Safeguarding and Child Protection Policy

St. James' School

Document control

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Approved by	**[[PROPRIETOR / GOVERNING BODY]]**
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1. Purpose, scope and principles

Safeguarding and promoting the welfare of children is everyone's responsibility. The school will act in a child-centred way and will consider, at all times, what is in the best interests of the child.

For the purposes of this policy, a child is anyone under the age of 18.

This policy applies whenever the school is responsible for, or has safeguarding information about, a pupil. It applies on the school site, during educational visits, transport, remote education, school-organised activities and where conduct outside school affects the safety or welfare of pupils.

Safeguarding and promoting the welfare of children means:

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

Safeguarding incidents can happen anywhere. Staff must maintain an attitude of "it could happen here", exercise professional curiosity and report concerns without delay.

The school will provide an open, inclusive and anti-discriminatory culture in which pupils feel safe, are listened to and know how to report concerns. Racism, discrimination, sexism, misogyny, misandry, homophobia, biphobia, sexual harassment, violence and derogatory behaviour will be challenged.

2. Statutory framework and linked policies

This policy has regard to the following principal legislation and guidance:

- Education Act 2002, section 175, as applicable, and the Education (Independent School Standards) Regulations 2014;
- Children Acts 1989 and 2004;
- Keeping Children Safe in Education 2026;
- Working Together to Safeguard Children 2026;
- Independent School Standards Guidance, April 2026;
- Early Years Foundation Stage statutory framework for group and school-based providers applying from 1 September 2026, where applicable;
- Prevent Duty Guidance: England and Wales 2023;
- Children Missing Education statutory guidance, September 2025;
- Relationships Education, Relationships and Sex Education and Health Education statutory guidance applying from 1 September 2026;
- Mobile Phones in Schools statutory guidance, to be followed from 1 September 2026;
- Restrictive Interventions, Including the Use of Reasonable Force, in Schools, effective from 1 April 2026;
- Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025;
- Disqualification under the Childcare Act 2006, where applicable; and
- current local safeguarding-partnership procedures and threshold documents.

The policy also takes account of the following guidance and operational material, where applicable:

- What to do if you are worried a child is being abused: advice for practitioners (DfE, 2015);
- Information sharing: advice for practitioners providing safeguarding services (DfE, 2024), pending final replacement guidance for the 2026 information-sharing duty;
- Working Together to Improve School Attendance, updated July 2026;
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS/DfE);
- Duty on police forces to notify education settings of domestic abuse incidents: Operation Encompass statutory guidance, 2025;
- Alternative Provision guidance, updated February 2025, and non-school alternative provision voluntary national standards, August 2025, used as relevant commissioning guidance;
- School and College Security guidance, updated July 2026;

- Boarding Schools: National Minimum Standards, where applicable;
- current DfE data-protection guidance, updated July 2026; and
- current local authority threshold, escalation, LADO, Prevent, CME, attendance and multi-agency procedures.

This policy should be read with:

- Admissions and Exclusions Policy; Anti-Bullying Policy; Attendance and Punctuality Policy; Behaviour and Discipline Policy;
- Staff Code of Conduct; Complaints Procedure; Data Protection Policy and Data Protection Privacy Notice;
- First Aid Policy; Health and Safety Policy; Images Policy; Internet Policy;
- Non-Discrimination and Inclusion Policy; PSHCE Policy; Relationships and Sex Education Policy;
- Risk Assessment Policy; Safer Recruitment Policy; Teaching and Learning Policy;
- Restrictive Interventions Policy; Supporting Pupils with Medical Conditions Policy; Whole-School Allergy Policy; and
- the school's restricted Emergency and Public Protection Plan and educational-visits procedures.

3. Immediate safeguarding action

CONCERN ABOUT A CHILD

Address any immediate danger or urgent medical need.

Report the concern to the DSL or a deputy immediately.

Make an accurate written record using **the school's Record of Concern form and safeguarding records**.

Do not investigate, promise secrecy or wait for proof.

Immediate danger or serious harm

- Call 999.
- Contact local authority children's social care immediately.
- Inform the DSL or deputy as soon as practicable.

DSL unavailable

- Speak to another senior leader.
- Contact children's social care directly if necessary.
- Anybody can make a referral. Delay is not acceptable.

Concern about an adult

- Report to the Headteacher without delay.
- If the concern is about the Headteacher, report to the proprietor Ali Khan, whose details are available on the school website or from the school office.
- If there is a conflict or the Headteacher is sole proprietor, contact the LADO directly.

Whistleblowing

- Use the internal route first where safe to do so.
- If unable to raise internally, use the NSPCC Whistleblowing Advice Line.
- Whistleblowing must not delay protection of a child.

Accessible reporting systems

Pupils may report a concern to any trusted adult, the DSL or a deputy, through contacting the SLT or DSL for the day, or emailing the DSL, or through the school's pastoral arrangements. Reporting routes will be well promoted, easy to understand, accessible to pupils with SEND or communication needs and available for concerns arising online, off site or outside the school day.

The school will explain to pupils that their concern will be taken seriously, that they will be supported and kept safe, and that information will only be shared with people who need it in order to help. Pupil feedback on reporting routes and safeguarding culture will be reviewed through **[[PUPIL VOICE ARRANGEMENT]]**.

4. Roles and responsibilities

The proprietor

- retains strategic responsibility for safeguarding and for ensuring that this policy is effective;
- ensures the school complies with KCSIE, the Independent School Standards and applicable EYFS requirements;

- appoints an appropriately senior DSL with sufficient authority, time, funding, training, resources and support;
- ensures all governors, directors or proprietors receive safeguarding and online-safety training at induction and regular updates;
- ensures safer recruitment, appropriate filtering and monitoring, premises, lettings and alternative-provision arrangements are effective; and
- reviews safeguarding information, trends, incidents and assurance evidence.

The Headteacher

- implements this policy and promotes a whole-school safeguarding culture;
- ensures staff understand the policy and receive appropriate training;
- acts as case manager for allegations about adults, unless the allegation concerns the Headteacher;
- ensures deficiencies are remedied without delay; and
- reports significant safeguarding matters and assurance information to the proprietor.

The Designated Safeguarding Lead

The DSL is **Trudy Harris, Headmistress / Designated Safeguarding Lead**. The DSL is a senior member of the leadership team with the status, authority, knowledge and experience needed to fulfil the role.

- leads safeguarding and child protection, including online safety;
- understands the school's filtering and monitoring arrangements;
- manages referrals and works with local authority children's social care, police, Channel, the LADO and other agencies;
- liaises with the Headteacher about ongoing section 47 enquiries and police investigations and is aware of the requirement for children to have an Appropriate Adult in relevant police processes;
- keeps safeguarding records and manages secure information sharing and file transfer;
- supports staff, promotes a culture in which children are heard and links welfare with educational outcomes;
- works with the SENCO, mental-health lead, attendance lead, IT lead and other relevant staff; and
- keeps the policy and procedures under review.

DSL cover and reporting arrangements

During term time, the DSL or a trained deputy will be available during school hours. Where the DSL is unavailable, cover will be provided by Jessica Campling/ Assistant Head/Deputy DSL, David Rose, Assistant Head / Deputy DSL, and Tracy Shepherd, Health & Hub Coordinator / Deputy DSL. The school uses safeguarding@saintjamesschool.co.uk so concerns continue to be received and acted upon. For out-of-hours school activities, the safeguarding contact is Trudy Harris & Jessica Campling.

Deputy Designated Safeguarding Leads

- Deputy DSLs are trained to the same standard as the DSL and may carry out delegated activities.
- The DSL retains lead responsibility and management oversight, and delegated duties will be clear and recorded.
- During term time, the DSL or a trained deputy will be available during school hours. Out-of-hours and off-site arrangements are set out in the school's DSL / Deputy DSL cover arrangements, with a nominated DSL or Deputy DSL available on site or contactable by phone or online video.

