



Document Control

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SAFEGUARDING CHILDREN & CHILD PROTECTION

- POLICY & GUIDANCE –

September 2025

Reviewed by Delyth Lynch (DSL): 1st September 2025

Reviewed by Ginny Rhodes (Nominated Safeguarding Governor): 1st September 2025

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This Policy is reviewed annually and is subject to immediate review in line with statutory changes as and when they take place.

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1 Introduction

- 1.1 Wellington College is committed to safeguarding and promoting the welfare and wellbeing of young people and staff. We believe that everyone, without exception, has a right to be safe and to be treated with dignity and respect regardless of background and live a life free from discrimination. The College recognises that children and young people learn best when they are healthy, safe and secure.
- 1.2 Safeguarding and promoting the welfare of children is defined as 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. (Keeping Children Safe in Education, September 2025)
- 1.3 This policy applies to all students in the College, including boarders.
- 1.4 The purpose of this policy is to inform staff, parents, contractors, volunteers and governors about the College's responsibilities for safeguarding children and to enable all parties to have a clear understanding of how these responsibilities should be carried out. It applies wherever staff members are working with students – even where this is away from the College, such as on educational visits or undertaking remote learning
- 1.5 This policy is published on the College website and is available to parents of current and prospective students from the College on request. Large print or other accessible formats can also be made available.
- 1.6 The policy is drafted in accordance with all relevant legislation and the following statutory guidance:
 - Keeping Children Safe in Education September 2025 (KCSIE)
 - Working Together to Safeguard Children 2023 (updated December 2023) (WTSC)
 - Prevent Duty Guidance for England and Wales July 2015 (updated September 2023)
 - Disqualification Under the Childcare Act August 2018
 - Education (Independent School Standards) Regulations 2014
 - Bracknell Forest agreed inter-agency procedures (see <https://bracknellforestsafeguarding.org.uk/>)
 - What to do if you are worried a child is being abused – advice for practitioners March 2015
 - Safeguarding children and young people October 2018
 - Children Missing Education September 2016
 - Strategy for dealing with safeguarding issues in charities December 2017
 - Safer Working Practices, Safer Recruitment Consortium, February 2022
 - Charity Commission guidance: safeguarding and protecting people for charities and trustees 2017 (updated June 2022)
 - Relationships Education, Relationships and Sex Education and Health Education (2019) (updated September 2021)
 - The National minimum standards for boarding schools (September 2022)
 - The Equality Act 2010
 - Meeting digital and technology standards in schools and colleges, DfE 2023 (updated May 2024)
 - Sharing of nudes and semi-nudes: advice for education settings working with children and young people, DfE 2020 (updated 2024)
 - Information Sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers, DfE 2024
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- 1.7 We follow the procedures of the Bracknell Forest Local Safeguarding Board. We are advised and supported by the Bracknell Forest Safeguarding Our Schools team, namely the Safeguarding Manager. Contact details are contained in Appendix 1. Their multi-agency safeguarding arrangements can be seen [here](#).
- 1.8 Every complaint or suspicion of abuse from within or outside the College will be taken seriously and action will be taken in accordance with this policy.

2 Principles

- 2.1 Wellington College is committed to safeguarding and promoting the welfare of all students in our care, and expects all staff, governors and volunteers to share this commitment. To achieve this, the College seeks to create a safe school environment and a strong pastoral system, where students who have been subject to any form of abuse can report the matter confident that it will be taken seriously, they will not be made to feel ashamed of making a report and will be fully supported. Staff are trained to listen to students' concerns, identify issues early and respond appropriately following agreed procedures. They are also aware that not all children may feel ready or know how to tell someone that they are being abused and that they should maintain a "professional curiosity and speak to the DSL if they have any concerns about a child." The College will consider, at all times, what is in the best interest of the child and will ensure that all staff are aware that even if there are no reports of certain incidents / types of abuse in the College, it does not mean that it is not happening – it may be the case that it is not being reported.
- 2.2 The College will take all reasonable measures to:
- ensure that we practise safer recruitment in checking the suitability of staff, governors and volunteers (including staff employed by other organisations) to work with children and young people. Staff recruitment procedures are outlined in detail in the College's Recruitment and Selection Policy;
 - ensure that, where staff from other organisations are working with our students on another site, we have received confirmation that appropriate child protection checks and procedures apply to those members of staff and that any such checks do not raise any issues of concern in relation to the suitability of those staff members working with children;
 - follow the local inter-agency procedures of the Bracknell Forest Local Safeguarding Board and contribute to inter-agency working;
 - support students in need through early intervention and, where appropriate, support them in co-operation with multi-agencies who are working to the Common Assessment Framework (CAF) and as part of the Team around the Child (TAC) approach;
 - be alert to signs of abuse, both in the College and from outside and to protect each pupil from any form of abuse, whether from an adult or another pupil;
 - deal appropriately with every suspicion or complaint of abuse and support students who have been abused in accordance with their agreed child protection plan;
 - design and operate procedures which promote this policy, but which, so far as possible, ensure that teachers and other staff who are innocent are not prejudiced by false allegations;
 - be alert to the needs of students with physical and mental health conditions. All staff should be aware that:
 - They are well placed to observe children day to day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk from developing one;
 - Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation;
 - Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem

- If they have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken and they should speak to a DSL or Deputy
- operate robust and sensible health and safety procedures;
- operate clear and supportive policies on drugs, alcohol and substance misuse;
- assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- identify children who may be vulnerable to radicalisation, and know what to do when they are identified;
- take all practicable steps to ensure that College premises are as secure as circumstances permit;
- teach students about safeguarding issues and about how to keep themselves safe (including on-line and when working online at home); and
- ensure that any deficiencies in our child protection and safeguarding procedures are remedied without delay.

3 Roles and responsibilities

3.1 All staff (including governors, volunteers and supply staff)

Safeguarding and child protection is **everyone's** responsibility. All staff (including governors, supply staff, contractors and volunteers) are under a general legal duty to:

- contribute to providing a safe environment in which children can learn;
- consider at all times the best interests of the student and take action to enable all students to have the best outcomes;
- attend appropriate safeguarding and child protection training (3 yearly, level 1 refresher), annually as directed by the DSL, and as and when additional updates are required;
- be aware of indicators of the different forms of abuse, neglect, exploitation and of emergent mental health problems;
- assist children in need and to protect children from abuse, neglect, exploitation, radicalisation and extremism;
- be familiar with the College's policies pertaining to safeguarding and child protection procedures and follow them;
- know how to access and implement the procedures, independently if necessary;
- keep a sufficient record of any significant complaint, conversation or event;
- report any matters of concern to the DSL or, where appropriate, to one of the key contacts in accordance with this policy; and
- support children's social care and any other agencies following any referral.

3.2 Senior Students

Senior students need to be aware of the need to report allegations or suspicions of child abuse to the DSL. Children often tell other young people, rather than staff or adults, about abuse.

All U6th students, which includes all students who hold a position of responsibility such as College and House Prefects, are briefed on College procedures and are given an information sheet. Mental health issues are regularly discussed within the College and an open dialogue is encouraged and practised. and the College trains L6 students in mental health as part of their "Mental Health Ambassador" training programme.

3.3 The Designated Safeguarding Lead (DSL)

The College has appointed a Designated Safeguarding Lead (DSL); this individual is a member of the College Senior Leadership Team and is known as the Director of Safeguarding. The DSL takes lead responsibility for safeguarding (including on-line safety) and child protection, and is the first point of contact for parents, students, staff and others if they have any concerns about safeguarding or child protection.

The College recognises that the role of the DSL carries a significant level of responsibility and they should be given the time, funding, training, resources and support they need to carry out their role effectively. The College also has a team of Deputy DSLs, ensuring that there is always an appropriately trained and designated person in the College at all times. The detailed responsibilities of the DSL and Deputy DSLs can be found in Annex C (KCSIE, 2025) and Appendix 8 of this policy but can be summarised as follows:

- **Managing Referrals:** the DSL will manage the referral of cases of suspected abuse, neglect, exploitation, radicalisation or any other relevant issue to the Local Authority Social Care Service, Channel programme, DBS and/or Police as appropriate.
- **Working with others:** the DSL will be the principal point of contact for all staff and when co-ordinating different departments and functions within and outside the College in the management of a case. They will promote supportive relationships with parents and carers to safeguard students' welfare, be able to identify the causes and consequences of issues that children are experiencing and to support staff to make appropriate adjustments in the provision of educational programmes.
- **Information sharing and managing the child protection file:** the DSL is responsible for keeping child-protection files up to date with accurate and complete records of any actions, discussions and decisions made including the rationale for those decisions and ensuring these confidential records are securely stored and, where appropriate, transferred to a new school within 5 days
- **Raising Awareness:** the DSL is responsible for reviewing and updating the College's safeguarding policy at least annually, for ensuring that all staff members have had appropriate training regarding its implementation, and that parents can access the policy and know that the College may make referrals where abuse, neglect or exploitation is suspected.
- **Training, knowledge and skills:** the DSL will receive the appropriate level of training, together with regular updates, to ensure they are able to understand the unique risks associated with online safety, to be confident that they have the relevant knowledge and up-to-date capability required to keep children safe whilst they are online at College or at home and to diagnose and respond to the specific needs of vulnerable children and work effectively with agencies such as the LADO, the Police and the Channel agency.
- **Providing support to staff:** the DSL should receive sufficient support and training so that they can support staff and help them feel confident on welfare, safeguarding and child-protection matters, including referrals and taking into account safeguarding, welfare and SEN in the provision of academic and pastoral support.
- **Understanding the views of children:** the DSL should, through training, develop the knowledge and skills needed to encourage a culture of listening to young people and taking account of their wishes and feelings among all staff. They should promote an understanding of the difficulties that students may have in approaching staff about their circumstances and help staff consider how to build trusted relationships which facilitate communication.
- **Understanding the referral processes and threshold criteria:** the DSL should be aware that thresholds and referral processes may differ between local authorities and ensure that these are understood before a referral is made. A good understanding of the local arrangements at Bracknell Forest is paramount as is an understanding of local, contextual and national safeguarding issues.

Notification of incidents to the Governing Body

The Nominated Safeguarding Governor meets with the Director of Safeguarding once per half term. Whilst no names or specific cases will be discussed, trends and patterns on MyConcern will be presented and any significant issues highlighted. A termly summary of pastoral and safeguarding incidents, written by the Deputy Head (Pastoral) and the Director of Safeguarding, is presented within the Master's Report which is delivered at the beginning of every full Governing Body meeting. Termly reports are also delivered to the Pastoral and Safeguarding Committee and other relevant items discussed, allowing the Nominated Safeguarding Governor time to brief the committee about any relevant issues.

Certain Governor's meetings have a designated time allotted to discuss the following areas in more detail:

- Safeguarding – October meeting
- Behaviour and Discipline – December meeting

Serious incidents relating to behaviour, bullying or safeguarding will be notified to the Nominated Safeguarding Governor and the Chair of Governors as they occur. Such incidents will include:

- Events or actions likely to result in a suspension of a pupil due to a disciplinary offence (to include bullying and child-on-child abuse)
- Events or actions likely to result in the expulsion or withdrawal of a pupil due to a disciplinary offence (to include bullying and child-on-child abuse)
- A pupil death or serious illness
- A pupil referral to the Local Authority
- A report to the LADO about a member of staff

3.4 Deputy Designated Safeguarding Leads (DDSL)

DDSLs are trained to the same standard as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of students. There is a Safeguarding Manager who supports the DSL and takes specific responsibility for certain aspects of safeguarding which is included in the Safeguarding Manager role description. In the event of a long-term absence of the DSL, the Deputy Head (Pastoral) will assume responsibility for all the activities described above, supported by the Safeguarding Manager. On a day-to-day basis safeguarding activities may be delegated to a DDSL but ultimate lead responsibility for safeguarding and child protection remains with the DSL. All Deputy DSLs have a job description and meet once every 3 weeks with the DSL. The Safeguarding Manager and the DSL meet formally three times a week.

3.5 The Master

The Master is responsible for ensuring that the procedures outlined in this Policy are followed on a day-to-day basis. To this end the Master will ensure that:

- the safeguarding and child protection policy and procedures adopted by the governing body are implemented and followed by all staff;
- sufficient time, training, funding, support and resources necessary to enable the DSL and DDSLs to carry out their roles effectively are allocated, including the assessment of students and attendance at strategy discussions and other necessary meetings;
- matters which affect pupil welfare are adequately risk-assessed by appropriately trained individuals and for ensuring that the relevant findings are implemented, monitored and evaluated;
- systems are in place for children to express their views and give feedback which operate with the best interests of the child at heart;

- all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the College's Whistleblowing Policy and low level concerns procedures;
- students are provided with opportunities throughout the curriculum and wider co-curricular programme to learn about safeguarding, including keeping themselves safe online (see Appendix 7);
- ensure safer recruitment procedures in line with Part 3 of KCSIE, September 2025 are being adhered to;
- they liaise with Local Authority Designated Officer (LADO) before taking any action and on an ongoing basis, where an allegation has been made against a member of staff or volunteer; and
- they notify the Disclosure and Barring Service and, where appropriate, the Teaching Regulatory Authority of anyone who has harmed or may pose a risk to a child.

3.6 Governing Board

The Governing Board has overall responsibility to ensure compliance with child protection statutory requirements and actively promote the wellbeing of students. All governors receive safeguarding training (including training about e-safety and online safeguarding issues) at induction. They then receive full training every 3 years with annual updates. It is the role of the Governing Board to provide scrutiny of Safeguarding policy and practice. The governing body takes seriously its responsibility to fulfil its duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. To this end, the Governors will ensure that:

- they facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection underpin all aspects of process and policy development;
- an effective, up to date child protection policy is in place that is clear and easy to understand for staff, students, parents and carers and is made available on the College's website;
- the College policy will be reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt;
- other policies, as prescribed in Part 2 of KCSIE, are in place and operational;
- the obligations imposed by the Human Rights Act (1998) and the Equality Act (2010) are met;
- students are being taught how to keep themselves and others safe, including online, and that there are appropriate provisions for the specific needs and vulnerabilities of individual children, including those who are victims of abuse and/or have SEN/D needs;
- required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register;
- all staff receive safeguarding induction and ongoing training in accordance with this policy and the safeguarding training policy;
- the College's safeguarding arrangements take into account the procedures and practice of the Bracknell Forest Local Safeguarding Board;
- serious incidents which fall within the threshold of serious incident reporting are reported to the Charity Commission;
- the College contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of children are identified;
- child protection files are maintained and, where appropriate, such records are transferred to a pupil's new school or college in accordance with statutory guidance;

- appropriate filters and monitoring systems are in place to keep children safe online (including when they are online at home) and that these systems are regularly reviewed;
- the leadership team and relevant staff have an awareness of the filtering and monitoring provisions in place and manage them effectively, knowing how to escalate concerns when identified;
- the College reports to their local authority any child who joins or leaves the College at non-standard transition times in line with statutory and local authority guidance; and
- written assurances are provided by individuals or organisations who hire College premises confirming appropriate safeguarding and child protection procedures are in place.
- they read and understand KCSIE (2025) in its entirety

3.7 Safeguarding Governor

The College governors have appointed a nominated governor for safeguarding to take a lead in relation to responsibility for safeguarding arrangements. The nominated Governor:

- discusses safeguarding matters with the DSL once per half term and more regularly if needed;
- liaises directly with the local authority and/or partner agencies where appropriate; and
- undertakes an annual audit of the College's safeguarding procedures and submits a written report to the Governing Body with recommendations for further improvements. The annual written report will typically consider: the effectiveness and implementation of relevant policies; staff safeguarding training; staff recruitment procedures; the handling of safeguarding issues; referral management; the contribution the College is making to inter-agency working; and the provision for teaching students how to keep themselves safe. This audit will form part of the annual review undertaken by the Governing Body as a whole to ensure that all policies, procedures and training provided by the College are effective and comply with the law.

3.8 The nominated Governor for safeguarding is Ginny Rhodes and her contact details are set out in Appendix 1.

4 Key personnel

The DSL at the School is Delyth Lynch, Director of Safeguarding, who is a member of the Executive Leadership Team. If the DSL is unavailable, the role will be carried out by the Safeguarding Manager or one of the Deputy DSLs. The DSL or Deputy DSLs are always available during College hours to discuss safeguarding concerns with staff, either in person or via telephone or email.

4.1 If the DSL and Deputy DSLs are unavailable, the role will be carried out by the Deputy Head (Pastoral) who is already a Deputy DSL. A random sample of emails between staff and pupils are monitored on a monthly basis by the Director of IT Services and only shared with Director of Safeguarding. Outside school hours and during out of term activities, a designated member of the DSL team will assume responsibility and the rota will be made available to all staff.

