extremist behaviour, risk to and from children displaying harmful behaviour.

22. SAFE ENVIRONMENT

The School undertakes appropriate risk assessments and checks in respect of all equipment and of the building and grounds in line with local and national guidance and regulations concerning health and safety.

The School has adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of school hours.

Visitors to the School, for example visiting speakers, theatre groups or curriculum specialists, will be appropriately checked and vetted to ensure they are not linked to extremist groups or promoting extremist or other harmful material.

23. CHALLENGE AND ESCALATION

We recognise that professional disagreements may arise between any agencies and resolving problems is an integral part of co-operation and joint working to safeguard children. As part of our responsibility for safeguarding children, we acknowledge that we must be prepared to challenge each other if we feel that responses to concerns, assessments or the way in which plans are implemented are not safeguarding the child and promoting their welfare.

We are aware of the [WSCP escalation procedures](#) for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interests of safeguarding and promoting the welfare of children.

24. MONITORING AND EVALUATION

The School monitors and evaluates its Safeguarding Children (including Child Protection) Policy and procedures through the following activities:

- Governors visits to the School, including termly meetings of the Governors' Safeguarding and Wellbeing Committee
- completion of the annual safeguarding audit and return to the LA/WSCP, when requested, of the annual safeguarding report to the Governing Body
- through pupil forums and pupil discussions with staff
- scrutiny of data and risk assessments
- regular review of parental concerns and parental questionnaires
- regular review of pupil-specific leisure/common rooms
- scrutiny of the School's single central record of recruitment checks
- monitoring of logs of bullying/racist behaviour incidents
- case file audits undertaken by the DSL and WCSP
- scrutiny of Governing Body minutes
- supervision of staff involved in child protection, which includes the DSL providing the Governor with responsibility for Safeguarding with regular updates as required
- regular review of effectiveness of online filters and online safety.

25. RECOGNISING ABUSE, NEGLECT AND EXPLOITATION

Definitions are taken from [Working Together to Safeguard Children 2026](#) (DfE).

Abuse, neglect and exploitation can occur in many different circumstances and safeguarding issues rarely occur in isolation. Children may experience more than one form of harm at the same time. Harm may occur within or outside the home, within or outside School, in extra-familial contexts and online.

Indicators of abuse, neglect and exploitation are not exhaustive or diagnostic. There may be other explanations for an individual sign or change in behaviour. Staff are not responsible for investigating concerns or determining whether abuse has occurred. Any safeguarding concern should be recorded and reported without delay in accordance with Section 6 of this policy.

Signs and indicators should always be considered in context. No single indicator necessarily establishes that abuse, neglect or exploitation has occurred. Staff should take account of the child's age and developmental stage, SEND, disability, communication needs, health, family circumstances and other relevant factors, while remaining professionally curious and avoiding assumptions that changes in behaviour, mood, attendance or presentation are explained by a child's disability or circumstances.

What Is Abuse?

Abuse is a form of maltreatment of a child. A child may be abused or neglected through the infliction of harm or through a failure to act to prevent harm. Harm may be physical or non-physical and includes the impact on children of witnessing or experiencing the effects of domestic abuse. Children may be abused within their family, in an institutional or extra-familial context, online, or through technology-facilitated abuse. Abuse may be perpetrated by adults or by other children and may occur within teenage relationships or in the context of so-called honour-based abuse or abuse related to faith or belief.

Exploitation may be sexual, criminal, financial or take other forms and may occur online or offline. It commonly involves an imbalance of power and may involve coercion, manipulation, deception or threats. A child may be exploited even where the activity appears consensual. Further information about child sexual and child criminal exploitation is set out in Section 40.

Indicators of Abuse

Caution should be used when referring to lists of signs and symptoms of abuse. Although the signs and symptoms listed below may be indicative of abuse there may be alternative explanations. In assessing

the circumstances of any child, any of these indicators should be viewed within the overall context of the child's individual situation including any disability.

EMOTIONAL ABUSE

Emotional abuse is the persistent emotional or psychological maltreatment of a child so as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Emotional abuse is chronic and cumulative and has a long-term impact. Possible indicators may include significant or persistent changes in emotional state or behaviour, low self-esteem, fearfulness or hypervigilance, social withdrawal, developmental regression, age-inappropriate expectations or control, serious bullying, coercive behaviour or a child reporting being repeatedly humiliated, threatened, rejected or made to feel worthless. These indicators are not diagnostic and should be considered in context.

NEGLECT

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may include failure to provide adequate food, clothing or shelter; protect a child from harm or danger; provide adequate supervision; ensure access to appropriate medical care or treatment; provide suitable education; or respond adequately to a child's basic emotional needs.

There are occasions when nearly all parents find it difficult to cope with the many demands of caring for children. But this does not mean that their children are being neglected. Neglect involves ongoing failure to meet a child's needs.

Changes in attendance, persistent or severe absence and a child not receiving suitable education can be indicators of abuse, neglect or exploitation. In severe and sustained circumstances, failure to secure suitable education may itself constitute neglect. Staff should consider the reasons for absence and the child's individual and family circumstances in accordance with the School's Attendance Policy.

A range of circumstances may affect a family's ability to meet a child's needs, including poverty and housing difficulties, parental ill-health or disability, mental health difficulties, substance misuse and domestic abuse. These circumstances do not in themselves establish neglect. Staff should consider their impact on the individual child, identify unmet needs and seek appropriate help and protection where required.

Common Concerns

With regard to the child, some of the regular concerns are:

- the child's development in all areas including educational attainment
- cleanliness
- health
- children left at home alone and accidents related to this
- taking on unreasonable care for others
- A child undertaking caring responsibilities that are excessive, unsafe or inappropriate for their age or development, or which significantly affect their welfare or education

School staff need to consider both acts of commission (where a parent/carer deliberately neglects the child) and acts of omission (where a parent's failure to act is causing the neglect). This is a key consideration with regard to school attendance where parents are not ensuring their child attend school regularly.

Many of the signs of neglect are visible. However, School staff may not instinctively know how to recognise signs of neglect or know how to respond effectively when they suspect a pupil is being neglected. Children spend considerable time in school so staff have opportunities to identify patterns over time and recognise and respond to concerns about their safety and welfare. All concerns should be recorded and reflected upon, not simply placed in a file.

Possible indicators of neglect may include persistent hunger; poor hygiene or clothing that does not adequately meet the child's needs; untreated or recurring health needs; inadequate supervision; repeated exposure to unsafe circumstances; persistent tiredness; developmental concerns; marked changes in attendance; a child regularly being left alone or with inappropriate caring responsibilities; or a pattern of basic physical, educational or emotional needs remaining unmet. No individual indicator establishes neglect. Staff should record and report concerns and should not attempt to make a clinical or social-work assessment themselves.

PHYSICAL ABUSE

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

Any injury, explanation or pattern of injuries that raises a safeguarding concern must be reported to the DSL or a deputy without delay. Staff must not investigate the cause of the injury themselves. Where a child is in immediate danger or requires urgent medical attention, the appropriate emergency services must be contacted without delay. Possible indicators may include unexplained or recurrent injuries; an explanation that is inconsistent with the injury or with the child's age or developmental stage; injuries in unusual locations or patterns; a child concealing injuries; fear of physical contact or of a particular person; significant changes in behaviour; or a disclosure by the child or another person.

Staff should not ask a child to remove clothing in order to inspect an injury, examine normally covered areas of the body or take photographs of injuries. Staff should follow the recording procedures in Section 6.

SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. It may involve physical contact or non-contact activity, including involving children in sexual images or activity, encouraging sexually inappropriate behaviour, or grooming a child in preparation for abuse. Sexual abuse may occur within families, institutional settings or online, and technology may be used to facilitate offline abuse. Online sexual abuse may include cyber-grooming or coerced self-generated sexual content. Sexual abuse may be perpetrated by adults or other children, and a child of any age or gender can be a victim.

Characteristics Of Child Sexual Abuse

- It is usually planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic.
- Grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent. This can be done in person or via the internet through online platforms, social media, messaging services, gaming environments and other digital technologies.
- Grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives. Again, this can be done in person or via the internet through chatrooms and social networking sites.

Possible indicators may include age- or developmentally unexpected sexual knowledge or behaviour; sexualised behaviour; sudden changes in behaviour, mood or attendance; fear of a particular person or place; secrecy around a new relationship or online contact; self-harm or significant emotional distress; sexual images or messages; a disclosure; or physical/health symptoms that raise a safeguarding concern. Children may communicate abuse indirectly and may not disclose the whole picture at once. The absence of a disclosure does not mean that abuse has not occurred.

Children can sexually abuse other children, both in person and online. Staff must remain alert to child-on-child sexual abuse even where there have been no reports and must follow Section 31 and the School's Child-on-Child Abuse Policy. When considering sexual behaviour between children, factors including age and developmental stage, consent, coercion, power imbalance and exploitation should be considered.

Staff should recognise that abuse and exploitation may occur outside the child's family and home, including within peer groups, School, community locations and online. Further information about extra-familial harm is set out in Section 26.

26. EXTRA-FAMILIAL HARM AND CONTEXTUAL SAFEGUARDING

Safeguarding concerns may arise from circumstances and relationships outside a child's family or home. Children may experience abuse, exploitation or other harm in extra-familial contexts including within peer groups, intimate relationships, school or other educational settings, neighbourhoods and community locations, public spaces and online environments. Harm in one context may also increase vulnerability in another.

Extra-familial harm may include, but is not limited to, child sexual exploitation, child criminal exploitation, serious violence, county lines, trafficking and modern slavery, child-on-child abuse, sexual violence and sexual harassment, harmful behaviour within teenage relationships, coercive control, bullying and discriminatory abuse, radicalisation and other forms of online or technology-facilitated harm. Children may experience several forms of harm at the same time.

All staff should remain alert to changes in a child's behaviour, relationships, attendance, presentation or online activity which may indicate that they are being harmed or exploited outside the home. Staff should consider not only what has happened to a child, but also where, how and with whom the harm may be occurring. Concerns must be recorded and reported without delay in accordance with this policy.

The Designated Safeguarding Lead and deputies will consider the wider context of safeguarding concerns when assessing risk and deciding what action is required. This will include, where relevant, consideration of peer groups and relationships, locations associated with risk, online environments, travel and transport, patterns of absence from education, links with other children who may be at risk, and whether there are concerns about groups or networks of children or adults.

The School recognises that safeguarding responses should not focus solely on changing the behaviour of an individual child where the source of risk exists within a peer group, location, relationship, online environment or wider community. Where appropriate, the School will work with safeguarding partners, children's social care, police and other relevant agencies to share information, assess contextual risks and contribute to action intended to reduce harm within those contexts.

Children affected by extra-familial harm may not recognise themselves as victims or may appear to have chosen or consented to behaviour associated with their exploitation. Apparent consent does not remove the need for safeguarding action where coercion, control, intimidation, manipulation, exploitation or an imbalance of power is present. Staff should approach children with professional curiosity and without blame.

Particular attention will be given to children whose circumstances may increase their vulnerability to extra-familial harm, including children with SEND, children experiencing difficulties with attendance, children who go missing or are absent from education, children in care or previously in care, children experiencing instability at home, and children already known to safeguarding or other services. The presence of

vulnerability does not mean that harm is inevitable and assumptions should not be made about individual children.

The School will consider the child's wishes and feelings when deciding how to respond and will seek to provide appropriate support alongside any protective action. Where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm, a referral will be made to children's social care without delay. Where there is immediate danger or a crime requiring urgent police involvement, the police will be contacted.

Further information about specific forms of extra-familial harm is contained elsewhere in this policy, including Child-on-Child Abuse (Section 31), Modern Slavery (Section 32), Extremism and Radicalisation (Section 33), Online Safety (Section 36), Child Sexual Exploitation and Child Criminal Exploitation (Section 40), and Sharing Nudes and Semi-Nudes (Section 43).

27. MENTAL HEALTH

Bromsgrove School recognises that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. School staff are well placed to observe children day-to-day and identify changes in behaviour, presentation, relationships, attendance or educational engagement which may indicate that a child is experiencing, or is at risk of developing, a mental health problem. Only appropriately trained professionals should attempt to diagnose a mental health condition.

Abuse, neglect, exploitation and other traumatic or adverse experiences can have a lasting impact on a child's mental health, behaviour, relationships, attendance and educational outcomes. Equally, children experiencing mental health difficulties may be more vulnerable to abuse, exploitation or other harm. Staff should not assume that concerning behaviour or emotional distress is explained solely by a child's SEND, disability or other known circumstances.