SENCO, designated teacher and other safeguarding partners within the school

- The SENCO works closely with the DSL where a pupil with SEND is involved in a safeguarding concern or allegation and ensures communication and reasonable adjustments are considered.
- The designated teacher for looked-after and previously looked-after children works with the DSL and Virtual School Head to support welfare, attendance and educational outcomes.
- The Senior Attendance Champion and attendance lead share absence and CME concerns with the DSL and ensure safeguarding action is not delayed by attendance procedures.

- The filtering and monitoring lead and IT provider supply the DSL and proprietor with assurance, reports and prompt escalation of safeguarding and cyber concerns.
- The mental-health lead, medical staff and educational-visits coordinator share relevant information and act within the DSL's safeguarding framework.

Pupils, parents and carers

- Pupils are encouraged to speak to a trusted adult, use the school's reporting routes and report concerns about themselves or others.
- Parents and carers should provide accurate contact, medical and welfare information, report absence promptly and tell the school about circumstances that may affect a child's safety or wellbeing.
- The school will work openly with parents wherever safe and appropriate. It will not seek consent or provide advance notice where doing so may increase risk, delay protection or prejudice a statutory investigation.

All staff and volunteers

- must safeguard children, follow this policy and act in the child's best interests;
- must report concerns immediately and must not assume another person will act;
- must understand the Staff Code of Conduct, low-level-concerns, allegations and whistleblowing procedures;
- must share information when necessary to protect a child; and
- must cooperate with assessments, referrals and multi-agency plans.

5. Training, induction and safeguarding culture

All staff will receive safeguarding and child-protection training at induction. Training will include online safety and the roles and responsibilities relating to filtering and monitoring.

- Safeguarding training will be updated regularly, with updates at least annually.
- The DSL and deputies will complete role-specific training at least every two years, Prevent awareness training and annual knowledge refreshers.
- Temporary staff, supply staff, trainee teachers, contractors and volunteers will receive proportionate safeguarding information before or as soon as reasonably practicable after beginning duties.
- Training records will include attendance, completion, KCSIE reading and understanding, updates and catch-up arrangements.
- Staff will be trained to recognise child-on-child abuse, harmful sexual behaviour, online and AI-related harms, exploitation, serious violence, mental-health concerns, discriminatory harm and concerns about adults.

Induction

As part of safeguarding induction, all staff will be provided with or directed to:

- the Safeguarding and Child Protection Policy;
- the Behaviour and Discipline Policy;
- the Staff Code of Conduct, including allegations, low-level concerns and whistleblowing;
- the school's response to children absent from education;
- online-safety and acceptable-use requirements;
- the identity and role of the DSL and deputies;
- KCSIE 2026 Part One; and
- School leaders and staff who work directly with children will also read KCSIE 2026 Annex A.

Where the school provides EYFS, practitioners will receive safeguarding training meeting the applicable EYFS criteria. Training will be renewed every two years, with additional refreshers where required.

6. Recognising abuse, neglect and exploitation

Abuse, neglect, exploitation and safeguarding concerns often overlap. They may occur within or outside the home, in school, in the community or online. Children may be harmed by adults or other children and may not recognise or disclose the harm.

Core categories

Category	What staff should understand
Physical abuse	Hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, otherwise causing physical harm, or fabricating or inducing illness.
Emotional abuse	Persistent emotional maltreatment, including criticism, belittling, name-calling, silencing, humiliation, unreasonable expectations, overprotection, exposure to ill-treatment, serious bullying or exploitation.
Sexual abuse	Forcing or enticing a child into sexual activity, including assault by penetration, for example rape or penetration with an object, non-penetrative acts and non-contact activity such as grooming, sexual imagery or watching sexual activity.
Neglect	Persistent failure to meet physical or psychological needs, including food, clothing, shelter, supervision, protection, medical care or emotional responsiveness.
Exploitation and modern slavery	Taking advantage of a power imbalance to coerce, control, manipulate or deceive a child into criminal, sexual, financial or other activity, including trafficking and organised networks.

Indicators that must prompt professional curiosity

- unexplained or repeated injuries, or conflicting explanations;
- changes in behaviour, presentation, attainment, attendance, friendships or relationships;
- frequent, persistent or unexplained absence, repeated classroom removal, multiple suspensions, part-time timetable, risk of exclusion or alternative provision;
- hunger, poor hygiene, inadequate supervision or unmet medical needs;
- self-harm, eating-disorder indicators, suicidal ideation or significant mental-health deterioration;
- sexualised behaviour or knowledge, harmful sexual behaviour, sexual harassment or violence;
- racist, misogynistic, misandrist, homophobic, biphobic, faith-based or other prejudicial behaviour;
- weapons, threats, unexplained money or possessions, older associates or criminal networks;
- online grooming, cyberbullying, financially motivated sexual extortion, AI-generated sexual imagery or sharing nudes and semi-nudes; and
- any disclosure, drawing, written account, comment or professional unease that may indicate harm.

DO NOT WAIT FOR A DISCLOSURE

A child may be unable or unwilling to explain what is happening. The absence of a disclosure does not mean abuse, neglect or exploitation is not occurring.

7. Reporting concerns, referrals and escalation

1. Address any immediate danger or medical need.
2. Report the concern to the DSL or a deputy without delay.
3. Record what was seen, heard or disclosed, using the child's own words where possible.
4. Continue to support the child and cooperate with any assessment or referral.

The DSL will decide the appropriate response. Options may include school support, universal or community-based help, targeted Family Help, local authority children's social care, police, Channel, the National Referral Mechanism or another specialist service.

SIGNIFICANT HARM THRESHOLD

Where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm, a referral must be made immediately to local authority children's social care and, where appropriate, the police.

If the DSL or deputy is unavailable, this must not delay action. Anybody can make a referral. A person making a direct referral must inform the DSL or deputy as soon as practicable.

Parents will normally be informed unless doing so may increase risk, prejudice an investigation, conflict with statutory-agency advice or otherwise be contrary to the child's welfare.

If a referral has been made and the child's situation does not improve, the referrer and DSL will follow the local escalation procedure. Staff must press for reconsideration where necessary.

All concerns, discussions, decisions, actions and reasons for decisions must be recorded in writing.

8. Responding to a disclosure

Do	Do not
• Listen calmly and without judgement. • Take the child seriously. • Reassure the child that they were right to tell. • Explain that you must share the information with people who can help. • Use open prompts only where needed for clarification. • Report to the DSL or deputy immediately. • Record exact words, date, time, location and relevant observations.	• Promise confidentiality or secrecy. • Express shock or disbelief. • Ask leading or investigative questions. • Ask the child to repeat the account unnecessarily. • Criticise the person alleged to have caused harm. • Confront the alleged person or contact parents independently. • Keep copies of notes outside the safeguarding system.

Staff must communicate in a way suited to the child's age, development, disability, language and communication needs. A child who stops speaking or cannot continue must still be protected and the concern must still be reported.

A child must never be made to feel ashamed, blamed or responsible for creating a problem by reporting abuse.

Staff who receive a distressing disclosure or are involved in a difficult safeguarding case may seek confidential support from the DSL, Headteacher or another appropriate senior lead, while maintaining the child's confidentiality and safeguarding the integrity of any investigation.

9. Support before statutory intervention and Family Help

Staff must identify children who may benefit from support before the need for statutory intervention arises.

Staff must understand **[[LOCAL THRESHOLD DOCUMENT]]**, the local Family Help arrangements and referral routes. The school will contribute to assessments, multi-agency plans and coordinated support where required.

Support will be reviewed. If circumstances do not improve, risk increases or significant harm is suspected, the matter will be escalated immediately to local authority children's social care.