4.2 The DSL is the designated member of staff who oversees the welfare of looked after children.

4.3 Contact details for all the above are contained in Appendix 1.

5 Staff training

5.1 Staff training encourages all members of staff to maintain an attitude of 'it could happen here' where abuse, neglect and exploitation are concerned and there should be a zero-tolerance approach to all forms of abuse.

5.2 Induction training for all new members of staff, including temporary employees or volunteers, includes formal child protection training which covers:

- This safeguarding policy and related policies on online safety, child-on-child abuse, , Mental Health and Prevent*;
- Part 1 and Annex B of KCSIE*;

- the role, identity and contact details of the DSL and Deputy DSLs;
- policies on acceptable use of IT and online safety, including when they are online at home*;
- the expectations, roles and responsibilities of staff in relation to filtering and monitoring online content;
- the pupil behaviour policy*;
- the College's children Absence Policy and attendance policy
- the staff Code of Conduct*;
- the College's policies on Whistleblowing* and Low Level Concerns*;
- an overview of Bracknell Forest's Local Safeguarding Board procedures and contact details and
- MyConcern entry (if applicable) and record keeping

* Copies of these documents will be provided either in paper form or electronically as part of the induction process and new staff will be required to sign a declaration confirming they have read and understood them. A proportional, risk-based approach will be taken to determine the level of information provided to temporary staff and volunteers.

- 5.3 All staff, including the Master and volunteers involved in regulated activity, will undertake appropriate child protection training which, in line with Bracknell Forest guidance, is updated every three years. In addition, all staff will receive safeguarding updates delivered through a combination of INSET, safeguarding newsletter updates, the weekly safeguarding email, appropriate email updates and the completion of relevant e-courses on a regular basis and at least annually. Safeguarding training is coordinated by the DSL and includes online safety and Prevent training where appropriate and is carried out in accordance with the College safeguarding training policy
- 5.4 All staff receive updated copies of the College policies referred to above and are required to confirm that they have read and understood them. In addition, Part 1 and, where appropriate, Annex B of KCSIE is reissued to staff whenever this statutory guidance is updated by the DfE; staff are required to read this information and sign to say that they have understood them. Staff training provides an opportunity to check and consolidate their understanding of the policies. Staff can also access the policies and further information on SharePoint. KCSIE Part 1 is available in a number of different languages for those members of staff who hold English as a second language. Specific training is also provided for:
- Contractors (short and long term)
 - Self-employed music and drama teachers
 - Self-employed sports coaches and healthcare professionals (such as Life signs paramedics and the mobile orthodontic unit)
 - Invigilators
 - Volunteers (Charity tuck shop and golf stewards)
 - Health and Fitness Club staff members
- 5.5 The DSL team will regularly assess the appropriate level and focus for staff training so that it can respond to specific safeguarding concerns such as mental health, child-on-child abuse, online safety, radicalisation, child sexual exploitation, child criminal exploitation, sexual violence and harassment, and female genital mutilation.
- 5.6 The DSL team receive external supervision in order to be properly supported in their work. Several College staff, including three members of the DSL team have also been trained to provide internal supervision

support for middle pastoral leaders (HMs) and any other staff who are in need of such professional support. Their work is undertaken in accordance with the Supervision Policy.

5.7 The DSL and Deputy DSLs undertake training that is in accordance with locally-agreed procedures to provide them with the knowledge and skills necessary to carry out their role. This training includes Prevent awareness training and will be updated every two years. Additional specialist training will be provided to those who have specific responsibility for safeguarding or for Looked After Children. They also refresh their knowledge and skills at regular intervals (and at least annually) by following developments in safeguarding to:

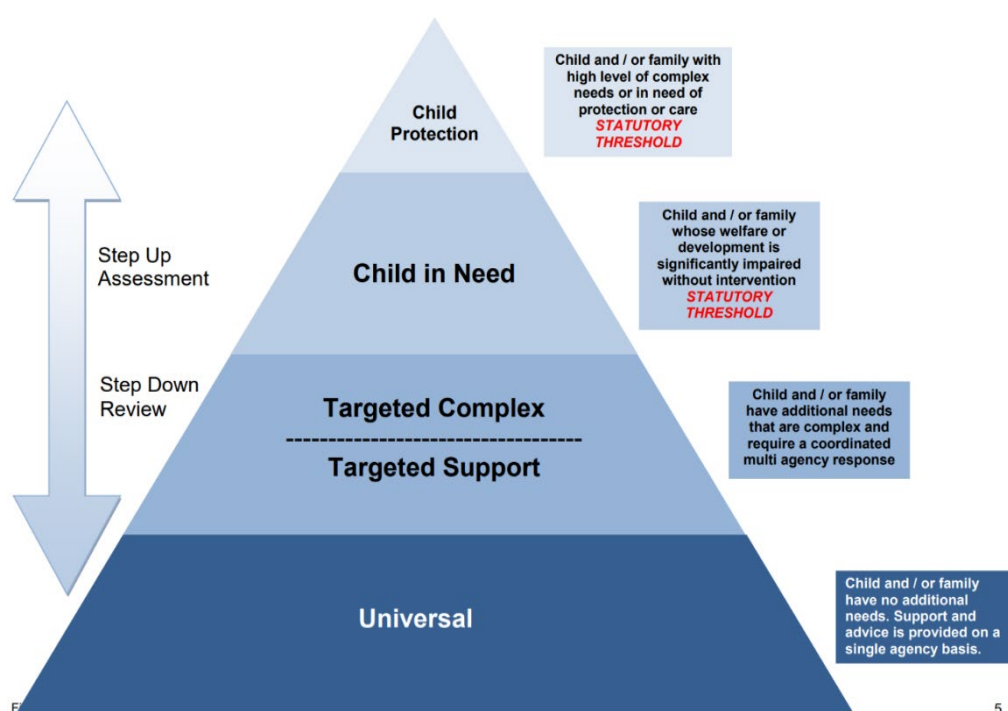
- keep abreast of best practice for promoting a culture of listening to children;
- remain up to date on the mechanics of inter-agency working as operated by the LSB;
- understand the assessment process for providing early help and intervention, for example through locally-agreed common and shared assessment processes such as early help assessments;
- have an up-to-date working knowledge of how local authorities conduct a child protection case conferences so they can contribute to these effectively when required to do so;
- be alert to the specific needs of children in need, those with special educational needs and young carers;
- understand and support the College with regard to the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation; and
- be able to keep proper written records of concerns and referrals.

5.8 New appointees to the Board of Governors receive appropriate safeguarding and child protection (including online) training at induction. This training is designed to ensure they understand their responsibilities as governors and equip them with the knowledge to provide strategic challenge to test and assure themselves that Wellington's safeguarding policies and procedures are effective and support the delivery of a robust while College approach to safeguarding. All members of the Board of Governors receive update training annually and full level 1 training every 3 years.

6 Hierarchy of intervention

6.1 Bracknell Forest LSB publishes threshold guidance ([here](#)) that all agencies, professionals and volunteers in the borough can use to consider how best to meet the needs of individual children and young people. This guidance provides a summary of thresholds for intervention in relation to a continuum of need, ranging from children who need no additional intervention to those who require intensive help and specialist support. Children's needs are not static and they may experience different needs – at different points on the continuum – throughout their childhood years. The levels of need also reflect levels which are attributed to students on MyConcern (see Appendix 6)

6.2 Within the continuum, there are four levels of intervention:



Level 1: Children with no additional needs (“Universal”)

Level 2: Children requiring early help (“Targeted” and “Targeted Complex”)

Level 3: Children in need

Level 4: Children at risk

7 Early help

- 7.1 The College recognises the importance of providing early help to students to provide support for a problem as soon as it arises, to prevent it from escalating. We recognise that young people may face many challenges that put them in need of support and ensure that staff are aware of them. These include: stress, peer pressure, body image concerns, anxiety and relationship issues.
- 7.2 Students are encouraged to raise concerns as soon as they are identified, either to their Housemaster or Housemistress (HM), their tutor, any teacher or directly to the Designated Safeguarding Lead, so that effective early support can be provided. They will always be taken seriously and never be made to feel that they are creating a problem for reporting concerns or abuse.
- 7.3 If staff believe that a pupil could benefit from early help, they should discuss the matter with the DSL who will, taking into account Bracknell Forest LSB threshold criteria (or the criteria of the pupil’s home LSB), consider what action should be taken.
- 7.4 If early help is provided, the situation will be monitored carefully and a referral to children’s social care made if the pupil’s situation does not appear to be improving.
- 7.5 The College has various mechanisms to help identify emerging problems, including a thorough pupil recruitment process, the College’s pastoral system (including the house and tutorial systems and regular online surveys), the Well-being programme and various policies, including child-on-child abuse, , online safety, Mental Health (Eating Disorders, Depression and Self Harm policies), and Prevent. Staff training also prepares staff to identify children who might benefit from early help.
- 7.6 The College recognises the increased vulnerability of young people who:

- are disabled or have special educational needs whether or not they have a statutory Education, Health and Care plan (EHCP as they are more prone to peer-group isolation or bullying (including prejudice-based bullying);
- do not have English as a first language;
- are living away from home for the first time;
- are looked after children;
- are faced with challenging family circumstances;
- are showing signs of being drawn into anti-social or criminal behaviour;
- are acting as a young carer;
- are showing early signs of abuse, neglect or mental health problems;
- are misusing drugs or alcohol themselves;
- are at risk of being radicalised or exploited
- unexplainable and / or persistent absences from education
- has experienced multiple suspensions, is at risk of being permanently excluded from the College
- may be subject to discrimination and maltreatment on the grounds of race, religion, ethnicity, sexual orientation or sexual identity.

Such children may be more likely to need early help. Also, recognising abuse, neglect or being exploited may be more difficult for these children for many reasons, including:

- assumptions that indicators of possible abuse such as behaviour, mood or injury relate to a pupil's disability without further exploration;
- students with special educational needs or disabilities can be disproportionately impacted by bullying without outwardly showing any signs;
- communication barriers and difficulties overcoming these barriers; and
- a disabled child's understanding of abuse.

Where the College places a pupil with an alternative provision provider, it recognises that it will continue to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the student's needs.

8 What to look out for and when to be concerned

- 8.1 All staff should be aware of the types and signs of abuse, neglect and exploitation so that they are able to identify students who may be in need of help or protection. They must also be mindful that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. To reduce barriers to a potential exposure it is incumbent on staff to build trusted relationships with children which facilitate communication. Staff must also exercise professional curiosity and speak to the DSL if they have concerns.
- 8.2 Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Staff should be aware of the four main categories of child abuse which are commonly identified:

- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, 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 adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing or shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Neglect also encompasses 'affluent neglect' a term commonly used to describe the neglect experienced by children living in wealthy families. While these children may have their material needs met—such as good housing, nutrition, and access to education—they may still experience neglect, particularly in the form of emotional neglect or lack of supervision

8.3 Other forms of abuse which staff should be aware of are:

- Child-on-child abuse (see separate College policy)
- Sexual violence and sexual harassment
- Children absent from education (see separate College policy)
- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE) County Lines
- Cybercrime
- Domestic abuse
- Honour-Based Abuse (HBA): Female Genital Mutilation (FGM), Forced marriage and Breast Ironing
- Radicalisation

- Children and the court system
- Children with family members in prison
- Homelessness
- Online abuse (see separate College policy)

These are explored more fully in Appendix 2 and further information is contained in Part 1 and Annex B of KCSIE.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between young people outside this environment. This is known as contextual safeguarding. All staff should consider, and especially those within the safeguarding team, whether students are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of forms and young people may be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

9 Signs of abuse

- 9.1 All staff need to be aware that students may be reticent about reporting abuse generally, and particularly so about child-on-child abuse, and therefore need to be vigilant for potential indicators that abuse may be taking place and inform the safeguarding team of any concerns they might have.
- 9.2 Possible signs of abuse include the following (but are not limited to and do not necessarily mean that abuse is occurring):
- the pupil discloses that he or she has been abused, or asks a question which gives rise to that inference
 - a pupil's injury cannot be reasonably or consistently explained, or is unusual in type or location
 - a pattern or frequency of injuries is emerging
 - the pupil engages in extreme or challenging behaviour or there is a sudden change in the pupil's behaviour
 - the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss reasons
 - the pupil appears neglected (e.g. dirty, hungry, inadequately clothed)
 - the pupil appears reluctant to return home or has been openly rejected by parents or guardians
 - the pupil's development is delayed in terms of emotional progress
 - the pupil withdraws emotionally – showing a lack of trust in adults
 - the pupil shies away from being touched or flinches at sudden movements
 - the pupil loses or gains weight
- 9.3 Further guidance is provided in Appendix 3. Other sources of information on the signs of abuse include: Bracknell Forest Safeguarding Children's Board ([here](#)); the DfE advice note [What to do if you're worried a child is being abused](#) (2015); and the [NSPCC](#) website.
- 9.4 All staff should be aware that even if incidents are not being reported, it does not mean that they are not happening and it could just mean that signs are not being recognised or that students are not reporting them. All staff should report any concerns – however small – to the DSL.

10 Listening to students and record keeping

10.1 The College provides a range of opportunities for students to be listened to. These include:

The opportunity to meet for one-to-one tutorials at least fortnightly; daily interactions with their HM and house meetings; house councils/forums; College council groups; the College counsellors and Health Centre team;

Whisper (online anonymous student reporting tool), Govox and annual pastoral surveys, including the 'Staying safe' survey.

10.2 Contact details for the Children's Commissioner and the NSPCC are available on posters in all houses, as are details about the College counselling service and Health Centre. Posters detailing all sources of help in the College are in houses with further links available through a QR code.

10.3 The National Minimum Boarding Standards require boarding schools to appoint an Independent Person, as an additional point of contact for students who wish to discuss concerns or problems with someone who is not connected with the hierarchy of the College. Communications with the Independent Person are confidential except in cases where there is concern for the welfare or safety of the pupil (or others) in which case the relevant authorities would be informed. The College's Independent Person is Judy Waugh. Their contact details are provided to boarders and clearly displayed on various noticeboards in the boarding houses.

10.4 If a pupil discloses that he or she has been abused or neglected in some way, the member of staff should:

- immediately stop any other activity to listen;
- listen carefully to the pupil and keep an open mind - do not interrupt the child or be afraid of silences;
- keep in mind that some students may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- limit the questioning to the minimum necessary for clarification using "what, when, how, where" but avoid using leading questions such as, "has this happened to your siblings?" which may prejudice an investigation;
- not make any attempt to investigate the incident themselves or make a decision as to whether or not the pupil has been abused;
- reassure the pupil, but never promise not to tell anyone. Instead, explain who has to be told to ensure that proper action is taken in accordance with this policy;
- make it clear that they are being taken seriously, will be kept safe and have been courageous in coming forward
- discuss the conversation with the DSL as soon as possible and take no further action unless instructed to do so by the DSL or the Master;
- only share information on a need-to-know basis; and
- make a full written record of the conversation as set out below.

10.5 Staff must record in writing all concerns, discussions and decisions made about a child as soon as possible on MyConcern. Details of how to do this can be seen in Appendix 6. The recording must be a clear, precise and factual account of the conversation or observations. Where a child has made a disclosure, the record must include details of:

- its date, time and place
- what was said and done by whom and in whose presence
- any noticeable non-verbal behaviour or words used by the child.

Any other evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers) must be kept securely and passed on to the DSL as soon as possible. No copies should be retained by the member of staff or volunteer. Notes may be scanned and uploaded onto MyConcern.