Possible indicators that a child may require mental health or wellbeing support include significant or persistent changes in mood, behaviour, relationships, attendance, eating or sleeping patterns, self-care, concentration or educational engagement; withdrawal or social isolation; heightened anxiety or distress; self-harm; expressions of hopelessness or suicidal thoughts; or information disclosed by the child, their family or another person. No single indicator necessarily means that a child has a mental health condition. Staff should consider concerns in context and should not attempt to diagnose.

Where a concern relates principally to a pupil's mental health or wellbeing, staff should follow the School's pastoral and wellbeing referral procedures. The School provides support through its pastoral structures, wellbeing teams and the Boarders' Clinic and Wellbeing Hub and works with parents, health services and other external agencies where appropriate. Further information is contained in the School's Wellbeing and Mental Health Policy.

Where a member of staff has a mental health concern about a child that is also a safeguarding concern, or is unsure whether there may be a safeguarding issue, they must act without delay and report the concern to the DSL or a deputy in accordance with this policy. Mental health concerns must not be treated solely as wellbeing or pastoral matters where there is reason to suspect that a child may be at risk of harm.

Some mental health concerns may present an immediate or serious risk to a child's safety, including suicidal thoughts or behaviour, self-harm, serious eating-disorder-related concerns or other circumstances in which a child may be at risk of serious harm. Such concerns must be taken seriously and responded to promptly. Where a child is in immediate danger or requires emergency medical assistance, staff must call 999 and/or arrange emergency medical care without delay. Safeguarding procedures should be followed alongside any urgent health response.

Not every mental health concern is a child protection concern. The School will respond proportionately according to the child's needs and level of risk. Where additional help is required, this may include School-

based or community support, community-based early help, Family Help, specialist health services or statutory safeguarding intervention as appropriate.

When responding to concerns, the School will consider possible underlying or contributing factors including SEND and communication needs, physical health, traumatic or adverse experiences, family circumstances, bullying or child-on-child abuse, online experiences, attendance and other safeguarding concerns. Behaviour which causes concern will not be viewed solely as a disciplinary issue where it may indicate an unmet need, mental health difficulty or safeguarding concern.

The child's wishes and feelings will be sought and taken into account when considering support and safeguarding action, in a manner appropriate to their age, understanding and communication needs. Parents will normally be involved unless doing so would place the child at increased risk of harm, prejudice a safeguarding response or otherwise be contrary to the child's best interests.

28. CHILDREN ABSENT FROM EDUCATION AND CHILDREN MISSING EDUCATION (CME)

The School recognises that absence from education, particularly where it is repeated, prolonged or unexplained, can be a vital warning sign of a range of safeguarding issues, including neglect, child sexual exploitation, child criminal exploitation and county lines. Absence may also increase existing safeguarding risks for children already known to children's social care or other services.

A child missing education (CME) is a child of compulsory school age who is not a registered pupil at a school and is not receiving suitable education otherwise than at school. A pupil who remains registered at the School but is absent from education is not necessarily CME. However, repeated, prolonged or unexplained absence can indicate safeguarding concerns and may increase the risk of a child becoming missing from education.

Not every absence is a safeguarding concern. The School will consider the reason for absence, its duration and frequency, emerging patterns and the child's individual circumstances and vulnerabilities when deciding what action is required. Staff should remain alert to patterns which may indicate a safeguarding concern even where individual absences have been explained or authorised.

Where a pupil is unexpectedly absent and no satisfactory reason has been provided, the School will make prompt enquiries to establish the reason for absence and, where necessary, the child's whereabouts and welfare. Parents will normally be contacted on the first day of unexplained absence and emergency contacts used where necessary. The School will maintain more than one emergency contact number for each pupil wherever reasonably possible and more than two for children in the Early Years Foundation Stage.

Where the School is unable to establish the reason for absence or the child's whereabouts, the level of concern will be assessed having regard to the child's circumstances, vulnerabilities, known safeguarding risks and the nature and pattern of absence. Appropriate action may include further contact attempts, liaison with known professionals, a home visit in accordance with the Home Visits Policy, consultation with the DSL, referral to children's social care and/or contact with the police where necessary. A home visit or other School enquiry will not delay a referral to statutory services where a child may be at risk of significant harm or in immediate danger.

Where a child is known to children's social care, has a social worker, is subject to a child protection plan or is looked after, unexplained or concerning absence will be responded to promptly and relevant professionals will be informed in accordance with the child's plan, known risks and local arrangements.

The School will monitor attendance and absence for emerging patterns and safeguarding concerns, irrespective of whether individual absences are authorised or unauthorised. Persistent and severe absence will be addressed in accordance with the Attendance Policy, with safeguarding considered alongside barriers to attendance and educational support.

Where a pupil is expected to leave the School, the School will take reasonable steps to establish the child's destination and the education they will receive. A pupil will not be removed from the admission

register merely because they have stopped attending or their whereabouts are unknown. The School will comply with the School Attendance (Pupil Registration) (England) Regulations 2024, current statutory CME guidance and local authority notification requirements when adding or removing pupils from the admission register.

Where a child meets, or may meet, the definition of CME, the School will notify and work with Worcestershire County Council's relevant attendance/CME service in accordance with current local procedures. The School will also make other attendance-related notifications required under current statutory and Worcestershire arrangements.

Elective home education is distinct from CME. Where parents indicate that they intend to withdraw a pupil for elective home education, the School will follow the applicable registration and local authority notification requirements and will consider and respond separately to any existing or emerging safeguarding concerns.

Where a pupil transfers to another school, relevant safeguarding information and records will be transferred securely and in accordance with KCSIE 2026 and the procedures elsewhere in this policy. Where a boarder is unexpectedly absent or missing, the relevant boarding and missing child procedures will be followed immediately.

Detailed procedures for registration, monitoring and responding to absence are set out in the School's Attendance Policy and relevant Supervision and Missing Child Procedures. This section should also be read alongside the Department for Education's statutory guidance Children Missing Education and Working Together to Improve School Attendance, and current Worcestershire attendance/CME procedures.

29. PRIVATE FOSTERING ARRANGEMENTS

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

It applies to children under the age of 16 or aged under 18 if the child is disabled. Children who are looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases so it is important that the School is alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's social care as soon as possible. If we become aware of a private fostering arrangement, we will check that children's social care have been informed.

30. HOMELESSNESS

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL, (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise or progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and discussion with the Local Housing

Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the duties: [Homelessness Reduction Act Factsheets](#). The duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases we will consider homelessness in the context of children who live with their families, and intervention will be on that basis. However, it is recognised that in some cases children aged 16 years and above may be living independently from their parents or guardians, for example, following exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these young people and the DSL or DDSL should ensure appropriate referrals are made based on the child's circumstances. The Department for Education and the Ministry of Housing, Communities & Local Government published statutory guidance on the provision of accommodation for 16 and 17-year olds who may be homeless and/or require accommodation: <https://www.gov.uk/government/publications/provision-of-accommodation-for-16-and-17-year-olds-who-may-be-homeless-and-or-require-accommodation>.

31. CHILD-ON-CHILD ABUSE, INCLUDING HARMFUL SEXUAL BEHAVIOUR, SEXUAL HARASSMENT AND SEXUAL VIOLENCE

Bromsgrove School recognises that children are capable of abusing other children and that child-on-child abuse can occur inside or outside School and online. All staff will maintain an attitude of 'it could happen here' and understand that the absence of reported incidents does not mean that abuse is not taking place.

The School has a zero-tolerance approach to child-on-child abuse. Abuse, sexual harassment and sexual violence are never acceptable and will not be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. Staff will challenge inappropriate and abusive behaviour and will not develop unnecessarily high thresholds before taking safeguarding action.

Child-on-child abuse can take many forms and may include bullying, including cyberbullying and prejudice-based or discriminatory bullying including faith-based abuse; abuse within intimate personal relationships between children; physical abuse; physical assault or threatened harm involving a weapon; harmful sexual behaviour, sexual violence and sexual harassment; consensual and non-consensual making or sharing of nudes and semi-nudes, including digitally manipulated or AI-generated imagery; causing another person to engage in sexual activity without consent; upskirting; and initiation or hazing-type violence and rituals. This list is not exhaustive.

Harmful sexual behaviour (HSB), sexual harassment and sexual violence can occur between children of any age and sex, between individuals or groups, face-to-face or online. Harmful sexual behaviour exists on a continuum and may include developmentally inappropriate, problematic, abusive or violent behaviour. The School recognises the importance of identifying concerning behaviour early and of recognising the potential for behaviour, including misogynistic behaviour, to escalate if it is not challenged and addressed.

All reports and concerns about child-on-child abuse will be taken seriously. A child who reports abuse will be reassured that they are being taken seriously, will be supported and kept safe and will never be made to feel that they are creating a problem by reporting abuse or be made to feel ashamed. Abuse which occurs online or outside School will be treated with the same seriousness as abuse occurring on School premises.

Children may disclose abuse directly or indirectly, including through a friend, changes in behaviour or other signs of distress. Staff should act on concerns and should not wait for a child to make a formal disclosure. Any concern about child-on-child abuse must be reported without delay to the DSL or a deputy

and recorded in accordance with the School's safeguarding procedures. Where a child is in immediate danger or at risk of serious harm, children's social care and/or the police will be contacted without delay.

The DSL or deputy will consider each case individually and in accordance with Part Five of Keeping Children Safe in Education 2026. Decisions will take account of the nature and seriousness of the behaviour, the ages and developmental stages of the children involved, any power imbalance, coercion or exploitation, the wishes and feelings of the child who has been harmed, the wider context in which the behaviour occurred and the needs and safety of all children involved. Appropriate action may include managing the matter within School, additional help or Family Help, referral to children's social care and/or referral to the police.

The School will consider and provide appropriate support for the child who has been harmed, the child alleged to have caused harm and any other children affected. Where required, proportionate risk assessments and safety plans will be put in place and kept under review. The needs of a child who has displayed harmful behaviour will be considered alongside the need to protect other children from further harm.

The School recognises that some children may be more vulnerable to child-on-child abuse or may experience additional barriers to reporting, including children with SEND or communication difficulties and children who are targeted because of actual or perceived protected or personal characteristics. Safeguarding responses will be child-centred and will take account of each child's individual needs and circumstances.

The School provides clear and accessible ways for pupils to report concerns and seeks to create a culture in which children feel confident that concerns will be listened to and taken seriously. Preventative education is provided through the curriculum, including PSHE and Relationships and Sex Education, and through the wider pastoral programme to promote respectful relationships, consent, equality and safe behaviour online and offline.

Detailed procedures for recognising, assessing and responding to child-on-child abuse, including harmful sexual behaviour, sexual harassment and sexual violence, are set out in the School's Child-on-Child Abuse Policy. The School will also follow the relevant procedures in Part Five of Keeping Children Safe in Education 2026 and current local safeguarding arrangements.

32. MODERN SLAVERY AND HUMAN TRAFFICKING

Modern slavery is a form of child abuse and includes human trafficking, slavery, servitude and forced or compulsory labour. Exploitation associated with modern slavery can take many forms, including sexual exploitation, criminal exploitation, forced labour, domestic servitude and other forms of exploitation. Different forms of abuse and exploitation may overlap, and a child may experience more than one form of harm at the same time.

Children who are victims of modern slavery or trafficking may not recognise themselves as victims and may appear to have consented to aspects of their exploitation. Apparent consent does not prevent a child from being a victim of exploitation or trafficking. Children may be exploited by adults or by other children, including children who may themselves be experiencing exploitation.

Staff should be alert to indicators that a child may be experiencing modern slavery, trafficking or exploitation. These may include unexplained changes in behaviour, relationships or attendance; going missing from home, care or education; unexplained money, gifts or possessions; association with individuals or groups who appear to exercise control over the child; being required to perform work, criminal or sexual activity; restrictions on the child's movement or communication; fearfulness or reluctance to explain their circumstances; or signs of child criminal or sexual exploitation. Indicators are not exhaustive and staff should remain professionally curious.

Any concern that a child may be a victim of modern slavery, human trafficking or exploitation must be treated as a safeguarding concern and reported without delay to the DSL or a deputy. The School will follow its child protection procedures and, where appropriate, make or support referrals to children's

social care and/or the police. Where a child is in immediate danger, the police must be contacted without delay.

The National Referral Mechanism (NRM) is the United Kingdom's framework for identifying and supporting potential victims of modern slavery and human trafficking. Where there are reasonable grounds to believe that a child may be a victim, the DSL will liaise with children's social care, the police or another authorised First Responder Organisation so that an appropriate referral to the NRM can be made. A child does not need to consent to an NRM referral.

The School will continue to safeguard and support the child while any referral or assessment is underway and will work with children's social care, police and other relevant agencies. Where applicable, this may include working with an Independent Child Trafficking Guardian or other specialist service. An NRM referral does not replace the School's ordinary child protection responsibilities or the need to make an immediate referral to statutory safeguarding services where required.

Modern slavery and trafficking may overlap with other safeguarding concerns addressed elsewhere in this policy, particularly extra-familial harm, children absent from education, child criminal exploitation, child sexual exploitation, county lines and child-on-child abuse.

33. EXTREMISM AND RADICALISATION AND THE PREVENT DUTY

Protecting children from the risk of radicalisation into terrorism is part of the School's wider safeguarding responsibilities. Under section 26 of the Counter-Terrorism and Security Act 2015, the School has a duty to have due regard to the need to prevent people from being drawn into terrorism (the Prevent duty). The School has regard to current Prevent duty guidance and Keeping Children Safe in Education 2026.

Radicalisation is the process by which a person comes to legitimise support for, or the use of, terrorist violence. There is no single profile of a person who may be susceptible to radicalisation and no single pathway to terrorism. Children may be exposed to radicalising influences through a range of circumstances, including online activity, social media, peer or family relationships and contact with individuals, groups or material which promotes terrorist or extremist ideology.

Staff should be alert to changes in behaviour, relationships, language, interests or online activity which, when considered in context, may indicate that a child is susceptible to radicalisation. Indicators should not be considered in isolation and staff must not make assumptions based on a child's religion, ethnicity, culture, political views or other aspects of their identity or background. Expressions of controversial, political or religious views do not in themselves mean that a child is being radicalised.

Any concern that a child may be susceptible to radicalisation into terrorism must be treated as a safeguarding concern and reported without delay to the DSL or a deputy. Staff should record what they have seen or heard accurately and should not attempt to determine for themselves whether a child meets the threshold for Prevent intervention. Where necessary, any member of staff may make a referral or seek assistance directly in accordance with the safeguarding procedures in this policy.

The DSL or deputy will consider the concern in its wider safeguarding context and follow the 'Notice, Check, Share' approach. Where there is concern that a child may be on a pathway that could lead to terrorism, the School will make a Prevent referral using the current national and local referral process and will liaise with the police, local authority and other relevant partners as appropriate. If there is an immediate threat to life or risk of serious harm, or information indicating that a serious criminal offence may be imminent, the police will be contacted immediately.

Prevent does not replace other safeguarding processes. Where a child may also be experiencing abuse, neglect, exploitation or another safeguarding concern, the School will consider and make any necessary referral to children's social care or other relevant services alongside the Prevent referral. Information will be shared where necessary and proportionate to protect the child and others.

Where a Prevent referral is assessed as appropriate for consideration by Channel, the School will cooperate with the multi-agency process and contribute relevant information and support where

appropriate. Channel is a voluntary multi-agency programme which provides tailored support to people who are susceptible to radicalisation into terrorism.

The School will take a proportionate and risk-based approach to the Prevent duty. This includes assessing the risk of pupils being drawn into terrorism, including through online activity; ensuring appropriate filtering and monitoring arrangements; providing staff with appropriate Prevent training; working with relevant safeguarding and Prevent partners; maintaining appropriate arrangements for visiting speakers; and providing a broad and balanced curriculum which develops pupils' ability to think critically, recognise harmful influences and challenge extremist and terrorist narratives.

The School provides opportunities for pupils to discuss sensitive and controversial issues safely and promotes the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. The School recognises the importance of distinguishing between lawful expression, debate and disagreement and circumstances which give rise to a safeguarding concern about radicalisation into terrorism.

Detailed arrangements for the School's Prevent risk assessment, staff training, curriculum, visiting speakers and Prevent referral procedures are contained in the School's Preventing Extremism and Radicalisation Policy.

34. PREJUDICE-BASED HARM

Racism, faith-based prejudice and other forms of discrimination are dealt with according to the School's Pupil Conduct and Behaviour Policy and associated procedures, and the Anti-Bullying Policies. The School acknowledges that repeated incidents or a single serious incident may lead to consideration under child protection procedures. We maintain a log of prejudice-based incidents in School. Racism, faith-targeted abuse and other discriminatory behaviour can significantly affect a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice.

35. ANTI-BULLYING

Our position on anti-bullying is set out in separate policies for each School and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. All incidents of bullying, including cyber-bullying, sexting, homophobic, gender-related, prejudice-based and discriminatory (including racist) bullying, will be dealt with in accordance with our anti-bullying policy. We recognise that children with special needs and/or disabilities are more susceptible to being bullied. We maintain a log of bullying incidents in School.

We recognise that there will be occasions when bullying incidents will fall within child protection procedures or may be deemed criminal activity and that it may be necessary to report the concerns to the Family Front Door or to the police.

36. ONLINE SAFETY

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate, or harmful content such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation and conspiracy theories
- contact: being subjected to harmful online interaction with other users such as child on child-on-child pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- conduct: online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography including digitally manipulated or AI-generated imagery,

- deepfakes and 'deep nudes'); sharing other explicit images, AI-generated material; and online bullying
- commerce: risks as online gambling, inappropriate advertising, phishing and or financial scams.

The School recognises that developments in generative artificial intelligence (AI) create additional safeguarding risks and opportunities. These may include exposure to harmful or inaccurate content; AI-generated or manipulated sexual imagery, including deepfakes and 'deep nudes'; impersonation, bullying, grooming, fraud and misinformation; inappropriate disclosure of personal or sensitive information; and risks associated with AI chatbots or other systems which simulate human interaction. The School will consider these risks as part of its online safety, safeguarding, curriculum and filtering and monitoring arrangements.

Filtering and monitoring provision will be reviewed at least once every academic year and following any significant change or safeguarding incident where appropriate. The review will include checks that filtering and monitoring operate effectively across relevant School-managed devices, systems and locations, including consideration of emerging risks associated with generative AI. Records of these reviews and checks will be maintained.

The School recognises that pupils may attempt to circumvent filtering and monitoring arrangements through personal mobile data, hotspots, VPNs, proxy services or other technologies. Such risks will be considered within online safety education, technical controls and the School's acceptable-use arrangements.

The use of mobile phones and other communication or smart technology during the School day is governed by the School's relevant behaviour, mobile-device and acceptable-use arrangements, which have regard to current statutory guidance on mobile phones in schools.

Access to filtering and monitoring alerts, reports and associated data will be restricted to appropriately authorised and trained personnel. Monitoring will be undertaken lawfully, proportionately and transparently, with appropriate arrangements for retention, escalation and safeguarding response.

To ensure the online safeguarding of members of our school community it is important that all members of that community work together to develop safe and responsible online behaviour, learning from each other and from good practice elsewhere, reporting inappropriate online behaviour, concerns, and misuse as soon as these become apparent. All staff should be aware of the procedures that need to be followed in the event of an online safety incident taking place and the need to immediately report those incidents.

All staff are able to recognise the additional risks that children with SEN and disabilities face online, for example from online bullying, grooming and radicalisation and all staff have the capability to support SEND children to stay safe online.

Members of the Online Safety Group, made up of the Designated Safeguarding Leads, the Deputy Head (Teaching), and the Network Manager, assist the DSL with:

- the production/review/monitoring of the school filtering policy and requests for filtering changes
- mapping and reviewing the online safety education provision – ensuring relevance, breadth, progression and coverage
- reviewing network/filtering/monitoring/incident logs, where possible
- encouraging the contribution of learners to staff awareness, emerging trends and the school online safety provision
- consulting stakeholders – including staff/parents/carers about the online safety provision
- monitoring improvement actions identified through use of the 360-degree safe self-review tool.

Curriculum Leads work with the DSLs to develop a planned and coordinated online safety education programme. This is provided through:

- RSE/PHSE programmes
- assemblies and pastoral programmes

- relevant national initiatives and opportunities e.g. Safer Internet Day and Anti-Bullying Week
- age-appropriate education about the safe, responsible and critical use of generative AI, including recognising AI-generated or manipulated content, protecting personal information, checking the reliability of AI-generated information and knowing when to seek help from a trusted adult.

School staff ensure that:

- they have an awareness of current online safety matters/trends and of the current school policy and practices
- they understand that online safety is a core part of safeguarding
- they have read the current IT Acceptable Use and Security Policy and follow its guidance
- they immediately report any suspected misuse or problem to the DSL for investigation/action, in line with the School's safeguarding procedures
- online safety issues are embedded in all aspects of the curriculum and other activities
- ensure learners understand and follow the acceptable use agreements, have a good understanding of research skills, and the need to avoid plagiarism and to uphold copyright regulations
- they supervise and monitor the use of digital technologies, mobile devices, cameras, etc., in lessons and other school activities (where allowed) and implement current policies regarding these devices
- in lessons where internet use is pre-planned learners are guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches
- where lessons take place using live-streaming or video-conferencing, there is regard to national safeguarding guidance and local safeguarding policies (NB the guidance contained in the [SWGfL Safe Remote Learning Resource](#)).
- there is a zero-tolerance approach to incidents of online-bullying, sexual harassment, discrimination, hatred etc.

NS Optimum (NSO), the School's IT support contractor, ensures that:

- they work effectively in line with school policy
- the School's technical infrastructure is secure and is not open to misuse or malicious attack
- the School meets (as a minimum) the required online safety technical requirements as identified by the [DfE Meeting Digital and Technology Standards in Schools and Colleges](#)
- there is clear, safe, and managed control of user access to networks
- they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- the use of technology is regularly and effectively monitored in order that any misuse/attempted misuse can be reported to the DSL/Bursar for investigation and action
- the filtering policy is applied and updated on a regular basis and its implementation is not the sole responsibility of any single person
- monitoring systems are implemented and regularly updated as agreed in School policies

The Online Safety Group and NSO review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on e-security is available from the National Education Network (<https://www.nen.gov.uk/>). In addition, we have regard to the cyber security standards for schools and colleges. (<https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges>). Broader guidance on cyber security including considerations for Governors and trustees can be found in the National Cyber Security Centre's cyber security training for school staff (<https://www.ncsc.gov.uk/section/education-skills/schools>).

The School and NSO ensure that the required filtering and monitoring standards are met and keep our compliance with them under review along with our IT support staff and service providers. The Prevent duty Departmental advice for schools and childcare providers and Home Office additional guidance on filtering and monitoring can be found at: UK Safer Internet Centre: "appropriate" filtering and monitoring. <https://www.saferinternet.org.uk/advice-centre/teachers-and-school-staff/appropriate-filtering-and-monitoring>. Lightspeed Systems are used to filter and monitor our systems.

The South West Grid for Learning (swgfl.org.uk) tool is used to check whether the School's filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse and Terrorist Content).

Learners:

- are responsible for using the school digital technology systems in accordance with the learner acceptable use agreement and relevant policies (this includes personal devices, where allowed)
- should understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- should know what to do if they or someone they know feels vulnerable when using online technology
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the School's acceptable use of IT agreement covers their actions out of school, if related to their membership of the School.

Pupils are expected to use their own mobile devices responsibly with due regard to safeguarding matters. We understand the fact that many children have unlimited and unrestricted access to the internet via personal mobile phone network connections. This access means some children, whilst at School, are able to sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.

The School will take every opportunity to help parents and carers understand these issues through:

- providing them with a copy of the learners' acceptable use agreement
- parents'/carers' evenings, newsletters, website, social media and information about national/local online safety campaigns and literature.

Parents and carers are encouraged to support the School in:

- reinforcing the online safety messages provided to learners in School
- the safe and responsible use of their children's personal devices in School (where this is allowed).

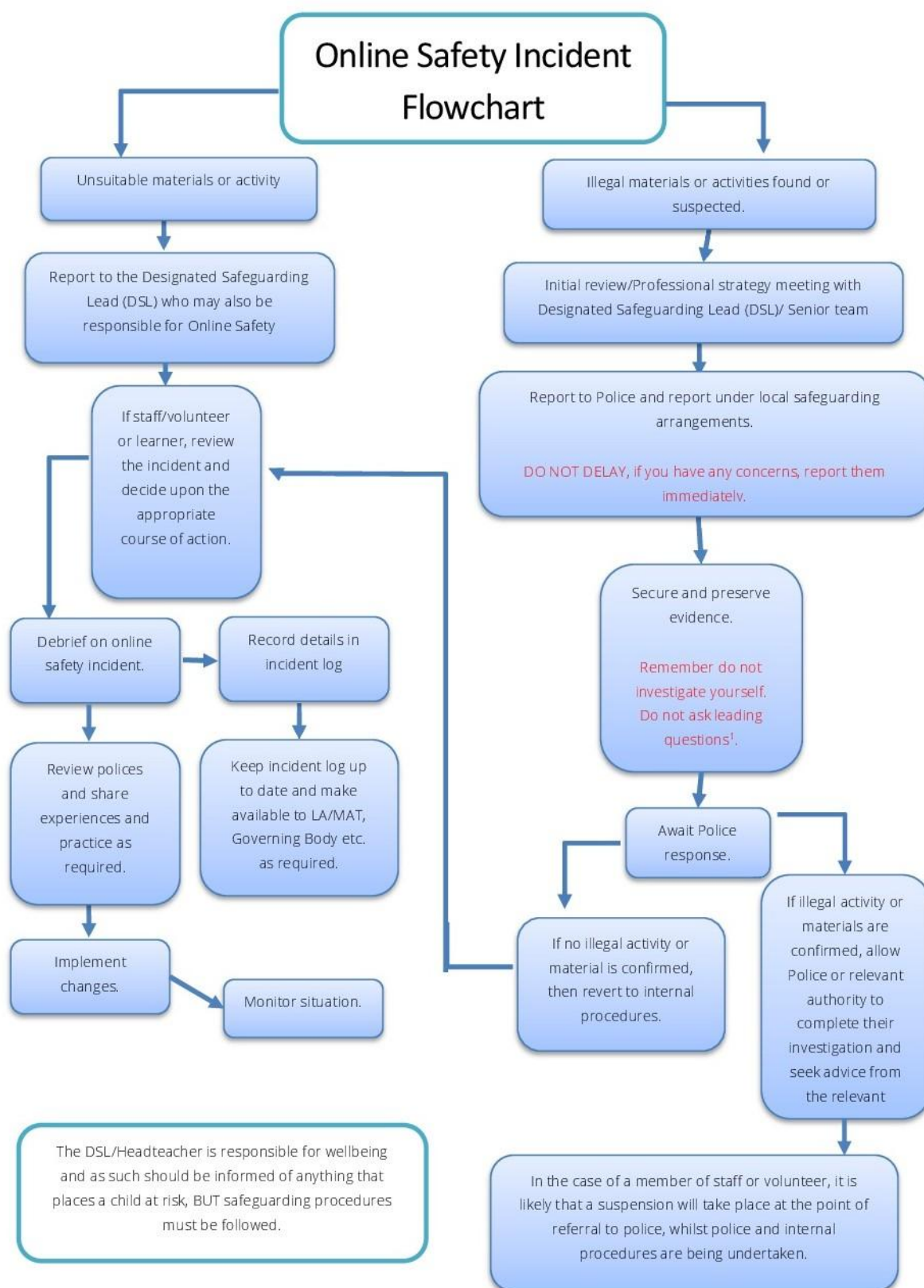
Reporting And Responding To Online Safety Concerns

The School takes all reasonable precautions to ensure online safety for all school users but recognises that incidents may occur inside and outside of the school (with impact on the school) which will need intervention. The School will ensure:

- there are clear reporting routes which are understood and followed by all members of the school community which are consistent with the School's safeguarding procedures, and with the whistleblowing, complaints and managing allegations policies.
- all members of the school community will be made aware of the need to report online safety issues/incidents
- reports will be dealt with as soon as is practically possible once they are received
- the Designated Safeguarding Lead and other responsible staff have appropriate skills and training to deal with online safety risks.
- if there is any suspicion that the incident involves any illegal activity or the potential for serious harm, the incident must be escalated through the agreed school safeguarding procedures, this may include:
 - non-consensual images and image-sharing including images generated by artificial intelligence
 - self-generated images
 - terrorism/extremism
 - hate crime/ abuse
 - fraud and extortion
 - harassment/stalking/threatening communication
 - child sexual abuse material (CSAM)

- child sexual abuse material generated by artificial intelligence ([Experts share key guidance on AI-generated child abuse material](#))
 - child sexual exploitation/grooming
 - extreme pornography
 - sale of illegal materials/substances
 - cyber or hacking offences under the Computer Misuse Act
 - copyright theft or piracy
 - cyber flashing
 - epilepsy trolling
 - encouraging serious self-harm
- any concern about staff misuse will be reported to the Head, unless the concern involves the Headteacher, in which case the complaint is referred to the Chair of Governors and the local authority
 - where there is no suspected illegal activity, devices may be checked using the following procedures:
 - one or more senior members of staff should be involved in this process. This is vital to protect individuals if accusations are subsequently reported.
 - conduct the procedure using a designated device that will not be used by learners and, if necessary, can be taken off site by the police should the need arise (should illegal activity be subsequently suspected). Use the same device for the duration of the procedure.
 - ensure that the relevant staff have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
 - record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed, and attached to the form
 - If a concern has substance then appropriate action will be required and could include the following:
 - internal response or discipline procedures
 - involvement by local authority
 - police involvement and/or action
 - it is important that those reporting an online safety incident have confidence that the report will be treated seriously and dealt with effectively
 - there are support strategies in place e.g., peer support for those reporting or affected by an online safety incident
 - incidents should be logged
 - relevant staff are aware of external sources of support and guidance in dealing with online safety issues, e.g. local authority; police; Professionals Online Safety Helpline; Reporting Harmful Content; CEOP.
 - learning from the incident (or pattern of incidents) will be provided to:
 - the Online Safety Group for consideration of updates to policies or education programmes and to review how effectively the report was dealt with
 - staff, through regular briefings
 - learners, through assemblies/lessons
 - parents/carers, through newsletters, School social media, website
 - governors, through regular safeguarding updates
 - local authority/external agencies, as relevant

The following flowchart is available to staff to support the decision-making process for dealing with online safety incidents.



It is more likely that the School will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour/disciplinary procedures.

37. CYBERCRIME

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

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

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the Designated Safeguarding Lead (or a deputy) will consider referring into the Cyber Choices programme and work with local/regional policing when required. See <https://www.nationalcrimeagency.gov.uk/cyber-choices> and <https://www.ncsc.gov.uk/> for more information.

38. LOOKED AFTER CHILDREN AND PREVIOUSLY LOOKED AFTER CHILDREN

The most common reason for children becoming looked after is as a result of abuse or neglect. The School ensures that staff have the necessary skills, knowledge and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or subject to an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They also have information about the child's care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Local Authority's Virtual Head for children in care and previously looked after children.

We recognise that a previously looked after child potentially remains vulnerable and therefore ensure that all staff have the skills, knowledge and understanding to keep previously looked after children safe.

The designated teacher for looked after children and previously looked after children will receive updated training for working with this group of children.

The DSL will obtain details of the local authority designated person appointed to guide and support each care leaver and will liaise with them as necessary regarding any issues of concern affecting the care leaver.

39. CHILDREN WITH ADDITIONAL VULNERABILITIES

We recognise that children with additional needs or whose living arrangements may mean that they are more vulnerable to harm (for example, children with special educational needs, disabilities or certain health conditions, and children in public care or privately fostered children) can face additional safeguarding challenges both online and offline. There are additional barriers when recognising abuse and neglect in this group of children.

These additional barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- no single point of contact available for the School regarding a child who could have a number of care-givers and involved professionals

- being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- a disproportional impact from behaviour such as bullying without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers which can lead to over reliance on parental accounts and interpretations
- Cognitive understanding, e.g. being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School, or not understanding the consequences of doing so

It is essential that the School knows who shares parental responsibility for children and has effective relationships with partner agencies in relation to these children. We will ensure that staff have sufficient knowledge and guidance so that they are aware of the additional challenges faced by these children and the impact of their additional vulnerabilities. Close liaison with the SENCO occurs in reports of abuse involving children with SEND.

We consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place, availing ourselves of support and guidance such as:

- SEND Code of Practice 0 to 25 years (<https://www.gov.uk/government/publications/send-code-of-practice-0-to-25>)
- Supporting pupils with medical conditions at school (<https://www.gov.uk/government/publications/supporting-pupils-at-school-with-medical-conditions-3>)
- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS): SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. (<https://www.worcestershire.gov.uk/sendiass>)
- Mencap: represents people with learning disabilities, with specific advice and information for people who work with children and young people (<https://www.mencap.org.uk/>).
- [Children with special educational needs and disabilities \(SEND\) | NSPCC Learning](#)
- [Safeguarding d/Deaf and disabled children and young people | NSPCC Learning](#)

40. CHILD SEXUAL EXPLOITATION (CSE) AND CHILD CRIMINAL EXPLOITATION (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim 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. CSE and CCE can affect children, both male and female, and can include children who have been moved (trafficked) for the purpose of exploitation.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

Child sexual exploitation may be perpetrated by an individual or by groups or networks of individuals. Group-based child sexual exploitation involves two or more individuals who are known to, or associated with, one another and who are involved in or facilitate the sexual exploitation of children. Groups may be organised or loosely connected, and perpetrators or facilitators may be adults or children.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter into, or remain involved in, sexually exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face-to-face and it can happen online. It can also occur between young people.

Children and young people can be unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. It may also be linked to child trafficking.

The School addresses the risks of sexual exploitation in the PSHE and SRE curriculum. A common feature of sexual exploitation is that the child often does not recognise the coercive nature of the relationship and does not see themselves as a victim. Furthermore the experiences of boys and girls can be different. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to having sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship, i.e. there can be abuse in intimate personal relationships between peers. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

The definition and further guidelines can be found in the DfE document [Child sexual exploitation - Definition and a guide for practitioners](#).

In all its forms, CSE is child abuse and should be treated as a child protection issue.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims (particularly that of older children) is not always recognised by adults and professionals, and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

CCE may also involve children being exploited to move or launder money, including through bank accounts, payment services or cryptocurrency accounts. Children may also be coerced, compelled or deceived into concealing drugs or other prohibited items on or within their bodies.

Child criminal exploitation is recognised in law as a distinct form of exploitation. Staff should understand that a child's involvement in offending behaviour does not remove their entitlement to a safeguarding response or mean that they have freely chosen that behaviour. Children who appear to be causing harm, committing offences, recruiting other children or facilitating exploitation may themselves be experiencing exploitation. All children involved should receive an appropriate safeguarding response, with consideration given both to the risk they may pose to others and to the harm they may be experiencing themselves.

Staff must be alert to the risk of adultification, whereby a child may be perceived or treated as older, more responsible or less vulnerable than they are. This can result in signs of exploitation being mistakenly interpreted as deliberate offending or lifestyle choice rather than as indicators that the child may need protection.

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

Both sexual and criminal exploitation may be facilitated wholly or partly online, including through social media, messaging platforms, gaming environments and other digital technologies. Online contact may be used to identify, groom, manipulate, threaten, control or recruit children and may lead to harm occurring offline.

CSE and CCE may involve trafficking and modern slavery. Where this is suspected, the procedures in Section 32 should also be followed, including consideration of the National Referral Mechanism through an authorised First Responder.

County Lines

'County Lines' is where children and young people are being exploited and drawn into drug-related activity by criminal gangs, groups or individuals. Typically, the gang exploits young or vulnerable people to store and/or supply drugs, move cash and to secure the use of homes belonging to vulnerable adults. This may include taking over or using another person's home for criminal activity, sometimes referred to as 'cuckooing' or home takeover. There is a crossover between CSE and County Lines and young people are sometimes required to offer sex in order to pay off perceived debts. Concerns about young people being possibly involved should be passed to the DSL who will refer to police and the Family Front Door.

Staff should understand the possible impact of exploitation on criminal behaviour (i.e. that this behaviour may not be consensual). They should be careful in their use of language when discussing pupils, being aware not to assume or imply that such behaviour is consensual.

The Home Office have published a '[Child exploitation toolkit](#)' which is aimed at staff working to safeguard children and young people under the age of 18 from sexual and criminal exploitation.

Possible Indicators and Factors Which May Increase Vulnerability

Any child can be exploited. Certain circumstances may increase vulnerability but should never be treated as predictive of exploitation or used to stereotype children or families. The following are typical **vulnerabilities in children prior to abuse**:

- living in a chaotic or dysfunctional household (including parental substance use, domestic violence, parental mental health issues, parental criminality)
- history of abuse (including familial child sexual abuse, risk of forced marriage, risk of so-called 'honour'-based violence, physical and emotional abuse and neglect)
- recent bereavement or loss
- gang association either through relatives, peers or intimate relationships
- attending school with young people who are sexually exploited
- learning disabilities
- unsure about their sexual orientation or unable to disclose sexual orientation to their families
- friends with young people who are sexually exploited
- homeless
- lacking friends from the same age group
- living in a gang neighbourhood
- living in residential care
- living in hostel, bed and breakfast accommodation or a foyer
- low self-esteem or self-confidence
- young carer

Signs and behaviour of children who **may be being sexually exploited**:

- missing from home or care
- physical injuries
- drug or alcohol misuse

- involvement in offending
- repeat sexually-transmitted infections, pregnancy and terminations
- absent from school
- evidence of sexual bullying and/or vulnerability through the internet and/or social networking sites
- estranged from their family
- receipt of gifts from unknown sources
- recruiting others into exploitative situations
- poor mental health
- self-harm
- thoughts of or attempts at suicide

Signs and behaviour of children who **may be being criminally exploited**:

- appearing with unexplained gifts or new possessions
- associating with other young people involved in exploitation
- suffering from changes in emotional well-being
- misuse of drugs and alcohol
- missing for periods of time or regularly come home late and
- regularly missing school or not taking part in education.