The school will use the local authority's current terminology. Legacy terms such as Common Assessment Framework or Team Around the Child will only be used if they remain the local system.

10. Child-on-child abuse

Children can abuse other children in school, outside school and online. The absence of reported incidents does not mean abuse is not happening. The school adopts a zero-tolerance approach and will not dismiss abuse as banter, part of growing up or boys being boys.

Child-on-child abuse is a safeguarding concern for both the child who experienced the behaviour and the child alleged to have caused harm.

- bullying, cyberbullying and prejudice-based or discriminatory bullying;
- abuse in intimate personal relationships between children;
- physical abuse and threats involving weapons;
- harmful sexual behaviour, sexual harassment and sexual violence, including misogyny or misandry;
- coercing another child to engage in sexual activity;
- making or sharing nudes and semi-nudes, including digitally altered or AI-generated images, deepfakes and deep nudes;
- upskirting;
- financial exploitation; and
- initiation or hazing-type violence and rituals.

Any concern must be reported to the DSL or deputy without delay. The response will be child-centred, case-by-case and will consider age, development, SEND, communication, power imbalance, coercion, impact, continuing risk and whether a criminal offence may have been committed.

The school will support all affected children, manage contact and safety, involve parents where appropriate, work with statutory agencies and record the concern, assessment, decisions, actions and outcome.

Mediation or restorative practice will not be automatic and will not ordinarily be used where there is sexual violence, serious harassment, exploitation, coercion or a significant power imbalance.

11. Harmful sexual behaviour, sexual harassment and sexual violence

The school recognises a continuum from developmentally expected sexual behaviour through inappropriate and problematic behaviour to abusive and violent behaviour. Every report will receive a safeguarding response.

IMMEDIATE RISK AND NEEDS ASSESSMENT

Following a report of sexual violence, the DSL or deputy will complete an immediate risk and needs assessment.

Following a report of sexual harassment, the need for an assessment will be considered case by case.

The assessment will cover the child who experienced the behaviour, the child alleged to have caused harm, other pupils and staff, locations, contact, supervision, transport and wider risk.

Assessments and protective arrangements will be recorded, implemented and reviewed.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is that it will be reported to the police, generally alongside a referral to local authority children's social care. Where the child alleged to have caused harm is under ten, the starting principle of reporting to the police remains; police involvement will focus on welfare rather than criminal responsibility.

The school will not conduct an investigation that could prejudice police or social-care enquiries. The school will continue to safeguard and educate the children involved while statutory enquiries proceed.

Consent must be understood as free, informed and capable of being withdrawn. A child cannot consent to exploitation or trafficking. Apparent consent does not remove the safeguarding concern.

12. Making or sharing nudes and semi-nudes

"Making or sharing nudes and semi-nudes" includes photographs, videos and live streams created by a child or another person, including imagery that is digitally altered or generated using AI, such as deepfakes or deep nudes.

STAFF MUST

Report the incident to the DSL or deputy immediately.

Never intentionally view, copy, print, forward, share, store or save the imagery.

Never ask a child to share or download it.

Do not delete it or ask the child to delete it before the DSL assesses the incident.

Do not blame or shame the child.

The DSL will lead the response under current UKCIS guidance and decide whether a device should be secured, whether viewing is exceptionally necessary, whether police or children's social care should be contacted, whether evidence must be preserved, how parents will be involved and what support is required.

All incidents involving nudes or semi-nudes require a safeguarding response, whether the imagery appears consensual or non-consensual.

13. Online safety, generative AI, mobile phones, filtering and monitoring

Online safety is a running and interrelated theme across safeguarding, curriculum, behaviour, staff conduct, data protection and technology management.

The four areas of online risk

- Content: illegal, inappropriate or harmful material, including pornography, extreme violence, racism, antisemitism, misogyny, misandry, self-harm, suicide, radicalisation, misinformation, disinformation and conspiracy theories.
- Contact: harmful interaction with people or generative-AI systems, including grooming, exploitation, harassment, coercion, peer pressure and adults posing as children.
- Conduct: cyberbullying, abusive messages, sexual harassment, non-consensual imagery, nudes and semi-nudes, AI-generated imagery, deepfakes and deep nudes.
- Commerce: gambling, scams, phishing, financial exploitation, inappropriate advertising and financially motivated sexual extortion.

Generative AI

- Only school-approved systems may be used for school purposes.
- Safeguarding, confidential, special-category or identifiable personal data must not be entered without specific authority.
- AI must not be used to create abusive, sexual, discriminatory, humiliating or misleading content.
- Staff and pupils must understand that outputs may be inaccurate, biased, harmful or fabricated.
- Harmful or concerning AI-generated material must be reported immediately.

Mobile phones and smart technology

The school will be a mobile-phone-free environment throughout lessons, transitions, breaktimes and lunchtime. The detailed storage, exception and sanction arrangements are set out in the Behaviour and Discipline Policy. Any medical, disability, SEND or safeguarding exception must be documented and reviewed.

Filtering and monitoring

The proprietor retains strategic responsibility. The Headmistress, Jessica Campling, David Rose and Mark Morris (SLT) leads operational oversight with the DSL and **Central IT Team**.

- Filtering and monitoring will cover pupil and staff accounts, school-managed devices and internet-connected devices in all relevant locations.
- The effectiveness of the arrangements will be reviewed at least once every academic year.
- The review will include checks that filtering is working appropriately, sample monitoring checks, off-site use, generative AI, cybersecurity, escalation routes and action tracking.
- A written record of the review and checks will be retained.

- A cyber incident that may expose children or their information to harm must be reported to the DSL and IT or data-protection lead immediately.

14. Children absent from education and children missing education

Repeated or prolonged absence from education can be a safeguarding warning sign. The school's safeguarding response operates alongside the Attendance and Punctuality Policy and the Children Missing Education statutory guidance.

- Unexplained absence will be followed up on the first day using parent and emergency-contact details.
- Where a pupil's whereabouts cannot be established, the school will make reasonable enquiries, involve the Senior Attendance Champion and DSL, consider a welfare check and contact children's social care or police where risk is identified.
- Attendance concerns will be considered for links to abuse, neglect, exploitation, trafficking, domestic abuse, bullying, mental health, SEND, homelessness, forced marriage or radicalisation.
- A temporary reduced timetable will only be exceptional, time limited, agreed, reviewed and in the pupil's best interests. It will never be used as a behavioural sanction or informal exclusion.
- The school will make required admission, deletion, unauthorised-absence and sickness returns to the local authority.
- A pupil will only be removed from the admission register where a statutory ground applies and required enquiries and notifications have been completed.
- Where a parent or carer indicates an intention to electively home educate, the school will follow the Attendance and Punctuality Policy and Admissions and Exclusions Policy, work with the local authority and relevant professionals where appropriate, and ensure that any safeguarding referral or protective action is not delayed by the proposed withdrawal. Particular care will be taken where the child has SEND, an EHC plan, a social worker or is otherwise vulnerable.

TEMPORARY ACCOMMODATION

Where the school is notified that a pupil has been placed in temporary accommodation, the DSL and attendance lead will assess attendance, transport, continuity, welfare, SEND and medical needs.

The school will work with the family and relevant authorities to remove barriers and monitor welfare. The notification does not replace a safeguarding referral where the child is at risk.

15. Children who may be at greater risk of harm

Any child can be harmed. The following circumstances may create additional barriers to recognition, reporting or support and require professional curiosity and appropriate adjustments.

SEND, disability and medical conditions

Staff must not assume that injuries, behaviour, mood or communication arise from a child's condition without exploration. Pupils may be more isolated, disproportionately affected by bullying or unable to report clearly. The DSL and SENCO will work closely and provide communication support. Medical conditions may also create safeguarding risks or mimic signs of abuse.