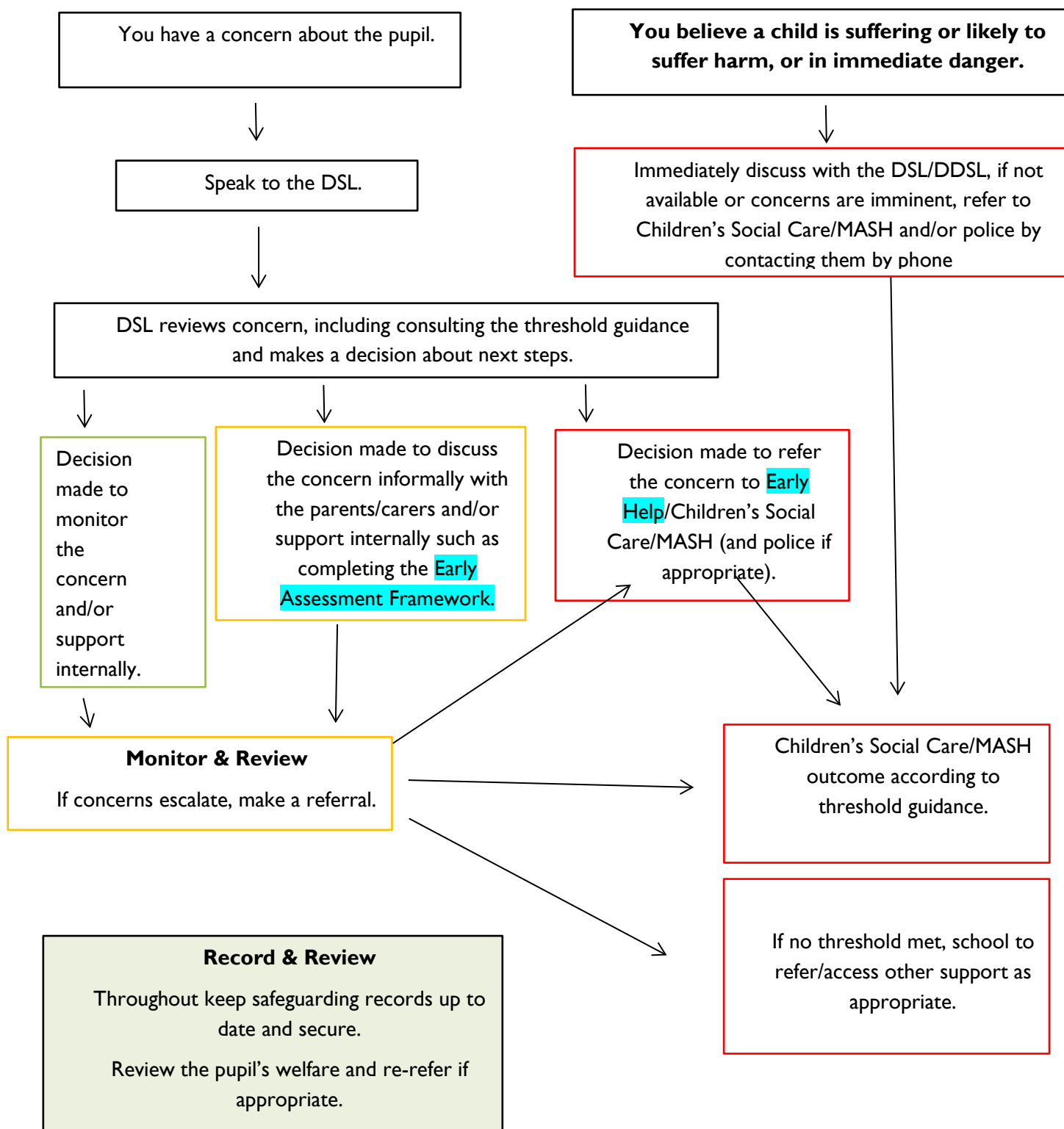
Where a report includes an online element, staff should, where possible, avoid viewing illegal images of a child and under no circumstances should such images be forwarded electronically. Further guidance is

available on what to do if viewing an image is unavoidable is available via accessing the resources below and the online safety policy:

- <https://www.gov.uk/government/publications/searching-screening-and-confiscation>
- [Sharing nudes and semi nudes: advice for education settings working with children and young people \(December 2020\)](#) (updated March 2024)

11 Procedure to be followed by staff if they have concerns about a pupil's welfare

- 11.1 If a member of staff has concerns about a pupil's welfare (including any mental health concerns), they must inform a member of the Safeguarding team as soon as possible, unless the concerns involve an allegation against a member of staff, in which case the procedures set out in the section *Allegations against members of staff (including supply staff), contractors and volunteers* below should be followed. Staff should not assume that somebody else will act and share information that might be critical in keeping a pupil safe.
- 11.2 All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing on MyConcern. If in doubt about recording requirements, staff should discuss with the DSL.
- 11.3 If a teacher or member the Health Centre team discovers that an act of female genital mutilation (FGM) appears to have been carried out on a girl under 18, the individual must report this to the police. Unless the individual has a good reason not to, they should also still inform the DSL. This statutory duty does not apply to suspected cases of FGM or those at risk of FGM, which should both be addressed in accordance with the safeguarding procedures described in this policy. (For further details, see Part 1 of KCSIE and '[Guidance for Schools](#)' information)
- 11.4 The normal safeguarding procedures outlined in this Policy must be used when there are concerns about children who may be at risk of being drawn into terrorism.
- 11.5 Parents can report to the DSL on the welfare of any pupil in the College, whether their own child or not. If preferred, parents may discuss concerns in private with the pupil's teacher or other member of staff, who will notify the DSL.
- 11.6 Any member of staff may refer a matter to children's social care directly. This could happen in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken.



12 Duties of the DSL on being notified of a concern about a pupil's welfare

12.1 When the DSL is notified of any concerns about a pupil's welfare, they will decide on the appropriate course of action. In particular, the DSL will decide whether a referral should be made to children's social care.

12.2 Factors that the DSL should bear in mind when making their decision include:

- the best interests of the child
- the nature and seriousness of the complaint
- the referral threshold set by the relevant Local Authority

- the child's wishes or feelings
- the inter-agency procedures of the Local Safeguarding Board
- where relevant, local information sharing protocols relating to Channel referrals.

12.3 If the DSL decides not to make a referral, but to support the pupil with early help, the DSL will keep the situation under review and consider a later referral to children's social care will be made if the pupil's situation does not appear to be improving.

12.4 Members of the DSL team are responsible for maintaining written safeguarding records once an issue has been logged on MyConcern. These records are confidential and the only personnel within the College who have access to them are the DSL/DDSLs. Such records will include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; and
- a note of any actions taken, decisions reached and the outcome.

13 Making a referral to children's social care

13.1 When a pupil is not considered at risk of harm, but still has an unmet need that could mean they are in a Child in Need, a referral should be made as soon as possible by the DSL to Children's Social Care in the local authority in which the pupil lives. Parental consent for referrals of this type is required. It is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge. Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) there should be an inter-agency early-help assessment. The College will coordinate with the local agencies involved.

13.2 If a pupil is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately. Further guidance on when to call the police is provided by the [NPCC - when to call the police](#). The College is not required to obtain parental consent prior to a referral being made.

13.3 If the initial referral is made by telephone, the DSL should confirm the referral in writing. Confirmation of the referral and details of the decision on what action will be taken should be received from the Local Authority within one working day. If this is not received, the DSL should contact children's social care again.

13.4 If the DSL is not sure whether a referral should be made, he/she will consult with children's social care on a no-names basis. However, if at any stage sufficient concern exists that a pupil may be at risk of harm or in immediate danger, a referral to children's social care and/or the police will be made immediately.

13.5 Whilst anyone can make a referral, it would be expected that all referrals go through the DSL. If, in exceptional circumstances, a referral is made by someone other than the DSL, the DSL should be informed as soon as possible.

13.6 If, after a referral, the pupil's situation does not appear to be improving, the DSL should contact children's social care again to follow the matter up and ensure that their concerns are addressed and the pupil's situation improves.

13.7 Where relevant, the College will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into extremism. The College will respond to requests for information from the police promptly and in any event within five to ten working days.

13.8 If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the College will consider whether any disciplinary action is appropriate against the individual who made it.

14 Informing parents

- 14.1 Parents will usually be informed of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult with the Local Authority Designated Officer, children's social care, the police and/or the Head before discussing details with parents.
- 14.2 For Channel referrals, the DSL will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.
- 14.3 Referrals do require parental consent if it is a referral made under the Child in Need, section 17 of the Children's Act, 1999. Parental consent is not required if it is a child protection concern (Section 47 of the Children's Act). It is always preferable to obtain parental consent, unless there is a specific reason not to, i.e. that there is a risk to the young person concerned by doing so.

15 Allegations about members of staff, supply staff, volunteers and contractors

15.1 Guidance to staff

Guidance is given to staff to be circumspect about placing themselves in situations which may

- put themselves or their students at risk of harm; or
- give rise to allegations of abuse.

To reduce the risk of allegations, staff should be aware of safer working practices and should be familiar with the detailed guidance on acceptable behaviour and actions contained in the Staff Code of Conduct, which is issued to all staff. Specific information about protecting themselves is given in individual staff inductions and in the safeguarding training. Particular care should be taken where staff have one-to-one meetings with students, or where they work in a boarding house.

15.2 The following procedures will be used where it is alleged that a member of staff, supply teacher, volunteer or contractor has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (this may include an incident outside of school which did not involve children but could have an impact on their suitability to work with children, for example an incident of domestic abuse).

These criteria are often referred to as the allegation or harms threshold. These procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. The procedures follow Part four of KCSIE.

15.3 Reporting an allegation about staff

If an allegation is made about staff that appears to meet the criteria in paragraph 15.2:

- Where an allegation is made about a member of staff, supply staff, the DSL, contractor or volunteer, the matter should be reported immediately to the DSL or the Master (James Dahl), or in the Master's absence, the Second Master (Cressida Henderson), the Nominated Governor for Safeguarding (Ginny Rhodes) or Chair of Governors (William Jackson). The adult to whom the allegation relates should not be informed without the explicit consent of the Local Authority Designated Officer (LADO).

- Allegations about the DSL should be reported to the Master or in the Master's absence, the Second Master (Cressida Henderson), the Nominated Governor for Safeguarding (Ginny Rhodes) or Chair of Governors (William Jackson). The adult to whom the allegation relates should not be informed without the explicit consent of the Local Authority Designated Officer (LADO),
- Allegations about the Master should be reported to William Jackson, Chairman of Governors, or in his absence the Nominated Safeguarding Governor, Ginny Rhodes, without first notifying the Master.
- Allegations about a governor should be reported to the Chairman or the Nominated Safeguarding Governor. If the allegation is against either the Chairman or the Nominated Safeguarding Governor, the matter should be reported to the other.
- The Master, Chairman or Nominated Safeguarding Governor who receives any such allegation is referred to in these procedures as the 'case manager'.

15.4 Action to be taken by the case manager

- Before contacting the LADO, the case manager will conduct basic enquiries in line with Bracknell Forest's procedures to establish the facts to help determine whether there is any foundation to the allegation. Nothing must be done at this initial stage that could jeopardise any future police investigation. If the case manager is unsure whether the allegation meets the criteria in para 15.2 above, the LADO will be consulted for advice.
- Any allegations meeting the criteria in para 15.2 will be dealt with in accordance with the Local Safeguarding Board's procedures. All such allegations must be dealt with as a priority so as to avoid any delay.
- The case manager will immediately (and in any event within one working day) discuss the matter with the Local Authority Designated Officer (LADO) – the person designated by the local authority to be involved in the management of allegations against people who work with children - before further action is taken. The case manager may also consult with the DSL, but no attempt will be made to formally investigate the allegation until the LADO has been consulted. The purpose of the initial discussion between the case manager and the LADO is to consider the nature, content and context of the allegation and agree a course of action. All discussions with the LADO should be recorded in writing.
- The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it will be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom.
- In situations where a person is deemed an immediate risk to children or where there is evidence of a possible criminal offence, the case manager may, in consultation with the LADO, request police involvement from the outset.
- Where an adult makes an allegation to the College that they were abused as child, the individual will be advised to report the allegation to the police. Non-recent allegations made by a pupil will be reported to the LADO in line with Bracknell Forest's procedures for dealing with non-recent allegations. The LADO will then coordinate with the local authority children's social care and the police.

15.5 Disclosure of information

- The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted and, if appropriate, local authority children's social care and the police.
- The parents of the pupil involved will be informed of the allegation as soon as possible if they do not already know of it, although where external agencies are involved, the case manager will not inform the accused or the parents until it has been agreed what information can be disclosed. Parents will be

kept informed of the progress of the case, only in relation to their child; no information can be shared regarding the member of staff.

- The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

15.6 Investigation

- Investigations will usually be undertaken by a senior member of College staff, under the guidance of the LADO. However, depending on the nature and complexity of an allegation, the investigation may instead be conducted by external agencies, such as social care or the police. In some cases, the LADO may ask for further enquiries to be made before a formal decision is reached about how to proceed. When this occurs, the LADO will provide specific guidance as how and by whom the investigation should be conducted.
- Where an external agency is conducting the investigation rather than the College, the College will cooperate fully with external investigators. No internal investigation into possible breaches of the College's disciplinary code will commence until any external investigation or criminal proceedings are complete.
- The case manager will monitor the progress of the case to ensure that it is being dealt with as quickly as possible in a thorough and fair way. Wherever possible, the first review should take place within four weeks of the initial assessment. Subsequent reviews will take place fortnightly (and no longer than monthly) intervals whilst the investigation is ongoing.
- It is recognised that the College may have to consider an allegation against an individual not directly employed by the College: for example, supply tutors provided by an employment agency or business. The College will ensure the agency are made fully aware of any allegations are dealt with properly. Prior to ceasing using a supply tutor due to safeguarding concerns, the facts will be found out and the LADO liaised with to determine a suitable outcome. The College will take the lead in the investigation, to ensure that the allegation is dealt with properly and to recognise the fact that the agency would not have direct access to students or other College staff. They would therefore not be able to collect the facts or liaise with the LADO, police and/or children's social care. The agency will be made fully aware of the issues and be fully involved in the process. For example, the School will discuss with the agency whether it is appropriate to suspend the person they have supplied, or redeploy them, whilst the investigation is carried out. Supply staff will be advised to contact their trade union for representation. If there is an allegation meeting, it will address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are considered by the College.
- If the College receives an allegation relating to an incident that happened when an individual or organisation was using its premises for the purposes of running activities for children, the College will follow the procedures set out in this policy, including informing the LADO.
- The College will not cease its investigations if the person involved leaves, resigns, ceases to provide their services or refuses to cooperate. Records will be kept of the nature of the allegation and any supporting evidence used to determine whether or not, on the basis of information available, the allegation is substantiated. The person involved will be notified in writing of the outcome of investigation process.
- In accordance with DfE statutory guidance, the following definitions will be used when determining the outcome of allegation investigations:
 - Substantiated: there is sufficient evidence to prove the allegation
 - Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject to the allegation
 - False: there is sufficient evidence to disprove the allegation

- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

15.7 Support

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

15.8 Suspension

- Suspension will not be an automatic response to an allegation and will only be considered in a case where there is cause to suspect a pupil or other students at the College is or are at risk of significant harm or the allegation is so serious that it might be grounds for dismissal. The College will consider whether the result that would be achieved by suspension could be obtained by alternative arrangements, such as redeployment. A member of staff will only be suspended if there is no reasonable alternative. The College will balance the need to ensure the safety and welfare of the pupil with the need for a full and fair investigation. The LADO will be consulted as to the appropriate action to take.
- If suspension is deemed appropriate, the reasons and justification will be recorded by the College and the individual notified of the reasons for the suspension. The College will ensure that the suspended person is given the contact details for the representative who has been appointed to keep him or her informed about the progress of the case.
- If the allegation is against a member of the residential boarding staff (such as an HM or Assistant HM) and that member of staff is suspended from duty as a result of the allegation, the College will provide alternative accommodation for that member of staff for the duration of the investigation. Likewise, if the member of staff is residential on the College site, alternative accommodation will be provided.
- If it is decided that the person who has been suspended should return to work, the College will consider how to facilitate this; for example, whether a phased return would be appropriate. The College may provide a mentor and will also consider how to manage contact with the pupil who made the allegation.

15.9 Confidentiality and information sharing

- The College will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality to ensure a fair investigation with minimum impact for all parties.
- A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence to publish information that could lead to the identification of a member of staff who is the subject of an allegation before they are charged with an offence. Publication includes any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public.
- The case manager will take advice from the LADO, police and children's services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip including how to make the student involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, or when, it arises.
- Where the police are involved, wherever possible the College will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in any subsequent disciplinary process initiated by the College.

We will ensure that information is only shared on a 'need to know' basis, including Domestic Abuse notifications and Operation Encompass. Operation Encompass supports communication between the Police and School regarding where a child has experienced a domestic abuse incident, ensuring that as a school we are able to put in place support for the child, as appropriate.

15.10 Unsubstantiated, unfounded, false or malicious allegations

- If an allegation by a pupil is shown to be unsubstantiated, unfounded, false or malicious, the Master will consider whether to take disciplinary action against the pupil in accordance with the College's Behaviour and Discipline Policy. The DSL will also consider if the pupil concerned needs help or may have been abused by someone else to determine whether a referral to local authority children's social care is appropriate.
- If a parent has made a deliberately invented or malicious allegation the Master will consider whether to require that parent to withdraw their child or children from the College, on the basis that they have treated the Master or a member of staff unreasonably.
- Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the College reserves the right to contact the police to determine whether any action might be appropriate.

