

Safeguarding and Child Protection Policy

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1. Policy Statement

- 1.1 Educ8 is fully committed to safeguarding and promoting the welfare of every learner. The school recognises that safeguarding is everyone's responsibility and that every member of staff, volunteer, governor, proprietor, contractor and visitor has a role to play in creating a safe, supportive and inclusive environment in which learners feel valued, respected, listened to and protected from harm.
- 1.2 The welfare of the child is paramount. All safeguarding decisions will be made in the best interests of the child, taking account of their wishes and feelings, age, understanding and individual circumstances. Educ8 adopts a child-centred approach to safeguarding and works collaboratively with parents and carers, local safeguarding partners and other agencies to promote the safety, wellbeing and positive outcomes of all learners.
- 1.3 As an independent school, Educ8 is committed to fulfilling its statutory safeguarding duties in accordance with current legislation, statutory guidance and the Independent School Standards.
- 1.4 Effective safeguarding extends beyond protecting children from abuse and neglect and encompasses all aspects of a learner's safety, welfare and wellbeing. Through a whole-school approach, we seek to create a culture of vigilance, openness, professional curiosity and shared responsibility, ensuring that concerns are identified promptly and acted upon appropriately.
- 1.5 This policy reflects Educ8's commitment to safeguarding and promoting the welfare of all learners by providing a safe, supportive and inclusive environment in which children are protected, valued, respected and encouraged to achieve their full potential.

2. Aims

- 2.1 The aims of this Safeguarding and Child Protection Policy are to ensure that Educ8 provides a safe, supportive and inclusive learning environment in which every learner is protected from harm and able to achieve their full potential.
- 2.2 Through this policy, Educ8 aims to:
 - Safeguard and promote the welfare of all learners by ensuring that their best interests remain central to all safeguarding decisions;
 - Provide clear procedures for recognising, responding to, recording and reporting safeguarding concerns in a timely and appropriate manner;
 - Ensure that all staff, governors, proprietors, volunteers, contractors and visitors understand their safeguarding responsibilities and know how to take appropriate action when concerns arise;

- Promote early identification, intervention and support through effective partnership working with parents or carers, local safeguarding partners and other relevant agencies;
- Protect learners from all forms of abuse, neglect, exploitation, child-on-child abuse, online harm, radicalisation and other safeguarding risks;
- Ensure that safeguarding arrangements are supported by effective leadership, appropriate training, secure record keeping and effective information sharing;
- Create an environment in which learners feel safe, respected, supported and encouraged to seek help when required.

2.3 By achieving these aims, we seek to ensure that safeguarding remains central to the school's ethos, culture and daily practice and that all learners receive the support, protection and opportunities they need to thrive.

3. Summary

- 3.1 This policy sets out Educ8's safeguarding and child protection arrangements and provides clear guidance to governors, leaders, staff, volunteers, contractors, agency workers and visitors regarding their safeguarding responsibilities.
- 3.2 The policy establishes the procedures for recognising, responding to, recording, reporting and managing safeguarding concerns in accordance with statutory guidance, local safeguarding arrangements and the Independent School Standards.
- 3.3 The school recognises that safeguarding extends beyond protecting children from abuse and neglect and includes promoting learners' physical and mental health, emotional wellbeing, attendance, online safety, educational achievement and overall welfare.
- 3.4 All safeguarding concerns, regardless of their perceived seriousness, must be reported immediately to the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL) and recorded using the school's safeguarding recording system (CPOMS). Where a learner is believed to be at immediate risk of harm, any member of staff has a responsibility to take appropriate action, including contacting Children's Social Care, the Police or emergency services without delay, where necessary.

4. Purpose

- 4.1 The purpose of this policy is to establish a clear and consistent framework for safeguarding and promoting the welfare of all learners across Educ8 and to ensure that safeguarding responsibilities are understood and implemented by all members of the school community.

- 4.2 This policy sets out the principles, expectations, procedures and responsibilities that underpin Educ8's safeguarding arrangements and provides guidance on the identification, recording, reporting and management of safeguarding concerns.
- 4.3 The policy has been developed in accordance with current legislation, statutory guidance, local safeguarding arrangements and the Independent School Standards and should be read alongside the associated policies, procedures and appendices referred to throughout this document.
- 4.4 In accordance with *Keeping Children Safe in Education* (KCSIE) and *Working Together to Safeguard Children* (WTSC), safeguarding and promoting the welfare of children includes:
- Providing help and support to children and their families as soon as needs are identified;
 - Protecting children from maltreatment, abuse, neglect, exploitation and harm;
 - Preventing the impairment of children's physical and mental health or development;
 - Ensuring that children grow up in circumstances consistent with safe and effective care; and
 - Taking appropriate action to enable children to achieve the best possible outcomes.
- 4.5 This policy is intended to:
- Provide clear safeguarding procedures and lines of accountability;
 - Ensure that concerns are identified, recorded, reported and managed appropriately;
 - Support effective information sharing and inter-agency cooperation;
 - Promote the safety, welfare and wellbeing of learners; and
 - Ensure that safeguarding arrangements are implemented consistently across all Educ8 provisions.
- 4.6 All staff are expected to read, understand and comply with the requirements of this policy as part of their professional responsibilities.

5. Legislative and Statutory Framework

This policy has been developed in accordance with current legislation, statutory guidance, local safeguarding arrangements and the Independent School Standards applicable to independent schools.

Further information is contained within Appendix G.

6. Scope

This policy applies to all learners, staff, volunteers, governors, proprietors, agency staff, contractors, visitors and any other adult working on behalf of the school.

The policy applies at all times when children are receiving education, care, supervision or support from the school, including during the school day, educational visits, off-site activities, alternative provision placements, work experience, extracurricular activities, remote education and the use of online platforms and digital technologies.

7. Definitions

For the purposes of this policy, the following definitions apply.

7.1 Child

For the purposes of this policy, the term *learner* refers to any child receiving education within Educ8. The terms *child* and *learner* may therefore be used interchangeably throughout this policy.

For the purposes of this policy, a child is anyone who has not yet reached their 18th birthday.

7.2 Safeguarding and promoting the welfare of children

Safeguarding and promoting the welfare of children encompasses:

- Providing help and support to meet the needs of children as soon as problems emerge;
- Protecting children from maltreatment, whether occurring 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; and
- Taking action to enable all children to achieve the best possible outcomes.

7.3 Child protection

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

7.4

Family Help (including Early Help)

Family Help (sometimes referred to locally as Early Help) involves the timely identification of need and the provision of appropriate support to children, young people and their families to prevent concerns from escalating and to improve outcomes.

Family Help may include targeted early help and statutory support provided to children in need under section 17 of the Children Act 1989, depending upon the child's needs and local arrangements. Universal and community-based early help may also provide support before targeted Family Help is required.

The school recognises that providing support at the earliest opportunity is a fundamental part of effective safeguarding practice. Family Help may involve coordinated support from a range of services working collaboratively with children, parents, carers and other professionals to identify needs, develop plans and coordinate interventions.

Concerns may relate to a learner's health, emotional wellbeing, behaviour, attendance, home circumstances, relationships, exploitation, online activity or other factors affecting their safety and welfare.

All staff should remain professionally curious, identify concerns at the earliest opportunity and report them promptly to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL).