Mental health, self-harm and suicide risk

Mental-health problems may indicate abuse, neglect or exploitation. Staff do not diagnose but must report safeguarding concerns. Immediate risk of self-harm or suicide requires urgent safety and medical action as well as DSL involvement.

Children with or who have had a social worker

The DSL will work with relevant leaders to understand the cohort, promote high aspirations and ensure welfare information informs appropriate academic and pastoral support.

Looked-after, previously looked-after and privately fostered children

The school will work with the designated teacher, Virtual School Head and relevant professionals. Private-fostering arrangements will be reported to the local authority where required.

Young carers, children affected by parental offending and children in kinship care

Staff will recognise possible stigma, poverty, isolation, disrupted care and mental-health impact and will consider appropriate support and information sharing.

Children who are LGB

Being lesbian, gay or bisexual is not itself a safeguarding risk. Risk may arise from bullying, discrimination, isolation or absence of a trusted adult. The school will provide safe reporting routes and challenge homophobic and biphobic abuse.

Children questioning their gender

Where a child or their parent asks the school to make changes or provide support to facilitate social transition, the following framework applies. Where a child confides feelings about gender but does not ask the school to make changes, staff will not break confidence unless there is a related safeguarding risk.

Safeguarding response where a child is questioning their gender

- The school will not initiate social transition.
- Individual members of staff must not implement changes independently.
- The school will take time to understand the child's full circumstances and involve the DSL, parents and other relevant professionals.
- Parents will be involved as a matter of priority unless the DSL determines that doing so would create a greater safeguarding risk.
- Decision-making and reasons will be documented and reviewed.
- The school will prevent bullying and treat the child respectfully.
- Pupils will not use toilets or changing rooms designated for the opposite biological sex. Where appropriate, a suitable individual alternative will be considered.
- Where single-sex sport or PE is necessary for safety, pupils will not take part in the category designated for the opposite sex.

16. Specific safeguarding issues

This section provides a concise staff reference. More detail is contained in KCSIE 2026 Annex A and local procedures. Any concern must be reported to the DSL or deputy.

Issue	Minimum school response
Domestic abuse and Operation Encompass	Children may see, hear or experience domestic abuse or experience abuse in their own intimate relationships. The school will receive and act on police notifications through safeguarding@saintjamesschool.co.uk
Child criminal and sexual exploitation	Exploitation involves a power imbalance, coercion, control, manipulation or deception. It may involve gangs or organised networks, trafficking, violence, online abuse or exchange. A child cannot consent to exploitation and may be criminalised for actions carried out under coercion.
County lines and serious violence	Indicators include absence, older associates, unexplained money or possessions, assault, weapons, decline in performance, self-harm or drug activity. The DSL will consider social-care, police and National Referral Mechanism action.
Modern slavery and trafficking	Includes forced labour, servitude, sexual exploitation, forced criminality and trafficking. The DSL will make child-protection referrals and seek NRM referral through an authorised First Responder.
Female genital mutilation	Teachers must report directly to the police where they discover that FGM appears to have been carried out on a girl under 18. Staff must not examine a child. Risks or suspicions must also be reported to the DSL and children's social care as appropriate.
Forced marriage and honour-based abuse	Never contact family or community members where this may increase risk. Report immediately to the DSL, children's social care and police as appropriate.

Issue	Minimum school response
Child abduction and community safety	Report suspicious approaches, unauthorised removal or retention, loitering or community threats. Provide age-appropriate safety education that builds confidence rather than fear of all strangers.
Children and the court system	Children giving evidence or affected by family-court arrangements may need support, confidentiality and special measures.
Homelessness and temporary accommodation	Work with housing and local-authority services, but do not substitute housing contact for a safeguarding referral where a child is at risk.
Cybercrime involvement	Children may be exploited because of technical skills or drawn into Computer Misuse Act offending. Report concerns and consider specialist support.
Private fostering	Notify the local authority where a child under 16, or under 18 if disabled, is living for 28 days or more with someone who is not a close relative, subject to statutory exceptions.
Fabricated or induced illness	Report concerns where a parent or carer may fabricate or deliberately induce illness or symptoms.
Hazing and initiation	Rituals involving humiliation, harassment, abuse, nudity, violence or sexual behaviour are safeguarding concerns.
Children with family members in prison	Consider stigma, poverty, isolation, disrupted relationships and mental-health needs.
Financially motivated sexual extortion	Threats to share sexual imagery in exchange for money, further images or other demands require immediate DSL action and likely police involvement.
Child-to-parent or caregiver abuse	A child may harm or abuse a parent, carer or other family member. The behaviour may include violence, coercion, intimidation, property damage, emotional abuse or financial abuse. Report to the DSL. Consider risk to the child, siblings and adults, family support and whether children's social care or police involvement is required.
Teenage relationship abuse and stalking	Children may experience physical, sexual, emotional or controlling abuse, coercion, harassment or stalking within intimate relationships. The legal domestic-abuse definition may not apply where a child is under 16, but safeguarding procedures always apply. Treat as child-on-child abuse. Complete risk and needs assessment, consider police and social-care referral, manage contact and provide support to both children.
Financial exploitation	Children may be coerced or deceived into moving money, opening accounts, committing fraud, taking debt, facilitating scams or surrendering benefits or earnings. Report to the DSL. Preserve evidence, consider police, social care, banking or specialist fraud support, and assess links to criminal exploitation or trafficking.
Abuse linked to faith or belief	Harm may be justified through beliefs about possession, witchcraft, honour, punishment, healing or spiritual practice. Do not challenge family or community members in a way that increases risk. Report immediately to the DSL and follow local child-protection procedures.
Pregnant pupils, pupil parents and unborn children	Pregnancy or parenthood can create additional welfare, health, exploitation, domestic-abuse and attendance risks. Working Together 2026 also requires consideration of help, support and protection for unborn children where concerns exist. Report concerns to the DSL, support access to health and education, and refer to children's social care where statutory thresholds are met.
Children missing from home or care	Going missing may indicate exploitation, trafficking, abuse, mental-health crisis, family conflict or other serious harm. Repeated episodes increase risk. Follow the school's missing-pupil procedure, notify police and parents as appropriate, inform the DSL and share information with children's social care or the child's social worker.
Children managed in the youth secure estate	Children in or returning from secure settings may have complex safeguarding, exploitation, trauma, health and educational needs. Work with the relevant professionals, share safeguarding information securely, plan transition and report any new concern without delay.
Substance misuse	A child's alcohol or drug use may indicate exploitation, abuse, mental-health need, peer pressure or family difficulty. Medication may also be diverted or misused. Prioritise medical safety, report to the DSL, consider safeguarding referral and provide proportionate support and education.
Child sexual abuse and hidden harm	Child sexual abuse may be contact or non-contact, online or offline, and may remain hidden because of grooming, shame, fear, loyalty, disability or a relationship of trust. Maintain professional curiosity, avoid waiting for a disclosure, report immediately and follow the DSL-led child-protection response.
Online grooming and exploitation	Adults or children may groom, coerce, impersonate, blackmail or exploit children through gaming, social media, livestreaming, generative-AI tools or encrypted services. Report to the DSL, preserve devices or evidence appropriately, follow imagery guidance and contact police or CEOP where indicated.

Issue	Minimum school response
Self-harm and suicide risk	Self-harm, suicidal ideation or attempted suicide may arise with or without abuse but always require urgent welfare assessment. Obtain urgent medical help where needed, do not leave the child alone where immediate risk exists, inform the DSL and parents unless unsafe, and follow the crisis plan.
Pupils with SEND, disability or communication needs	Additional barriers may include assumptions about behaviour or injury, isolation, dependence on adults, communication difficulty and increased online vulnerability. Involve the DSL and SENCO, provide communication support and reasonable adjustments, and avoid attributing indicators to the child's condition without exploration.