15.11 Substantiated allegations

- If an allegation is substantiated and the member of staff, contractor or volunteer is dismissed because they are unsuitable to work with children a report to the Disclosure and Barring Service will be made promptly, and in any event within one month of the person leaving the College.
- Settlement agreements, including a form of words for a reference, will not be used in cases where a member of staff, volunteer or contractor resigns or ceases to provide his or her services, where there are allegations that indicate the person is a risk or poses a risk of harm to children. Resignation or ceasing to provide services will not prevent a referral being made to the Disclosure and Barring Service where appropriate.
- If a teacher has been dismissed, or would have been dismissed had they not resigned, in cases involving unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction for a relevant offence, the College will give separate consideration to whether a referral should be made to the Teaching Regulation Agency. The College will follow the advice set out in the TRA documents: [Teacher misconduct: information for teachers](#) and [Teacher misconduct: the prohibition of teachers](#) (as updated from time to time) to decide whether a referral should be made.
- At the conclusion of a case in which an allegation is substantiated, the LADO will review the circumstances of the case with the case manager to determine whether any improvements could be made to the School's procedures to prevent the occurrence of similar events in the future. Consideration will also be given to how the investigation process was managed, including, where

appropriate, the use of suspension of the accused. The case manager will produce a written report that will be presented to the governors without delay.

15.12 Reporting to the Charity Commission

- Wellington College as a registered charity has a duty to protect people who come into contact with its work as a charity from abuse or mistreatment of any sort. As part of this duty the College is required to notify the Charity Commission of serious incident involving students or other beneficiaries of the charity. Examples of where such a report would be required include (but are not limited to):
 - incidents (alleged or actual) where students have been abused or mistreated whilst under the College's care or by individual(s) connected to the College
 - failures to follow policies and procedures which have put students at significant risk of harm
- It is the responsibility of the Board of Governors to ensure such reports are made promptly. The report will provide an account of the circumstances of the incident, actions taken by the College and details of lessons to be learnt from the subsequent review. The Governors will also oversee the production of an action plan to address any deficiencies or weaknesses identified in the College's safeguarding arrangements to ensure they are remedied without delay.

15.13 Record keeping and references

- Details of allegations that are found to be malicious or false will be removed from personnel records, unless the individual gives their written consent for the retention of the information. For all other allegations, a comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any actions taken, decisions made and the outcome (substantiated, unfounded or unsubstantiated) kept on the employee's file where agreed by the Local Authority Children's Care or the police, and a declaration on whether information will be referred to in a future reference. A copy of this summary will be provided to the individual concerned. Such records will be retained at least until the employee reaches the normal pension age (or for a period of ten years from the date of the allegation, if this is longer).
- When providing employer references, the College will not refer to any allegation or history of allegations where the allegation(s) have been proven to be false, unfounded, unsubstantiated, false or malicious. Factual information (not opinions) will be included in references, where an allegation has been substantiated.

15.14 Learning lessons

- Throughout the investigation process into a safeguarding allegation about a member of staff at the conclusion of a case, irrespective of whether an allegation is substantiated, the College will review the circumstance of the case to see if there are any improvements which can be made in policy or practice which may prevent similar cases in the future. Such reviews will be conducted by the case manager in consultation with the LADO and will also consider how future investigations of a similar nature may be carried out more effectively, including any issues arising from any decision to suspend a member of staff, the duration of the suspension and whether or not the suspension was justified. The case manager will submit a report to the Board of Governors summarising the outcome of the review.

15.15 Low Level Concerns

- If an allegation is made about staff that does not meet the criteria in paragraph 15.2, the College Low Levels Concerns procedures should be followed. A low-level concern for this purpose is any concern, that an adult working in or on behalf of the College may have acted in a manner inconsistent with the College's Code of Conduct (including inappropriate conduct outside of work) and does not meet the threshold of harm or is not considered serious enough to refer to the LADO. Low level concerns cover a spectrum of behaviours, including inadvertent or thoughtless actions, behaviour that might be

inappropriate depending on the circumstances or behaviour intended to enable abuse. Examples of such behaviour could include but are not limited to:

Being overly friendly with students; showing favouritism; taking photographs of students on a personal device; humiliating students, or using inappropriate sexualised, intimidating or offensive language.

- NB: The term 'low-level' does not mean that the concern is insignificant; it simply means the behaviour does not meet the allegation threshold as defined in KCSIE.
- The overarching aim of the College's low-level concern policy is to facilitate a culture in which the College values and expected behaviours which are set out in the staff Code of Conduct are lived, constantly monitored, and reinforced by all staff. The intention of the policy is therefore to:
 - maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines.
 - ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in the Code of Conduct.
 - provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst on the other hand protecting staff from false allegations or misunderstandings.
- Staff are required to report any concerns about any adult (including a person employed by a supply agency, a contractor or visitor) to the Director of Safeguarding. In the case of supply staff, and contractors their employers will be notified so any patterns of inappropriate behaviour can be identified. Where the concern relates to the Master it should be reported to the Chair of Governors. Such reports should be made without undue delay. Staff do not need to be able to determine whether their concern is a low-level concern or whether it meets the threshold of an allegation. This determination will be made by the Master/Chair of Governors when the matter has been investigated. If there is uncertainty as to whether a low-level concern meets the harm threshold, the LADO will be consulted for guidance.
- Full details of how the College will go about investigating low-level concerns are set out in an annex to the Staff Code of Conduct. In brief, the Director of Safeguarding will collect as much evidence as possible by speaking directly to the person who raised the concern, the individual involved and to any witnesses.
- All low-level concerns, including those determined to be unfounded, will be recorded in writing by the Director of Safeguarding. The record will include details of the concern, the context in which the concern arose, and any actions taken and decisions reached (and the rationale for them), and the eventual outcome. The name of the individual sharing their concerns will be noted. If the individual wishes to remain anonymous, then this will be respected as far as reasonably possible. Records of low-level concerns are confidential and securely stored by the DSL in accordance with the Data Protection Act 2018 and the UK General Data Protection regulation until the individual ceases to be employed by the College.
- Low-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in employment references provided by the College. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to.
- Records of low-level concerns are reviewed by the Director of Safeguarding and the Master on a termly basis to determine if potential patterns of concerning, problematic or inappropriate behaviour

exist. The DSL discusses low-level concerns with the Master on a weekly basis. Where a pattern of behaviour is identified consideration will be given to whether disciplinary procedures should be invoked, the matter should be escalated to the LADO and, more broadly, whether existing policies need to be revised and/or additional training is required to address wider cultural issues and minimise the risk of recurrence in the future. All low-level concerns are recorded on the database Confide.

16 Arrangements for dealing with child-on-child abuse and allegations

16.1 Most instances of students causing harm to each other will be dealt with under the College's Child-on-child abuse and Behaviour Policies. However, all staff should be aware that safeguarding concerns can arise as a result of conduct by a pupil towards another (referred to as child-on-child abuse). This type of abuse can happen both inside and outside of College and online. For more detailed guidance on child-on-child abuse, please refer to the separate College policy. Examples of students' conduct towards each other that could raise safeguarding concerns are:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children
- physical violence such as hitting, kicking, biting, hair-pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (sexting)
- initiation/hazing types violence and rituals.
- upskirting, which typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or to cause humiliation or distress is now a criminal offence. Anyone of any gender can be a victim.)

16.2 Students with Special Educational Needs or Disabilities are particularly vulnerable to child-on-child abuse.

16.3 The fact that a child or young person may be LGBT may mean that they are targeted by other children. Risks can be compounded where children who are LGBT lack a trusted adult. The College provides a safe space for these children to speak out and share their concerns, running an LGBTQ+ Society which is co-chaired by an external provider specialising in LGBTQ+ issues as well as fortnightly drop-in sessions for students. Further detail about support for Gender questioning and transgender students can be found in the College policy and guidance in supporting gender-questioning and transgender young people.

16.4 It is more likely that girls will be victims and boys perpetrators of child-on-child abuse. Also, child-on-child abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual harassment, assault and/or exploitation whereas boys seem to be at greater risk of physical, and sometimes gang-related violence and serious youth violence.

16.5 Children can be particularly vulnerable in residential settings such as boarding accommodation. All staff and especially those involved with boarding need to be alert to welfare issues children living away from home may experience as well as the potential for child-on-child abuse. Particular risks associated with young people sharing accommodation overnight include: bullying or intimidation by peers; initiation or hazing

rituals; sexual relationships; use of mobile devices in the boarding house; concerns regarding educational guardianship arrangements; and access to staff accommodation.

16.6 These risks have been assessed and a variety of policies and procedures are in place to mitigate them. Boarding staff have had dedicated training on the indicators of child-on-child abuse and the management of welfare issues for boarders. There are numerous pathways by which boarders can raise concerns or worries with staff within the college or with the Independent Person, and external helplines. They are reminded of these support mechanisms on a regular basis and further guidance is provided on notice boards throughout the College.

16.7 Sexual violence and sexual harassment can occur between students of any age and sex and more specific guidance and information can be found in the College policy 'Sexual Harassment and Violence'. Staff should be aware that some groups are at greater risks than others. Girls, students with SEND, and LGBTQ+ students are more likely to be victims of these types of abuse. Evidence also shows that boys are more likely to be perpetrators of sexual harassment and sexual violence. Sexual violence includes acts such as sexual assault, assault by penetration, and rape. A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act.

16.8 Sexual violence and harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable. All staff are advised to maintain an attitude of 'it could happen here'.

16.9 Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline and both inside and outside of College and are never acceptable. Sexual harassment can take a wide variety of forms:

- Sexual comments e.g. making lewd comments or sexualized remarks about a person's clothes or appearance, using sexualised names etc
- Sexual 'jokes or taunting
- Physical behaviour e.g. deliberately brushing against someone, interfering with clothing (flicking bra straps, lifting up skirts etc), displaying pictures, drawings or photos of a sexual nature
- Online harassment e.g. non-consensual sharing of images and videos, unwanted sexualised comments and messages, sharing of unwanted explicit content, coercing others into sharing images or performing acts that they are not comfortable with

16.10 Wellington College has an important role in developing students' understanding of what constitutes child-on-child abuse and instilling behavioural norms that minimise the risk of it taking place. All staff should be familiar with the College 'child-on-child abuse' policy.. Staff should also be aware of the importance of:

- assuming child-on-child abuse is not occurring because known cases are rare when it may be that such abuse is occurring and is simply going unreported by students;
- enforcing the College's rules which are explicit about the high standards of behaviour and courtesy the College expects;
- implementing in a consistent way its Behaviour Policy;
- being clear about the College's zero-tolerance approach to sexual violence or sexual harassment and that such behaviours are abusive and must not be dismissed as 'banter', 'just having a laugh', 'part of growing up', or 'boys being boys'. Downplaying such behaviour leads to a culture of unacceptable behaviour, an unsafe environment and a culture which normalises abuse leading to students accepting it as normal and not coming forward to report it;
- implementing the College's anti-bullying strategy and promoting the College values.

Other strategies in place to prevent the occurrence of child-on-child abuse include:

- providing developmentally appropriate well-being lessons which develop students' understanding of acceptable behaviour. Themes covered in these lessons that are particularly relevant to child-on-child abuse include: consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships
- having systems in place to for any students to raise concerns with staff, knowing that they will be listened to, believed and valued
- delivering targeted work on assertiveness and keeping safe for those students identified as being potentially vulnerable
- having robust supervision arrangements, particularly for those in the boarding community, as set out in the 'supervision of students' policy.

16.11 All staff will be trained to manage a disclosure of child-on-child sexual abuse, including sexual violence and sexual harassment, including knowing how to respond when a disclosure is made or if other evidence comes to light that these kinds of abuse may be occurring. In all cases the victim should never be given the impression that they are creating a problem by reporting child-on-child abuse, including sexual violence or sexual harassment nor should they be made to feel ashamed for making a report or their experience minimised. Staff are also made aware of what support can be offered to the young people concerned as detailed in Part 5 of KCSIE. Wellington College also have a team of specially trained staff – SWiMs (student wellbeing mentors) to assist in cases of child-on child abuse. Their role is set out in the child-on-child abuse policy.

16.12 If an allegation of child-on-child abuse has been made the DSL must be informed as soon as possible. Where the DSL considers that the behaviour meets the local authority threshold criteria, the case will be referred to the local authority using the procedures set out in this policy. If unsure as to how to proceed, the College should take advice from children's social care on when and how to inform the pupil about the allegations and how the investigation of allegations will be conducted. The College will also take all appropriate action to help facilitate the safety and welfare of all students involved including those accused of abuse. Further details on how cases of child-on-child abuse will be managed is contained in Part 5 of KCSIE and in the College's Child-on-child abuse Policy.

16.13 A pupil against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the College's policies on behaviour and discipline will apply.

16.14 If it proves necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the College will ensure that an appropriate adult supports the student during the interview. If a student's parents are abroad, the pupil's education guardian will be asked to support the pupil and to accommodate him or her if they have been suspended.

16.15 Both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. The DSL as part of these procedures will produce a welfare risk assessment which will consider the needs of all those involved (victim, perpetrator and other students at the College) and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment appropriate weight will be given to: the wishes of the victim; the nature of the alleged incident; the ages of those involved; whether the incident was an isolated one or part of a pattern; any power imbalance between the victim and perpetrator; time and location of the incident; any ongoing risks to the victim and other students; and any relevant contextual factors. Children's social care may independently risk assess the situation and any assessment produced by them will be used to inform and update the College's own risk assessment which, in any event, will be reviewed on a regular basis.

- 16.16 All cases of child-on-child abuse and sexual harassment will be logged on MyConcern and a separate log of these issues is also kept by the DSL so that emerging trends and patterns can be monitored and ongoing training and education can be targeted appropriately.
- 16.17 If a report of child-on-child abuse including sexual violence or sexual harassment is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider if disciplinary action should be taken against the pupil who made the allegation and/or whether a referral to children's services is appropriate.

17 Other safeguarding arrangements

17.1 Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where young people have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

17.2 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by raising the issue with the DSL, who may in turn contact an appropriate external agency. Further details are provided in the College's Mental Health Policy

17.3 Teaching students to keep themselves safe

The College is committed to educating students about safeguarding issues, which are explored in a variety of contexts, including assemblies, mid-week chapel services, well-being lessons, tutorials, house assemblies, additional pastoral talks and opportunities within the curriculum. Issues covered include online safety, radicalisation, grooming, child sexual exploitation, child criminal exploitation, healthy relationships, mental health, substance misuse and bullying. Students are also taught how to identify risks and how to modify their behaviour to mitigate these risks. Staff are aware of the ongoing need to promote fundamental British values as a means of building resilience to the risks of radicalisation. Resources are provided to students and their parents when they join the College (House handbooks, College Admissions Joining Booklet, Acceptable Use IT Policy and information, signposting about where to go if students need help and advice) and copies of these are all readily available in the College.

17.4 Online safety

The widespread use of digital communications technologies, such as personal mobile devices and the internet, presents young people with a host of opportunities for learning, participation, creativity and self-expression. At the same time, it has become a significant component of many safeguarding issues, including child exploitation, radicalisation and sexual predation. Issues of online safety are ever evolving but can be broadly categorised into four areas of risk:

1. **Content:** Being exposed to illegal, inappropriate or harmful online content such as spam, pornography, fake news, substance abuse, violence, misogyny, anti-Semitism, racism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories.
2. **Contact:** Being subjected to harmful online interaction with other users. Examples include: peer-to-peer pressure, exposure to viruses and malware, anonymous online chat sites, cyber-bullying commercial advertising, personal data or identity theft, cyber-stalking, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
3. **Conduct:** Personal online behaviour that increases the likelihood of being harmed oneself or causing harm to others. Examples include threats to: health and well-being, such as gaming or social network addiction; online disclosure of personal information and ignorance of privacy settings; online bullying; making, sending and receiving explicit images (e.g. consensual and non-consensual sharing

of nudes and semi-nudes and/or pornography, sharing other explicit images); and illegal conduct, including hacking, plagiarism, and copyright infringement of digital media, such as music and film.

4. **Commerce:** Risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

The safe use of technology is a focus in all areas of the curriculum and key ICT safety measure are routinely reinforced in lessons and assemblies and at pastoral events, The College has an Acceptable Use of IT policy. It manages access to the internet via 3G,4G and 5G through the use of filters and monitoring systems to ensure IT is being used in a safe and appropriate manner.

The College recognises the increasing use of Artificial Intelligence in educational settings. All staff should be aware of the safeguarding implications of AI, including the potential for deepfakes, AI-generated abuse, or students using AI to access inappropriate content. Staff are required to report concerns related to AI as safeguarding issues and training will be provided annually on safe AI use and emerging risks.