The Designated Safeguarding Lead (DSL) will consider the most appropriate course of action, which may include providing support within the school, consulting external agencies or making referrals in accordance with local safeguarding arrangements.

The school will have regard to local safeguarding partnership arrangements, thresholds of need and local assessment protocols when considering the support required by a child and their family. The Designated Safeguarding Lead (DSL) will work collaboratively with partner agencies to ensure that concerns are managed appropriately and that children and families receive support through the most appropriate pathway.

Depending upon local arrangements and the needs of the child, assessments may be led by children's social care, family help practitioners or other appropriately qualified professionals.

Staff should understand that a learner does not need to be at immediate risk of significant harm in order to receive support. Early intervention may help to prevent concerns from escalating and improve outcomes for children, young people and their families.

The school recognises that safeguarding concerns frequently overlap and that effective support often depends upon timely information sharing, professional curiosity and effective multi-agency working.

7.5 Abuse

Abuse is a form of maltreatment of a child and may occur within the family, within institutional or community settings, through exploitation by others or online. Further information regarding specific forms of abuse is contained within Section 12 of this policy.

7.6 Contextual safeguarding

Contextual safeguarding recognises that children may experience abuse or exploitation in a range of settings beyond the family home, including schools, peer groups, community settings and online environments.

7.7 Online safety

Online safety refers to the protection of children while using technology, digital services, social media platforms, online games, communication platforms and artificial intelligence (AI) tools.

8. Important Contacts

- 8.1 Educ8 maintains comprehensive safeguarding contact information for all schools and provisions. These details are reviewed regularly to ensure that they remain accurate and up to date.
- 8.2 Staff must ensure that they know how to contact the Designated Safeguarding Lead (DSL), Deputy Designated Safeguarding Lead (DDSL), Children's Social Care, the Police and other relevant agencies.
- 8.3 Detailed contact information can be found in:
 - The Safeguarding Setting Schedule and
 - Appendix C – National safeguarding contacts.
- 8.4 If a learner is believed to be at immediate risk of harm, staff must take immediate action, contact the emergency services where necessary and inform the DSL or DDSL at the earliest safe opportunity.

Further guidance relating to safeguarding referrals and reporting procedures can be found in Section 13 and Appendix D.

9. Equality, Inclusion and Safeguarding Principles

- 9.1 Safeguarding is fundamental to every aspect of Educ8's work and is central to our commitment to providing a safe, inclusive and supportive learning environment in which every learner is valued, respected and protected from harm.

Educ8 is committed to promoting equality, diversity and inclusion and to ensuring that all safeguarding arrangements are fair, proportionate, child-centred and free from discrimination, prejudice, bias and stereotyping.

Educ8 recognises that promoting an inclusive and anti-discriminatory culture is a core safeguarding responsibility. Leaders and staff will actively challenge racism, faith-based prejudice and other forms of discrimination and will promote a culture in which all learners feel safe, respected and able to raise concerns.

Safeguarding decisions will always be made in the best interests of the child and with due regard to the learner's wishes, feelings, lived experiences, age, understanding and individual circumstances.

The school recognises that children experience risk differently and that some learners may face additional barriers to recognising abuse, communicating concerns or accessing support. Staff are expected to remain professionally curious and to ensure that safeguarding responses are adapted to meet individual needs.

Our safeguarding arrangements are underpinned by the following principles:

9.2 Child-centred practice

The welfare of the child is paramount. Learners will be listened to, treated with dignity and respect, and supported to participate in decisions affecting them whenever appropriate.

9.3 The voice of the child

Learners will be encouraged to speak openly about worries, concerns and experiences and will be supported to access appropriate help and guidance.

The school recognises that safeguarding practice must be child centred and that children should be seen, heard, understood and involved in decisions affecting them whenever this is appropriate. Staff will take account of each child's wishes, feelings, lived experiences, individual needs and circumstances when considering concerns, assessing risk and determining appropriate support.

The school acknowledges that some children may experience additional barriers to communicating concerns or seeking help. Staff will therefore maintain professional curiosity and ensure that children have access to trusted adults, effective support systems and appropriate opportunities to express their views.

9.4 Equality, diversity and inclusion

Educ8 promotes a culture of equality, inclusion and belonging in which diversity is valued and every learner has the opportunity to thrive in a safe and supportive environment.

Anti-discriminatory safeguarding practice

Discrimination, prejudice, stereotyping, exclusion and bias can have a significant impact on children's safety, wellbeing, educational attainment and access to support.

Racism, faith-based prejudice and other forms of discrimination can constitute harm in their own right and can have a significant impact on a child's welfare, wellbeing and sense of safety. Staff must recognise, challenge, record and respond appropriately to prejudice-based and discriminatory harm, including racism and faith-targeted abuse, in accordance with the school's safeguarding and behaviour procedures.

Safeguarding practice will therefore be informed by an understanding of the diverse experiences, identities, backgrounds and individual needs of children. Staff will remain alert to the possibility that children may face additional barriers to recognising abuse, reporting concerns or accessing appropriate support because of factors such as disability, special educational needs, ethnicity, culture, language, faith, sex, sexual orientation, gender identity, socio-economic circumstances or previous experiences of trauma.

The school recognises that some children may be questioning their gender identity and that they may experience additional vulnerability associated with bullying, harassment, discrimination, social isolation, mental health difficulties, online harm or exploitation. Staff should adopt a child-centred approach and consider each child's individual circumstances, age, developmental stage, wishes and feelings. Staff should avoid making assumptions and should report any safeguarding concerns to the Designated Safeguarding Lead (DSL) and seek advice where appropriate. The welfare of the child will remain the school's paramount consideration at all times.

All safeguarding decisions will be undertaken in a fair, proportionate, child-centred and anti-discriminatory manner, ensuring that every child is seen, heard, valued and supported.

Staff will challenge discriminatory language, attitudes, behaviours and practices and will take appropriate action where such behaviour presents a safeguarding concern.

Vigilance and professional curiosity

Staff will remain professionally curious and will consider the child's wishes, feelings, lived experiences, individual circumstances and relationships when assessing concerns, determining risk and planning appropriate support. Staff will respectfully challenge assumptions, seek clarification where necessary and take appropriate action whenever concerns arise.

Early identification and intervention

Concerns will be identified, recorded and addressed as early as possible to ensure that learners receive the right support at the right time.

9.7 **Partnership working**

Educ8 will work collaboratively with learners, families and partner agencies to safeguard and promote the welfare of children and young people.

9.8 **Contextual safeguarding**

Safeguarding assessments will consider the wider contexts in which children live, learn and socialise, including peer groups, families, neighbourhoods and online environments.

9.9 **Identifying cumulative vulnerability and emerging risk**

The school recognises that some children may be exposed to multiple and interacting vulnerabilities that increase their risk of abuse, neglect, exploitation or other forms of harm. Staff should exercise professional curiosity and consider the cumulative impact of concerns rather than viewing incidents in isolation.

Additional indicators of vulnerability may include, but are not limited to:

1. repeated removal from lessons or classrooms;
2. multiple suspensions or exclusions;
3. part-time timetables or reduced educational provision;
4. persistent absence or disengagement from education;
5. children who are pregnant or who are parents;
6. children displaying early indicators of abusive, violent, harmful or exploitative behaviours;
7. significant changes in presentation, behaviour or emotional well-being; and
8. children experiencing multiple adverse circumstances simultaneously.