17. Prevent duty and radicalisation

The school will have due regard to the need to prevent people from being drawn into terrorism. Safeguarding from radicalisation forms part of the school's wider safeguarding duties.

- Staff will receive Prevent awareness training and understand how to report a concern.
- The school will maintain a proportionate Prevent risk assessment and action plan.
- The curriculum will build resilience through critical thinking, online safety, respectful debate and the active promotion of Fundamental British Values.
- Concerns will be reported to the DSL, who will consider local Prevent or Channel referral routes and information sharing with police.
- Emergency risk must be reported to the police immediately.

The school will challenge extremist, discriminatory and derogatory behaviour while ensuring that legitimate political, religious and philosophical discussion is not suppressed.

18. Safer recruitment and ongoing suitability

The school will recruit in accordance with KCSIE 2026 Part Three, the Independent School Standards, applicable EYFS requirements and the Safer Recruitment Policy.

- All offers are conditional on satisfactory completion of applicable checks.
- The school will use an application form, scrutinise employment history, obtain and verify references and consider online searches for shortlisted candidates.
- Applicable checks include identity, right to work, enhanced DBS, children's barred list where regulated activity applies, prohibition from teaching, section 128, qualifications, overseas checks, disqualification and health or fitness relevant to the role.
- The school will maintain an accurate Single Central Record covering required staff, agency staff, salaried trainees and proprietor-body members.
- Supply, agency, contractor, trainee-teacher, volunteer, visitor and homestay arrangements will follow KCSIE and the Safer Recruitment Policy.
- Safer recruitment continues after appointment through induction, supervision, appraisal, staff conduct, low-level-concerns, allegations and whistleblowing arrangements.

The School follows KCSIE Part Three and the Safer Recruitment Policy when determining regulated activity and completing enhanced DBS and children's barred-list checks for staff and volunteers. Detailed requirements, including the removal of the volunteer supervision exemption from 1 September 2026 and arrangements where an enhanced DBS certificate is pending, are set out in the Safer Recruitment Policy.

19. Concerns or allegations about adults

This section applies to employees, supply staff, trainee teachers, volunteers, contractors, governors, proprietors and third-party personnel.

The harm-threshold procedure applies where it is alleged that an adult has:

- behaved in a way that harmed 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 indicating that they may pose a risk of harm; or

- behaved or may have behaved in a way indicating that they may not be suitable to work with children, including transferable risk outside work.

REPORTING ROUTE

Report immediately to the Headteacher, who acts as case manager.

If the allegation concerns the Headteacher, report to **Mr Ali Khan, Director with overall responsibility for safeguarding**.

If the Headteacher is sole proprietor or there is a conflict, report directly to **North East Lincolnshire LADO, lado@nelincs.gov.uk, 01472 326118**.

The DSL or deputy will ensure the child is safeguarded and supported.

The case manager will make only basic enquiries permitted by local procedures and will consult the LADO before any substantive investigation or detailed interview. Police and children's social care will be contacted immediately where a child is harmed, at immediate risk or a crime may require urgent action.

The school shares safeguarding responsibility with agencies and providers for supply staff, trainee teachers and contracted staff. Suspension is not automatic. Alternatives will be considered and the decision and reasons recorded.

The school will support the person subject to the allegation, maintain confidentiality, inform parents as appropriate and retain records and provide references in accordance with KCSIE.

The school will make required referrals to the Disclosure and Barring Service and will consider a Teaching Regulation Agency referral where applicable.

Primary authority: KCSIE 2026 Part Four, including trainee teachers and third-party personnel.

20. Low-level concerns

A low-level concern is any concern, however small, that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Staff Code of Conduct but does not meet the harm threshold.

- being overfriendly with children or having favourites;
- taking photographs on a personal phone contrary to policy;
- unjustified one-to-one contact in a secluded area or behind a closed door;
- humiliating, intimidating, sexualised, discriminatory or derogatory language;
- personal social-media or messaging contact with a pupil;
- failure to maintain physical, emotional or professional boundaries; or
- conduct outside work that may indicate transferable risk.

Low-level concerns must be reported promptly to **the Headmistress**. Concerns about the Headteacher must be reported to **Mr Ali Khan, Director with overall responsibility for safeguarding**. Where there is uncertainty about the threshold, the LADO will be consulted.

Where concerns are initially shared with the DSL or another designated recipient, the Headteacher will be informed in a timely way according to the nature of the concern. The Headteacher is the ultimate decision-maker in respect of all low-level concerns, although the Headteacher may consult the DSL and take a collaborative approach where appropriate.

All concerns, context, enquiries, decisions, reasons and actions will be recorded securely. Records will be reviewed for patterns and cultural issues. Supply and contractor concerns will also be shared with their employer.

Low-level-concern records will be kept confidential and secure. The school will retain them at least until the individual leaves employment and may retain them for longer where this is justified by safeguarding, employment, legal or records-retention requirements.

Low-level concerns will not normally be included in references unless they relate to misconduct or poor performance that would ordinarily be included, or form part of a substantiated pattern meeting the harm threshold.

21. Whistleblowing

All adults must raise concerns about unsafe safeguarding practice, conduct placing children at risk or failure to follow procedures.

WHISTLEBLOWING ROUTE

Report to **the Headmistress / DSL** without delay.

If the concern relates to that person, use **another Director**.

If unable to raise internally or the concern is not addressed, contact the NSPCC Whistleblowing Advice Line: 0800 028 0285 or help@nspcc.org.uk.

Contact Ofsted where the concern relates to registered early-years provision and the threshold for notification is met.

Genuine concerns will be taken seriously. The person raising the concern will be protected from victimisation as far as the law allows. Deliberately false or malicious allegations may be managed under disciplinary procedures.

Whistleblowing must never delay an immediate referral to children's social care or police.

22. Professional boundaries, lone working and transport

All adults must maintain clear professional boundaries and follow the Staff Code of Conduct. Conduct that may appear innocuous can form part of a pattern and must be reported where it causes concern.

- Use school-approved communication systems and accounts only.
- Do not form inappropriate emotional, physical, sexual, financial or online relationships with pupils.
- Do not use personal devices to photograph, film or contact pupils unless a documented emergency exception applies.
- One-to-one work must be visible or otherwise safeguarded and must have a legitimate educational, pastoral or welfare purpose.
- A pupil's crush or attachment to a member of staff must be reported and managed professionally.
- Gifts, favouritism, secrecy, private meetings and personal transport must be avoided or controlled under school procedures.
- Staff must self-report any relationship, conduct, investigation or personal circumstance that may affect suitability or create transferable risk.

Transporting pupils

Private-vehicle transport requires Headteacher authorisation, a legitimate reason, appropriate licence, insurance, roadworthiness, restraints, recorded journey details and reasonable steps to avoid one-to-one transport. Emergency transport must be recorded and reported. Any private arrangement with a family must be disclosed and risk assessed.

23. Restrictive interventions

Restrictive interventions include reasonable force, restraint and seclusion. Full procedures are contained in the Restrictive Interventions Policy and Behaviour and Discipline Policy.

Principles

- Use only where lawful, necessary and proportionate.
- Use the least restrictive intervention for the least amount of time.
- Never use force as punishment.
- Use prevention and de-escalation wherever practicable.
- Consider age, SEND, disability, medical and mental-health needs, communication, trauma and relevant plans.
- Record every restraint or seclusion and every significant use of force.
- Inform parents as soon as practicable, subject to the statutory **serious-harm** exception.
- Report any allegation, excessive or inappropriate intervention, injury or safeguarding concern to the DSL immediately.

24. Searching, confiscation and electronic devices

Any search will be undertaken only by authorised staff, using the school's lawful powers, published rules, contractual arrangements and current procedures. The pupil's dignity, safety, SEND and communication needs will be considered.