Please see the College Online Safety policy for further details.

- 17.5 The College will review its filtering and monitoring systems annually, reporting outcomes and any breaches to the Governing Board and ensuring all staff understand both the limitations and strengths of these systems. The leadership team will regularly assess whether the current systems address new and emerging risks. Please see the College Filtering and Monitoring Policy for further details. Education of parents

The College also educates parents on safeguarding and pastoral matters through the half-termly safeguarding newsletter, the Parents' Masterclass talks and the annual Mental Health and Wellbeing day. There is also a parent Mental Health Committee that meets half termly to discuss mental health within the College and assists the DSL with strategic planning as well as raise awareness of mental health across the parental body.

The College will communicate with parents on a regular basis to reinforce the importance of children being safe online. Communications with parents will include what systems the College has in place to filter and monitor online use, what their children are being asked to do online (including sites that they will be asked to access) and who from the College they will be asked to interact with online.

- 17.6 Mobile phones and cameras

The College provides mobile phones for trips and cameras for taking photographs when necessary. Mobile phones should not be used when supervising or teaching students except in cases of emergency. Images of children must not be taken or stored on any personal mobile phone. If a phone is to be used for school blogs or social media whilst on educational visits, permission must be obtained from the DSL and the Education Visits Coordinator and reference to their use and subsequent safety of data must be referred to in the trip risk assessment.

Photographs and videos are taken of students by staff for a variety of purposes, including displays of work/activities, personal records of achievement and for the school website and newsletter. Written permission is obtained when a pupil joins the College and this also indicates the level of consent, including where images may be used (personal records only or personal records and on the school website or in school publications). The DSL will ensure that all staff are aware of the names of students who may not be photographed or where there is limited consent. Images of students on the website will not be named. Images may only be captured on College cameras and the images may only be stored on those cameras and on the College's network in a suitable SharePoint folder. Once images have been transferred from a camera onto a computer the images should be deleted from the camera immediately. Additional copies may be stored on flash drives but these must be stored securely in a locked cupboard. Images must

not under any circumstances be transmitted over the internet. Personal mobile phones may not be used to photograph students.

When taking photographs or recording video footage, staff should have regard to the following guidance:

- all students must be appropriately dressed
- images that only show a single child with no surrounding context should be avoided – photographs of three or four children are more likely to include the learning context
- use photographs that represent the diversity of children participating
- do not use images that are likely to cause distress, upset or embarrassment
- do not use images of a pupil who is considered vulnerable, unless parents/guardians have given specific written permission
- photographs must not be taken in the cloakroom/toilet/changing areas

Parents/guardians should be made aware of the need for sensitivity and respect when filming/photographing events featuring their own child or children. Staff should monitor the use of cameras at these events and ask anyone behaving inappropriately to cease filming/taking photos.

For guidance about pupil use of mobile phones, please see the Online Safety policy. For more detailed guidance about social media, please see the College social media policy..

17.7 Risk assessment

The College recognises that the evaluation of risks and putting in place measures to mitigate those risks contributes to promoting the welfare and protection of students. Risk assessments may pertain to the whole school, to specific curricular or extra-curricular activities that have hazards associated with them, or to individual students or staff. The procedures for conducting, recording and monitoring risk assessments are set out in full in the College Risk Assessment Policy.

17.8 Safer recruitment

All prospective members of staff undergo DBS checks and will also be subject to the other checks required under the Education (Independent School Standards) Regulations 2014 and in accordance with the latest version of KCSIE. At least one member of any staff recruitment panel will have had Safer Recruitment training. The College's separate Staff Recruitment Policy contains further details about how the process of staff recruitment is conducted. Wellington College has also adopted the NSPCC Values Based interviewing framework and all staff undergo a VBA interview in accordance with the VBA Policy.

17.9 Children who are absent or missing from education procedures

All staff are aware that children being absent, as well as missing, from education for prolonged periods and/or on repeat occasions, is a potential indicator of a range of safeguarding issues such as: neglect, sexual abuse or exploitation, child criminal exploitation, mental health problems, substance abuse, travelling to conflict zones, female genital mutilation or forced marriage. The College has clear procedures in place for following up on unexplained absences and, where necessary, reporting to the local authority students who are absent from school for more than 10 school days (continuous). The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing. See the College 'Supervision and Registration' policy for full details. We will ensure that we follow our attendance policy and procedures set out within this policy. Our attendance policy can be accessed via the Policies page on the College website which is line with [Working together to improve school attendance \(applies from 19 August](#)

[2024\) \(publishing.service.gov.uk\)](https://publishing.service.gov.uk). We will work closely with Bracknell Forest Education Welfare Service regarding attendance.

Children missing from education are children of compulsory school age who are not registered students at a school and are not receiving suitable education otherwise than at a school. The College has a legal duty to inform the Local Authority if a pupil is to be removed from the roll at a non-standard transition point; i.e., where a compulsory school-aged child leaves the school before completing the school's final year. When this notification is made the following information has to be provided by the College: full name of the pupil; name, address and telephone number of the parent the pupil lives with; details of any new address for the child and parent; the name of the pupil's destination school and expected start date; and the reason why the pupil is leaving the school.

The College is also legally required to notify the Local Authority within five days of adding a pupil's name to the admissions register at a non-standard transition point. The notification includes all the details contained in the admissions register for the new pupil; specifically, their full name; sex; name and address known to be a parent of the pupil (and an indication of which parent the pupil normally lives with and which parents hold parental responsibility); address of new or additional places of residence; at least one contact telephone numbers at which the parent can be contacted in an emergency*; date of birth; name and address of last school attended (if any); and details of whether they are a boarder or a day pupil. The information must be forwarded to the Education Welfare Service at ews@bracknell-forest.gov.uk.

This information is also logged and a record is kept by the DSL.

*Note: In line with KCSIE 2025, it is the College's policy to hold a minimum of two emergency contacts for each pupil.

17.10 The Prevent Duty

All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard" to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. There are four specific elements to Wellington College's approach to meeting the statutory requirements imposed by the Prevent duty. These are detailed in the College Prevent policy and risk assessment. In summary these are:

- Risk assessment – working with the Local Authority, who provide contextual information about the area, the College assesses the risk of students being drawn into terrorism, including extremist ideologies
- Working in partnership – liaising closely with the Bracknell Forest LSB to ensure students requiring support are referred at a suitably early stage
- Staff training – enabling staff to identify students at risk of being drawn into terrorism and to challenge extremist ideas
- IT policies – to provide guidance to students as to how to stay safe online (see Acceptable Use Policy) and set out the filtering and monitoring mechanisms in place.
- Furthermore, the Operations Bursar regularly monitors risks in the local community and nationally and is trained to respond accordingly and appropriately. In addition:
- The College has a robust Crisis Management and Response plan (CMAR)
- Prevent is included in school recruitment arrangements

17.11 Visiting speakers

Any pupil or member of staff who wishes to invite a speaker to address students must provide details of the individual to the DSL (in accordance with the 'Visiting Speaker policy'), so that a comprehensive vetting procedure can be undertaken. The event organiser will undertake a search via the internet to research the

background of the individual and consider taking up references from other schools at which they have spoken at in the past. If the event organiser is a pupil, the member of staff in charge of that activity/society will undertake the search. The event organiser should also consider carefully whether the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups. In these circumstances the event will not be allowed to proceed.

It is not necessary to undertake a DBS check on every speaker. In cases where specific vetting checks are not prescribed by KCSIE, the visiting speaker will be accompanied at all times by a member of staff to ensure there is no unsupervised access to students. However, if a DBS check is deemed necessary, the appropriate details will be recorded on the College's SCR. An evaluation form will be completed by the event organiser and submitted to the DSL following the visit.

17.12 Confidentiality and information sharing

The College will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The College will co-operate with police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations.

Where a pupil who is subject to a child protection plan is moving to another school, the DSL will ensure their child protection file is securely transferred to the new school as soon as possible and within five days for an in-year transfer or within the first five days of a new term to allow the new school to have support in place when the child arrives. This file will be transferred separately from the main pupil file to the DSL at the new school and confirmation of safe receipt will be obtained. The DSL should also consider if it would be appropriate to share any information with a new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have support in place for when the child arrives.

Where allegations have been made against staff, the College will consult with the LADO and, where appropriate, with the police and social care to agree the information that should be disclosed and to whom.

Information sharing is essential in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including educational outcomes. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Information that is relevant to safeguarding is regarded as 'special category personal data' and as such can be shared securely on a need-to-know basis. Further non-statutory guidance [Information Sharing](#) was updated by the Government in May 2024 and in the '[Myth Busting Guide](#)' (Working Together(amended Dec 2023)). See also Appendix 5

17.13 Whistleblowing

All staff are required to report to the Master any concerns about:

- poor or unsafe safeguarding practices at the College;
- potential failures by the College or its staff to properly safeguard the welfare of students; or
- other wrongdoing in the workplace that does not involve the safeguarding and welfare of students.

If the member of staff feels unable to raise their concern with the Master (or a relevant member of SLT) or if they believe any concern has not been dealt with, they should contact the Chair of Governors. The NSPCC whistleblowing advice line is available for staff who do not feel able to raise safeguarding concerns internally (see Appendix 1 for contact details). Any member of staff can whistleblow without fear of detriment

(retribution or disciplinary action) provided the report was made in good faith. Malicious allegations may be considered as a disciplinary offence.

17.14 College premises, security and visitors

The College will take all practicable steps to ensure that premises are as secure as circumstances permit. This includes:

- Biometric access control to buildings throughout College
- Regular patrols around the campus by members of the Security team
- Visitor access control procedures.
- High definition CCTV at various points around the campus
- Security lighting
- Perimeter fencing

Further details can be found in the College's 'General Security' guidance document. College Security is overseen by the Operations Bursar

All staff are identified by photo ID cards worn at all times during College-related activities and duties. A Visitors' Log is kept at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on College premises by a member of staff. All visitors will be given a name badge with the title 'Visitor', which must be clearly displayed and worn at all times whilst on the premises.

All visitors to the boarding houses must sign in and report to the duty staff member immediately on arrival, and during the visit comply with the supervision arrangements put in place.

All visiting speakers are welcomed to the College in accordance with the Visiting Speakers Policy.

Parents visiting the College (for anything other than dropping off their child) are required to wear orange parental lanyards.

The College hires and rents out facilities to organisations, both during term time and the holidays. Where activities and courses are provided by the College (such as the Easter revision course), this policy and all other arrangements for child protection will apply, regardless of whether the children attending are students at Wellington. Where services are supplied by another organisation, the College will seek reassurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place and is included in all contractual agreements. Failure to comply with this will lead to the termination of the contract or agreement. This is in line with procedures laid out in KCSIE 2025.

17.15 Boarders

As a boarding school, Wellington has additional factors to consider with regards safeguarding and these are set out in Standard 8 of the National minimum boarding standards. The management of issues relating to: sexual relationships between students; the sharing of overnight accommodation; and boarders' use of personal devices to bring in or download harmful content are covered in detail in the following documents:

- Boarding Handbook
- The Child-on-child abuse policy
- Online Safety policy

17.16 Children Staying with Host families

The College sometimes makes arrangements for students to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family; this might happen as part of a foreign exchange or sports trip, for example. For guidance about safeguarding in such

circumstances, members of staff and parents should speak to the College's Educational Visits Coordinator who will refer to Annex E in Keeping Children Safe in Education.

17.17 The Human Rights Act

KCSIE sets out the significance of the Equality Act 2010 with reference to school safeguarding. It is unlawful for schools to act in a way which is incompatible with the Articles and Protocols of the European Convention of Human Rights that are deemed to apply in the UK. Schools:

- Must not unlawfully discriminate against students because of their protected characteristics
- Must consider how they are supporting students with protected characteristics
- Must take positive action, where proportionate, to deal with the disadvantages these students face. For example, by making reasonable adjustments for disabled children and supporting girls if there is evidence they are being disproportionately subjected to sexual violence and harassment.

Wellington College is aware that there is a need to be conscious that students with protected characteristics may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Further guidance on this can be found [here](#).

17.18 Monitoring this Policy

- Any child protection incidents at the College will be followed by a review of the safeguarding procedures in the College and a report to the governors. Where an incident involves a member of staff, the LADO will be asked to assist in this review to determine whether any improvements can be made to the College's procedures.
- The DSL will monitor the operation of this policy and procedures on a day-to-day basis and will provide regular updates at Executive Leadership Team meetings. In addition, the DSL will write a termly report to the governors.
- The governors will undertake an annual review of the policy and implementation of its procedures including good co-operation with local agencies and of the efficiency with which the related duties have been discharged. The governors will draw on the expertise of staff, including the DSL, when considering amendments to policies and/or arrangements related to safeguarding.
- Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay.
- The College will continually monitor and evaluate safeguarding and child protection. This will be achieved by:
 - Listening to feedback from parents, students and staff
 - Recording and analysing reports on MyConcern to track trends and patterns
 - Recording the level of need for students on MyConcern and keeping termly and annual reports
 - Recording the number of students on welfare plans or safety risk assessments
 - Monitoring the number of referrals to Bracknell Forest CSC
 - Recording and analysing the number of low-level concerns and self reports made to the DSL
 - Analysing feedback from training courses

17.19 Critical incidents, including a child death

In the event of a critical incident, we will take immediate action which will include contacting the Bracknell Forest MASH team, to ensure an appropriate, multi-agency response. If we are aware of a child death (whether expected or unexpected), we will contact the MASH team and respond in line with the [Child Death](#)

17.20 Other relevant policies

The following policies and documents should be read in conjunction with this policy:

- Health and Safety Policy
- Risk Assessment Policy
- Educational Visits Policy
- Recruitment and Selection Policy
- DBS Policy
- Code of Conduct for Staff, including low-level concerns procedures
- Rewards and Sanctions Policy
- Online Safety Policy
- Filtering and Monitoring policy
- ICT acceptable Use Policy
- Whistleblowing Policy
- Low Level Concerns Policy
- Supervision of Pupils Policy
- Mental Health Policy and separately:
 - Depression Policy
 - Eating Disorders Policy
 - Self-Harm Policy
- Prevent Duty Policy and risk assessment
- Mobile Phone Use Policy (Appendix 1 in the Online Safety policy)
- Social Media policy
- Child-on-Child abuse Policy (including the anti-bullying policy)
- Visiting Speakers Policy
- Extra tuition policy
- Safeguarding Risk Assessment Management policy
- Transporting pupils in personal cars policy
- Safeguarding training policy
- Guidelines for staff in relation to pupils in boarding houses – included in advice on “The Role of the tutor”
- Historic Abuse Policy
- Wellbeing (RSE) policy
- Supervision Policy
- Policy and Guidance for Supporting Gender-Questioning and Transgender Young People

All staff will be issued with a copy of “WELL-Simple” on their arrival at the College and annually. This is a simplified version of the full Safeguarding policy and outlines key procedures that all staff need to know.