The presence of one factor does not necessarily indicate that a child is at risk of harm. However, the likelihood of harm may increase where multiple indicators are present, and staff should share concerns promptly with the Designated Safeguarding Lead (DSL).

9.10 **Safeguarding through education**

Safeguarding is promoted through the curriculum, pastoral support, behaviour systems, attendance procedures, online safety education and everyday practice.

10. **Roles and Responsibilities**

10.1 **Safeguarding Responsibilities and Oversight**

Safeguarding responsibilities within Educ8 are divided between statutory accountability, collective governance oversight, portfolio leadership, professional safeguarding leadership

and assurance, and operational implementation. These responsibilities are complementary but distinct. The delegation of safeguarding activities does not transfer or reduce the statutory accountability of the registered Proprietor.

Safeguarding accountability and oversight are structured as follows:

- **Registered Proprietor or relevant company directors**
Formal adoption of safeguarding arrangements and ultimate accountability, as applicable to the status of the setting.
- **The Executive Board**
Collective scrutiny, challenge and oversight of safeguarding assurance.
- **Director of Education, Safeguarding & Standards**
Board-level portfolio leadership, scrutiny and challenge in relation to safeguarding.
- **Head of Safeguarding & Awarding Organisation Compliance**
Group-wide professional safeguarding leadership, advice, assurance, quality assurance and compliance oversight.
- **Headteacher or designated provision lead**
Implementation of safeguarding arrangements within the setting.
- **DSL and DDSLs**
Operational safeguarding leadership, referrals, safeguarding records and case management.

Detailed responsibilities are set out in **Appendix E – Safeguarding Responsibilities and Accountability**.

10.2 Voice of the Child

The school recognises that effective safeguarding practice must be child centred. The wishes, feelings, views, experiences and lived experiences of learners will be considered whenever decisions are made about their safety, welfare and support.

The school recognises that children may communicate concerns in different ways and that some learners, including those with special educational needs and disabilities (SEND), may experience additional barriers to seeking help or expressing their views. Staff will therefore remain professionally curious, listen carefully to learners and take all concerns seriously.

Educ8 is committed to ensuring that every learner feels safe, respected, valued and able to seek support from trusted adults whenever necessary. The welfare of the child will remain paramount in all safeguarding decisions and actions.

10.3 **Governance, strategic leadership and accountability**

Safeguarding governance and leadership within Educ8 operate through clearly defined and complementary responsibilities. Statutory accountability remains with the registered Proprietor of each independent school, while relevant company directors retain accountability for the safeguarding arrangements applicable to alternative provision settings.

The Executive Board provides collective scrutiny, challenge and oversight, supported by the Director – Education, Safeguarding & Standards through the designated Board portfolio. Professional safeguarding leadership, advice and assurance are provided by the Head of Safeguarding & Awarding Organisation Compliance through Educ8's agreed senior leadership and governance arrangements.

Those with governance and leadership responsibilities will receive safeguarding training appropriate to their role and maintain an appropriate understanding of their safeguarding duties.

10.3.1 **Proprietor**

The registered Proprietor of each independent school retains ultimate statutory accountability for safeguarding and is responsible for ensuring that appropriate safeguarding arrangements, policies, resources and oversight are in place and that safeguarding requirements are implemented effectively.

For alternative provision settings, the relevant company directors retain organisational accountability for the safeguarding arrangements applicable to that provision.

Delegation of safeguarding functions to the Executive Board, Director portfolio, Head of Safeguarding, Headteacher, provision lead or DSL does not transfer or reduce the accountability applicable to the registered Proprietor or relevant company directors.

10.3.2 **The Executive Board**

The Executive Board provides collective scrutiny, challenge and oversight of safeguarding across Educ8. It reviews safeguarding assurance, risks, trends, significant issues and improvement activity to support effective governance and continuous improvement.

The Executive Board does not replace or assume the statutory accountability of the registered Proprietor or the responsibilities of relevant company directors.

Director of Education, Safeguarding & Standards

10.3.3

The Director of Education, Safeguarding & Standards provides Board-level portfolio leadership, scrutiny and challenge in relation to safeguarding across Educ8. The Director reviews safeguarding assurance, risks, trends, audits, significant issues and improvement actions and supports effective scrutiny through the Executive Board and relevant governance arrangements.

This is a governance and portfolio-oversight role and does not include routine safeguarding case management, supervision of DSL casework or the delivery of operational safeguarding activity.

Head of Safeguarding & Awarding Organisation Compliance

10.3.4

The Head of Safeguarding & Awarding Organisation Compliance provides Group-wide professional safeguarding leadership, advice and assurance across Educ8. Responsibilities include safeguarding policy and standards development, quality assurance and audit, monitoring statutory compliance, review of safeguarding practice and trends, oversight of safeguarding training, and professional support and challenge to DSLs and senior leaders.

The Head of Safeguarding supports consistency and continuous improvement in safeguarding practice across Educ8 and provides professional safeguarding assurance through Educ8's agreed senior leadership and governance reporting arrangements.

Headteacher / Designated Provision Lead

10.3.5

The Headteacher, or designated provision lead where applicable, is responsible for ensuring that safeguarding arrangements are implemented effectively within the setting. This includes ensuring that safeguarding policies and procedures are understood and followed, appropriate staffing, resources and training are in place, and safeguarding responsibilities are embedded within the day-to-day operation of the setting.

The Headteacher or designated provision lead works with the DSL/DDSLs and Head of Safeguarding & Awarding Organisation Compliance to address safeguarding risks, compliance issues and required improvement actions, and to ensure that concerns requiring escalation are acted upon promptly.

10.4 **Designated Safeguarding Lead (DSL) and Deputy DSLs (DDSLs)**

The DSL has lead operational responsibility for safeguarding and child protection within the setting, supported by appropriately trained DDSLs. The DSL is responsible for coordinating safeguarding responses, assessing concerns, making or supporting referrals to statutory agencies, maintaining appropriate safeguarding records, managing safeguarding casework and ensuring that information is shared appropriately and in accordance with statutory guidance.

The DSL provides advice and support to staff, promotes effective safeguarding practice within the setting and works with the Headteacher or designated provision lead and Head of Safeguarding & Awarding Organisation Compliance to identify safeguarding risks, themes and areas requiring improvement or escalation.

The DSL and DDSLs must have the status, authority, time, training, resources and support necessary to fulfil their safeguarding responsibilities effectively. The DSL retains lead responsibility for safeguarding and child protection; this responsibility should not be delegated, although activities may be delegated to appropriately trained DDSLs.

10.4.1 **Availability**

The Designated Safeguarding Lead (DSL), or an appropriately trained Deputy Designated Safeguarding Lead (DDSL), will always be available during term time and throughout the school day to provide safeguarding advice, support and oversight.

Appropriate arrangements will be implemented to ensure continuity of safeguarding leadership during periods of absence, training, annual leave, educational visits and other activities undertaken away from the school site.

The school will maintain clear communication and reporting procedures, including secure electronic recording systems and designated safeguarding contact arrangements. Safeguarding contact details will be readily available to staff, learners, parents, carers and external agencies.

10.5 **Deputy Designated Safeguarding Leads (DDSLs)**

The school may appoint one or more Deputy Designated Safeguarding Leads (DDSLs) to support the work of the DSL, according to the needs and structure of the school.