- Staff will seek cooperation first and search no more extensively than necessary.
- A same-sex searcher and witness will be used where required by law or procedure.
- Staff will not conduct a strip search.
- Force will not be used merely to search for an item prohibited only by school rules.
- Weapons, drugs, suspected criminal evidence and safeguarding material will be handled securely and referred to the DSL and police as appropriate.
- Searches and confiscation involving mobile phones will follow the Behaviour and Discipline Policy and the statutory mobile-phone guidance.
- A device suspected of containing nudes or semi-nudes will be secured and referred to the DSL. Staff must not browse, copy, forward or delete imagery independently.

25. Missing pupils

A missing pupil may be at risk of significant harm. The school will act immediately and will not wait for the end of a session or activity.

1. Confirm the pupil is missing and alert the Headteacher, DSL and relevant staff.
2. Search the immediate area and check registers, collection, transport and known arrangements without placing others at risk.
3. Contact parents or carers and emergency contacts.
4. Contact police and local authority children's social care where the pupil cannot be found, risk is elevated or local procedures require it.
5. Maintain a written chronology of actions, decisions and communications.
6. On return, consider safeguarding, medical and welfare needs and review the incident and procedures.

Educational visits procedures will set out additional site-specific actions, staff roles and notification requirements. Where an EYFS serious incident is notifiable to Ofsted, the school will comply with the required timescale.

26. Educational visits, visitors, contractors, lettings and alternative provision

Educational visits

Visits will be risk assessed and managed under the Educational Visits and Risk Assessment procedures. Planning will include safeguarding, supervision, SEND, medical and allergy needs, transport, accommodation, communications, missing pupils, external providers and emergency arrangements.

Visitors and contractors

Visitors and contractors will sign in, verify identity, receive relevant safeguarding and emergency information and be supervised according to their role, checks and risk assessment. Contractors without required checks must not work unsupervised or undertake regulated activity.

Lettings and transfer of control

Hire and transfer-of-control agreements must state the school's and hirer's safeguarding responsibilities. The hirer must maintain appropriate safeguarding arrangements, report concerns and cooperate with the school. Failure to comply may lead to termination of the agreement.

Alternative provision

The school will:

- complete due diligence before placement and keep it under review;
- know every site, subcontracted provision or satellite location attended;
- obtain safeguarding assurance and share relevant information securely;
- agree daily attendance confirmation and follow up absence on the same day;
- assess transport and travel safeguarding arrangements;
- maintain regular contact and review the placement at least half-termly and immediately where concern arises;
- monitor safety, attendance, behaviour, progress, SEND support, objectives and reintegration plans.

The commissioning school retains safeguarding responsibility.

27. Information sharing, records and file transfer

Safeguarding information is sensitive but is not absolutely confidential. Information will be shared where relevant, necessary and proportionate to protect a child or another person.

- Staff must not promise secrecy.
- Consent is not always required and must not delay safeguarding action.
- Data-protection law does not prevent appropriate safeguarding information sharing.
- Records must be clear, factual and distinguish observed fact, professional opinion and historic information.
- Records will include the concern, follow-up, decisions, reasons, actions and outcome.
- Safeguarding files will be stored securely and separately from the main pupil record, with access limited to those who need it.

TRANSFER OF CHILD-PROTECTION FILES

Transfer as soon as possible and within five days for an in-year transfer or within the first five days of a new term.

Transfer separately from the main pupil file using a secure method and obtain confirmation of receipt.

Where the school has confirmed that no child-protection file exists, the receiving school or college will be informed of this so that the absence of a transferred file is not mistaken for an incomplete safeguarding transfer.

Include a structured summary of current concerns, relevant context and ongoing support needs.

Distinguish current risk from historic information.

Share important risk information in advance where necessary so support is ready before arrival.

The receiving DSL will review promptly, seek clarification where needed and share information with relevant staff, including the SENCO, on a need-to-know basis.

The school will comply with any final statutory guidance issued under the new information-sharing duty when it comes into force and will update this policy where required.

28. Early Years Foundation Stage

Not applicable. The school does not provide Early Years Foundation Stage provision.

29. Boarding and residential accommodation

Not applicable. The school does not provide boarding or residential accommodation.

30. Emergency preparedness, disruption and remote education

The school maintains a restricted, site-specific Emergency and Public Protection Plan covering evacuation, invacuation, lockdown, communication, accounting for pupils and visitors, emergency medication, reunification, recovery and business continuity.

Operational details that could compromise security will not be published in this policy. Staff and pupils will receive appropriate information, training and proportionate exercises, taking account of age, trauma, SEND and medical needs.

During partial closure, disruption or remote education, safeguarding duties continue. The school will maintain DSL cover, contact vulnerable pupils, work with social workers and Virtual School Heads, record concerns, apply staff-conduct and online-safety requirements and ensure pupils know how to seek help.

31. Monitoring, assurance and review

The proprietor will ensure that this policy is implemented effectively, not merely published.

- The policy will be reviewed at least annually and after a significant incident, learning review, legislative change or revised statutory guidance.
- The DSL will monitor concerns, referrals, outcomes, child-on-child abuse, discriminatory incidents, attendance, online safety, filtering and monitoring, low-level concerns, allegations, alternative provision and training.
- The Headteacher will report significant themes, risks, deficiencies and actions to the proprietor.
- The proprietor will receive safeguarding assurance information at least termly and will challenge and test the effectiveness of arrangements.
- Pupil, parent and staff voice will inform safeguarding improvement.
- This policy will be available on the school website and free of charge on request.

The school will retain evidence that staff have read and understood KCSIE Part One and this policy, and that school-specific procedures match the wording in this document.

Appendix 1: Staff quick-reference flow

A CONCERN ABOUT A CHILD

1. Make the child safe and obtain urgent medical help if needed.
2. Listen, reassure, do not promise secrecy and do not investigate.
3. Report to the DSL or deputy immediately.
4. Record facts, exact words, date, time and action.
5. If the child is in immediate danger, call 999 and contact children's social care.
6. If the DSL is unavailable, act directly and inform the DSL later.

A CONCERN ABOUT AN ADULT

Harm threshold or possible harm: report to the Headteacher.

Concern about the Headteacher: report to Mr Ali Khan, Director with overall responsibility for safeguarding.

Conflict or sole proprietor: contact the LADO directly.

Low-level concern: report to **the Headmistress**.

Whistleblowing: use **the Headmistress, or the DSL, Deputy DSL or another Director if unable to raise the concern with the Headmistress** or the NSPCC Advice Line.

NUDES OR SEMI-NUDES

Do not view, copy, print, forward, save or delete.

Do not ask the child to share or download.

Report immediately to the DSL.

Reassure the child and do not blame or shame.