D. A. Lynch (Director of Safeguarding, DSL)

Reviewed and updated 1 September 2025

Appendix 1: Contact details

Wellington College Safeguarding contact details

Position	Name	Phone	e-mail
Designated Safeguarding Lead (DSL)	Delyth Lynch	07825 419190	dal@wellingtoncollege.org.uk
Senior Deputy DSL Safeguarding Manager	Stephanie Eysers	07469 858984	seyers@wellingtoncollege.org.uk
Deputy DSL (Deputy Head Pastoral)	Tom Wayman	07766 448086	tfw@wellingtoncollege.org.uk
Deputy DSL (Assistant Head Pupils)	Charlie Sutton	07767 270384	cms@wellingtoncollege.org.uk
Deputy DSL (Health and Fitness Club)	Gaby Moretti-Chambers	01344 444243	gmmc@wellingtonfitness.co.uk
Master	James Dahl	01344 4444101	Master@wellingtoncollege.org.uk
Chair of governors	William Jackson	Contact details can be obtained from Lisa Thompson 01344 444020 or ljt@wellingtoncollege.org.uk	
Nominated safeguarding governor	Ginny Rhodes	Contact details can be obtained from Lisa Thompson 01344 444020 or ljt@wellingtoncollege.org.uk	

Bracknell Forest Children's Social Care numbers and contact details

Name	Phone	Out of hours phone	Email
Duty Team	01344 352020	01344 351999	childrensocialcare@bracknell-forest.gov.uk
MASH Team	01344 352005		MASH@bracknell-forest.gov.uk

Safeguarding and Child Protection Training, Consultation and Advice:

Title	Name	Phone	e-mail
Safeguarding Officer	Amanda Hall	01344 353313	Amanda.Hall@bracknell-forest.gov.uk
Safeguarding Manager	Baljit Bhabra	01344 354204	Baljit.Bhabra@bracknell-forest.gov.uk
Safeguarding Our Schools	http://can-do.bracknell-forest.gov.uk/Services/5145		

Sharon Gibson -Education Welfare Early Help Professional

Allegations against staff

Title	Name	Phone	e-mail
Local authority's designated officer (LADO)	Alison Small	01344 351533	LADO@bracknell-forest.gov.uk

Extremism

Title	Name	Phone	e-mail
Prevent Lead Officer for Thames Valley Police	DS Kulvinder Bansal	07788 307 178	Kulvinder.bansal@thamesvalley.pnn.police.uk
DfE regional Prevent Coordinator (SE)	Helene Morris	n/a	Prevent.SouthEast@service.education.gov.uk
DfE non-emergency advice	Telephone helpline and mailbox	020 7340 7264	counter-extremism@education.gsi.gov.uk
https://www.bracknell-forest.gov.uk/sites/default/files/documents/prevent-safeguarding-against-radicalisation-and-extremism.pdf			
Police	Non-emergency number	101	
Anti-terrorism helpline	0800 789 321		

Female genital mutilation (FGM)

Title	Name	Phone	e-mail
Bracknell Forest LSB FGM procedures: https://bflscb.org.uk/links-and-publications/fgm/			

Other useful contact details

Name	Phone
Childline	0800 1111
NSPCC	0808 800 5000
NSPCC Whistleblowing Advice Line	0800 028 0285
NSPCC Victims of Sexual harassment and abuse helpline	0800 136 663
Kidscape (Anti-bullying helpline for parents)	0845 120 5204
Child exploitation Online Prevent (CEOP)	0870 000 3344
The Disclosure and Barring Service PO Box 3961, Royal Wootton Bassett , SN4 4HF	0300 200 190

Appendix 2: Other types of abuse

- **Child abduction and community safety incidents:** child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbors', friends and acquaintances); and by strangers. The most common form of abduction is by a parent or family member and often occurs in the wake of an acrimonious separation or divorce where there is a dispute over custody arrangements. Abduction by strangers is much rarer. There are a variety of reasons why strangers abduct children, including:
 - Sexual interest in the child by the offender
 - Offender's desire to control, dominate, and cause harm to the child and /or a child's family
 - Emotional/mental health issues
 - Financial motives where the abductor intends to profit from the abduction by demanding a ransom or by trafficking the child (see sections on child sex exploitation, child criminal exploitation and modern slavery below)

Other community safety incidents in the vicinity of a college can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

- **Children who are absent from education:** all children of compulsory school age, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special needs they may have. A child being absent from education, particularly repeatedly, is a potential indicator of abuse or neglect, including possible sexual abuse, sexual exploitation or radicalisation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, 'honour'-based abuse or forced marriage. The College will report to the Local Authority instances of prolonged unauthorised absence or a pupil being removed from the College roll under the circumstances outlined in KCSIE. In cases where a pupil has a prolonged period of authorised absence for a reason such as long-term illness, the College will be proactive in terms of providing support to both the parents and the pupil.
- **Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE):** Both CCE and CSE are forms of abuse that occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 (a) in exchange for something the victim needs or wants (for example, food, drugs, alcohol money or affection) and/or (b) for the financial advantage or increased status of the perpetrator or facilitator and/or (c) through violence or threat of violence. An imbalance of power is commonly associated with age difference, it can also be due to a range of other factors including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic and other resources.

Perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation. More detailed definitions of CCE and CSE are given below:

- **CSE** occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. The victim (male or female) may have

been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some additional specific indicators that may be present in CSE are children who:

- Have older boyfriends or girlfriends; and
 - Suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant
 - Further information is available in the Home Office guidance [here](#).
- **CCE:** is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or being forced or manipulated into threatening/committing serious violence to others.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) are forms of child abuse and if we suspect a pupil is being exploited, we will respond immediately which can include:

Contacting the Police and/or Children's Social Care

Completing the exploitation tool and sending this to the Bracknell Forest Make Safe Team

- **County lines:** 'County lines' is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of 'deal line'. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), where the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. Further information on a child's involvement in county lines can be found [here](#).
- **Children with family members in prison:** Children with a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. National Information Centre on Children of Offenders provides information designed to support professionals working with offenders and their children to help mitigate the negative consequences for those children.
- **Cybercrime:** is a criminal activity committed using computers and the internet. It includes unauthorised access to computers (illegal hacking), denial of service (attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources and making, supplying or obtaining

malware (malicious software) with intent to commit further offence. Children with particular skills and interest in computing and technology may stray inadvertently or deliberately into cyber-dependent crime. If there are concerns about a child in this area, the DSL should consider referring into the [Cyber Choices programme](#).

- **Domestic abuse:** Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be, but is not limited to psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development and ability to learn. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status sexuality or background. Domestic violence can take place inside or outside the home. Domestic abuse now encompasses not only physical and sexual abuse, but also economic, emotional, and coercive-control abuses, as updated in statutory guidance. Children can be victims in their own right or affected by abuse between adults in the household.

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

- **Operation Encompass:** This operates within Thames Valley. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. The helpline is available from 8am to 1pm Monday to Friday on 0204 513 9990. Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.
- **Honour-based abuse (HBA).** So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse, are illegal in the UK (regardless of the motivation) and should be handled and escalated as such.
 - **FGM:** FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

All staff must be aware of the law requiring teachers to report cases to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl aged under 18. The duty to report resides with the teacher who becomes aware of the case not the DSL, although

the DSL should be informed unless the teacher has a good reason for not doing so. The report should be made orally by calling 101 within 24 hours of the issue coming to light. Failure to report a case of FGM can result in disciplinary sanctions.

- **Forced marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent is where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use religion and culture as a way to coerce a person into marriage. The Forced Marriage Unit has created guidance on the handling of forced marriage (pages 75-80) focusses on the role of schools. This guidance can be found [here](#). In addition, since February 2023, it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages.
- **Radicalisation, extremism and terrorism:** 'Radicalisation' is the process of legitimising support for, or use of, terrorist violence. 'Extremism' is defined in the Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Extremist views may result in terrorist activity. There are various reasons why a young person might become interested in extremism:
 - a search for answers to questions about identity, faith and belonging
 - a desire for 'adventure' and excitement
 - a desire to enhance self-esteem of the individual and promote 'street cred'
 - the discovery of and identification with a charismatic individual and, through them, attraction to a group which can offer identity, social network and support
 - a sense of grievance that can be triggered by personal experiences of racism or discrimination

The College has a legal duty to have due regard to the need to prevent people from being drawn into terrorism and this is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Schools and colleges should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

College staff should use their professional judgement in identifying young people who might be at risk of radicalisation and discuss their concerns with the DSL. On the basis of this information the DSL may conclude that a referral to the Channel Programme is appropriate. The Channel programme is run in every local authority and addresses all kinds of extremism including the extreme-right and Islamist-related. The support provided could include assistance with education or employment, and ideological mentoring to provide vulnerable individuals with skills to protect themselves from being drawn into extremism. An individual's engagement with the programme is entirely voluntary at all stages.

- **Youth produced sexual imagery:** While sharing photos and videos online and via smartphones is part of daily life for many people, enabling them to share their experiences, connect with friends and record their

lives, there are risks associated with the production and distribution of sexual and explicit images. both in terms of the law (Protection of Children Act 1978, as amended by the Sexual Offences Act 2003) and in relation to the possible impact on a child's well-being if images are shared more widely than they originally intended.

Creating and sharing sexual photos and videos of under-18s is illegal. Consensual and non-consensual sharing of nude or semi-nude images and/or videos can be an indicator that children are at risk. Consequently, a member of the DSL team should be notified as soon as possible if an incident comes to light in which a pupil under the age of 18:

- has created and shared sexual imagery of themselves with a child under the age of 18;
- has shared sexual imagery created by another person under the age of 18 with another person; or
- is in possession of sexual imagery created by another person under the age of 18.

Staff **must not** ask to see the imagery but should confiscate the device on which it is held and pass it on to the DSL. You should not view youth-produced sexual imagery unless there is good and clear reason to do so. Along with our own Safeguarding and Child Protection procedures, the College will follow the advice given in Sharing nudes and semi-nudes: advice for education settings working with children and young people (DfE 2020) (updated March 2024). Further information on this aspect including images generated by AI can be found in the Online Safety policy.

A decision to respond to the incident without involving the police or local authority children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to students involved and the risks can be managed within the College's pastoral support and disciplinary framework and, if appropriate, local network of support.

Appendix 3: Further information on signs of abuse

Physical abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none">• Unexplained bruises and welts on the face, throat, arms buttocks thighs or lower back in unusual patterns or shapes which suggests the use of an instrument• Unexplained burns, especially burns found on palms, soles of feet, abdomen or buttocks• Scald marks –immersion burns produce ‘stocking’ or ‘glove’ marks on feet and hands or upward splash marks which may suggest hot water has been thrown over a child• Human bite marks• Broken bones	<ul style="list-style-type: none">• Behavioural extremes (withdrawal, aggression or depression)• Unbelievable or inconsistent explanations of injuries• Fear of parents being contacted• Flinching when approached or touched• Truancy or running away from home

Emotional abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none">• Eating disorders, including obesity or anorexia• Speech disorders (stammering)• Nervous disorders (rashes, hives, facial tics, stomach aches)	<ul style="list-style-type: none">• Fear of parent being approached• Fear of making mistakes• Developmental delay in terms of emotional progress• Cruel behaviour towards children, adults or animals• Self-harm• Behavioural extremes, such as overly compliant-demanding, withdrawn-aggressive, listless-excitabile

Sexual abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none">• Torn, stained or bloody underclothes• Pain or itching in genital area• Bruises or bleeding near genital area or anus• Sexually transmitted infections• Pregnancy• Discomfort when walking or sitting down	<ul style="list-style-type: none">• Self-harm• Sexual knowledge or behaviour (promiscuity) that is beyond their age/developmental level• Sudden or unexplained changes in behaviour• Avoidance of undressing or wearing extra layers of clothing• Truancy• Regressive behaviours (bed-wetting, fear of the dark etc)

Neglect

Physical signs	Behavioural signs
<ul style="list-style-type: none">• Height and weight significantly below age level• Poor hygiene (lice, body odour etc)• Inappropriate clothing for weather conditions• Indicators of prolonged exposure to the elements (sunburn, chapped extremities, insect bites)• Constant hunger, sometimes stealing others' food	<ul style="list-style-type: none">• Erratic attendance at College• Chronic hunger or tiredness• Having few friends• Assuming adult responsibilities

Affluent neglect

Physical signs	Behavioural signs
<ul style="list-style-type: none">• Appears well-cared-for physically (clean, well-dressed)• Good nutrition and housing (no obvious deprivation)• May have access to private healthcare and enrichment• No visible signs of physical neglect	<ul style="list-style-type: none">• Withdrawal from social activities; appearing isolated• Emotional distress: depression, anxiety, low self-esteem• Acting out at school or home; risk-taking behaviours (drugs, alcohol, sex)• Difficulty forming attachments or relationships• Excessive pressure to achieve; fear of failure• Lack of empathy for others; emotional detachment• Left unsupervised or in care of paid carers for long periods• Chronic loneliness or feeling emotionally unfulfilled by parents• Struggles with mental health; eating disorders, self-harm• Parents resistant to professional intervention or overly controlling

Child sexual exploitation

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Tiredness or mood swings • Bruising • Sexually transmitted diseases • Pregnancy 	<ul style="list-style-type: none"> • Sudden decline in College performance, punctuality, attendance • In possession of expensive goods • Going to place they cannot afford • Age-inappropriate clothing • Inappropriate sexualised behaviour • Secretive • Deterioration in mental well-being • Mixing with older people • Misuse of drugs and alcohol

Child criminal exploitation and county lines

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • See sections on physical and sexual abuse • Carrying weapons 	<ul style="list-style-type: none"> • Deterioration in mental well-being • Self-harming • Persistently going absent from College or home and/or being found out of area; periods of absence from College • Unexplained acquisition of money, clothes or mobile phones • Excessive receipt of texts/phone calls and/or having multiple handsets • Relationships with controlling older individuals or groups • Significant decline in College performance • Gang association or isolation from peers or social networks

Female genital mutilation

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Difficulty walking, sitting or standing • Bladder or menstrual problems • Severe pain and bleeding • Infections such as tetanus, HIV and hepatitis B and C 	<ul style="list-style-type: none"> • Abroad for a prolonged period • Unusual behaviour after a period of absence • May talk of a 'special procedure' or 'special occasion to become a woman' • Spending longer periods in the bathroom • Reluctance to undergo normal medical examinations

Forced marriage

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Cut or shaved hair as a form of punishment for being disobedient 	<ul style="list-style-type: none"> • Absence from College • Failure to return from visit to country of origin • Self-harm or attempted suicide • Running away from home • Early marriage of siblings • Sudden announcement of engagement to a stranger • May talk of a 'special procedure' or 'special occasion to become a woman' • Spending longer periods in the bathroom • Reluctance to undergo normal medical examinations

Grooming

The boarding environment offers a unique opportunity for a possible child abuser to settle and use this situation to their personal advantage. Any individual at the College who has particular concerns about another a member of staff should speak to the DSL. For further advice on grooming, please refer to the information [here](#).

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • See section on sexual abuse 	<ul style="list-style-type: none"> • Secretiveness about who they are talking to online and what sites they visit • Possession of electronic devices such as mobile phones or webcams that parents have not provided • Engaging less with their usual friends • Using sexual language that you would not expect them to know • Going to unusual places to meet people • Using drugs and/or alcohol • Going missing from home or College; unexplainable and/or persistent absences from education

Radicalisation

Physical signs	Behavioural signs
<ul style="list-style-type: none">• Out of character changes in dress, behaviour and peer relationships	<ul style="list-style-type: none">• Showing sympathy for extremist causes• Glorifying violence• Evidence of possessing illegal or extremist literature• A sudden disrespectful attitude towards others• Increased secretiveness, especially in relation to internet use• Unwillingness or inability to discuss their views• Advocating messages similar to illegal organisations such as ‘Muslims Against Crusades’ or other non-proscribed extremist groups such as the English Defence League

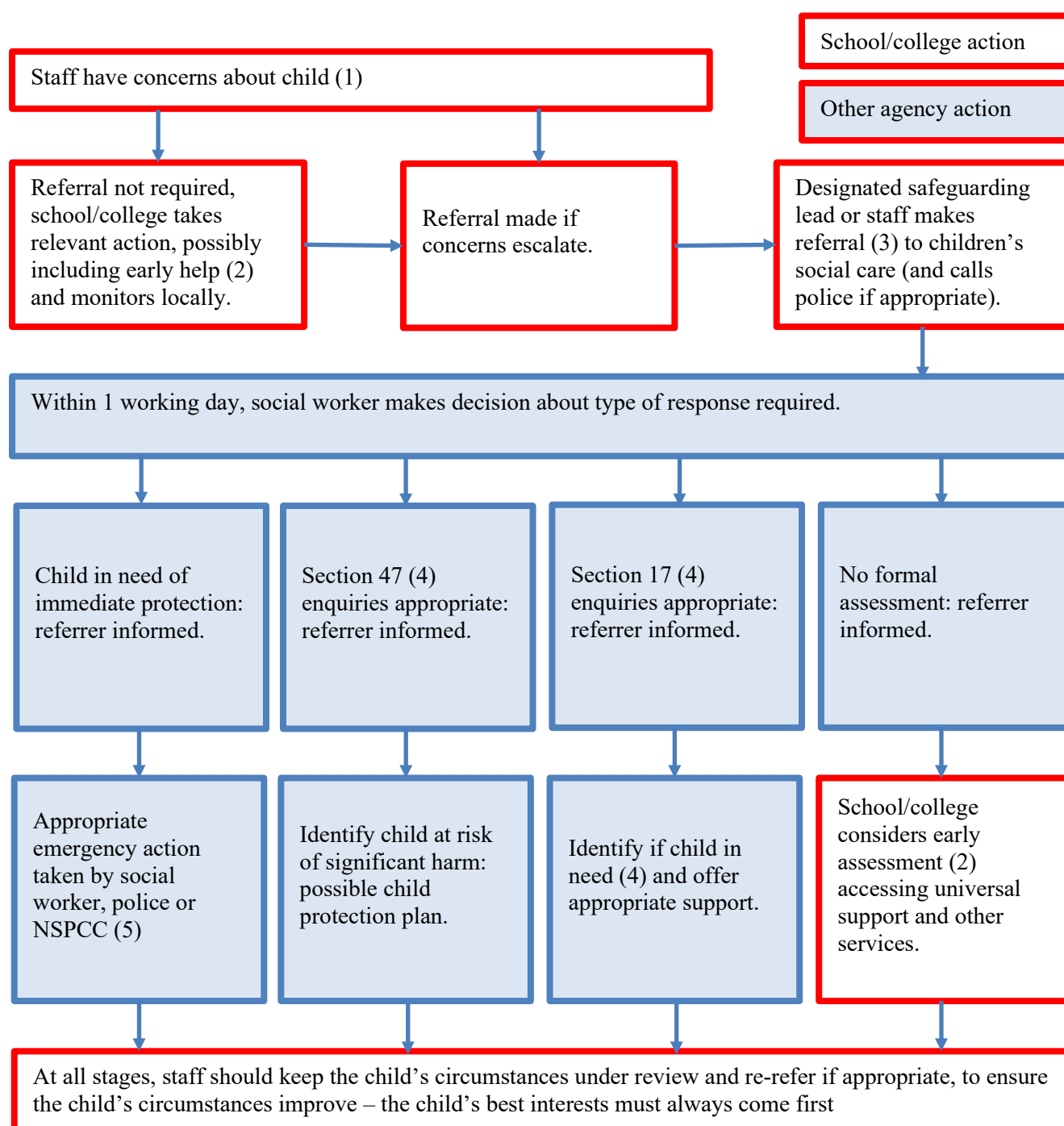
Serious Violence

Physical signs	Behavioural signs
<ul style="list-style-type: none">• Signs of assault or unexplained injuries	<ul style="list-style-type: none">• An increased absence from College• A change in friendships or relationships with older individuals or groups• A significant decline in performance• Glorifying violence• Signs of self-harm or a significant change in wellbeing