DDSLs will receive the same level of safeguarding training as the DSL and will possess the knowledge, skills, authority and capacity necessary to undertake the role effectively.

DDSLs may undertake delegated safeguarding responsibilities and will act with the same authority as the DSL when providing cover. However, overall responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.

10.6 **Staff, volunteers, agency staff, contractors and visitors**

All adults working with or on behalf of Educ8 must understand and fulfil the safeguarding responsibilities relevant to their role, remain vigilant to concerns and report safeguarding concerns promptly in accordance with this policy and Educ8 procedures.

Responsibilities include recognising indicators of abuse, neglect and exploitation, maintaining professional curiosity, recording concerns accurately, sharing information appropriately and supporting children in accordance with their individual needs.

10.7 **Learners, parents and carers**

Learners are encouraged to raise concerns and seek help whenever they feel unsafe or worried about themselves or others.

Parents and carers are encouraged to work collaboratively with Educ8 and share relevant information to support the safeguarding and welfare of learners.

10.8 **Safeguarding Escalation**

Safeguarding concerns must be acted upon and escalated promptly through the appropriate safeguarding and leadership routes. Where there is disagreement about safeguarding action or an inadequate response from another agency, staff must use professional challenge and escalation procedures where appropriate.

Concerns relating to adults working with learners, including allegations, low-level concerns and whistleblowing matters, must be managed in accordance with the relevant sections of this policy and associated Educ8 procedures.

11. **Responding to Safeguarding Concerns**

11.1 Educ8 is committed to ensuring that all safeguarding concerns are recognised, reported, recorded, escalated where necessary and responded to promptly and effectively. The welfare of the child will always remain the paramount consideration.

Safeguarding records should be factual, accurate, timely and child centred. Records should clearly distinguish between fact, opinion, observation and professional judgement and should reflect the child's wishes, feelings, lived experiences and the actions taken in response to concerns.

The school recognises that safeguarding is not a single action or event but a continuous process of listening, observing, reviewing, supporting and acting in the best interests of every child.

11.2 **Safeguarding Culture, vigilance and professional curiosity**

We promote a safeguarding culture in which all learners feel safe, valued, respected and listened to. Staff are expected to be approachable, responsive and willing to act upon concerns, recognising that learners may disclose information gradually or communicate their experiences in different ways.

All staff are expected to remain professionally curious and vigilant, recognising that abuse, neglect, exploitation and harm can present in many different ways.

Staff should understand that no single practitioner can have a full picture of a learner's circumstances and that concerns which appear insignificant in isolation may become more significant when considered alongside other information.

Staff should be alert to:

- Changes in behaviour, appearance or presentation;
- Patterns of attendance or absence;
- Indicators of abuse, neglect, exploitation or harm;
- Changes within a learner's family, peer group or wider environment;
- Online activity and contextual safeguarding concerns;
- Repeated low-level concerns;
- The cumulative impact of multiple concerns; and
- Signs that a learner may require additional support.

Staff should never assume that another person has taken action and should always seek advice if they are uncertain.

Wherever possible, safeguarding decisions will be informed by the wishes, feelings, experiences and lived experiences of the child.

11.3 **Reporting Safeguarding Concerns**

All adults working with or on behalf of Educ8 have a responsibility to recognise and report safeguarding concerns without delay.

Any adult who receives a disclosure, observes a concern or becomes concerned about a learner's welfare must:

- Listen carefully and allow the learner to speak in their own words;
- Reassure the learner that they have done the right thing by speaking up;
- Remain calm, supportive and non-judgemental;
- Avoid asking leading questions or conducting their own investigation;
- Explain that information may need to be shared to keep the learner safe;
- Record the concern accurately, factually and objectively;

- Report the concern immediately to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL); and
- Continue to support the learner appropriately.

Staff must never promise confidentiality, delay reporting concerns or assume that another member of staff has taken action.

Where a learner is believed to be at immediate risk of harm, staff must take immediate action. If a DSL or DDSL is unavailable, staff must contact emergency services, Children's Social Care or the Police before informing the DSL at the earliest opportunity.

Where concerns relate to the conduct of an adult working with children, staff should follow the procedures set out in Section 14 of this policy relating to allegations, low-level concerns and whistleblowing.

11.4 **Escalation of concerns and professional challenge**

Educ8 promotes a culture of respectful challenge in which staff feel empowered to seek clarification, escalate concerns and request additional support whenever necessary.

Any member of staff who is dissatisfied with a decision, believes insufficient action has been taken, or remains concerned about a learner's welfare must continue to escalate the matter until they are satisfied that appropriate action has been taken.

This may include:

- Seeking further guidance from the DSL or DDSL;
- Discussing concerns with the Headteacher;
- Consulting Children's Social Care or other relevant agencies;
- Using the whistleblowing procedures; or
- Seeking support from external safeguarding professionals.

Differences of professional opinion will be managed respectfully and in accordance with local safeguarding procedures.

Staff should not regard the reporting of a concern as the end of their responsibility and should continue to monitor, support and advocate for the learner where appropriate.

11.5 **DSL Response, Referrals and Review**

The Designated Safeguarding Lead (DSL), or Deputy Designated Safeguarding Lead (DDSL) acting on behalf of the DSL, will assess all safeguarding concerns and determine the most appropriate course of action.

This may include:

- Providing advice and guidance to staff;
- Initiating universal or community-based early help, Family Help or other appropriate support;
- Making referrals to Children's Social Care, the Police, the Local Authority Designated Officer (LADO), Prevent, Channel or other agencies;
- Coordinating multi-agency arrangements;
- Implementing safeguarding interventions;
- Undertaking or coordinating risk assessments;
- Implementing individual support plans, behaviour support plans, healthcare plans or other appropriate interventions;
- Reviewing the effectiveness of interventions; and
- Monitoring the learner's welfare and ongoing support arrangements.

Where safeguarding concerns are identified, Educ8 will implement appropriate and proportionate measures to safeguard and support the learner. This may include the completion of risk assessments, the implementation of individual support plans, behaviour support plans, healthcare plans and other safeguarding interventions designed to reduce risk and promote the welfare of the learner.

Risk assessments and support plans will be tailored to the individual circumstances of the learner and will be reviewed regularly to ensure that they remain effective and responsive to changing needs. Where appropriate, learners, parents, carers and external agencies will be involved in the development, implementation and review of these arrangements.

The DSL will ensure that safeguarding concerns are reviewed regularly and that actions remain appropriate, proportionate and focused on achieving the best possible outcomes for the child.

Decisions not to make referrals will be recorded, together with the rationale for those decisions, any advice received and details of any ongoing monitoring arrangements.

11.6

Information sharing, confidentiality and record keeping

Effective safeguarding depends upon timely, accurate, proportionate, relevant and lawful information sharing.

Safeguarding information will be shared lawfully, proportionately and securely in accordance with statutory guidance, data protection legislation and local safeguarding procedures.

Educ8 uses CPOMS to record, monitor and manage safeguarding concerns. Recording information on CPOMS does not remove the requirement to notify the DSL or DDSL directly where immediate action is required.

Access to safeguarding information will be restricted to those with a legitimate professional need to know.

Data protection legislation does not prevent the sharing of information where this is necessary to safeguard and promote the welfare of children.

Staff should not assume that another person has shared information or taken action and should always take responsibility for ensuring that safeguarding concerns are communicated appropriately.