Appendix 2: School and local contact details

Role / service	Name or local service	Contact details
Designated Safeguarding Lead	**Trudy Harris, Headmistress / DSL**	**trudy.harris@saintjamesschool.co.uk / 01472 503260**
Deputy DSL	**David Rose, Assistant Head / Deputy DSL**	**david.rose@saintjamesschool.co.uk**
Additional Deputy DSL	**Tracy Shepherd, Health & Hub Coordinator / Deputy DSL** **Jessica Campling, Assistant Head Pastoral/ Deputy DSL** **David Rose, Assistant Head Academic, Deputy DSL**	**tracy.shepherd@saintjamesschool.co.uk** **Jessica.campling@saintjamesschool.co.uk** **David.rose@saintjamesschool.co.uk**
Headteacher	**Trudy Harris**	**trudy.harris@saintjamesschool.co.uk / 01472 503260**
Proprietor safeguarding lead	**Mr Ali Khan, Director with overall responsibility for safeguarding**	**ali.khan@alphaschools.co.uk / 01494 535857**
Local authority children's social care front door	**North East Lincolnshire MASH / Children's Social Care**	**01472 326292; Social Services Emergency Duty Team: 01472 326292**
Local Authority Designated Officer	**North East Lincolnshire LADO**	**lado@nelincs.gov.uk / 01472 326118**
Local safeguarding partnership	**North East Lincolnshire Safeguarding Children's Partnership (NELSCP)**	**NEL.SCPEnquiries@nelincs.gov.uk / 01472 326292**
Police emergency	Police	999
Police non-emergency	Police	101
Prevent / Channel	**Channel Programme**	**0800 011 3764**
Operation Encompass	**[[LOCAL ARRANGEMENT]]**	0204 513 9990 - National number
Ofsted, where applicable	Ofsted	**Not applicable**
NSPCC Whistleblowing Advice Line	NSPCC	0800 028 0285 / help@nspcc.org.uk
School confidential safeguarding route	**Email to DSL and DDSL's**	**Safeguarding@saintjamesschool.co.uk**

Appendix 3: Source register

Final legislation and statutory guidance take priority over implementation toolkits and checklists. Sources were checked for the September 2026 position.

Source	Status and use
Keeping Children Safe in Education 2026	Final statutory guidance published 7 July 2026; effective 1 September 2026.
Working Together to Safeguard Children 2026	Statutory multi-agency guidance updated 18 March 2026.
Independent School Standards Guidance	Updated 2 April 2026.
EYFS statutory framework for group and school-based providers	Final framework effective 1 September 2026.
Mobile Phones in Schools	Statutory from 29 June 2026; schools should follow from 1 September 2026.
Restrictive Interventions, Including the Use of Reasonable Force, in Schools	Effective 1 April 2026 and applicable to independent schools.
Relationships Education, RSE and Health Education	Revised statutory guidance applying from 1 September 2026.
Children Missing Education	Statutory guidance updated 8 September 2025.
School and College Security	Updated 3 July 2026.
Sharing nudes and semi-nudes	UKCIS non-statutory operational guidance, updated March 2024.
Operation Encompass statutory guidance	Police notification duty guidance published 7 November 2025.
ISA Annual Compliance Toolkit and September 2026 Ticklist	Used as practical implementation cross-checks. They are not definitive statutory sources.
Education Act 2002; Children Acts 1989 and 2004; Education (Independent School Standards) Regulations 2014	Core legal framework for independent-school safeguarding and welfare duties.
Human Rights Act 1998 and Equality Act 2010	Relevant to fair, non-discriminatory and proportionate safeguarding decisions.
What to do if you are worried a child is being abused	DfE practitioner advice, 2015.
Information sharing advice for safeguarding practitioners	Current DfE advice updated May 2024, pending publication of final statutory guidance for the 2026 information-sharing duty. The school will have regard to the final guidance when it comes into force
Working Together to Improve School Attendance	Statutory guidance updated July 2026; used for safeguarding responses to repeated and prolonged absence.
Alternative Provision guidance	Updated February 2025. Used as relevant commissioning and safeguarding guidance alongside KCSIE.
Non-school alternative provision voluntary national standards	Published August 2025; non-statutory but relevant to due diligence and oversight.
Data protection in schools	DfE guidance updated July 2026; independent schools may use it as relevant guidance.
Prevent Duty Guidance	Statutory guidance, 2023.
Searching, Screening and Confiscation	DfE guidance updated 2023. It does not directly confer statutory search powers on ordinary independent schools and is used only as relevant procedural guidance.
Disqualification under the Childcare Act 2006	DfE guidance, where childcare-disqualification rules apply.
Boarding Schools: National Minimum Standards	Current standards, where the school provides boarding.
Regulated activity: removal of supervision exemption	Applies from 1 September 2026 and affects volunteer barred-list checks.
Crime and Policing Act 2026 mandatory child-sexual-abuse reporting provisions	Not yet treated as an operative duty until commencement and final operational guidance. Monitor and update.
Terrorism (Protection of Premises) Act 2025 / Martyn's Law	Main duties not yet fully commenced. Prepare proportionately and monitor commencement.
Independent Schools Inspectorate framework and DfE/Ofsted independent-school inspection materials	Inspection and assurance material. Inspectors test implementation, culture, casework, staff knowledge, pupil voice and governance.

Appendix 4: Detailed safeguarding issue guide

This appendix supports staff awareness and DSL decision-making. It does not replace KCSIE 2026 Annex A, local safeguarding procedures or specialist advice. School leaders and staff who work directly with children should read KCSIE 2026 Annex A.

Issue	What staff need to know	Possible indicators	Required school response
Physical abuse	Hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. It includes fabricated or induced illness.	Unexplained or repeated injury; inconsistent explanation; fear of a person or going home; delay in seeking treatment.	Make the child safe, obtain medical help, report to the DSL and record visible injuries without examining or asking the child to undress.
Emotional abuse	Persistent emotional maltreatment, including humiliation, rejection, criticism, silencing, intimidation, unreasonable expectations, overprotection, exposure to ill-treatment or serious bullying.	Low self-esteem; anxiety; developmental delay; extremes of behaviour; withdrawal; fearfulness; difficulty forming relationships.	Report to the DSL. Consider overlap with domestic abuse, neglect, bullying, coercive control and online harm.
Sexual abuse	Forcing or enticing a child into contact or non-contact sexual activity, including rape or penetration with an object, touching, grooming, sexual imagery, watching sexual activity or exploitation.	Sexualised behaviour or knowledge; pain or injury; pregnancy or STI; fear of a person; secrecy; gifts; online contact; absence.	Listen and report immediately. Do not investigate, examine the child or confront the alleged person. Preserve evidence and follow the DSL-led response.
Neglect	Persistent failure to meet physical or psychological needs, including food, clothing, shelter, supervision, protection, medical care or emotional responsiveness.	Hunger; poor hygiene; unsuitable clothing; tiredness; untreated health needs; poor attendance; developmental concerns; inadequate supervision.	Report patterns as well as individual incidents. Consider poverty and unmet need without allowing assumptions about poverty to obscure neglect.
Child-on-child abuse	Abuse by one child of another, on or off site or online. It includes bullying, intimate-relationship abuse, physical abuse, sexual violence or harassment, coercion, nudes or semi-nudes, upskirting and hazing.	Changes in friendship, attendance or behaviour; fear; injuries; sexualised conduct; online distress; repeated reports; power imbalance.	Report every concern to the DSL. Record, assess, investigate appropriately, support all affected children and maintain a zero-tolerance culture.
Harmful sexual behaviour, sexual harassment and sexual violence	Sexual behaviour exists on a continuum from developmentally expected to inappropriate, problematic, abusive or violent. Context, consent, coercion, power, age and development matter.	Sexual comments or gestures; pressure; unwanted touching; assault; coercion; repeated sexualised behaviour; pornography; online harassment.	Complete an immediate risk and needs assessment after sexual violence and consider one after sexual harassment. Refer to police and social care in accordance with KCSIE Part Five.
Making or sharing nudes and semi-nudes	Creation, sending or posting of nude or semi-nude images by under-18s, including self-generated, digitally altered and AI-generated images, deepfakes and deep nudes.	Disclosure; threats; blackmail; sudden distress; device secrecy; rumours; non-consensual distribution.	Staff must not view, copy, forward, print, save or delete. Report to the DSL, secure devices only where appropriate and follow UKCIS guidance.
Domestic abuse and Operation Encompass	Children may see, hear or experience domestic abuse or experience abuse in their own intimate relationships. Police may notify the school through Operation Encompass.	Anxiety; aggression; sleep problems; absence; caring responsibilities; fear of a parent or partner; sudden housing change.	The Key Adult or DSL records the notification, arranges discreet support and considers whether a separate child-protection referral is required.
Child criminal exploitation	A person or group exploits a power imbalance to coerce, control, manipulate or deceive a child into criminal activity. Apparent consent does not remove exploitation.	Unexplained money or possessions; older associates; absence; travel; weapons; drug activity; debt; assault; fear; multiple phones.	Report promptly. Consider social-care, police and NRM referral, support education and avoid criminalising a child for conduct carried out under coercion.
Child sexual exploitation	Sexual exploitation may involve exchange, affection, accommodation, money, drugs, status, coercion, online contact, organised networks or trafficking.	Older relationships; gifts; hotels or taxis; missing episodes; sexualised behaviour; pregnancy or STI; emotional change; online grooming.	Report to the DSL. A child cannot consent to exploitation. Assess risks to siblings and other children and involve statutory agencies.
County lines	Drug networks use children to move drugs or money, often involving coercion, debt, violence, trafficking and missing episodes.	Travel; unexplained tickets; multiple phones; missing episodes; injuries; drug paraphernalia; fear; older associates.	Report to the DSL, social care and police as appropriate. Consider trafficking and NRM referral.
Serious violence and weapons	Children may be at risk of carrying weapons, violent assault, gang harm or retaliatory violence. Risk can be higher around the school day and after exclusion or disrupted education.	Threats; weapon possession; assault injuries; gang association; decline in attendance or attainment; unexplained gifts; self-harm.	Make people safe, call police where immediate risk exists, inform the DSL, preserve evidence and assess wider risks.