Broad government guidance on the following is also available via the GOV.UK website (see Part one: Keeping children safe in education [September 2025])

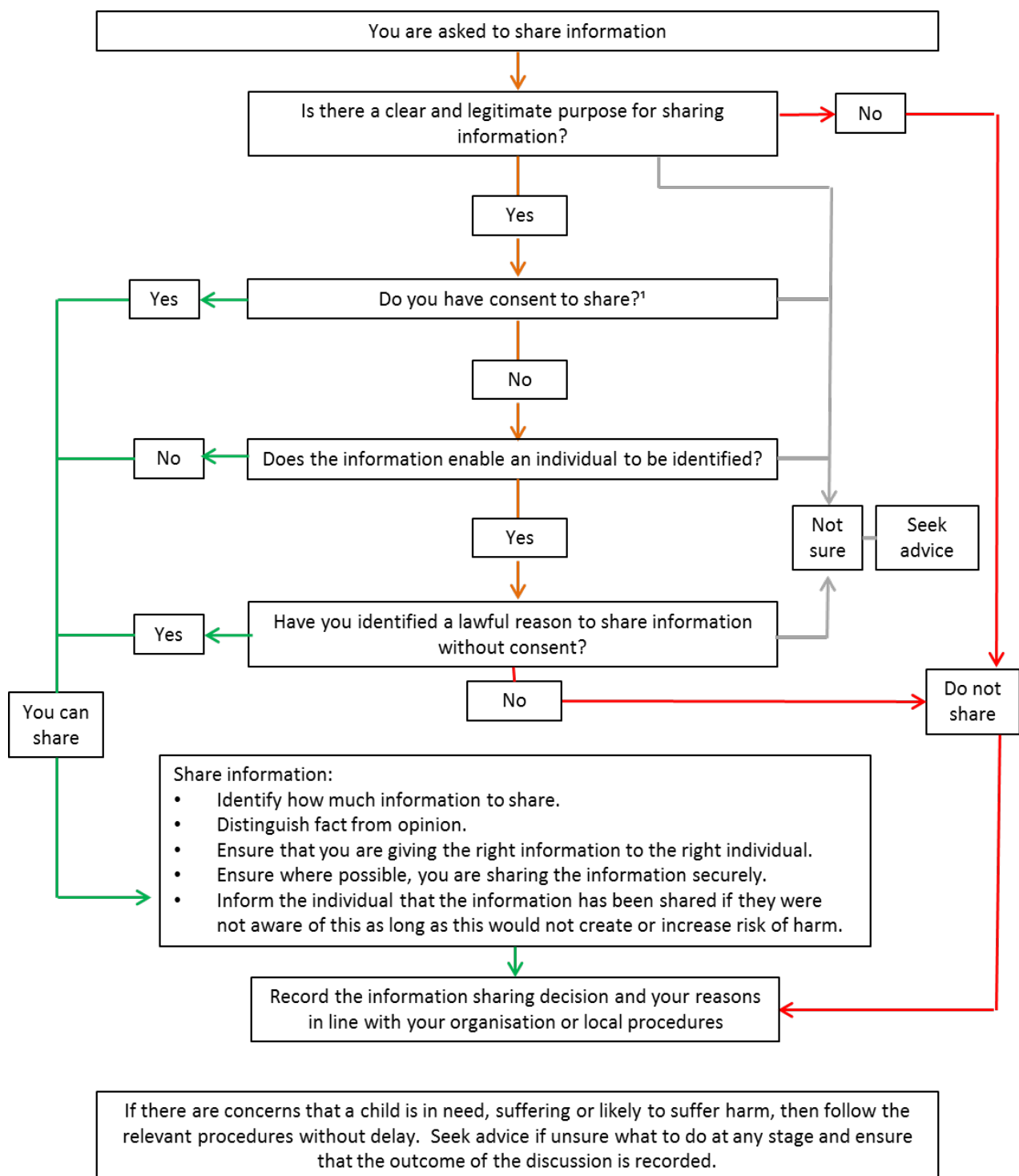
- [bullying including cyberbullying](#)
- [children missing education](#)
- [child missing from home or care](#)
- [child sexual exploitation](#)
- [domestic violence](#)
- [drugs](#)
- [fabricated or induced illness](#)
- [faith abuse](#)
- [female genital mutilation \(FGM\)](#)
- [gangs and youth violence](#)
- [gender-based violence/violence against women and girls \(VAWG\)](#)
- [hate](#)
- [mental health](#)
- [missing children and adults](#)
- [private fostering](#)
- [preventing radicalisation](#)
- [relationship abuse](#)
- [sexting](#)
- [trafficking](#)

Appendix 4: Actions where there are concerns about a child (KCSIE, September 2025)



1. Cases where there is a concern or allegation made against a staff member refer to the Principal or LADO (see Section 15)
2. Early help involves providing support as soon as problem emerges. Where coordinated early help is required, an early help inter-agency assessment will be arranged.
3. Referrals will follow the processes set out in Bracknell Forest's's threshold guidance
4. Children in need may be assessed under section 17 of the Children Act. Under section 47, where a local authority has reasonable cause to suspect a child is suffering or likely to suffer from significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare.
5. This could include applying for an EMO (Emergency Protection Order)

Appendix 5: Flowchart of when and how to share information



Appendix 6 MyConcern Entry Guidance and Levels of Need

What should NOT go on MyConcern?

- Any low-level pastoral incident/concern – speak to HM / tutor first (HM's and tutors should record these concerns on OneNote)
- Any safeguarding concerns about a member of staff – speak/communicate with DSL or Deputy DSL or anything which you are 'self-reporting'.

What should you report on MyConcern?

- A safeguarding "event" – finding students in a compromising situation, a member of the public trespassing or accessing area of the College that they are not allowed, a significant accident. An event does not have to have a pupil assigned to it (especially if you are uncertain who the pupil might have been – it is more important to report what you saw)What should you report on MyConcern?
- Any issue which concerns you about a pupil or an incident you have witnessed. This might include:
- Concerns about a pupil being anxious, depressed, showing different behaviour – a subtle change over time or a rapid change
- A significant pastoral concern such as a friendship difficulty, inability to form good relationships with peers.
- Any safeguarding concern – mental health issues, self-harm, suicidal ideation, eating disorder, abuse, drugs, inappropriate behaviour, bullying and child-on-child abuse of any sort, alcohol use, inappropriate use of online technology including accessing pornography, gambling, criminal activity of any sort etc
- Home issues – parental divorce, significant illness, parental mental health concerns, lack of supervision, family member in prison
- Witnessing or overhearing nasty comments about a pupil/seeing another pupil being unkind to another
- A safeguarding "event" – finding students in a compromising situation, a member of the public trespassing or accessing area of the College that they are not allowed, a significant accident. An event does not have to have a pupil assigned to it (especially if you are uncertain who the pupil might have been – it is more important to report what you saw)

How to report a concern?

- Click on the MyConcern icon on the MyDay dashboard
- Click on "Report a Concern"
- Fill in the details on the "Report a Concern" page, remembering these important points:
- The concern summary should be brief – a couple of words only. E.g. "Injury to right leg"; "Bullying"; "Possible drugs use"
- The concern should ALWAYS be sent to Delyth Lynch – the DSL. She is the gatekeeper of all cases and will assign the case to others where necessary
- The details of the concern box should contain ALL details, specifically names, times, places – as much detail as you have about the pupil / event /situation. When writing names, please ensure that you use full names in the first instance and not just initials.
- Action taken – what you did or are doing; this might just be as simple as "reporting the incident on MyConcern"; it might also include more detail – a care plan, referrals to outside agencies (e.g. a counsellor) – whatever action that has been taken which is relevant

- Attachment – you can attach documents to the entry. It might be a copy of some handwritten notes, a piece of work that a pupil has written that you are concerned about, something which you have found (e.g. a note / piece of paper which is concerning)
- Before you submit check that your entry is SPECIFIC (details of timing / names of all individuals concerned are entered) and any DECISION MAKING or RATIONALE has been included.
- When you are happy, press “submit concern”

How to update a concern

- Click on the MyConcern icon on the MyDay dashboard
- Click on “Update a Concern”
- Click on the concern that you wish to update
- Click Chronology tab
- Click on “Add Concern Update” and fill in the details
- Attach any files which might need to be added (on the files tab)

Being a team member and being assigned tasks

You may be asked to be a “team member” for a case. This will mean that you can contribute to case management or may be assigned tasks. This is most likely to be:

- HMs (almost always)
- Tutors (sometimes, depending on the case)
- Matron (sometimes)

You may be assigned a task. For example, “call up parents and ask them to come in for meeting” or “HM to update case on the 31/01/21”. If a task has been assigned, you will get an email advising you what you need to do. When the task meets the deadline, you will be sent a reminder email to complete the task.

REPORTING A CONCERN FLOWCHART

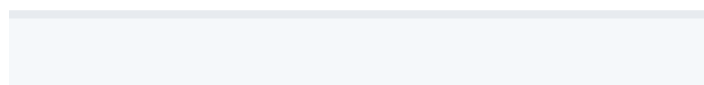
CLICK



CLICK



Report a Concern



FILL IN THE PAGE

Report a Concern

Name(s) of Pupil(s)

Concern Summary

Send Concern to

Please Select a Notification Group

Concern Date/Time

Details of Concern

Location of Incident

Not Applicable

Action taken

Attachment

Browse...

Please attach any media that is relevant to this concern.

Submit Concern

PRESS SUBMIT CONCERN

Use the guidance on the staff information sheet to complete the form. Always remember to send the concern to Delyth Lynch.

UPDATING A CONCERN FLOWCHART

CLICK ON 'MY CONCERNS'

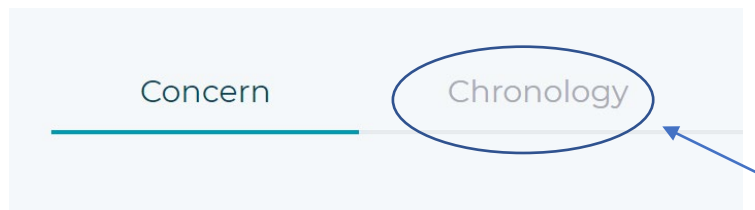


Go to the relevant concern you want to update

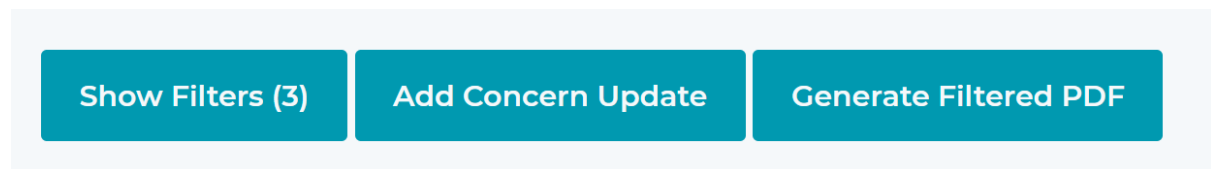
The screenshot shows the 'My Concerns' page. At the top, there's a navigation bar with 'Report a Concern', 'My Concerns' (circled in green), and 'Resources'. Below this, there's a 'My Concerns' section with a table of concerns. The table has columns for Concern ID, Concern Summary, Class, Categories, Reported At, Associated People, Owning Group, and Status. One row is highlighted with a green border.

Concern ID	Concern Summary	Class	Categories	Reported At	Associated People	Owning Group	Status
2017: 8513	Megan came into college with a nasty bruise on her face		Injury Home Issues	16/1/17 11:10	Megan Davies Sophie Davies Benjamin Davies	DSLs	Open
2017: 8558	Alex came into school this morning with a bruised left eye	None		1/2/17 10:42	Alex Grazer	DSLs	Recorded
2016: 8202	Alex and Claire were fighting in the corridor before school today		Violence Home Issues	29/7/16 10:45	Alexander Burton Claire Abbot	Openshaw Campus	Closed

Click "Chronology"



Click "Add Concern Update", fill in the relevant information and click on "add update" when you have finished

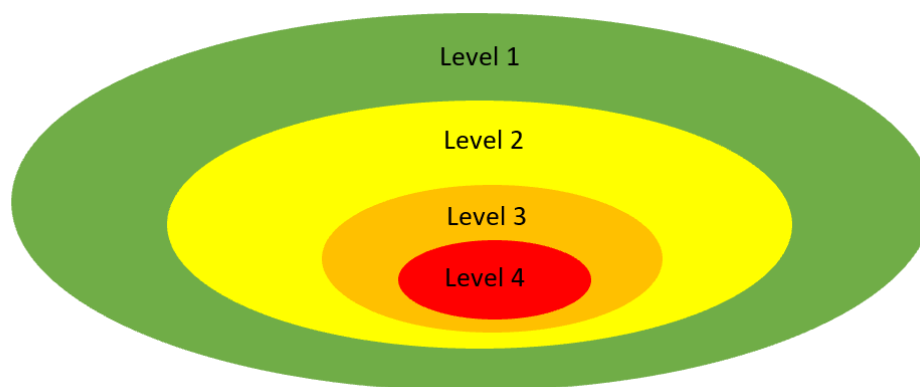


MyConcern Levels of Need

Levels of need

After an entry has been made onto MyConcern, a level of need will be assigned to the pupil associated with the case. Levels of need may move, depending on the pupil's circumstances. When a level of need is altered, the rationale behind that decision will be recorded on MyConcern.