The presence of one or more indicators does not establish that exploitation is occurring, and the absence of recognised indicators does not mean that a child is safe. Staff should consider the child's circumstances and patterns of behaviour in context, remain professionally curious and report concerns in accordance with this policy.

The School's dedicated lead person with responsibility for implementing local guidance in respect of child sexual and criminal exploitation is the DSL.

The DSL must ensure that all staff are aware of signs and symptoms of CSE and CCE and know that these must be reported and recorded as child protection concerns. The DSL must use the [Worcestershire GETSAFE online portal](#) for dealing with issues of CSE and CCE.

All staff, volunteers and governors are made aware of the indicators of CSE and CCE, the fact that the victim may have been sexually exploited even if the sexual activity appears consensual, and that it does not always involve physical contact but can occur through the use of technology. All concerns of child sexual exploitation and child criminal exploitation are reported immediately to the DSL. Knowing what to look out for is vital in the early identification of abuse and neglect and specific safeguarding issues such as CSE and CCE so that staff are able to identify cases of children who may be in need of universal or community-based early help, Family Help, child protection arrangements or other multi-agency plans or protection.

41. DOMESTIC ABUSE

Domestic Abuse is 'any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality'. Abuse can be direct or indirect (e.g. through a child). The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

We recognise that exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships as well as in the context of their home life.

We will ensure that our pupils are educated to ensure they understand what a healthy relationship looks like, for example by using resources from the [WCC Domestic Abuse and Sexual Violence website](#).

All concerns regarding Domestic Abuse will be reported to the DSL, who will ensure that appropriate support is available to the young people and make referrals to the Family Front Door where the threshold for social care intervention is met.

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

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at some and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

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

All concerns regarding Domestic Abuse will be reported to the DSL, who will ensure that appropriate support is available to the young people and make referrals to the Family Front Door where the threshold for social care intervention is met.

Where a child is identified as at high risk of being a victim of domestic abuse, the School will consider a MARAC (multi agency risk assessment conference) referral. This is to share information and establish a multi-agency action plan to support the victim and to make links with other public protection procedures, particularly safeguarding children. MARAC does not replace a referral to children's social care.

The impact of domestic abuse on children and young people can be wide-ranging and may include effects in any or all of the following areas:

Physical

Children and young people can be hurt either by trying to intervene and stopping the violence or by being injured themselves by the abuser. They may develop self-harming behaviour or eating disorders. Their health could be affected, as they may not be being cared for appropriately. They may have suicidal thoughts or try to escape or blank out the abuse by using drugs, alcohol or by running away.

Sexual

There is a high risk that children and young people will be abused themselves where there is domestic abuse. In homes where living in fear is the norm, and situations are not discussed, an atmosphere of secrecy develops and this creates a climate in which sexual abuse could occur. In addition to this, children and young people may sometimes be forced to watch the sexual abuse of their mother/carer. This can have long-lasting effects on the sexual and emotional development of the child/young person.

Economic

The parent or carer of the child or young person may have limited control over the family finances. Therefore, there might be little or no money available for extra-curricular activities, clothing or even food, impacting on their health and development.

Emotional

Children and young people will often be very confused about their feelings – for example, loving both parents/carers but not wanting the abuse to continue. They may be given negative messages about their own worth, which may lead to them developing low self-esteem. Many children and young people feel guilty, believing that the abuse is their fault. They are often pessimistic about their basic needs being met and can develop suicidal thoughts. Some children and young people may internalise feelings and appear passive and withdrawn or externalise their feelings in a disruptive manner.

Isolation

Children and young people may become withdrawn and isolated; they may not be allowed out to play; and if there is abuse in the home they are less likely to invite their friends round. Schooling may be disrupted in many ways, and this may contribute to their growing isolation. They may frequently be absent from School as they may be too scared to leave their mother alone. They may have to move away from existing friends and family – e.g. into a refuge or other safe or temporary accommodation.

Threats

Children and young people are likely to have heard threats to harm their mother/father. They may have been directly threatened with harm or heard threats to harm their pet. They also live under the constant and unpredictable threat of violence, resulting in feelings of intimidation, fear and vulnerability, which can lead to high anxiety, tension, confusion and stress.

This clearly highlights that living with domestic abuse has a significant impact on a child's ability to achieve the five outcomes as outlined in the *Every Child Matters* agenda:

- be healthy
- stay safe
- enjoy and achieve
- make a positive contribution
- achieve economic well-being.

The Domestic Abuse Act 2021 is intended to transform the response to domestic abuse by preventing offending, supporting victims and ensuring they have the support they need.

WHAT YOU MIGHT SEE IN SCHOOL

- Unexplained absences or lateness – either from staying at home to protect their parent or hide their injuries, or because they are prevented from attending school
- Children and young people attending school when ill rather than staying at home
- Children and young people not completing their homework, or making constant excuses, because of what is happening at home
- Children and young people who are constantly tired, on edge and unable to concentrate through disturbed sleep or worrying about what is happening at home
- Children and young people displaying difficulties in their cognitive and school performance
- Children and young people whose behaviour and personality changes dramatically
- Children and young people who become quiet and withdrawn and have difficulty in developing positive peer relations
- Children and young people displaying disruptive behaviour or acting out violent thoughts with little empathy for victims
- Children and young people who are no trouble at all.

This list is not exhaustive – this is intended to give you an idea of some of the types of behaviour that could be presented.

WHAT SCHOOLS CAN DO

Schools can create an environment which both promotes their belief and commitment that domestic abuse is not acceptable, and that they are willing to discuss and challenge it.

For many victims, the school might be the one place that they visit without their abusive partner.

Contact details for useful agencies are:

- NSPCC: 0808 800 5000
- ChildLine: 0800 1111

- Parentline: 0808 800 2222
- Worcestershire Domestic Abuse Partnership Board [website](#)
- West Mercia Women's Aid 24 hr. helpline: 0800 980 3331.

Research shows that the repeated use of physical, sexual, psychological and financial abuse is one of the ways in which male power is used to control women. The underlying attitudes which legitimate and perpetuate violence against women should be challenged by schools as part of the whole-school ethos.

Schools can support individual children and young people by:

- Introducing a whole-school philosophy that domestic abuse is unacceptable
- Responding to disclosures and potential child protection concerns; recognising that domestic abuse and forced marriage may be a child protection concern; policies and procedures must include domestic abuse
- Giving emotional support – the child or young person might need referral to a more specialist service or need additional support to complete coursework, exams etc.
- Facilitating a peer support network – children and young people can become isolated but often welcome talking to friends about their problems
- Offering practical support – if children or young people are new to the School they may not yet have a uniform, they may also need financial help with extra-curricular activities, or they may be unfamiliar with the syllabus, the area, where to hang out, etc.
- Providing somewhere safe and quiet to do their homework or just to sit and think
- Improving the self-esteem and confidence of children and young people by:
 - offering them opportunities to take on new roles and responsibilities
 - offering tasks which are achievable and giving praise and encouragement
 - monitoring their behaviour and setting clear limits
 - criticising the action, not the person
 - helping them to feel a sense of control in their school lives
 - involving them in decision making
 - helping them to be more assertive
 - respecting them as individuals
 - encouraging involvement in extra-curricular activities.

RECEIVING NOTIFICATION OF A DOMESTIC ABUSE INCIDENT VIA OPERATION ENCOMPASS¹

Background

Following a call to a domestic abuse incident where children are involved, police notify children's social care and the School DSL will receive an e-mail via their secure communications system on the Children's Services Portal, from the Family Front Door, informing them that an incident has taken place and giving them a copy of the police log. This is known as an Operation Encompass Notification. For high-risk cases, they will also be contacted by telephone and asked whether they have any concerns about the children at school.

School Action

On receiving this information, the DSL will:

- log the information and keep the record alongside other information/concerns that the School has on this child/family, with all other confidential CP records in a secure place. This will allow the School to recognise any pattern and/or frequency of notifications and take appropriate action. Please note that School may receive further communication about this same incident, once further assessment of the situation has been undertaken by Police – the DSL will be careful not to log this as a separate incident
- inform any staff of notification on a 'need to know' only basis – e.g. class teacher/form tutor

¹ From The Expect Respect Education Toolkit – Women's Aid

- alert all staff who teach pupil/student with minimum of information – e.g. ‘This pupil/student may need extra support / may need extra time to complete homework’
- monitor pupil/student behaviour in school (including attendance) and should concerns arise which may be attributed to the impact of the incident, consult with Social Care through the Family Front Door as the concerns may be significant and lead to new safeguarding action, or to seek advice on how to proceed
- provide appropriate support for child, if required – do not question pupil/student about the incident. Respect the child's decision on whether or not they wish to discuss the situation
- provide appropriate support for adult, if asked – e.g. helpline number (0800 980 3331) or [Domestic abuse support | Worcestershire County Council](#).

Bear in mind:

- the victim of the incident may be anxious that the information will be shared inappropriately
- a notification may not give details as to which parent is the perpetrator/victim – any disclosure to the ‘wrong’ parent could heighten risk
- there is a need to be aware who is ‘connected’ to the child – e.g. TA/lunchtime supervisor may be child’s relative/friend of the family
- inappropriate sharing of information could heighten the risk for the victim and/or the child.

If in doubt, consult with the Family Front Door (01905 822666).

42. SO-CALLED ‘HONOUR’-BASED ABUSE

So-called ‘honour’-based abuse (HBA) encompasses incidents or crimes, which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of these dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

We recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called ‘honour’-based abuse (HBA) and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of HBA they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children’s social care.

FEMALE GENITAL MUTILATION

What is FGM?

FGM includes procedures that intentionally alter or injure the female genital organs for non-medical reasons.

There are four known types of FGM, all of which have been found in the UK:

- Type 1 – clitoridectomy: partial or total removal of the clitoris and, in very rare cases, only the prepuce (the fold of skin surrounding the clitoris)
- Type 2 – excision: partial or total removal of the clitoris and the labia minora, with or without excision of the labia majora (the labia are the ‘lips’ that surround the vagina)
- Type 3 – infibulation: narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the inner, or outer, labia, with or without removal of the clitoris

- Type 4 – other: all other harmful procedures to the female genitalia for non-medical purposes, e.g., pricking, piercing, incising, scraping and cauterising the genital area.

FGM is sometimes known as ‘female genital cutting’ or ‘female circumcision’. Communities tend to use local names for this practice, including ‘sunna’.

Why is FGM carried out?

It is believed that:

- it brings status and respect to the girl and that it gives a girl social acceptance, especially for marriage
- it preserves a girl’s virginity/chastity
- it is part of being a woman as a rite of passage
- it upholds the family honour
- it cleanses and purifies the girl
- it gives the girl and her family a sense of belonging to the community
- it fulfils a religious requirement believed to exist
- it perpetuates a custom/tradition
- it helps girls and women to be clean and hygienic
- it is cosmetically desirable
- it is mistakenly believed to make childbirth safer for the infant

Religion is sometimes given as a justification for FGM. For example, some people from Muslim communities argue that the Sunna (traditions or practices undertaken or approved by the prophet Mohammed) recommends that women undergo FGM, and some women have been told that having FGM will make them ‘a better Muslim’. However, senior Muslim clerics at an international conference on FGM in Egypt in 2006 pronounced that FGM is not Islamic, and the London Central Mosque has spoken out against FGM on the grounds that it constitutes doing harm to oneself or to others, which is forbidden by Islam.

Within Which Communities Is FGM Known To Be Practised?

According to the Home Office it is estimated that up to 24,000 girls under the age of 15 are at risk of FGM.

UK communities that are most at risk of FGM include Kenyan, Somali, Sudanese, Sierra Leonean, Egyptian, Nigerian and Eritrean, as well as non-African communities including Yemeni, Afghani, Kurdish, Indonesian and Pakistani.

Obviously, this not to say that all families from the communities listed above practise FGM, and many parents will refuse to have their daughters subjected to this procedure. However, in some communities a great deal of pressure can be put on parents to follow what is seen as a cultural or religious practice.

Is FGM Harmful?

FGM is extremely harmful and is often described as brutal because of the way it is carried out, and its short and long term effects on physical and psychological health.

FGM is carried out on children between the ages of 0 and 15, depending on the community in which they live. It is often carried out without any form of sedation and without sterile conditions. The girl or young woman is held down while the procedure of cutting takes place and survivors describe extreme pain, fear and feelings of abandonment.

Where the vagina is cut and then sewn up, only a very small opening may be left. This is often seen as a way to ensure that when the girl enters marriage, she is a virgin. In some communities the mother of the future husband and the girl’s own mother will take the girl to be cut open before the wedding night.

Repeat urinary tract infections are a common problem for women who have undergone FGM, and for some, infections come from menstruation being restricted. Many women have problems during pregnancy and

childbirth. The removal of the clitoris denies women physical pleasure during sexual activity and some groups will practise complete removal to ensure chastity.

Is It Illegal?

FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries – including the UK. The Female Genital Mutilation Act 2003 came into force in 2004. The act makes it illegal to:

- practise FGM in the UK
- take girls who are British nationals or permanent residents of the UK abroad for FGM, whether or not it is lawful in that country
- aid and abet, counsel or procure the carrying out of FGM abroad.

The offence carries a penalty of up to 14 years in prison, and/or a fine.

Signs, Symptoms And Indicators

The following list of possible signs and indicators are not diagnostic, but are offered as a guide as to what kind of things should alert professionals to the possibility of FGM.

Things that may point to FGM happening:

- a child talking about getting ready for a special ceremony
- a family arranging a long break abroad
- a child's family being from one of the 'at-risk' communities for FGM (see above)
- knowledge that an older sibling has undergone FGM
- a young person talks of going abroad to be 'cut', or get ready for marriage.

Things that may indicate a child has undergone FGM:

- prolonged absence from school or other activities
- behaviour change on return from a holiday abroad, such as the child being withdrawn and appearing subdued
- bladder or menstrual problems
- finding it difficult to sit still, and looking uncomfortable
- complaining about pain between their legs
- mentioning something somebody did to them that they are not allowed to talk about
- secretive behaviour, including isolating themselves from the group
- reluctance to take part in physical activity
- repeated urinal tract infection
- disclosure.

What Should Schools Do?

Where schools have a concern about a child, they should contact children's social care. If the concerns are based on more concrete indicators – i.e., the young person says this is going to happen to them, or disclosure that it has happened to them or to an older sister – schools should make a child protection referral and inform the police as required by the mandatory reporting duty. Staff may discuss any disclosure with the DSL unless there is a good reason not to. There are no circumstances in which a teacher or other member of staff should examine a girl.

This mandatory reporting duty does not apply to at risk/suspected cases, and in these circumstances, teachers should follow normal school procedures. Schools should not:

- contact the parents before seeking advice from children's social care
- make any attempt to mediate between the child/young person and parents.

It is important to keep in mind that the parents may not see FGM as a form of abuse; however, they may be under a great deal of pressure from their community and or family to subject their daughters to it. Some parents from identified communities may seek advice and support as to how to resist and prevent

FGM for their daughters, and education about the harmful effects of FGM may help to make parents feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support FGM.

The 'One Chance' Rule

In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for FGM are taking the 'one chance' of seeking help.

It is essential that we take such concerns seriously and act without delay. Never underestimate the determination of parents who have decided that it is right for their daughter to undergo FGM. Attempts to mediate may place the child/young person at greater risk, and the family may feel so threatened at the news of their child's disclosure that they bring forward their plans or take action to silence her.

Mandatory Reporting Duty

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers (persons employed or engaged to carry out teaching work). Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Staff may discuss any disclosure with the DSL unless there is a good reason not to. This mandatory reporting duty does not apply to at risk/suspected cases, and in these circumstances, teachers should follow normal school procedures. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance '[Mandatory Reporting of Female Genital Mutilation – procedural information](#)' (October 2015).

FORCED MARRIAGE

Forced Marriage should be recognised as a human rights abuse – and should always invoke child protection procedures within the School.

A forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

A forced marriage is not the same as an arranged marriage – in an arranged marriage the families take a leading role in choosing the marriage partner. The marriage is entered into freely by both people.

Warning Signs

Warning signs can include a sudden drop in performance, truancy from lessons and conflicts with parents over continuation of the student's education.

There may be excessive parental restrictions and control, a history of domestic abuse within the family, or extended absence through sickness or overseas commitments. Students may also show signs of depression or self-harming, and there may be a history of older siblings leaving education early to get married.

The Justifications

Most cases of forced marriage in the UK involve South Asian families. This is partially a reflection of the fact that there is a large established South Asian population in the UK. It is clear, however, that forced marriage is not a solely South Asian phenomenon – there have been cases involving families from East Asia, the Middle East, Europe and Africa.

Some forced marriages take place in the UK with no overseas element, while others involve a partner coming from overseas, or a British citizen being sent abroad. Parents who force their children to marry

often justify it as protecting them, building stronger families and preserving cultural or religious traditions. They may not see it as wrong.

Forced marriage can never be justified on religious grounds: every major faith condemns it and freely given consent is a pre-requisite of Christian, Jewish, Hindu, Muslim and Sikh marriage.

Culture

Often parents believe that they are upholding the cultural traditions of their home countries, when in fact practices and values there have changed. Some parents come under significant pressure from their extended families to get their children married.

The Law

Sexual intercourse without consent is rape, regardless of whether this occurs within the confines of a marriage. A girl who is forced into marriage is likely to be raped and may be raped until she becomes pregnant.

In addition, the Forced Marriage (Civil Protection) Act (2007) makes provision for protecting children, young people and adults from being forced into marriage without their full and free consent through Forced Marriage Protection Orders. Breaching a Forced Marriage Protection Order is a criminal offence.

The Anti-Social Behaviour, Crime and Policing Act 2014 makes it a criminal offence, with effect from 16th June 2014, to force someone to marry. This includes:

- taking someone overseas to force them to marry (whether or not the marriage takes place)
- marrying someone who lacks the mental capacity to consent to the marriage (whether they are pressured into it or not).

Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or other form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages (<https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage>).

What To Do If A Student Seeks Help

- The student should be seen immediately in a private place, where the conversation cannot be overheard.
- The student should be seen on her own, even if she attends with others.
- Develop a safety plan in case the student is seen i.e. prepare another reason why you are meeting.
- Explain all options to the student and recognise and respect her wishes. If the student does not want to be referred to Children's Services, you will need to consider whether to respect the student's wishes — or whether the student's safety requires further action to be taken. If you take action against the student's wishes you must inform the student.
- Establish whether there is a family history of forced marriage — i.e. siblings forced to marry.
- Advise the student not to travel overseas and discuss the difficulties she may face.
- Seek advice from the Forced Marriage Unit.
- Concerns should be referred, via normal school procedures to the DSL or to the police and Children's Services directly, to establish if any incidents concerning the family have been reported.
- Refer to the local police child protection unit if there is any suspicion that there has been a crime or that one may be committed.
- Refer the student with her consent to the appropriate local and national support groups, and counselling services.

What To Do If The Student Is Going Abroad Imminently

The Forced Marriage Unit advises education professionals to gather the following information if at all possible — it will help the unit to locate the student and to repatriate her:

- a photocopy of the student's passport for retention — encourage her to keep details of her passport number and the place and date of issue

- as much information as possible about the family (this may need to be gathered discretely)
- full name and date of birth of student under threat
- student's father's name
- any addresses where the student may be staying overseas
- potential spouse's name
- date of the proposed wedding
- the name of the potential spouse's father if known
- addresses of the extended family in the UK and overseas

It is also useful to take specific information that only the student would know, as this may be helpful during any interview at an embassy or British High Commission – in case another person of the same age is produced pretending to be the student.

Professionals should also take details of any travel plans and people likely to accompany the student. Note also the names and addresses of any close relatives remaining in the UK and a safe means to contact the student – a secret mobile telephone, for example, that will function abroad.

Forced Marriage: What Educators Should NOT Do

- treat such allegations merely as domestic issues and send the student back to the family home
- ignore what the student has told you or dismiss the need for immediate protection
- approach the student's family or those with influence within the community, without the express consent of the student, as this will alert them to your concern and may place the student in danger
- contact the family in advance of any enquires by the police, children's services or the Forced Marriage Unit, either by telephone or letter
- share information outside child protection information sharing protocols without the express consent of the student
- breach confidentiality except where necessary in order to ensure the student's safety
- attempt to be a mediator

Further Guidance

Further guidance is available from The Forced Marriage Unit:

Tel: (+44) (0)20 7008 0151 between 9.00 a.m. and 5.00 p.m. Monday to Friday
 Emergency Duty Officer (out of hours): (+44) (0)20 7008 1500
 E-mail: fmufco.gov.uk Website: www.fco.gov.uk/forcedmarriage

Publications:

- 'Multi-Agency Practice Guidelines: Handling Cases of Forced Marriage', The Forced Marriage Unit, June 09
- 'The Right to Choose – Multi-Agency Guidance in relation to Forced Marriage' Government Office - November 2008.
- [WSCP regional procedures](#)

BREAST IRONING

What Is Breast Ironing?

Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware. Estimates range between 25% and 50% of girls in Cameroon are affected by breast ironing, affecting up to 3.8 million women across Africa.

Why Does Breast Ironing Happen?

The practice of breast ironing is seen as a protection to girls by making them seem 'child-like' for longer and reduce the likelihood of pregnancy. Once girls' breasts have developed, they are at risk of sexual harassment, rape, forced marriage and kidnapping; consequently, breast ironing is more prevalent in

cities. Cameroon has one of the highest rates of literacy in Africa and ensuring that girls remain in education is seen as an important outcome of breast ironing.

Breast Ironing Is Physical Abuse

Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence. Although, countries where breast ironing is prevalent have ratified the African Charter on Human Rights to prevent harmful traditional practices, it is not against the law.

Breast ironing does not stop the breasts from growing, but development can be slowed down. Damage caused by the 'ironing' can leave women with malformed breasts, difficulty breastfeeding or producing milk, severe chest pains, infections and abscesses. In some cases, it may be related to the onset of breast cancer.

Breast Ironing In The UK

Concerns have been raised that breast ironing is also to be found amongst African communities in the UK, with as many as 1000 girls at risk. Keeping Children Safe in Education (2025) mentions breast ironing as part of the section on so-called 'honour'-based abuse. Staff worried about the risk of breast ironing in their school should speak to the Designated Safeguarding Lead as soon as possible. Schools need to know the risk level within their communities and tackle the risk as appropriate.

What Should Schools Do?

Where schools have a concern about a child, they should contact children's social care. If the concerns are based on more concrete indicators – i.e., the young person says this is going to happen to them, or disclosure that it has happened to them or to an older sister – schools should make a child protection referral and inform the police as required by the mandatory reporting duty. Schools should not:

- Contact the parents before seeking advice from children's social care
- Make any attempt to mediate between the child/young person and parents.

It is important to keep in mind that the parents may not see breast ironing as a form of abuse; however, they may be under a great deal of pressure from their community and or family to subject their daughters to it. Some parents from identified communities may seek advice and support as to how to resist and prevent breast ironing for their daughters, and education about the harmful effects of breast ironing may help to make parents feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support breast ironing.

The 'One Chance' Rule

In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for breast ironing are taking the 'one chance', of seeking help.

It is essential that we take such concerns seriously and act without delay. Never underestimate the determination of parents who have decided that it is right for their daughter to undergo breast ironing. Attempts to mediate may place the child/young person at greater risk, and the family may feel so threatened at the news of their child's disclosure that they bring forward their plans or take action to silence her.

43. SHARING NUDES AND SEMI-NUDES, INCLUDING AI-GENERATED OR MANIPULATED IMAGERY

The sharing of nudes and semi-nudes is a safeguarding issue and all incidents must be responded to in accordance with the School's safeguarding procedures and current UK Council for Internet Safety (UKCIS) guidance.

For the purposes of this policy, sharing nudes and semi-nudes includes the sending or posting of nude or semi-nude images, videos or live streams involving a person under the age of 18. This may occur through social media, messaging services, gaming platforms, online forums, file-sharing services or directly between devices. It also includes digitally manipulated or artificially generated imagery which depicts or appears to depict a child, including AI-generated images, deepfakes and 'deep nudes'.

Incidents may arise in a wide range of circumstances. Images may have been created or shared consensually between children, created or shared without consent, digitally manipulated or generated without the knowledge of the child depicted, or obtained through pressure, coercion, grooming, sexual exploitation, threats or blackmail. An incident which initially appears to involve only children may subsequently be found to involve an adult who has presented themselves online as a child.

The School recognises that children who create or share images of themselves may not understand the potential consequences and should not automatically be treated as offenders. The primary concern in responding to any incident will be the welfare and protection of the children involved. Non-consensual sharing, coercion, manipulation, threats or exploitation will be treated particularly seriously. A child must never be blamed or shamed for having created or shared an image of themselves.

Any member of staff who becomes aware of an incident involving nudes or semi-nudes must report it to the DSL or a deputy as soon as possible. Staff must not investigate the incident themselves and must not ask a child to send, copy, download or share the imagery. Staff should not normally view the imagery.

If imagery is displayed to a member of staff before they are able to prevent this, they should not copy, save, print, photograph, screenshot, forward or otherwise distribute it. They should close or move away from the imagery as soon as practicable and report what has happened to the DSL.

The DSL will conduct an initial review and assess the safeguarding risks in accordance with current UKCIS guidance. This will include consideration of the ages and developmental stages of the children involved; whether consent was freely given; whether there has been coercion, pressure, exploitation, grooming, blackmail or malicious intent; whether an adult may be involved; the nature and extent of any sharing; whether the imagery has been digitally manipulated or generated using AI; whether there are concerns about harmful sexual behaviour or child-on-child abuse; and whether any child is at immediate risk of harm.

Viewing imagery will only be considered by the DSL in exceptional circumstances where this is necessary and proportionate to safeguard a child and where the decision is consistent with current UKCIS guidance. The reasons for any decision to view imagery will be recorded. Imagery will not normally be copied or stored by the School.

Where there is concern that a child has been harmed or is at risk of harm, or where the circumstances indicate coercion, exploitation, abuse or adult involvement, the DSL will consider referral to children's social care and/or the police in accordance with safeguarding procedures and current guidance. Where a child is in immediate danger, emergency services will be contacted without delay.

Parents or carers will normally be informed and involved at an early stage unless doing so would place a child at increased risk of harm or prejudice a safeguarding or police response. Where appropriate, the DSL will seek advice from children's social care and/or the police before parents are informed.

The School will provide appropriate support to all children affected by an incident. This may include pastoral and wellbeing support, measures to prevent further sharing or harassment, support to remove imagery from online services where possible, and consideration of whether a risk assessment or safety plan is required. The School will challenge victim-blaming and ensure that a child who reports an incident is taken seriously, supported and not made to feel ashamed or responsible for the actions of others.

The School recognises the increasing risk of financially motivated sexual extortion ('sextortion'), in which a child may be threatened or blackmailed using genuine, stolen, manipulated or AI-generated sexual imagery. Any such concern will be treated as a safeguarding matter and reported immediately to the DSL. Children should be advised not to pay money, provide further imagery or comply with further demands, and appropriate police and specialist support will be sought.

The creation, possession and distribution of indecent images of a person under 18 may constitute a criminal offence, including where a child creates an image of themselves. The law is intended to protect children and the School's response will be child-centred, safeguarding-led and proportionate. The School will not attempt to determine criminal liability itself and will seek advice from the police where appropriate.

The School will educate pupils, in an age-appropriate way through Relationships and Sex Education (RSE), PSHE and online safety education, about healthy relationships and consent; the risks and potential consequences of creating, requesting and sharing intimate imagery; non-consensual image sharing; online grooming and sexual extortion; AI-generated and manipulated imagery; how to report concerns; and where to obtain help.

This section should be read alongside the School's Child-on-Child Abuse Policy, Online Safety arrangements and the current UKCIS guidance, Sharing nudes and semi-nudes: advice for education settings working with children and young people.

44. CHILDREN AND THE JUSTICE SYSTEM

Our children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. We can support pupils by using age-appropriate guides to explain the process, support and special measures that are available.

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

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

45. CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) the School gives practical advice on how to keep safe, for example with self-defence classes in activity time for older children. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

46. CHILDREN WHO ARE LESBIAN, GAY OR BISEXUAL, OR WHO ARE QUESTIONING THEIR GENDER

A child or young person being lesbian, gay or bisexual is not in itself a risk factor for harm. However, children who are lesbian, gay or bisexual, or who are perceived by others to be lesbian, gay or bisexual, may be vulnerable to discriminatory bullying, harassment or abuse. The School will take a strong and proactive approach to preventing and responding to such behaviour and will provide appropriate pastoral and safeguarding support where required.

Children who are questioning their gender may also require sensitive and thoughtful support. The School will take time to understand the child's thoughts and feelings and will remain professionally curious about the full range of their experiences and circumstances, including their relationships with family and peers, their wider social environment, any discriminatory bullying, and any mental health, psychosocial, SEND, neurodiversity or other safeguarding needs. Staff will avoid assumptions or rigid gender stereotypes and will consider each child's circumstances individually.

The School will not initiate social transition. Where a child or their parent or carer requests that the School make changes or provide support to facilitate social transition, the matter will be considered carefully on an individual basis. Individual members of staff should not make or implement changes relating to social transition independently; any such request should be referred to the appropriate senior leader and the DSL should be involved where there are safeguarding or welfare considerations.

When considering a request for support with social transition, the School will consider what is in the best interests of the child and other children affected. Decisions will take account of the child's wishes and feelings, their age and developmental stage, the full range of their individual circumstances and needs, any relevant clinical evidence or advice, and any other appropriate professional advice. The School will take a careful approach, recognising that social transition is an active intervention and that evidence about its long-term impact on children and young people remains limited. Particular caution will be exercised in relation to pre-pubertal and primary-aged children.

Parents and carers have a leading role in their children's lives. Where a child requests support with social transition, the School will engage parents or carers as a matter of priority and will give proper consideration to their views. In the rare circumstances where involving parents or carers may place the child at greater risk of harm, the DSL will be involved before parents or carers are contacted or decisions are made.

Where a child speaks to a member of staff about questioning their gender but does not ask the School to make changes to how they are treated, there is no automatic requirement to inform parents or carers. Staff should respect an appropriate level of confidentiality unless the conversation raises a safeguarding or welfare concern, in which case the School's normal safeguarding procedures will be followed.

Any decision about support for social transition will be made in accordance with the School's safeguarding duties and its obligations under equality and human rights law. The decision-making process and reasons for decisions will be appropriately documented and kept under review, recognising that a child's circumstances and needs may change over time.

The School will comply with the statutory requirements relating to single-sex facilities, boarding and residential accommodation and, where applicable, single-sex sport. Requests relating to these matters will be considered in accordance with Keeping Children Safe in Education 2026 and other applicable legal requirements.

The School will ensure that relevant information necessary to safeguard a child is appropriately recorded and available to those staff who need it. The School will also provide appropriate support to children who wish to reverse or reconsider a previously agreed social transition, working with parents or carers and relevant professionals as appropriate.

All children are entitled to feel safe, respected and able to seek help at School. Bullying, harassment or abuse relating to sexual orientation, perceived sexual orientation, sex or gender questioning will not be tolerated and will be addressed in accordance with the School's safeguarding, behaviour, anti-bullying and child-on-child abuse procedures.

The School will have regard to the statutory guidance in Keeping Children Safe in Education 2026 when supporting children who are lesbian, gay or bisexual and children who are questioning their gender.

APPENDIX 1: LOGGING A CONCERN

All safeguarding concerns should be logged using the School's Safeguarding system, MyConcern. Training is provided to staff at the start of year INSET sessions and further details are available from the School DSL.

Alternatively, Form 1 can be used as in Appendix 2 below.

MyConcern is available at <https://www.myconcern.education/> for which there is also a shortcut on the start menu of School staff computers.

Form 1 is available below in Appendix 2, on NETconsent or a paper copy is available on staff room noticeboards.

APPENDIX 2: FORM 1

Logging a Concern about a Child's Safety and Welfare – all staff and visitors

Pupil's full name:		Date of birth:	Year group:
Date:		Time:	
Name: Print		 Signature	
Position:			
Details of concern/incident and reason for recording - record the who/what/where/when factually (continue on reverse of sheet if necessary):			
Any other relevant information (witnesses, immediate action taken):			
Action taken			
Reporting staff signature:		Date:	
DSL – Response/outcome			
DSL signature:		Date:	

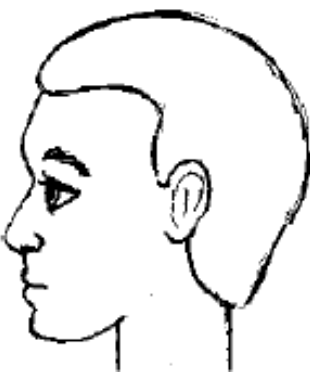
Check to make sure your report is clear now and will also be clear to someone else reading it for the first time in the future.

Remember to attach any other relevant documents such as hand written notes, a piece of work a pupil has written that you are concerned about, something which you have found (e.g. a note/piece of paper which is concerning).

PLEASE PASS THIS FORM TO YOUR DESIGNATED SAFEGUARDING LEAD

Body Map (Part 1)

NAME OF CHILD		DATE OF BIRTH	
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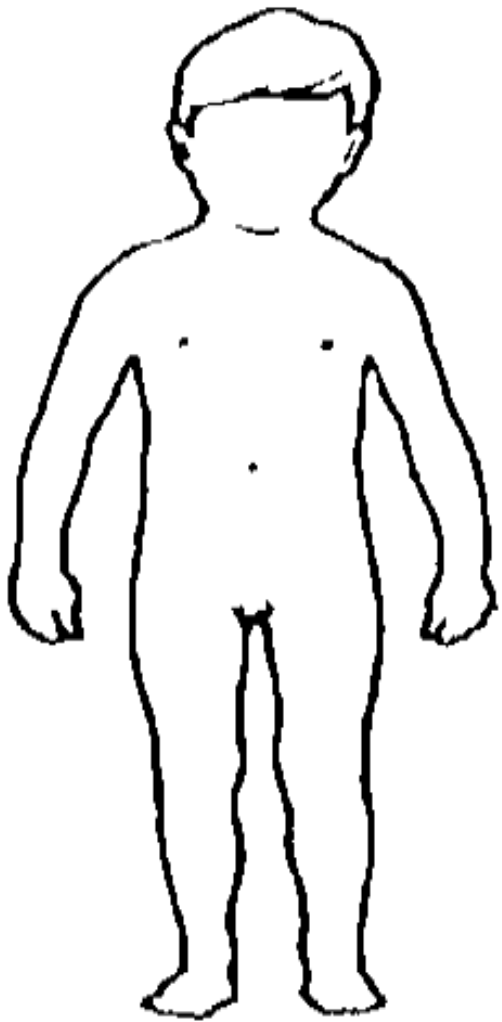
LEFT SIDE



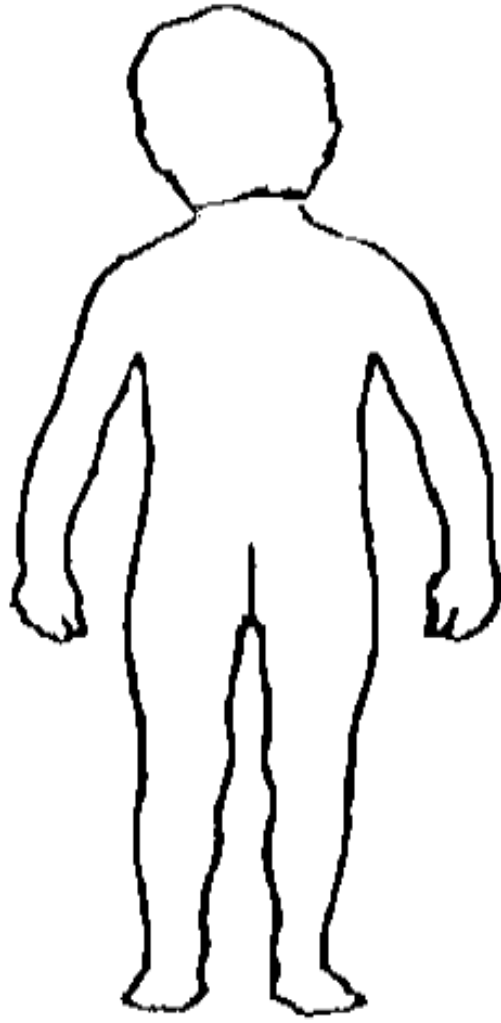




RIGHT SIDE



FRONT



BACK

Reporting staff signature Date

Body Map (Part 2)

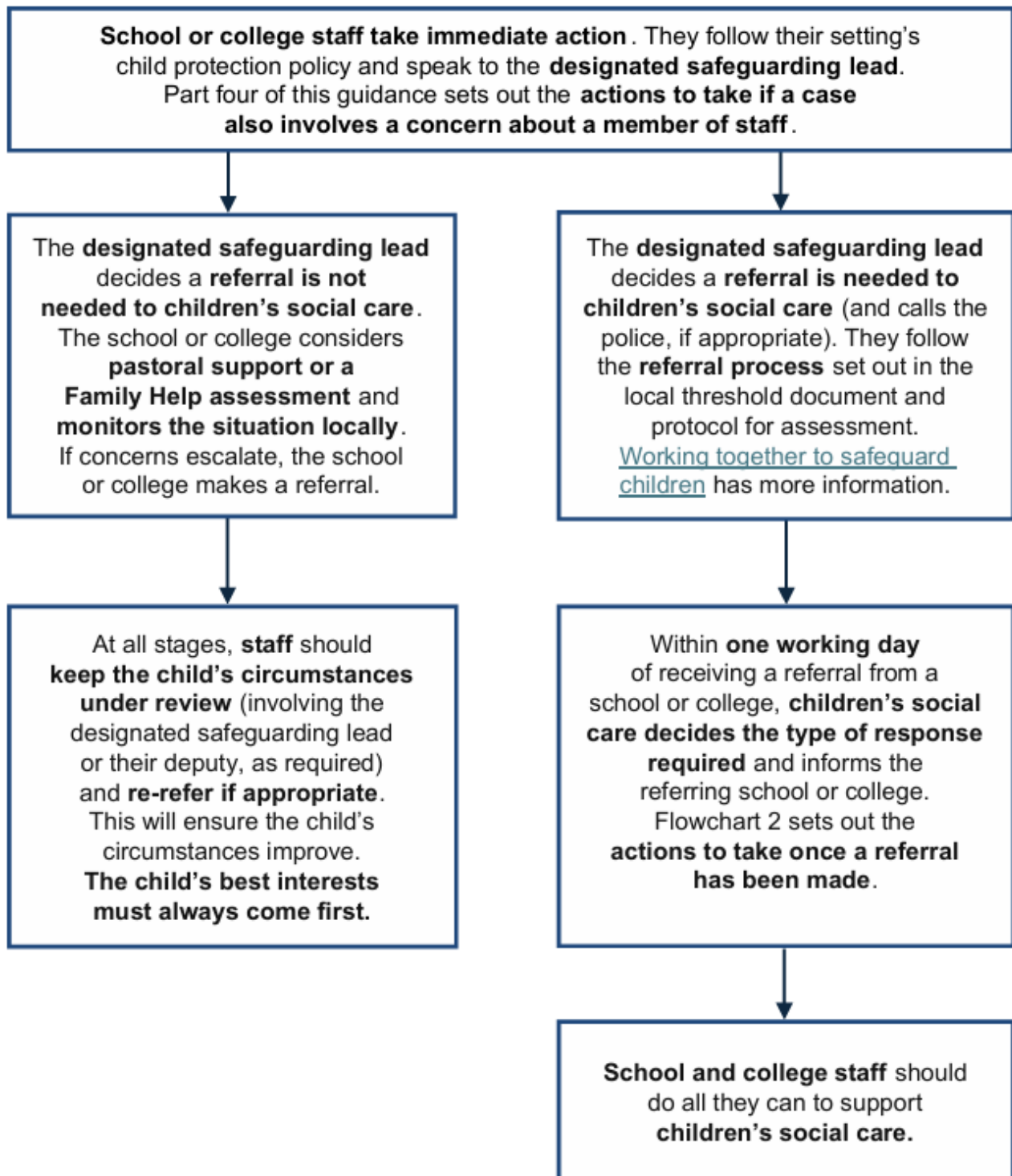
NAME OF CHILD		DATE OF BIRTH	
 		 	
LEFT HAND		RIGHT HAND	
 		 	
LEFT FOOT		RIGHT FOOT	
FULL DESCRIPTION OF INJURY			
ANY EXPLANATION GIVEN?			
REPORTED BY?			
REPORTED WHEN?			

Reporting staff signature Date

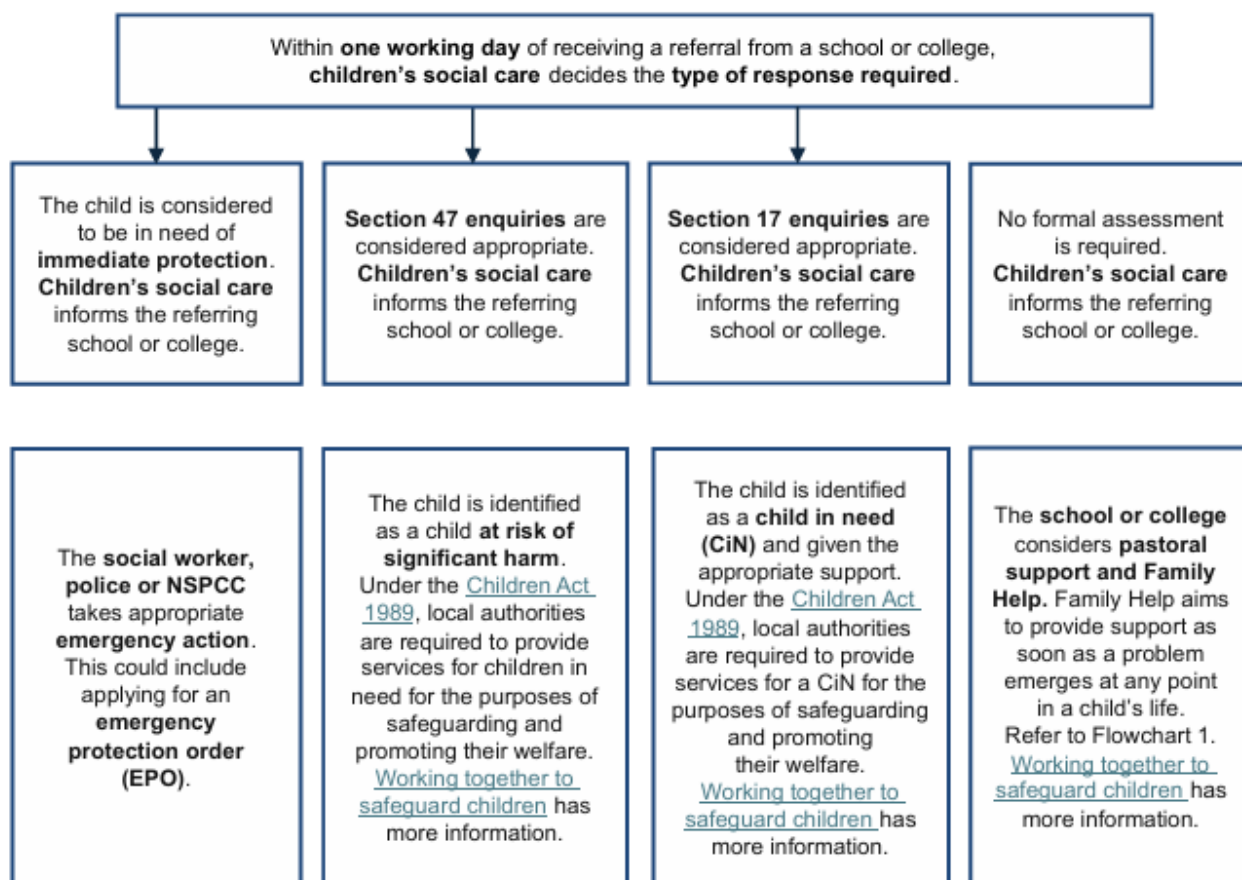
APPENDIX 3: ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD

These flowcharts are taken from KCSIE September 2026 and are intended to assist staff in the processes involved where there is a concern about a child.

Flowchart 1: actions taken by a school or college when there are concerns about a child



Flowchart 2: actions taken once a referral has been made to children's social care



APPENDIX 4: JOB DESCRIPTIONS FOR THE ROLES OF THE DESIGNATED SAFEGUARDING LEAD (DSL), SENIOR DSL AND DEPUTY DESIGNATED SAFEGUARDING LEADS (DDSL)

Due to the size of Bromsgrove School we have a unique position of Senior Designated Safeguarding Lead (DSL) who oversees safeguarding in all four sections of the School, in addition to being DSL responsible for the Senior School.

SENIOR DSL JOB DESCRIPTION

The Senior DSL is expected to:

- co-ordinate the safeguarding meetings of all four sections of the School liaising with the Chair of Governors and other Governors as required
- co-ordinate all minutes and records of meetings/training
- attend weekly safeguarding meetings in both the Prep and Senior School, and as and when required at Winterfold
- co-ordinate reflective practice
- co-ordinate all Safeguarding notice boards and information for Common Room briefings
- provide training resources for all DSLs to disseminate to all staff e.g. 7 Minute Briefings and INSET materials
- attend the Worcestershire Children's Social Care DSL Network Meetings to disseminate good practice to staff
- compose Safeguarding policies and review annually in line with KCSIE
- undertake Safeguarding Induction training for new staff

in addition to all the responsibilities listed for DSLs and DDSLs below.

DSL AND DDSL JOB DESCRIPTION

The job description for the DSL and DDSLs has regard to KCSIE 2026, Annex C: the role of the Designated Safeguarding Lead.

The Designated Safeguarding Lead (DSL) will be an appropriate senior member of staff, and a member of the School's senior leadership team, or hold an equivalent position of status and authority. They have a legal responsibility for dealing with safeguarding issues, providing advice and support to staff, liaising with the local authority (Worcestershire County Council Children's Social Care), and working with a range of other agencies. The Designated Safeguarding Lead need not be a teacher but must have the status and authority within the management structure to carry out the duties of the post.

Deputy Designated Safeguarding Leads (DDSLs) are trained to the same standard as the DSL, but the ultimate lead responsibility for child protection remains with the designated safeguarding lead; this responsibility should not be delegated, although they may, and can, be asked to help share the workload at any time.

Manage Referrals

The DSLs are expected to:

- refer all cases of suspected abuse to the local authority children's social care and: (i) the designated officer(s) for child protection concerns (all cases which concern a staff member), (ii) the Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or (iii) the police (cases where a crime may have been committed)
- act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- support staff who make referrals to local authority children's social care
- refer cases to the Channel programme where there is a radicalisation concern as required
- support staff who make referrals to the Channel programme.

Work with Others

The DSLs are expected to:

- act as a point of contact with the three safeguarding partners
- liaise with the Headmaster/Headmistress to inform them of all child protection issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- as required, liaise with the “case manager” (Keeping Children Safe in Education 2026) and the designated officer(s) at the local authority (also known as local authority designated officer/LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (for example pastoral support staff, School nurses or counsellors, IT technicians and teachers of ICT, Heads of Curriculum Support (SEND) and Looked After Children Co-ordinator) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- act as a source of support, advice and expertise for all staff
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and School leadership staff
- provide a mechanism to ensure that all staff understand and are able to discharge their role and responsibilities (as set out in Part One of Keeping Children Safe in Education 2021)
- assist in conjunction with the Head, Senior DSL and Safeguarding Governor, an annual audit of safeguarding procedures, using the County s175/157 audit or similar
- make use of the Levels of Need guidance when making a decision about whether or not the threshold for universal or community-based early help, Family Help, child protection arrangements or other multi-agency plans or children’s social care intervention is met. Informal advice on borderline cases and as required will be sought from an advisor at the Family Front Door
- develop effective links with relevant agencies and other professionals and co-operate as required with their enquiries regarding safeguarding matters including co-operation with serious case reviews, attendance at strategy meetings, initial and review child protection conferences, core group and child in need review meetings
- notify the key worker if there is an unexplained absence of more than two days of a pupil who is subject to a child protection plan
- monitor unauthorised absence, particularly where children go missing on repeated occasions, reporting concerns in-line with the Schools’ Missing Child Policies
- contribute to assessments and provide a report to initial and review conferences which have been shared with parents first, whenever possible.

Training

The Designated Safeguarding Lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The Designated Safeguarding Lead should undertake Prevent awareness training.

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

- understand the assessment process for providing universal or community-based early help, Family Help, child protection arrangements or other multi-agency plans and statutory intervention, including local criteria for action and local authority children’s social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- ensure each member of staff has access to, and understands, the School’s child protection policy and procedures, especially new and part time staff
- are alert to the specific needs of children in need, those with special educational needs and young carers

- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
- understand the importance of information sharing, both within the School, and with the three safeguarding partners, other agencies, organisation and practitioners
- are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- obtain access to resources and attend any relevant or refresher training courses
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.

Raise Awareness

The Designated Safeguarding Lead should, in conjunction with the Senior DSL:

- ensure the School's child protection policies are known, understood and used appropriately
- ensure the School's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the governing body regarding this
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this
- link with Worcestershire Safeguarding Children Partnership (WSCP) to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Child Protection File

When children leave the School, the DSL should ensure their child protection file is transferred to the new school or educational establishment as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term). This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

All child protection files should be kept securely, separate from the main pupil file, and locked/password in protected locations. There should be written records of concerns about children, including the use of body maps, even where there is no need to refer the matter immediately. Please note that staff must only view parts of a child's body which are normally visible.

Availability

During term time the Designated Safeguarding Lead (or deputies) should always be available (during school hours) for staff to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputies) would be expected to be available in person, it is a matter for each section of the School working with the DSL, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

It is a matter for the School, and the DSL, to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.