Issue	What staff need to know	Possible indicators	Required school response
Modern slavery and trafficking	Includes trafficking, slavery, servitude, forced labour, sexual exploitation, forced criminality and organ removal. Movement is not required for exploitation to amount to modern slavery.	Control by others; restricted movement; debt; poor living conditions; unexplained work; fear; false documents; missing episodes.	Refer to children's social care and police and seek NRM referral through an authorised First Responder.
Financial exploitation	Children may be forced or deceived into fraud, money-muling, moving criminal funds, taking debt, surrendering wages or benefits, or facilitating scams.	Unexplained transactions; new accounts or devices; debt; threats; fear; sudden cash; criminal associates.	Report to the DSL, preserve evidence and consider police, social-care and specialist fraud support.
Financially motivated sexual extortion	A person threatens to share sexual imagery unless the child pays money, provides more imagery or complies with another demand.	Panic; secrecy; requests for money; account deletion; threats; self-harm or suicide risk.	Treat as an emergency safeguarding issue. Do not pay or negotiate. Preserve evidence, report to the DSL and police, and assess immediate mental-health risk.
Online grooming and exploitation	Children may be groomed, coerced, impersonated or exploited through social media, gaming, livestreaming, encrypted services or AI systems.	Secret accounts; gifts; contact with unknown adults; sexualised chat; distress; pressure to meet or share images.	Report to the DSL, preserve evidence, use CEOP or police routes where appropriate and support the child without blame.
Cybercrime involvement	Children may be drawn into Computer Misuse Act offending or exploited for technical skills, including hacking, malware, denial-of-service or credential theft.	Excessive or secretive technical activity; unexplained money; boasting; contact with criminal forums; school-system attacks.	Report to the DSL and IT lead. Consider police or specialist cyber-diversion support and avoid treating technical interest itself as suspicious.
Radicalisation and terrorism	A child may be drawn into extremist ideology, terrorism-related activity or support for terrorist organisations through online or offline influence.	Changed language or associations; accessing extremist material; intent to travel; glorification of violence; intolerance; isolation.	Report to the DSL. Use local Prevent or Channel routes where appropriate. Call police immediately for imminent risk.
Female genital mutilation	FGM is illegal and a form of child abuse. Teachers have a personal mandatory duty to report to police where they discover that FGM appears to have been carried out on a girl under 18.	Talk of a special procedure or travel; prolonged absence; difficulty walking or sitting; pain; repeated urinary problems.	Do not examine the child. Teachers make the police report and inform the DSL unless there is a good reason not to. Suspected risk is referred through normal safeguarding routes.
Forced marriage and honour-based abuse	Marriage without free and full consent, or abuse said to protect family or community honour. It may involve physical, emotional, sexual or financial abuse.	Planned travel; family surveillance; withdrawal; fear; sibling history; threats; sudden engagement; absence.	Do not contact family or community members where this could increase risk. Report immediately and seek specialist police and social-care advice.
Abuse linked to faith or belief	Harm may be justified by beliefs about possession, witchcraft, healing, punishment or spiritual purity.	Scapegoating; fasting; isolation; unusual injury; fear of religious figures; repeated exorcism or harmful ritual.	Report to the DSL. Respect for belief never excuses abuse. Do not confront adults in a manner that increases risk.
Mental health, self-harm and suicide risk	Mental-health difficulty may be a consequence or indicator of abuse, neglect, exploitation or other harm. Staff do not diagnose.	Withdrawal; hopelessness; self-injury; eating concerns; suicidal comments; sudden decline; risk-taking; absence.	Obtain urgent medical help for immediate risk, do not leave the child alone where unsafe, inform the DSL and follow the crisis or healthcare plan.
Fabricated or induced illness	A parent or carer may fabricate, exaggerate or deliberately cause illness or symptoms in a child.	Unusual medical history; symptoms only reported by a carer; repeated appointments; inconsistency; improvement away from carer.	Record facts and patterns, do not confront the carer, and report to the DSL for specialist health and social-care advice.
Homelessness and temporary accommodation	Housing instability can affect safety, attendance, transport, health, SEND support and continuity of education.	Frequent moves; overcrowding; travel difficulty; fatigue; missing belongings; sudden absence; family crisis.	Work with housing and attendance services, assess safeguarding needs and make a social-care referral where the child has been harmed or is at risk.
Children absent from education or missing from home or care	Repeated or prolonged absence and missing episodes can indicate abuse, exploitation, trafficking, forced marriage, mental-health crisis or neglect.	Unexplained absence; failed contact; repeated late return; missing overnight; changed routine or associates.	Follow up on day one, make reasonable enquiries, involve the DSL and attendance lead, and contact police or social care according to risk.
Private fostering	A child under 16, or under 18 if disabled, may be privately fostered when cared for for 28 days or more by someone who is not a close relative, subject to statutory exceptions.	Child living with family friend, distant relative or host for an extended period; unclear parental arrangements.	Notify the local authority so it can assess the arrangement and provide support.
Pregnant pupils, pupil parents and unborn children	Pregnancy and parenthood may involve health, exploitation, domestic-abuse, attendance and support needs. Concerns may also relate to an unborn child.	Concealed pregnancy; coercive relationship; missed healthcare; homelessness; isolation; controlling partner or family.	Inform the DSL, support education and healthcare access, and refer to children's social care where thresholds are met.

Issue	What staff need to know	Possible indicators	Required school response
Child abduction and community safety	Unauthorised removal or retention by a parent, known adult or stranger, or unsafe approaches and threats near the school.	Custody conflict; suspicious adult; attempts to collect without authority; loitering; following or approaching children.	Follow collection and missing-pupil procedures, call police where necessary and provide practical, age-appropriate safety education.
Hazing and initiation	Rituals or activities involving humiliation, harassment, abuse, nudity, violence or sexual behaviour as a condition of joining a group.	Secretive group activity; injuries; humiliation; fear; coercion; missing possessions; sexualised ritual.	Report to the DSL. Treat serious incidents as child-on-child abuse and consider police or social-care referral.
Children affected by court proceedings or parental imprisonment	Criminal or family-court processes and imprisonment can cause trauma, conflict, stigma, poverty and disrupted care.	Anxiety; behavioural change; absence; secrecy; caring responsibilities; family conflict.	Provide pastoral support, protect confidentiality, work with relevant professionals and report any safeguarding concern.