The initial level of need will be decided by the DSL, based on the criteria listed below (which are commensurate with the Bracknell Forest thresholds guidance)



Level	Needs of the pupil	Examples of support	Other comments
Low level Pastoral concern (1)	<p>This pupil may just need keeping an eye on to ensure that a low level concern does not develop into a larger issue.</p> <p>The team around the child (usually HM, DSL and WHAT group) will speak about the pupil at their weekly meetings to ensure that there have been no further developments.</p> <p>Examples may be initial concerns regarding:</p> <ul style="list-style-type: none"> Disordered eating or weight loss Low level mental health or behaviour changes Family circumstances SEN or academic issues Friendship / relationship issues Poor sleep 	<p>The support offered will be by internal College staff and professionals.</p> <p>The pupil should be offered support by relevant individuals. This might be:</p> <ul style="list-style-type: none"> HM Tutor Counsellor Deputy Head (Pastoral) Health Centre Team Chaplain <p>The pupil will be discussed as part of the weekly pastoral meeting and will be flagged to teaching staff as a pupil to be aware of.</p> <p>The Deputy Head (Pastoral) will discuss the pupil at their fortnightly meeting with the HM.</p>	<p>HM's should build up a full chronology of the pupil on MyConcern, adding any relevant updates as soon as they occur. At least monthly, an HM should provide a summary of the pupil on MyConcern so that their progress can be recorded.</p> <p>This will enable that the team around the child has relevant information to ensure that the pupil receives the right help, at the right time, from the right people.</p> <p>Other factors: There are no concerns as highlighted in the Level 1 thresholds guidance (blue) (link here (page 7))</p>

<p>Higher level Pastoral concern (2)</p>	<p>This pupil will need a close eye keeping on them and is likely to need access to an additional service, usually provided by the College, but not exclusively so.</p> <p>They may be vulnerable individuals who are showing early signs of a failure to thrive and flourish, either in College or at home. Additional help is needed in order to enable them to fulfil their potential.</p> <p>This pupil will need close monitoring and there may be higher level concerns about:</p> <ul style="list-style-type: none"> • Disordered eating or weight loss • Mental health or behaviour changes • Family circumstances (e.g. divorce) • Significant bereavement • Significant ill health within the family • SEN or academic issues • Friendship / relationship issues • Bullying • Sexual harassment • Online safety / sexting • Child-on-child abuse • Attendance at College • General social issues / social anxiety • Gender issues 	<p>The support offered will usually be by internal College staff and professionals.</p> <p>The pupil should be offered support by relevant individuals. This might be:</p> <ul style="list-style-type: none"> • HM • Tutor • Counsellor • Deputy Head (Pastoral) • Health Centre Team • Chaplain • DSL <p>The pupil will be discussed as part of the weekly pastoral meeting and will be flagged to teaching staff as a pupil to be aware of.</p> <p>The Deputy Head (Pastoral) will discuss the pupil at their fortnightly meeting with the HM.</p> <p>External services may be accessed, if appropriate. These might include:</p> <ul style="list-style-type: none"> • Psychologist • SEN Support (e.g. an educational psychologist) • An external therapist • Education Welfare Service 	<p>The pupil will be discussed in detail at weekly pastoral meetings. Staff will ensure that an appropriate team around the child is in place and that appropriate services are engaged. A full analysis if any risk factors and vulnerabilities will be considered.</p> <p>It is likely that parents will be aware that there are pastoral concerns.</p> <p>HMs should build up a full chronology of the pupil on MyConcern, adding any relevant updates as soon as they occur. At least monthly, an HM should provide a summary of the pupil on MyConcern so that their progress can be recorded.</p> <p>This will enable that the team around the child has relevant information to ensure that the pupil receives the right help, at the right time, from the right people.</p> <p>If appropriate relevant pastoral information will be shared with SLT and the Master.</p> <p>Other factors:</p> <p>There may be additional concerns as highlighted in the Level 2 thresholds guidance (green) (link here (page 7))</p>
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<p>Intensive support and monitoring (3)</p>	<p>This pupil will require significant support due to complex and high-level pastoral concerns. Often several areas of professional support will be required.</p> <p>The pupil is likely to be dealing with multiple long-term issues, and they need support from individuals to ensure that the impact of these significant issues are minimised as much as possible.</p> <p>Issues likely to be within this category of concern are:</p> <ul style="list-style-type: none"> • Eating disorder, significant weight loss • Mental health – severe anxiety, depression, suicidal ideation • Diagnosed mental health illness, such as OCD, Bipolar or Schizophrenia • Repeated online safety concerns, sexting • Repeated alcohol offences • Concerns over illegal substances • Significant bullying which is longer term • Dangerous behaviour • Serious physical illness / disability • Gambling or gaming addiction • Serious sexual harassment • Child-on-child abuse • Gender transition / reassignment • Risky sexual behaviour • Death of a parent / sibling 	<p>The support offered will include both internal and external professionals and agencies. This may include:</p> <ul style="list-style-type: none"> • Counselling • College Psychiatrist • External therapists • DSL and Deputy Head (Pastoral) involvement • Education welfare service • Bracknell Forest MASH <p>The pupil will be discussed as part of the weekly pastoral meeting and will be flagged to teaching staff as a pupil to be aware of.</p> <p>The Deputy Head (Pastoral) will discuss the pupil at their fortnightly meeting with the HM.</p> <p>This pupil will be put onto a College Welfare, Recovery Action Plan (WRAP) which will be overseen by a member of the safeguarding team and specialist tutoring support will also be offered and discussed.</p>	<p>The pupil will be discussed in detail at weekly pastoral meetings. Staff will ensure that an appropriate team around the child is in place and that appropriate services are engaged. A full analysis if any risk factors and vulnerabilities will be considered.</p> <p>The WRAP will be reviewed fortnightly.</p> <p>It is likely that parents will be aware that there are pastoral concerns.</p> <p>HMs should build up a full chronology of the pupil on MyConcern, adding any relevant updates as soon as they occur. At least fortnightly, an HM should provide a summary of the pupil on MyConcern so that their progress can be recorded.</p> <p>This will enable the team around the child has relevant information to ensure that the pupil receives the right help, at the right time, from the right people.</p> <p>The Master and the SLT will be aware of the pupil's needs.</p> <p>The Safeguarding Governor will be informed.</p> <p>Other factors:</p> <p>There may be additional concerns as highlighted in the Level 3 or 4 thresholds guidance (orange/red) (link here (page 7))</p>
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<p>Significant, serious and urgent Level of Need</p> <p>(4)</p>	<p>This pupil is likely to be living in circumstances where they are suffering or are likely to suffer significant harm, where the young person themselves may pose a risk of serious harm to others or where there are complex needs in relation to disability and may require a more specialist intervention.</p> <p>The pupil may be accessing more specialised services such as residential care or hospitalisation.</p> <p>Issues likely to be in this category of concern are:</p> <ul style="list-style-type: none"> • In-patient care for an eating or mental health issue • Suicide attempt or suicidal ideation (requiring psychiatric evaluation) • Psychiatric assessment for an acute mental health concern (such as psychosis) • Abuse – physical, sexual, emotional, neglect • Honour based abuse: FGM, Forced Marriage • Sexual violence or assault • Radicalisation • Absconding, no idea of whereabouts • Homelessness <p>In this level of need, a referral will have been made to Children’s Social</p>	<p>The support offered will include both internal and external professionals and agencies to help children and their families cope with very significant and long-term care. This may include a combination of:</p> <ul style="list-style-type: none"> • Bracknell Forest Children’s Social Care statutory involvement • CAMHS (or private equivalent) • Therapists / medical professionals within an inpatient setting • Counselling • College / external Psychiatrist • External therapists • DSL and Deputy Head (Pastoral) involvement • Education welfare service • Bracknell Forest MASH • Channel Panel <p>The pupil will be discussed as part of the weekly pastoral meeting and will be flagged to teaching staff as a pupil to be aware of.</p> <p>The Deputy Head (Pastoral) will discuss the pupil at their fortnightly meeting with the HM.</p> <p>This pupil will be put onto a College WRAP which will be overseen by the DSL and specialist tutoring support will also be offered and discussed.</p>	<p>The pupil will be discussed in detail at weekly pastoral meetings. Staff will ensure that an appropriate team around the child is in place and that appropriate services are engaged. A full analysis if any risk factors and vulnerabilities will be considered.</p> <p>The WRAP will be reviewed weekly.</p> <p>Parents will be aware that there are pastoral concerns and will have regular contact with the HM and also the DSL.</p> <p>A Child protection plan or CIN plan may be in place and will be monitored and overseen by the DSL.</p> <p>HMs should build up a full chronology of the pupil on MyConcern, adding any relevant updates as soon as they occur. At least fortnightly, an HM should provide a summary of the pupil on MyConcern so that their progress can be recorded.</p> <p>This will enable the team around the child has relevant information to ensure that the pupil receives the right help, at the right time, from the right people.</p> <p>The Master and the SLT will be aware of the pupil’s needs. The Safeguarding Governor will be informed.</p> <p>Other factors:</p> <p>There may be additional concerns as highlighted in the Level 4 thresholds guidance (green) (link here (page 7))</p>
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Appendix 7 Safeguarding in the College curriculum

As a College, we will recognise vulnerable students and support them through:

1. The curriculum to encourage self-esteem and self-motivation (see table below)
2. The College ethos which promotes a positive, supportive and secure environment and which gives all students and adults a sense of being respected and valued
3. The implementation of the College's behaviour management policies
4. Regular liaison with other professionals and agencies that support the students and their families
5. A commitment to develop productive, supportive relationships with parents, whenever it is in the child's best interest to do so
6. Recognition that statistically, children with behavioural difficulties and disabilities are most vulnerable to abuse so staff who work in any capacity with children with profound and multiple disabilities, sensory impairment and/or emotional and behavioural problems, will need to be particularly sensitive to signs of abuse
7. Recognition that in a home environment where there is domestic violence, drug or alcohol abuse, children may also be vulnerable and in need of support and/or protection.

Use of the curriculum and year group talks to highlight safeguarding and child protection issues to students. Examples of where this takes place can be seen below and any additional student talks for safeguarding are organised by the Safeguarding Manager.

APPENDIX 8:

Job description for the Designated Safeguarding Leads (DSL and DDSLs)

September 2025

The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment

Summary of the role	<ul style="list-style-type: none">• To take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) occurring at the School and to support all other staff in dealing with any child welfare and child protection concerns that arise.• To provide advice and support to other staff on matters of child welfare, safeguarding and child protection.• To take part in strategy discussions and inter-agency meetings and to support other staff to do so, and to contribute to the assessment of pupils.• To promote and safeguard the welfare of pupils in the School.• Whilst the activities of DSL can be delegated to appropriately trained deputies (DDSLs), the ultimate lead responsibility for child protection remains with the DSL. This lead responsibility cannot be delegated.
Main duties and responsibilities	Further specifics:
Availability	<p>You are expected to:</p> <ul style="list-style-type: none">• ensure during term time that you or a Deputy will always be available during College hours to discuss any safeguarding concerns; and• arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.
Managing referrals	<p>You are expected to refer cases:</p> <ul style="list-style-type: none">• of suspected abuse and neglect of any pupil at the School to the local authority children's social care and support staff who make referrals to local authority children's social care;• to the Channel programme where there is a radicalisation concern and support staff who make referrals to the Channel programme;• where a person is dismissed or left due to risk/harm to a child to Disclosure and Barring Service (DBS); and• where a crime, or alleged crime, has been committed to the Police.

Working with others	<p>You are expected to:</p> <ul style="list-style-type: none"> • act as a source of support, advice and expertise for all staff; • act as a point of contact with the three safeguarding partners: the local authority (Bracknell Forest)); the clinical commissioning group; and the Police; • liaise with the Master to inform him of issues; especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance – PACE Code C 2019 • as required, liaise with the “case manager” (as per Part 4 of KCSIE) and the designated officer (LADO) at the local authority for child-protection concerns in cases which concern a staff member; • liaise with staff (especially tutors, pastoral support staff, IT staff, First Aiders, counsellors and the named persons with oversight for SEND) on matters of safety, safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically; • promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances; • ensure that an appropriate adult is present if a student is being questioned or detained by the police; • Liaise with the College Head of Student Mental and Emotional Health (who is the College mental health lead) where safeguarding concerns are linked to mental health • work with the Master and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at the School. This includes: <ul style="list-style-type: none"> ○ ensuring that the School knows who its cohort of children are who have or have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and, ○ supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes.
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Information sharing and managing the child protection files	<p>You are expected to:</p> <ul style="list-style-type: none"> • ensure that child protection files are kept up to date. • ensure that information is kept confidential and stored securely. • ensure that records include: <ul style="list-style-type: none"> ○ a clear and comprehensive summary of the concern; ○ details of how the concern was followed up and resolved; and ○ a note of any action taken, decisions reached and the outcome. • ensure that files are only accessed by those who need to see them and that where the file or content within it is shared, this happens in line with information-sharing advice, as set out in Part 1 and Part 2 of KCSIE. • ensure, when a pupil leaves the School, that: <ul style="list-style-type: none"> ○ their child protection file is transferred to the new school or School as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term); and ○ their child protection file is transferred separately from the pupil's main file in a secure manner and confirmation of receipt is received from the destination school or School; and • consider whether it is appropriate to share any information with the new school or School in advance of the pupil leaving.
Raising awareness	<p>You are expected to:</p> <ul style="list-style-type: none"> • ensure each member of staff has access to, and understands, the School's safeguarding policy and procedures, especially new and part-time staff; • ensure the School's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Board regarding this, • ensure the safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this; • link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and • help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and School leadership staff.

Training, knowledge and skills	<p>You are expected to ensure your child protection training and that of the DDSLs is sufficient and appropriate to provide the knowledge and skills required to carry out this role. This training must be updated every two years. All members of the DSL team should also undertake Prevent awareness training.</p> <p>In addition to the formal training, the knowledge and skills of members of the DSL team should be supplemented and refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so that they:</p> <ul style="list-style-type: none"> • understand the assessment process for providing early help and statutory intervention, including local criteria for action and local-authority children's social care referral arrangements; • have a working knowledge of how local authorities conduct a child-protection case conference and a child-protection review conference and be able to attend and contribute to these effectively when required to do so; • understand the importance of the role the Designated Safeguarding Lead has in providing information and support to children social care in order to safeguard and promote the welfare of children; • understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in response to this in promoting educational outcomes; • are alert to the specific needs of children in need, those with Special Educational Needs and Disabilities (SEND), those with relevant health conditions and young carers; • understand the importance of information sharing, both within the School, and with the three safeguarding partners, other agencies, organisations and practitioners; • understand and support the School with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation; • are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School; • can recognise the additional risks that children with SEN and disabilities (SEND) face online (for example, from online bullying, grooming and radicalisation) and are confident they have the capability to support SEND children to stay safe online; • obtain access to resources and attend any relevant or refresher training courses; and • encourage a culture among all staff of listening to pupils and taking account of their wishes and feelings, in any measures the School may put in place to protect them.
Providing support to staff	<p>Training should support the Designated Safeguarding Lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes, specifically, to:</p> <ul style="list-style-type: none"> • ensure that staff are supported during the referrals processes; and • support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children	<p>It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:</p> <ul style="list-style-type: none"> • encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the School may put in place to protect them; and, • understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.
Holding and sharing information.	<p>The critical importance of recording, holding, using and sharing information effectively is set out in Parts 1, 2 and 5 of KCSIE, and therefore members of the DSL team should:</p> <ul style="list-style-type: none"> • understand the importance of information sharing, both within the School, and with other schools and Schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners; • understand relevant data-protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation and the DfE guidance Information Sharing (May 2024); and • be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme. and referrals and understand the purpose of this record-keeping.

Appendix 9 Useful Glossary of Terms

Child protection refers to the processes undertaken to meet statutory obligations laid out in the Children Act 1989 and associated guidance (see *Working Together to Safeguard Children*), in respect of those children who have been identified as suffering or being at risk of suffering harm.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as: Providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing the impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care ; taking action to enable all children to have the best outcomes. (Keeping Children Safe in Education, 2024)

Keeping Children Safe in Education states that “safeguarding and promoting the welfare of children is everyone’s responsibility”. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children.’ This means that the College should consider, at all times, ‘what is in the best interests of the child.’ All staff should be aware that behaviours linked to the likes of domestic abuse, drug taking, alcohol abuse, truancy and sexting put children in danger. Safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but is not limited to:

- Bullying (including cyberbullying),
- Physical abuse such as hitting, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment (see the College policy)
- Upskirting, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim.
- Sexting (also known as youth produced sexual imagery)
- Initiation/hazing type violence and rituals

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- Protecting children from maltreatment
- Preventing the 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
- Taking action to enable all children to have the best outcomes.

Staff refers to all those working for or on behalf of the School, full time or part time, in either a paid or voluntary capacity.

Child refers to all young people who have not yet reached their 18th birthday.

Parent refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

Extremism refers to the Government’s ‘Prevent Strategy’ which defines extremism as: “Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism, calls for the death of members of our armed forces”.

Prevent is part of the UK’s Counter Terrorism Strategy, preventing people from becoming involved in terrorism or supporting terrorism. ‘Prevent duty guidance for England and Wales: guidance for specified authorities in

England and Wales on the duty of schools and other providers in the Counterterrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism', HM Government, 2015.

Radicalisation – children may be susceptible to radicalisation into terrorism. Radicalisation is the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism – most often by a third party, who have their own agenda, who have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institution or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. All staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance staff should discuss early help requirements with the DSL. Staff may be required to support other agencies and professionals in an early help assessment. If early help is appropriate the DSL should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate. If early help and or other support is appropriate the case should be kept under constant review and consideration given to a referral to local authority children's social care services if the child's situation does not appear to be improving. While the School understands that the acronym 'LADO' has been removed from KCSIE in favour of 'designated officer', it continues to use it for the sake of brevity, as allowed by the Independent Schools Inspectorate Handbook- 'The Regulatory Requirements'.

Contextual safeguarding: Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. (KCSIE, 2025)

Upskirting: The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on the 12th April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim.