Child protection and safeguarding policy

Approved by:	Governing Board
Date:	September 2026
Designated Safeguarding Lead (DSL):	Chaerin Lee
Deputy DSLs:	Joyce Jennings and Katherine Murphy
SLT member responsible for filtering and monitoring:	Chaerin Lee
Last reviewed on:	September 2025
Next review due by:	September 2027 (reviewed annually, and sooner if legislation, guidance or local safeguarding arrangements change)

Statement of intent

Felixstowe International College is committed to safeguarding and promoting the welfare of every pupil in our care – physical, mental and emotional – whether on the school site, in boarding accommodation, or off site on trips, exchanges or work experience. Safeguarding is everyone's responsibility, and this policy sets out how the whole school community will work together to keep pupils safe.

We will achieve this by:

- Making sure governors, the headteacher and all staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of abuse and neglect, and know how to raise a concern
- Teaching pupils how to keep themselves safe and recognise behaviour that is unacceptable, both online and offline
- Identifying pupils who have suffered, or are at risk of, abuse, neglect or exploitation, and making sure they get the help they need
- Operating safer recruitment procedures that help deter, reject or identify people who might pose a risk to children
- Making sure the headteacher and all new staff and volunteers are only appointed once all appropriate checks have been completed satisfactorily
- Responding to allegations of abuse against staff, and low-level concerns, promptly, fairly and consistently

The DSL is Chaerin Lee. In the absence of the DSL, child protection matters will be dealt with by the deputy DSLs, Joyce Jennings and Katherine Murphy.

1. Aims

This policy aims to:

- Support the safeguarding and welfare of all our pupils by providing staff with the information they need to identify and respond to abuse and neglect
- Ensure staff in our school are aware of policies and procedures around safeguarding and know how to act on them, including where they have a concern about another staff member
- Provide a framework of support for children who are potentially more vulnerable, including looked-after and previously looked-after children, young carers, and pupils with SEND or certain medical or physical health conditions
- Ensure any allegations regarding a pupil's safety and welfare are handled appropriately, and that pupils are protected when concerns are raised about adults who may pose a risk
- Support pupils' social, emotional and mental health needs by identifying that mental health problems can be an indicator of abuse, neglect or exploitation
- Support and promote safe practice with technology and reduce the risk of harm to pupils, staff and the wider community online

2. Legislation and statutory guidance

This policy is based on statutory guidance and law that seeks to protect children, in particular:

Keeping Children Safe in Education 2026 (KCSIE 2026), the statutory safeguarding guidance for schools and colleges in England, which came into force on 1 September 2026 **[NEW/UPDATED FOR KCSIE 2026]**

- Working Together to Safeguard Children 2026
- The Children Acts 1989 and 2004
- The Education Act 2002 (as amended by the Education Act 2011), section 175

The Children's Wellbeing and Schools Act 2026, including its statutory guidance on mobile phones in schools issued under section 36 **[NEW/UPDATED FOR KCSIE 2026]**

The Crime and Policing Act 2026, in particular section 139, which removes the supervision exemption from the legal definition of regulated activity **[NEW/UPDATED FOR KCSIE 2026]**

- The Education (Independent School Standards) Regulations 2014
- The Independent School Standards (ISSRs), in particular Part 3 (welfare, health and safety of pupils) and Part 4 (suitability of staff, supply staff, and proprietors)
- The Rehabilitation of Offenders Act 1974
- The Human Rights Act 1998
- Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025
- The Equality Act 2010
- The Protection of Freedoms Act 2012
- The Immigration Act 2016
- Statutory guidance: What to do if you're worried a child is being abused; Disqualification under the Childcare Act 2006; Sharing nudes and semi-nudes: advice for education settings working with children and young people; and Special educational needs and disability (SEND) code of practice: 0 to 25 years

This policy also has regard to statutory guidance on Care of unaccompanied migrant children and child victims of modern slavery, and Preventing and tackling bullying, and meets the standards outlined by the National Minimum Standards for Boarding Schools (NMS).

This policy complies with the school's funding agreement and articles of association.

3. Definitions and acronyms

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

Child protection is part of this wider safeguarding duty, and refers specifically to activities undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Key acronyms used in this policy:

- CCE – child criminal exploitation
- CSE – child sexual exploitation
- CSCS – children's social care services
- DBS – Disclosure and Barring Service
- DSL – designated safeguarding lead
- FGM – female genital mutilation
- HSB – harmful sexual behaviour
- LA – local authority
- LAC/PLAC – looked-after child / previously looked-after child
- LADO – local authority designated officer
- SCR – single central record
- SEND – special educational needs and disabilities
- VSH – virtual school head

VAWG – violence against women and girls **[NEW/UPDATED FOR KCSIE 2026]**

4. Equality statement

We will comply with our duties under the Equality Act 2010. We will not discriminate against, harass or victimise pupils, staff, parents or carers on the basis of a protected characteristic (age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, and sexual orientation).