11.7

Transfer of Safeguarding Records

Where a child transfers to another school or educational setting, the Designated Safeguarding Lead (DSL) will ensure that safeguarding records are transferred securely, separately from the main learner file and in accordance with data protection requirements. In line with statutory guidance, records will be transferred within five school days for an in-year transfer or within the first five school days of the start of a new term. Where appropriate, the DSL will also speak directly with the receiving setting to ensure that all relevant safeguarding information is shared and that suitable support arrangements are put in place.

Where concerns are ongoing or complex, the DSL will communicate directly with the receiving Designated Safeguarding Lead to support continuity of care and protection.

The DSL will obtain confirmation that records have been received and will retain a record of the transfer.

11.8

Receipt of Safeguarding Records

The school recognises the importance of obtaining safeguarding information promptly when a learner joins the school or provision. Wherever possible, safeguarding records will be obtained and reviewed before a learner commences their placement in order to ensure that appropriate support, risk assessments and safeguarding arrangements are in place. No learner should ordinarily commence placement until the Designated Safeguarding

Lead (DSL) has confirmed that safeguarding information has been obtained, reviewed and appropriately recorded.

Where records have not been received before admission, the DSL will take immediate steps to obtain the information from the previous setting, local authority or other relevant agency. All actions taken will be recorded.

Where learners are dual registered, Educ8 will work collaboratively with the referring school and other agencies to ensure that safeguarding information is shared appropriately and that responsibilities remain clearly understood.

The absence of safeguarding records will not prevent Educ8 from taking immediate action where there are concerns regarding a learner's safety or welfare.

11.9 Information Sharing

Effective information sharing is essential to safeguarding and promoting the welfare of children.

From **30 September 2026**, section **16LA of the Children Act 2004**, inserted by the Children's Wellbeing and Schools Act 2026, places a statutory information-sharing duty on organisations within scope.

Where Educ8 holds information that it considers relevant to safeguarding or promoting the welfare of a child, it **must share that information with another organisation covered by the duty where it considers that sharing the information may help that organisation to exercise its safeguarding or welfare functions.**

Staff must not wait for a particular safeguarding threshold to be reached before relevant information is shared. The duty applies to information that may assist another relevant organisation to assess need or risk, make a decision, provide support or take action to safeguard or promote a child's welfare.

The duty also applies when Educ8 receives a request for relevant safeguarding or welfare information from another organisation covered by the duty.

Consent is not required in order to comply with the statutory information-sharing duty. Staff must identify the appropriate lawful basis for processing and sharing information rather than treating parental or child consent as a prerequisite to sharing. Children and families should be informed about information sharing where appropriate, but transparency must not be confused with seeking permission to share.

A child or family's decision about whether to accept a service or support is separate from the school's duty to share relevant information. This includes information shared in connection with Family Help or Early Help.

Data protection legislation does not prevent lawful safeguarding information sharing. Information must be relevant, proportionate, accurate, shared securely and limited to what is required for the safeguarding or welfare purpose.

Information should only be withheld under the statutory duty where the applicable statutory exception is met, including where sharing the information would be more detrimental to the child's welfare than not sharing it. The rationale for any decision not to share relevant information must be clearly recorded.

Staff should ordinarily be open and transparent with children and parents/carers about how information will be used and shared, unless doing so could place a child or another person at increased risk, prejudice an investigation or otherwise undermine safeguarding action.

All significant information-sharing decisions must be recorded, including what information was shared, with whom, when and why, together with the rationale for any decision not to share.

Staff who are uncertain should seek advice from the DSL/DDSL or Head of Safeguarding, but seeking advice must not cause unnecessary delay in sharing information required to safeguard or promote a child's welfare.

Educ8 will have regard to the Department for Education's **Information Sharing Duty statutory guidance for safeguarding organisations and their practitioners (September 2026)** alongside *Working Together to Safeguard Children* and applicable data protection legislation.

Recording Principles

11.10

Safeguarding records must be timely, accurate, factual, proportionate, confidential and child centred. Records should clearly distinguish between factual information, observations, opinions and professional judgements. They should accurately record concerns, actions taken, decisions reached and the reasons for those decisions. Records should also reflect the child's wishes, feelings, lived experiences and the actions taken in response to concerns.

When recording concerns, staff should consider the following questions:

- What has happened?
- What have I seen, heard or been told?
- What does the child say?
- What is the child's lived experience?
- What worries me?
- What action have I taken?
- What happens next?

These principles are intended to support professional curiosity, professional challenge, effective information sharing and a child-centred approach to safeguarding practice.

All safeguarding records should be:

- timely;
- accurate;
- factual;
- objective;
- sufficiently detailed to support decision-making;
- attributable to the author;
- confidential;
- proportionate;
- child centred; and
- focused on promoting the welfare and best interests of the learner.

12. Specific safeguarding issues

Safeguarding concerns can arise in many forms and that abuse, neglect and exploitation can affect any child, regardless of their age, gender, ethnicity, disability, culture, religion, sexual orientation or family circumstances.

All staff receive safeguarding training to help them recognise the signs and indicators of abuse, neglect and other safeguarding concerns. Staff are not expected to determine whether abuse has occurred; their responsibility is to remain professionally curious, record concerns promptly and report them immediately to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL) in accordance with this policy.

12.1 Abuse and Neglect

Educ8 adopts the definitions of abuse and neglect set out in *Keeping Children Safe in Education* (KCSIE) and *Working Together to Safeguard Children* (WTSC). Abuse and neglect may occur within the home, the community, educational settings or online environments and may be perpetrated by adults or other children.

Abuse, neglect and exploitation can affect any learner, regardless of age, gender, ethnicity, disability, culture, religion, sexual orientation, identity or family circumstances. Learners may experience more than one form of abuse, and concerns may develop gradually over time rather than arising from a single incident.

Staff are not expected to determine whether abuse has occurred. Instead, all staff are expected to:

- Maintain an attitude of professional curiosity;
- Remain vigilant to changes in behaviour, presentation, attendance, Wellbeing and relationships;
- Listen carefully to the voice of the child;

- Recognise that safeguarding concerns may have multiple or cumulative causes;
- Record concerns promptly, accurately and objectively; and
- Report concerns immediately to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL).

12.2 The four recognised categories of abuse are defined as follows:

Physical Abuse

Physical abuse is a form of abuse that 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 or deliberately induces illness in a child.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child's emotional development. Emotional abuse may include conveying to a child that they are worthless, unloved, inadequate or valued only insofar as they meet the needs of another person.

Sexual Abuse

Sexual abuse involves forcing, causing or inciting a child to take part in sexual activities. The activities may or may not involve violence, and the child may or may not be aware of what is happening. Sexual abuse may take place in person, online or through a combination of both. It may involve physical contact or non-contact activities and may include sexual exploitation, grooming, coercion, the creation or sharing of indecent images, and abuse facilitated through the use of technology. Sexual abuse may be perpetrated by adults or by other children. Children are more likely to be sexually abused by someone they know than by a stranger. A child under the age of 13 cannot legally consent to sexual activity.

Neglect

Neglect is the persistent failure to meet a child's basic physical and psychological needs, which is likely to result in serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse and may continue throughout childhood and adolescence.

Abuse may present in many different ways and that learners with additional vulnerabilities may face barriers to recognising, reporting or disclosing abuse. Staff should never

assume that a concern is insignificant or solely related to a learner's disability, mental health needs, behaviour, communication difficulties or personal circumstances.

12.3 **Additional Vulnerabilities and Safeguarding Considerations**

Some learners may be at increased risk of abuse, neglect, exploitation or other safeguarding concerns because of their individual needs, circumstances or lived experiences. These factors may affect a learner's ability to recognise abuse, communicate concerns or access support.

Safeguarding practice will always be child-centred and based upon a clear understanding of each learner's individual circumstances. Staff will remain professionally curious and consider the cumulative impact of concerns rather than viewing incidents in isolation.

Additional vulnerabilities may include, but are not limited to, the following:

12.4 **Children with Special Educational Needs and Disabilities (SEND)**

The school recognises that children with special educational needs and disabilities (SEND) may face additional barriers to recognising abuse, communicating concerns, seeking help and accessing support. These barriers may include communication difficulties, difficulties understanding or recognising risk, social isolation, assumptions that behaviours are related solely to a child's disability or additional needs, increased dependence upon others, difficulties reporting concerns, exposure to bullying or exploitation, attendance difficulties, online risks, mental health needs and increased vulnerability to abuse, neglect and harm.

Staff will remain alert to these additional vulnerabilities, exercise professional curiosity and ensure that safeguarding assessments, interventions and support are tailored to the individual needs, wishes and circumstances of the child.

12.5 **Children who are Lesbian, Gay or Bisexual (LGB) or who are Questioning their Gender Identity**

Being lesbian, gay or bisexual is not in itself a safeguarding risk factor; however, children who are LGB, or who are perceived to be LGB, may experience discriminatory bullying, harassment or other safeguarding concerns.

The school recognises that children who are lesbian, gay or bisexual (LGB), or who are questioning their gender identity, may experience additional vulnerabilities relating to bullying, harassment, discrimination, social isolation, mental health difficulties, online harm, exploitation or gender-related distress.

In accordance with statutory guidance, the school will adopt a child-centred approach and will consider each case individually, taking account of the child's age, developmental stage, wishes, feelings, lived experiences, individual circumstances and overall welfare. Staff will consider the full range of factors that may be affecting the child, including any

wider health, SEND or neurodiversity needs and any relevant professional or clinical advice.

Staff will exercise professional curiosity, avoid making assumptions regarding a child's experiences, needs or future identity and avoid taking actions that could place a child at increased risk of harm. Staff will also avoid applying pressure on a child to reach a particular decision or follow a particular course of action.

The school recognises that older children may have greater agency in decisions affecting them. Nevertheless, safeguarding considerations, the child's welfare and the impact of decisions on other children will remain central to decision-making. A decision made in the best interests of the child may not always be the same as the child's expressed wishes.

Where a child or their parent or carer requests support relating to social transition, the school will respond in accordance with current statutory guidance. The school will not initiate social transition arrangements. Any request will be considered carefully and individually, with the best interests and safeguarding of the child as the starting point, alongside the school's duties under equality and human rights legislation.

Parents and carers have a leading role in their child's life and, in the vast majority of cases, the school will work with them to determine what is in the child's best interests. Where a child requests support relating to social transition, parents or carers will normally be engaged as a matter of priority and their views will be given appropriate weight. Where there is reason to believe that involving a parent or carer may place the child at greater risk of harm, the DSL will consider the appropriate safeguarding response before information is shared.

The Designated Safeguarding Lead (DSL) will be involved as appropriate and will work collaboratively with the child, parents or carers and relevant professionals, including consideration of any available clinical or other professional advice. Decisions, the rationale for them, safeguarding considerations and agreed support will be clearly documented and recorded.

The welfare and best interests of the child will remain central to all decision-making, alongside consideration of the safeguarding, welfare, privacy and dignity of other children who may be affected.

12.5.1 Single-Sex Toilets, Changing and Washing Facilities

Educ8 will manage access to toilets, changing rooms, showers and washing facilities in accordance with current statutory requirements and safeguarding guidance relating to single-sex school premises.

Learners will not be permitted to use toilets designated for the opposite biological sex. Separate toilet facilities will be maintained in accordance with the requirements applicable to independent schools, except where an individual toilet is provided in a room intended for use by one learner at a time and capable of being secured from the inside.

Where a learner who is questioning their gender does not wish to use the toilet designated for their biological sex, the school will consider whether appropriate alternative facilities can reasonably be provided. This may include access to a self-contained individual toilet. Any alternative arrangement must not compromise the provision of single-sex facilities or the safety, comfort, privacy or dignity of the learner or of other children.

Learners aged 11 years or over at the start of the school year will not be permitted to undress in front of a learner of the opposite biological sex or to use changing rooms designated for the opposite sex.

Where a learner who is questioning their gender does not wish to use the changing or washing facilities designated for their biological sex, the school will consider whether appropriate alternative arrangements can reasonably be provided. This may include the use of a fully enclosed room for one learner at a time, capable of being secured from the inside, or access to facilities at an alternative time.

Any alternative arrangements must protect the safety, comfort, privacy and dignity of the learner and other children and must not compromise the provision of appropriate single-sex facilities.

Decisions and agreed arrangements will be clearly recorded, communicated only to those who need to know and reviewed regularly. The DSL will be involved where the circumstances give rise to a safeguarding concern.

12.6 **Mental Health and Emotional Wellbeing**

The school recognises that mental health problems, emotional wellbeing concerns and behavioural difficulties may be indicators that a child has experienced abuse, neglect, trauma, exploitation, adverse childhood experiences (ACEs) or other safeguarding concerns.

Staff will remain alert to changes in behaviour, mood, presentation, attendance, relationships, engagement, academic performance, personal care and emotional wellbeing, recognising that these changes may indicate an underlying safeguarding need. Staff will also remain vigilant to signs of self-harm, suicidal ideation, disordered eating, anxiety, depression, trauma responses and other indicators of emotional distress.

The school recognises that mental health concerns may arise as a consequence of experiences such as abuse, neglect, child criminal exploitation, child sexual exploitation, domestic abuse, bullying, child-on-child abuse, bereavement, family difficulties or exposure to traumatic events.

The school also recognises that mental health concerns and safeguarding concerns frequently overlap and that children experiencing difficulties may require support from a range of services. The presence of a mental health concern does not necessarily indicate that abuse has occurred; however, all concerns will be considered carefully and in the context of the child's circumstances and lived experiences.

Where concerns arise, staff will follow the school's safeguarding procedures and seek advice from the Designated Safeguarding Lead (DSL), who will determine the most appropriate course of action and coordinate support, intervention and referrals where appropriate.

The school will work collaboratively with children, parents, carers, mental health professionals and safeguarding partners to promote positive outcomes and reduce the risk of harm.

The wishes, feelings, experiences and best interests of the child will remain central to all decision-making processes.

Further guidance is provided within *Keeping Children Safe in Education*, the school's safeguarding procedures, the behaviour policy and the school's approach to pastoral care and emotional wellbeing.

12.7 **Young Carers**

Young carers may experience additional responsibilities that affect their attendance, attainment, behaviour, wellbeing and educational progress.

The school recognises the importance of identifying young carers at the earliest opportunity and ensuring that appropriate support is provided at the right time.