We recognise that some pupils may be disproportionately vulnerable to abuse because of prejudice-based harm, including racism, faith-based prejudice, homophobia, biphobia or transphobia, and we integrate this awareness throughout our safeguarding practice, not only where a specific incident has occurred. **[NEW/UPDATED FOR KCSIE 2026]**

5. Roles and responsibilities

5.1 The governing board

The governing board will make sure the school meets its statutory obligations in respect of safeguarding, and in particular will:

- Appoint a DSL, who is a member of the senior leadership team, and one or more deputy DSLs
- Ensure the DSL has the status, authority and time to carry out the role effectively, including sufficient time away from teaching commitments
- Ensure a senior leader takes responsibility for safeguarding matters where an allegation is made against the DSL
- Ensure any deputy DSLs are trained to the same standard as the DSL

Ensure the school's filtering and monitoring systems are reviewed at least annually, formally receive and sign off that review, and ensure appropriate systems are in place – see section 8 **[NEW/UPDATED FOR KCSIE 2026]**

Ensure the school operates as a mobile phone-free environment by default, in line with the Children's Wellbeing and Schools Act 2026, and monitor how this is implemented **[NEW/UPDATED FOR KCSIE 2026]**

- Ensure staff and volunteers have appropriate safeguarding and child protection training, updated regularly, and that this is integrated into whole-school approaches
- Ensure the school has robust safer recruitment procedures in place, as set out in the school's Safer Recruitment Policy
- Ensure the school has procedures for dealing with allegations of abuse against staff and volunteers, including low-level concerns
- Ensure a senior leader is appointed to work with the DSL on responding to reports of sexual violence and sexual harassment
- Appoint a designated teacher to promote the educational achievement of looked-after and previously looked-after children, and ensure this person has appropriate training
- Ensure all members of the governing board and proprietor body undergo safeguarding training, and that at least one governor has completed safer recruitment training
- Remain up to date with how local safeguarding partner arrangements operate, the role of the school within them, and how information is shared
- Ensure this policy is reviewed at least annually, and updated whenever there are changes to legislation or guidance

5.2 The headteacher

The headteacher will:

- Take overall responsibility for safeguarding and child protection, including online safety, at the school
- Ensure staff receive appropriate safeguarding and child protection training, including regular updates, at induction and at least annually thereafter
- Ensure the DSL is given the time, funding, resources and support needed to carry out the role effectively
- Act as case manager where an allegation of abuse is made against a member of staff, unless the concern is about the headteacher, in which case the Proprietor will act as case manager
- Liaise with the DSL and deputy DSLs to ensure effective safeguarding outcomes for pupils

5.3 The designated safeguarding lead

The DSL takes lead responsibility for safeguarding and child protection, including online safety. This is explicitly recognised in their job description. The DSL is a member of SLT and has the authority to make decisions and access resources as necessary.

The DSL, supported by the deputy DSLs, will:

- Act as the central point of contact for staff, external agencies and families in relation to safeguarding matters
- Manage referrals to children's social care, the police, and other relevant agencies
- Liaise with the case manager and the LADO for child protection concerns as required
- Act as a source of support, advice and expertise for all staff
- Keep detailed, accurate, secure written records of concerns and referrals, using the school's record of concern form (see appendix 4)
- Ensure that each pupil who has a social worker, and looked-after or previously looked-after children, has their information appropriately known and understood by relevant staff
- Liaise with staff on matters of safety and safeguarding, including online safety, and support staff who make referrals to children's social care

Take lead responsibility for understanding the school's filtering and monitoring systems and processes, working with the IT Network Manager, and support the SLT member responsible for filtering and monitoring in the annual review – see section 8 **[NEW/UPDATED FOR KCSIE 2026]**

- Understand the unique risks associated with online safety, and be confident that they have the relevant knowledge and expertise to identify, escalate and support children with online safety issues, including bullying, image-sharing, and the use of generative AI

- Undertake DSL training at least every 2 years, and update their knowledge and skills at regular intervals, and at least annually
- Encourage a culture of listening to pupils, and taking account of their wishes and feelings

Ensure that any weapons-related concern reported by staff – for example a pupil carrying, using, or expressing an intention to use a weapon – is assessed promptly and appropriate action taken, in line with KCSIE 2026 paragraph 49 **[NEW/UPDATED FOR KCSIE 2026]**

5.4 SLT member responsible for filtering and monitoring

Chaerin Lee is the SLT member responsible for filtering and monitoring. This is a distinct role from the DSL role under KCSIE 2026, though held by the same person at FIC. She carries out, at least annually, a review of the school's filtering and monitoring systems, supported by the DSL and IT Network Manager, and reports the outcome to the governing board. Full detail is set out in the ICT and Internet Acceptable Use Policy. **[NEW/UPDATED FOR KCSIE 2026]**

5.5 All staff

All staff, including supply staff, volunteers and contractors, will:

- Read and understand Part One of Keeping Children Safe in Education 2026 in full – the condensed summary previously available to staff not working directly with pupils no longer applies; every member of staff is expected to read Part One in its entirety
- Be aware of the signs of abuse and neglect, and act on any concern immediately, following this policy
- Know the identity of the DSL and deputy DSLs, and how to contact them
- Maintain an attitude of 'it could happen here', and never assume that a colleague, or another agency, will deal with a concern
- Speak to the DSL if they are unsure whether to act on a concern
- Follow this policy's procedures on confidentiality when sharing information about a safeguarding concern
- Understand their responsibilities in relation to online safety, including their role in relation to filtering and monitoring

6. Confidentiality and information sharing

This school handles safeguarding concerns and personal data with the sensitivity and confidentiality they need, in line with UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025. Staff will only discuss concerns with those who need to know, primarily the DSL or deputy DSLs, and will not promise a pupil confidentiality when they disclose information that raises a safeguarding concern.

Fears about sharing information must never be allowed to stand in the way of protecting a child. Staff will share information with the DSL, and the DSL will share information with relevant external agencies, in line with the principle that information sharing decisions should be recorded, whether or not a decision is taken to share.

The school will share information about a pupil with a new school, college or other setting the pupil transfers to, and will do so promptly and, where a pupil has a child protection file, separately from the main pupil file, ideally within 5 working days for an in-year transfer and, for children with a social worker, within 1 working day.

7. Recognising abuse and taking action

7.1 Types of abuse and neglect

All staff will be aware that abuse, neglect and safeguarding issues are rarely standalone events and can take many different forms, including physical abuse, emotional abuse, sexual abuse, neglect, and child-on-child abuse. Full definitions and indicators are set out at appendix 1.

7.2 Additional vulnerability factors

Staff will be aware that certain pupils may be more vulnerable to abuse, including (but not limited to) pupils with SEND or certain medical or physical health conditions, pupils with a social worker, looked-after and previously looked-after children, young carers, pupils who are LGBTQ+ or questioning their gender, and pupils who are disproportionately vulnerable to sexual violence, homophobic, biphobic or transphobic bullying, or racial or faith-based discrimination. Additional barriers can exist when recognising abuse and neglect in these pupils, and staff will never assume that an indicator relates only to a pupil's disability, health condition or other characteristic without further exploration.

Staff will also be aware that young carers – pupils who care for a family member with an illness, disability, mental health condition or substance misuse problem – may face additional pressures that affect their attendance, attainment and welfare, and that this is itself a safeguarding consideration. **[NEW/UPDATED FOR KCSIE 2026]**

7.3 If you think a pupil is in immediate danger

If a staff member thinks a pupil is in immediate danger, they will call 999 and inform the DSL as soon as possible afterwards.

7.4 If you have a concern about a pupil

Any staff member who has a concern about a pupil's welfare will follow this procedure:

- Report the concern to the DSL, or a deputy DSL if the DSL is unavailable, on the same day – do not wait for a break in teaching or a convenient moment
- Record the concern factually, using the school's record of concern form (appendix 4)
- Do not investigate the concern themselves, or promise the pupil confidentiality
- The DSL will decide on next steps, which may include: monitoring, referral to Family Help or another early-help service, a referral to children's social care, or a referral to the police
- Where a referral is made by anyone other than the DSL, the DSL will be informed as soon as possible

If the DSL is not satisfied with the local authority's response to a referral, they will follow the process set out in 'What to do if you're worried a child is being abused' to escalate the concern, including requesting reconsideration.

7.5 Child-on-child abuse

KCSIE 2026 broadens the definition of child-on-child abuse to explicitly include serious violence, misogyny, and imagery that has been digitally altered or wholly generated using AI, alongside existing recognised forms such as bullying, sexual violence and sexual harassment, physical abuse, and abuse in intimate personal relationships between peers. **[NEW/UPDATED FOR KCSIE 2026]**

This school has a zero-tolerance approach to child-on-child abuse. It will never be dismissed as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys', as this normalises unacceptable behaviour and creates an unsafe environment. We recognise that girls are statistically more likely to be victims and boys more likely to be perpetrators, but that all child-on-child abuse, whoever it involves, is unacceptable and will be taken seriously. We also recognise that abuse can occur even where no incident has been reported, and staff will maintain a proactive, curious approach rather than assuming an absence of reports means an absence of risk.

Most incidents of pupils affecting other pupils will be dealt with under the Behaviour Policy, but this policy applies wherever an allegation raises a safeguarding concern – for example where the behaviour is serious, potentially criminal, violent, involves coercion, or involves sexual harassment, sexual violence, or the sharing of nudes or semi-nudes.

Part Five of KCSIE 2026 sets out that harmful sexual behaviour exists on a continuum that may escalate into sexual harassment or sexual violence; early intervention in behaviour such as sexist or misogynistic language can help prevent escalation. **[NEW/UPDATED FOR KCSIE 2026]**

7.6 Sharing of nudes and semi-nudes

KCSIE 2026 confirms that every incident involving the making or sharing of a nude or semi-nude image, video or livestream – whether taken by the pupil, taken by someone else, digitally altered, or wholly AI-generated (including a 'deepfake') – requires a safeguarding response, whether the sharing was consensual or non-consensual. What differs between the two is the nature and proportionality of the response, not whether a response happens. **[NEW/UPDATED FOR KCSIE 2026]**

Any member of staff made aware of such an incident must report it to the DSL immediately, and must not: view, copy, print, forward, or store the imagery; ask a pupil to share, download or delete it; ask the pupils involved to disclose further details themselves (this is the DSL's responsibility); or share information about the incident other than with the DSL.

The DSL will hold an initial review to establish whether there is an immediate risk, whether a referral to police or children's social care is needed, and whether the images need to be viewed in order to safeguard a pupil (in most cases they should not be). A referral to police and/or children's social care will always be made immediately where an adult may be involved, where there is reason to believe a pupil has been coerced, blackmailed or groomed, where the imagery depicts sexual acts unusual for the pupil's developmental stage or is violent, where any pupil shown is under 13, or where a pupil appears to be at immediate risk of harm.

Parents/carers will be informed at an early stage and kept involved, unless there is good reason to believe this would put the pupil at greater risk. All such incidents, and the decisions made in responding to them, will be recorded in line with section 15.

7.7 Weapons

Under KCSIE 2026 (paragraph 49), any member of staff who has a concern that a pupil is carrying, using, or has expressed an intention to use, a weapon, must report this to the DSL or a deputy DSL immediately. The DSL will assess the risk and take appropriate action, which may include a referral to police and/or children's social care. This is not an automatic mandatory external reporting duty, but a risk-assessment duty led by the DSL. **[NEW/UPDATED FOR KCSIE 2026]**

7.8 Prejudice-based harm, radicalisation and extremism

Staff will be alert to prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination, and to the risk of a pupil being drawn into extremism or radicalisation. If a staff member is concerned that a pupil is being radicalised, or may be vulnerable to radicalisation, they will report this to the DSL, who will consider a referral to the Channel programme where appropriate. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321. **[NEW/UPDATED FOR KCSIE 2026]**

7.9 Mental health

KCSIE 2026 reinforces that a mental health problem can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation. Staff will be alert to behavioural signs that suggest a pupil may be experiencing, or at risk of developing, a mental health problem, and will recognise the pathway from a mental health concern to a safeguarding assessment. Where a mental health concern is also a safeguarding concern, staff will follow the procedure at 7.4. Where it is not, staff will speak to the DSL or pastoral team to agree a course of action, and, where appropriate, to the school's pastoral care arrangements set out in the Pastoral Care Policy. **[NEW/UPDATED FOR KCSIE 2026]**

7.10 Concerns about a staff member, supply teacher, volunteer or contractor

If a staff member has a concern about, or receives an allegation against, another member of staff, supply teacher, volunteer or contractor, they will speak to the headteacher as soon as possible. If the concern is about the headteacher, they will speak to the Proprietor. Where there is a conflict of interest in reporting to the headteacher or Proprietor, the concern will be reported directly to the LADO. Full procedures are set out at appendix 2.

7.11 Reporting systems for pupils

We want pupils to feel safe and confident coming forward with a concern, about themselves or a peer. We will:

- Ensure pupils know who they can talk to, both within the school (including their tutor, Head of Boarding, or any trusted member of staff) and outside it (such as Childline or, for boarders, the school's Independent Listener)
- Make our reporting routes well-publicised, easy to understand, and accessible, including for boarders outside the school day
- Reassure pupils that they will be listened to, believed, and taken seriously
- Cover these issues, in an age-appropriate way, through our pastoral curriculum

8. Online safety and the use of mobile and smart technology

The breadth of issues classified within online safety is considerable and ever-evolving. We will identify the categories of risk as:

- Content: being exposed to illegal, inappropriate or harmful material, including misinformation, disinformation and conspiracy theories
- Contact: being subjected to harmful online interaction with other users, including peer-to-peer pressure and commercial advertising
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending or receiving explicit images, or online bullying
- Commerce: risks such as online gambling, inappropriate advertising, phishing and financial scams

Content risks now explicitly include AI-generated content, deepfakes and 'nudification' apps – tools that digitally alter or generate images to create nude or semi-nude imagery of a real person. Where such content involves a pupil, this is treated as a child sexual abuse image and reported in line with section 7.6, regardless of whether the imagery is 'real'. **[NEW/UPDATED FOR KCSIE 2026]**

The school considers the 4Cs when assessing the risks its pupils may face online, both to enable us to effectively identify those risks and to develop a robust and effective online safety policy.

8.1 Filtering and monitoring

In line with KCSIE 2026, appropriate filtering and monitoring systems are in place on the school's network and school-provided devices. The effectiveness of these systems is reviewed at least once every academic year by Chaerin Lee, the SLT member responsible for filtering and monitoring, supported by the DSL and IT Network Manager. This review is formally received by the governing board and is recorded and made available to inspectors as evidence of compliance. Full detail is set out in the ICT and Internet Acceptable Use Policy. **[NEW/UPDATED FOR KCSIE 2026]**

All staff understand their role in relation to filtering and monitoring, including reporting a concern about a pupil's online activity, or about the effectiveness of the filtering and monitoring systems themselves, to the DSL or IT Network Manager.

8.2 Mobile and smart technology

In line with the Children's Wellbeing and Schools Act 2026 and KCSIE 2026, the school operates as a mobile phone-free environment by default. Day pupils hand their phone in to a member of SLT on arrival; boarding pupils' access to their phone is governed by key stage and time of day. Full detail is set out in the school's Mobile Phone Policy and Bring Your Own Device Policy. **[NEW/UPDATED FOR KCSIE 2026]**

The school's requirements for filtering and monitoring also apply to the use of AI, including generative AI tools such as chatbots. Where AI has been used to access harmful content, generate harmful imagery, or bully a pupil, this will be treated as a safeguarding matter under this policy, alongside the ICT and Internet Acceptable Use Policy.

9. Notifying parents or carers

Where appropriate, the school will notify parents or carers of any actions taken in respect of their child, unless doing so would place the pupil at increased risk of harm, or the pupil has expressly asked that a parent or carer not be informed.

10. Pupils with SEND or certain medical or physical health conditions

Staff will be aware that additional barriers can exist when recognising abuse and neglect in pupils with SEND, or certain medical or physical health conditions. These can include: an assumption that indicators of possible abuse relate to the pupil's condition without further exploration; pupils being more prone to peer group isolation or bullying; communication barriers, and difficulties overcoming these barriers, in reporting abuse to adults or peers.

When managing a safeguarding concern relating to a pupil with SEND, the DSL will liaise with the SENCO and the pupil's parents/carers where appropriate, to ensure the pupil's needs are met effectively.

11. Pupils with a social worker

Where a pupil has a social worker, the DSL will hold and, where appropriate, use this information to support decisions about the pupil's welfare, and will ensure relevant staff are aware of a pupil's social worker and the reasons for their involvement.

12. Looked-after and previously looked-after children

A designated teacher takes lead responsibility for promoting the educational achievement of looked-after and previously looked-after children, and works with the virtual school head (VSH) to discuss how the pupil premium plus can be best used to support the pupil's progress. The DSL will hold information about a pupil's looked-after legal status, contact arrangements, and care arrangements, as required to keep the pupil safe.

13. Pupils who are LGBTQ+ or questioning their gender

The fact that a pupil is, or is perceived to be, LGBTQ+ is not in itself an inherent risk factor for harm, but staff will be aware that these pupils can be targeted by others, and that the risks can be compounded where a pupil does not have a trusted adult to speak openly with. Staff will work to reduce additional barriers these pupils may face and provide a safe space for them to raise concerns.

Where a pupil discloses that they are questioning their gender, staff will respond in a supportive, individual, and child-centred way, and will refer to the relevant DfE guidance. This is not, itself, a safeguarding concern, but staff will remain alert to any associated safeguarding risks (for example, bullying, family conflict, or mental health concerns) and will speak to the DSL. The DSL will consider, on a case-by-case basis and in consultation with parents/carers except where this would not be safe to do so, arrangements around single-sex spaces (such as toilets and changing facilities) and participation in residential trips, in line with DfE guidance and the school's approach to safeguarding all pupils. **[NEW/UPDATED FOR KCSIE 2026]**

14. Complaints and concerns about school safeguarding policies or practice

Any complaint about how the school has responded to a safeguarding matter will be dealt with in accordance with the school's Complaints Policy. Complaints about the DSL will be referred to the headteacher; complaints about the headteacher will be referred to the Proprietor. Any member of staff, pupil, parent or carer who has a concern about the school's safeguarding arrangements more broadly may raise this with the DSL, the headteacher, or, if the concern is not resolved, the Proprietor.

15. Record-keeping

All staff are aware that safeguarding incidents and/or concerns will be recorded and held on a pupil's confidential child protection file, kept separately from their main school file, using the school's record of concern form (appendix 4). Concerns are recorded factually, distinguishing between fact and opinion, and are kept securely in a locked cabinet in the SLT office, with access restricted to the DSL and deputy DSLs.

Records are retained in line with the school's records management arrangements and current guidance on retention of child protection records, and are transferred securely and promptly (see section 6) if a pupil moves to another school.

16. Training

The DSL and deputy DSLs will undertake formal child protection and safeguarding training at least every 2 years, and update their knowledge and skills at regular intervals, and at least annually, including on the areas covered by this policy.

All staff members will undergo child protection and safeguarding induction training on appointment, which is regularly updated, and will receive further safeguarding and child protection updates as required, and at least annually, including training on online safety and their role and responsibilities in relation to filtering and monitoring. All staff, including support, site, catering and administrative staff, will read Part One of KCSIE 2026 in full.

Volunteers who work with pupils will be given appropriate safeguarding training, in a manner and to a level consistent with the role they are carrying out.

All members of the governing board and proprietor body will undertake safeguarding and child protection training at induction, updated regularly, and at least one governor will have completed safer recruitment training.

17. Monitoring arrangements

This policy is reviewed at least annually by the DSL, in consultation with the governing board. It is also reviewed sooner if there is a change in legislation or guidance, or in response to a serious incident. It was approved by the governing board on the date at the top of this policy.

18. Links with other policies

This policy links with the following school policies and procedures:

- Safer Recruitment Policy
- Behaviour Policy
- Anti-bullying Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Complaints Policy
- Data Protection Policy
- ICT and Internet Acceptable Use Policy
- Mobile Phone Policy
- Bring Your Own Device Policy
- Pastoral Care Policy
- Health and Safety Policy, and First Aid Policy
- Missing Pupil Policy
- Relationships and Sex Education Policy
- UKVI Compliance Policy

19. Multi-agency working and early help

Where a pupil and their family could benefit from coordinated support before needs escalate, the DSL will consider a referral under the Family Help model, which, in line with Working Together to Safeguard Children 2026, has replaced the previous separate early help and Section 17 pathways with a single, consent-based, locally coordinated offer. The case will be kept under constant review; if the pupil's situation does not improve, the DSL will consider a referral to children's social care. **[NEW/UPDATED FOR KCSIE 2026]**

All staff, particularly the DSL and deputy DSLs, will be aware of local safeguarding partner arrangements, including the local criteria for action and the local protocol for assessment, and will follow the statutory duty to cooperate where the school is named as a relevant agency.

Where the school is notified of a domestic abuse incident affecting a pupil through Operation Encompass, the DSL will ensure the pupil's voice is reflected in how this information is received, recorded and acted upon, and will provide discreet, tailored support to the pupil. **[NEW/UPDATED FOR KCSIE 2026]**

20. Use of the school premises for non-school activities

Where the governing board hires or rents out school facilities or premises to another organisation or individual, it will seek assurance that appropriate safeguarding and child protection policies and procedures are in place, in line with DfE guidance on keeping children safe in out-of-school settings. Safeguarding requirements will be built into any lease or hire agreement, with failure to comply grounds for termination. Where activities are run under the direct supervision of school staff, this policy applies in full.

21. Alternative provision

Where a pupil is placed with an alternative provider, the school remains responsible for that pupil's welfare. Before placing a pupil, the school will obtain written confirmation that the provider has carried out all relevant safeguarding checks on its staff, and will satisfy itself that the placement continues to meet the pupil's needs. Staff commissioning alternative provision will be mindful that pupils placed there often have complex needs and may be at increased risk of harm.

22. Work experience

Where a pupil is placed on work experience, the school will ensure the provider has appropriate safeguarding policies and procedures in place. Where a pupil undertakes work experience at the school itself, an enhanced DBS check will be obtained if the pupil is aged 16 or over.

23. Homestay and exchange visits

Where the school arranges for a visiting pupil to be cared for and accommodated in the UK by a family to which they are not related, the responsible adults are considered to be in regulated activity for the duration of the stay, and the school is the regulated activity provider. The school will obtain the information necessary to assess the suitability of the host household, including an enhanced DBS check with barred list information for the responsible adults, and will consider whether a DBS check is needed for any other household member aged 16 or over.

For homestays arranged by the school abroad, the school will liaise with partner schools on the arrangements in place, and will consider, case by case, whether to contact the relevant embassy or High Commission. Pupils will be given emergency contact details to use if they feel unsafe or uncomfortable.

Where a parent or pupil arranges their own homestay privately, this is not a school arrangement and the school is not the regulated activity provider. Where a period of UK homestay lasts 28 days or more for a pupil under 16 (or under 18 for a pupil with SEND), this may amount to private fostering under the Children Act 1989, and the school will notify the local authority as soon as it becomes aware.

24. Context of safeguarding incidents and contextual safeguarding

Staff will always consider the context within which incidents and concerns occur. Safeguarding issues are rarely standalone events, and assessment should consider a pupil's wider life, including family, peer group, online activity and community, as well as the school environment, since abuse and exploitation can take place both inside and outside school, and online.

25. Managing referrals

Staff will follow the school's Reporting Safeguarding Concerns process, and will be aware of the local authority's arrangements for managing referrals. Where a referral is made, the local authority will normally confirm what action is to be taken within one working day; the referrer will follow this up if no such

confirmation is received. Where a pupil is in immediate danger, or has been the victim of a crime, a referral will be made to children's social care and/or the police without delay.

Throughout, the school will make sure a pupil's wishes and feelings are taken into account, that there are systems for pupils to give feedback, and that staff respond to concerns calmly and supportively so that a pupil feels heard and believed.

Appendix 1: Types of abuse and neglect

Physical abuse

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

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. This may involve conveying that a child is worthless or unloved, age- or developmentally-inappropriate expectations, preventing a child from participating in normal social interaction, seeing or hearing the ill-treatment of another, serious bullying (including cyberbullying), and the exploitation or corruption of a child. Some level of emotional abuse is present in all forms of maltreatment, though it may occur alone.

Sexual abuse

Forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This may involve physical contact, or non-contact activities such as involving children in looking at or producing sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by males or females, by adults or by other children.

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of health or development. Neglect may occur during pregnancy, and once born may involve a parent or carer failing to provide adequate food, clothing or shelter, protect a child from physical or emotional harm, ensure adequate supervision, or ensure access to appropriate medical care or treatment; it may also include neglect of a child's basic emotional needs.

Child-on-child abuse

Abuse of a child by another child or children. In line with KCSIE 2026, this includes: bullying (including cyberbullying, prejudice-based and discriminatory bullying); serious violence; misogyny; abuse in intimate personal relationships between peers; physical abuse; sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and/or videos (including where wholly or partly AI-generated); causing someone to engage in sexual activity without consent; and initiation/hazing-type violence and rituals. Child-on-child abuse is never acceptable and will always be taken seriously, in line with section 7.5 of this policy. **[NEW/UPDATED FOR KCSIE 2026]**

Appendix 2: Allegations of abuse made against staff

This appendix sets out the school's procedure for managing an allegation, or concern, that a member of staff, supply teacher, volunteer, contractor, or trainee teacher has behaved in a way that:

- May have harmed a child
- Possibly constitutes a criminal offence against, or related to, a child
- Has behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Has behaved, or may have behaved, in a way that indicates they may not be suitable to work with children

These procedures apply equally to trainee teachers, who are confirmed under KCSIE 2026 to sit within the same allegations-against-staff framework as substantive staff. **[NEW/UPDATED FOR KCSIE 2026]**

Threshold for referral

Where an allegation meets the harm threshold above, the headteacher (or Proprietor, if the allegation is against the headteacher) will act as case manager and will normally contact the LADO within one working day to discuss the allegation and agree a course of action. The individual concerned will be informed of the allegation as soon as possible after consulting the LADO, and will be offered the support of a trade union or professional association representative, or a colleague, at any interview or meeting.

Where an allegation does not meet the harm threshold, it will be considered and recorded as a low-level concern. This may include, for example, being overly familiar with children, or acting in a way that is inconsistent with the Staff Code of Conduct, even where it does not suggest a risk of harm. Recording and considering patterns of low-level concerns, even where no single incident meets the threshold for referral, is an important part of creating and maintaining a safe environment for pupils. All low-level concerns will be reported to the headteacher (or the Proprietor, where the concern relates to the headteacher) and a record kept.

The role of the LADO

The LADO provides advice and guidance to the school, liaises with the police and other agencies, monitors the progress of cases, and ensures the process is dealt with as quickly as possible consistent with a thorough and fair process.

Managing the process

Where a formal process is required, the school will follow the process set out in Part Four of KCSIE 2026, and, in line with the DBS's requirements, will make a referral to the DBS where a person is dismissed, or would have been dismissed had they not resigned, because they have harmed a child or pose a risk of harm to a child. Where relevant, the school will also refer to the Teaching Regulation Agency.

Where the outcome of an investigation is that an allegation is substantiated, the case will be referred to the DBS, and, where the person is a teacher, to the Teaching Regulation Agency, within one month.

Appendix 3: Specific safeguarding issues

This appendix sets out a summary of specific safeguarding issues staff should be aware of. It should be read alongside Annex B of KCSIE 2026 and any locally agreed procedures from the school's safeguarding partners. In all cases, staff should speak to the DSL if they have a concern.

County lines and child criminal exploitation (CCE)

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store and sell drugs and money, and coerced into this activity through violence, debt bondage or grooming. Staff will be alert to signs such as unexplained absences, unexplained money or gifts, going missing, and association with older individuals or groups.

Child sexual exploitation (CSE)

A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator. It can affect any child, and the age of consent does not change the fact that an exploitative relationship is abusive.

Cyber-crime

This includes children accessing tools or guidance to commit cyber-crime (cyber-enabled or cyber-dependent), and children being targeted or exploited by online criminals. Staff will be alert to unusual interest in hacking or online criminal forums.

Modern slavery

Modern slavery encompasses slavery, human trafficking, and forced labour. Perpetrators use whatever means they have at their disposal to coerce, deceive or force individuals into a life of abuse and control.

Female genital mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons. It is illegal in the UK. Teachers have a statutory duty to personally report to the police, via 101, where they discover (either through disclosure by the victim, or physical signs) that FGM appears to have been carried out on a girl under 18.

Virginity testing and hymenoplasty

Both are illegal in the UK. Virginity testing is a physical examination purporting to determine whether a female has had vaginal intercourse; hymenoplasty is a surgical procedure to reconstruct the hymen. Staff will treat any disclosure or concern as they would FGM.

Forced marriage

A marriage in which one or both parties do not, or cannot, consent, and where pressure or abuse is used. This is illegal in the UK. Staff will be alert to signs such as extended absence from school, a family history of forced marriage, and talk of an upcoming family holiday during which the pupil is anxious or reluctant to go.

Radicalisation

The process by which a person comes to support terrorism or extremist ideologies. The school has a duty under the Counter-Terrorism and Security Act 2015 to have due regard to preventing people from being drawn into terrorism. Staff will refer concerns to the DSL, who will consider whether a referral to the Channel programme is appropriate.

Pupils with family members in prison

An estimated 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, and mental health difficulties, and the school will support these pupils appropriately, drawing on relevant charities and support organisations where needed.

Pupils required to give evidence in court

Pupils required to give evidence in criminal proceedings, whether for the prosecution or defence, are potentially vulnerable, and the school will support them appropriately, including liaising with the Witness Service where relevant.

Serious violence and weapons **[NEW/UPDATED FOR KCSIE 2026]**

Staff will be alert to indicators that a pupil may be involved in, or at risk from, serious violence, including gang association, unexplained injury, and carrying a weapon. Any concern that a pupil is carrying, using, or has expressed an intention to use a weapon must be reported to the DSL or a deputy DSL immediately – see section 7.7. **[NEW/UPDATED FOR KCSIE 2026]**

Misogyny and violence against women and girls (VAWG) **[NEW/UPDATED FOR KCSIE 2026]**

Staff will challenge sexist and misogynistic language and behaviour, recognising that it exists on a continuum that can escalate into harmful sexual behaviour, sexual harassment and sexual violence if not addressed early. **[NEW/UPDATED FOR KCSIE 2026]**

Young carers **[NEW/UPDATED FOR KCSIE 2026]**

Pupils who care for a family member with an illness, disability, mental health condition, or substance misuse problem may experience additional pressures affecting their attendance, attainment and emotional wellbeing. Staff will be alert to this and will support young carers through the school's pastoral arrangements, referring to relevant local young carers' services where appropriate. **[NEW/UPDATED FOR KCSIE 2026]**

Adult involvement in nude and semi-nude image sharing

Not all incidents involving nude or semi-nude imagery of pupils are between children and young people. Adults may pose as a child to obtain such images, either for sexually motivated reasons or for financial extortion ('sextortion'). Staff will be alert to signs such as a pupil being contacted by an unfamiliar account, being moved quickly to a private or encrypted platform, being offered money or gifts, or being threatened or blackmailed. Any such incident, or suspicion of adult involvement, must be reported to the DSL immediately and will always be referred to the police and/or children's social care.

Appendix 4: Record of concern about a pupil's safety and welfare

Part 1 (for use by any member of staff – must be handwritten, legible, and passed to the DSL without delay)

Pupil's name		**Date of birth**	
Form/tutor group			
Date & time of incident		**Date & time of writing**	
Name (print)		**Job title**	
Signature			
Nature of concern – record factually what was seen, heard or disclosed (attach further sheets if needed)			
What is the pupil's perspective?			
Professional opinion, where relevant (clearly distinguished from fact)			
Any other relevant information, including previous concerns			
Actions taken, including names of anyone the information was passed to, and when			

Part 2 (for use by the DSL)

Information received by DSL – date/time/from whom	
Advice sought, if applicable (date, from whom/organisation)	
Advice received	
Action taken, with reasons recorded (e.g. referral completed, monitoring advice given, early help offer) – date and by whom	
Outcome – date and by whom	
Parent/carer informed? Y / N – who spoken to, or reason not informed (date, time, by whom)	
Is any additional detail held, and if so where?	
Number of previous records of concern for this pupil	