The school will work collaboratively with children, families, local authorities, health services and other relevant partners where additional support is required

12.8 **Looked-After and Previously Looked-After Children**

Looked-after and previously looked-after children may have experienced trauma, instability, disrupted relationships, loss, neglect or abuse. The school will work closely with parents, carers, social workers, Virtual School Heads (VSHs), local authorities and other professionals to promote learners' safety, wellbeing, attendance, participation and educational achievement.

The school recognises that children in care and previously looked-after children may experience barriers to attendance, participation, engagement and educational achievement. The Designated Safeguarding Lead (DSL), school leaders and other relevant professionals will work collaboratively to remove barriers to learning and ensure that appropriate support is provided.

The school recognises the important role of the Virtual School Head in promoting educational achievement, improving attendance, strengthening engagement with education and helping to ensure that children receive the support they need to achieve positive outcomes.

12.9 **Children who have or have had a social worker**

The school recognises that children who have a social worker, or who have previously had a social worker, may be particularly vulnerable to abuse, neglect, exploitation, poor attendance, mental health difficulties and other safeguarding concerns. This includes children who are subject to child in need plans, child protection plans or other forms of statutory intervention.

The Designated Safeguarding Lead (DSL) will work closely with social workers, parents, carers, local authorities and other relevant agencies to ensure that learners receive appropriate support, that risks are effectively managed and that information is shared appropriately and in a timely manner.

The school recognises the importance of understanding each child's wishes, feelings, lived experiences and individual circumstances and will seek to remove barriers to education, attendance, participation, engagement and achievement wherever possible. The school will maintain high aspirations for all learners and ensure that support is tailored to their individual needs and circumstances.

12.10 **Children Missing Education (CME)**

Children missing education are at increased risk of abuse, neglect, exploitation, radicalisation and involvement in criminal activity. Concerns relating to attendance, unexplained absence or unknown whereabouts will be managed promptly and in accordance with statutory guidance.

12.11 **Attendance, Persistent Absence and Severe Absence**

Attendance is an essential safeguarding responsibility, persistent absence and severe absence may indicate underlying safeguarding concerns and should always be considered alongside a learner's individual circumstances.

Learners with poor attendance may be at increased risk of:

- Abuse and neglect;
- Child criminal exploitation (CCE);
- Child sexual exploitation (CSE);
- County lines involvement;
- Radicalisation;
- Online harm;
- Child-on-child abuse;
- Substance misuse;
- Domestic abuse; and
- Mental health difficulties.

Staff will remain professionally curious, identify patterns and trends and ensure that concerns are reported promptly. Further information is available within the school's Attendance Policy.

12.12 Contextual Safeguarding

Safeguarding risks can arise outside the home and may be influenced by the environments in which children spend their time.

These environments may include:

- Peer groups;
- Schools and alternative provision settings;
- Neighbourhoods and communities;
- Transport networks;
- Online environments;
- Social media platforms; and
- Locations associated with exploitation or criminal activity.

Staff will consider the wider context surrounding a learner's experiences and work collaboratively with families, safeguarding partners and external agencies to reduce risk and promote safety.

12.13 Economic Disadvantage and Adversity

The school recognises that poverty, financial hardship and adverse experiences can affect a learner's safety, wellbeing and ability to access support.

Factors may include:

- Financial hardship;
- Housing insecurity or homelessness;
- Food insecurity;
- Domestic instability;
- Social isolation;
- Barriers to accessing education; and
- Increased vulnerability to exploitation.

12.14 Child-on-Child Abuse, Sexual Violence and Sexual Harassment

12.14.1 Principles

The school recognises that children can abuse other children and that all allegations, concerns and disclosures must be treated seriously and managed as safeguarding matters. Child-on-child abuse may occur between children of the same age or different ages, may take place inside or outside the school environment and may occur both online and offline.

The school adopts a zero-tolerance approach to all forms of child-on-child abuse and actively promotes a culture of safety, dignity, equality, inclusion and respect. Abuse will never be ignored, tolerated, minimised or dismissed as banter, horseplay, harmless fun, part of growing up, experimentation or "boys being boys".

The school recognises that behaviours and incidents which may initially appear isolated or of lesser concern can, when considered in context, indicate emerging or wider safeguarding concerns. This may include discriminatory behaviour, including racism and faith-targeted abuse, derogatory language, intimidation, conflict or physical aggression. Such behaviour will not be dismissed or minimised. Staff will consider the nature, frequency, context, impact and any patterns of behaviour, together with the circumstances and relationships of the children involved, and will take appropriate action in accordance with the school's safeguarding and behaviour procedures.

The school recognises that child-on-child abuse is preventable and that early identification, education, effective intervention and the promotion of positive relationships play an essential role in reducing risk and protecting children from harm.

The school recognises that child-on-child abuse can cause significant physical, emotional, psychological, educational and social harm and that the impact of abuse may continue into adulthood if concerns are not identified and addressed appropriately.

The school also recognises that sexual violence and sexual harassment can occur between children of any age and sex. Although any child may be affected, the school acknowledges that girls are disproportionately affected and that some children may be less likely to disclose concerns or seek support. Learners will therefore be encouraged and supported to speak to a trusted adult, knowing that they will be listened to, supported and taken seriously.

The school recognises that misogyny, misandry, discrimination, prejudice and harmful attitudes may contribute to a culture in which inappropriate, abusive or harmful behaviours become normalised. Staff will challenge such behaviour promptly and take appropriate safeguarding action whenever concerns arise.

12.14.2 **Harmful Sexual Behaviour (HSB)**

The school recognises that harmful sexual behaviour exists on a continuum ranging from developmentally inappropriate behaviour and problematic sexual behaviour through to abusive behaviour, sexual harassment and sexual violence.

Staff will exercise professional curiosity and consider the child's age, developmental stage, understanding, relationships, lived experiences, vulnerability, the context in which the behaviour occurred and any evidence of coercion, exploitation or power imbalance.

The school recognises that some sexualised behaviours may be developmentally typical, while others may indicate wider safeguarding concerns or harmful sexual behaviour. Concerns will be considered carefully and proportionately, recognising the importance of early intervention, education, support and specialist advice where appropriate.

The school recognises that consent must always be freely given and may be withdrawn at any time. Consent cannot be assumed because of a previous relationship, friendship, age, previous sexual activity, silence or a failure to resist.

The school will adopt a safeguarding approach to all concerns involving sexual violence, sexual harassment and the consensual or non-consensual sharing of nude and semi-nude images.

12.14.3 **Forms of Child-on-Child Abuse**

Child-on-child abuse will never be dismissed or minimised as banter, horseplay, harmless fun, part of growing up, experimentation, “boys being boys” or simply a behavioural issue. Where behaviour may constitute or indicate abuse or give rise to a safeguarding concern, it will be considered and responded to through the school's safeguarding procedures, alongside any appropriate behaviour management response.

- bullying, including cyberbullying and prejudice-based bullying;
- racist, faith-targeted and other discriminatory, misogynistic, misandrist and hate-related abuse;
- physical abuse, including serious violence, threatening behaviour and incidents involving weapons;
- sexual violence;
- sexual harassment;
- stalking and harassment;
- harmful sexual behaviour;
- sexual exploitation;
- upskirting;
- coercive, controlling and abusive behaviour;
- abuse within intimate personal relationships;
- initiation and hazing-type violence and rituals;

- the consensual or non-consensual sharing of nude and semi-nude images, videos and livestreams where this gives rise to safeguarding concerns;
- online sexual abuse;
- sexualised language and behaviour;
- unwanted sexual comments, gestures, remarks, jokes and touching;
- causing another child to engage in sexual activity without consent; and
- any behaviour that creates an intimidating, hostile, degrading, humiliating or offensive environment.

12.14.4 **Online Child-on-Child Abuse**

The school recognises that technology can facilitate child-on-child abuse and that concerns may arise both online and offline.

Further guidance relating to online safety, cyberbullying, online sexual abuse, filtering and monitoring arrangements, artificial intelligence technologies and the sharing of nude and semi-nude images is provided within Section 12.15.

12.14.5 **Responding to Concerns**

The school recognises that children who display harmful behaviour towards others may themselves have experienced abuse, neglect, trauma, exploitation or adverse childhood experiences and may require safeguarding support alongside appropriate intervention.

All concerns will be considered individually, taking account of the age, developmental stage, needs and wishes of the children involved, the nature and seriousness of the incident, any ongoing risks and the potential risk of further harm.

Contextual factors, patterns of behaviour, previous incidents and the wider safeguarding picture will also be considered when determining the appropriate course of action.

The school recognises that reports may be substantiated, unsubstantiated, unfounded, false or malicious. All concerns will be considered carefully and managed fairly, appropriately and proportionately in accordance with statutory guidance, the circumstances of the case and the needs of the children involved.

The welfare of the child who has experienced harm will remain paramount. However, appropriate support, intervention and risk-management measures will also be provided for the child who has allegedly caused the harm and for any other children affected by the incident.

The Designated Safeguarding Lead (DSL) will determine the most appropriate course of action, including the completion of risk assessments, the implementation of protective

measures and support arrangements, liaison with parents or carers and referrals to external agencies where appropriate.

The Designated Safeguarding Lead (DSL) will also consider the nature and duration of any ongoing support required and the most appropriate means of providing that support within the school environment.

The school recognises that safeguarding is a shared responsibility and will work collaboratively with children, families, safeguarding partners and other agencies to identify needs, reduce risks and promote positive outcomes.

All concerns, decisions, actions taken and outcomes will be managed and recorded in accordance with statutory guidance, the school's safeguarding procedures, information-sharing arrangements and data-protection requirements.

Further guidance is provided within the Behaviour Policy, Educ8's Acceptable Use of Technology and Online Safety Policy, Relationships, Sex and Health Education (RSHE) curriculum, the PSHE curriculum, PSHE Association-approved resources, staff safeguarding training and the school's safeguarding procedures.

12.15 **Online Safety**

Technology presents both significant educational opportunities and potential safeguarding risks. Online safety is an integral part of safeguarding and is embedded throughout the curriculum, pastoral support systems, staff training, policies and the wider culture of the school.

This section should be read alongside Educ8's Acceptable Use of Technology and Online Safety Policy, which sets out the detailed arrangements for acceptable use, mobile and smart technology, generative AI, filtering and monitoring, information security and the management of online safety incidents.

The school recognises that online risks may arise through content, contact, conduct and commerce (the "four Cs") and that these risks frequently overlap. Safeguarding arrangements will therefore take account of the ways in which learners access technology and engage with the online environment.

The school is committed to maintaining a safe online environment through effective filtering and monitoring systems, appropriate supervision, clear expectations regarding acceptable use, digital safeguarding education and regular staff training. Online safety arrangements apply to school equipment, school networks, remote learning platforms, personal devices, mobile phones and all forms of technology used within the educational environment.

Learners will receive age-appropriate safeguarding education through the curriculum, including PSHE, RSHE and other safeguarding activities. Wherever appropriate, the

school will use evidence-informed and PSHE Association-approved resources to support the delivery of safeguarding education.

Online safeguarding concerns may include, but are not limited to:

- online abuse, bullying and harassment;
- cyberbullying and prejudice-based abuse;
- online grooming and exploitation;
- child criminal exploitation (CCE);
- child sexual exploitation (CSE);
- sexually coerced extortion (sextortion);
- harmful sexual behaviour;
- radicalisation and exposure to extremist material;
- misinformation, disinformation and conspiracy theories;
- live-streaming risks;
- the inappropriate use of social media;
- online scams, fraud and financial exploitation;
- cyber-enabled and cyber-dependent crime;
- artificial intelligence (AI), including generative artificial intelligence;
- AI-generated or digitally manipulated content, including deepfakes;
- the creation, possession or sharing of nude and semi-nude images, videos and live-streamed content; and
- exposure to harmful, inappropriate or illegal content.

12.15.1 **The Four Cs of Online Safety**

Online risks are commonly grouped into four categories: content, contact, conduct and commerce.

Content - Content risks arise when children are exposed to harmful, misleading, inappropriate or illegal material online. This may include violent or sexual content, extremist material, self-harm content, misinformation, disinformation, conspiracy theories, deepfakes and AI-generated material.

Contact - Contact risks arise when children interact with others online in ways that place them at risk of harm. Examples include grooming, exploitation, radicalisation, stalking, bullying, harassment, sextortion and harmful interactions through social media platforms, gaming platforms, messaging applications and artificial intelligence technologies.

Conduct - Conduct risks arise from a child's own behaviour online or from the behaviour of others. Examples include cyberbullying, online harassment, harmful sexual behaviour, the misuse of personal information and the creation, possession or sharing of nude and semi-nude content.

Commerce - Commerce risks arise where children are exposed to financial harm or exploitation. Examples include fraud, phishing, identity theft, online gambling, malicious advertising, in-app purchases and financial exploitation.

12.15.2

Filtering and Monitoring

Educ8 will ensure that appropriate filtering and monitoring systems are in place to safeguard learners from potentially harmful and inappropriate online material, while ensuring that the systems do not unreasonably restrict access to information required for teaching and learning.

The **Headteacher at each site is the named senior person responsible for ensuring that the filtering and monitoring standards are met**, working with the DSL and IT support.

The **DSL** will take lead responsibility for safeguarding concerns identified through filtering and monitoring arrangements and will ensure that concerns are assessed, recorded and responded to in accordance with this policy.

IT support will support the technical implementation, maintenance, testing and effectiveness of filtering and monitoring arrangements.

The **Head of Safeguarding** will provide organisation-wide safeguarding oversight and assurance, including consideration of relevant safeguarding themes, risks and concerns arising from filtering and monitoring.

The Proprietor and governance arrangements will provide strategic oversight and seek assurance that appropriate filtering and monitoring systems are in place and remain effective.

The effectiveness of Educ8's filtering and monitoring arrangements will be formally reviewed **at least annually**, with appropriate recorded checks undertaken across relevant sites, devices and user groups. Arrangements will also be reviewed where there are significant changes to technology, provision or identified safeguarding risks.

Staff must remain vigilant to online safeguarding risks and must not rely solely on technical filtering and monitoring systems. Any concerning online activity identified through filtering, monitoring, staff observation, disclosure or other means must be reported promptly to the DSL/DDSL and recorded and responded to in accordance with Educ8's safeguarding procedures.

12.15.3 **Artificial Intelligence (AI), Deepfakes and Misinformation**

The school recognises that developments in artificial intelligence (AI) present both educational opportunities and safeguarding risks. Artificial intelligence technologies,

including generative artificial intelligence, may be used to create text, images, audio recordings and videos that appear realistic but may be inaccurate, misleading, manipulated or harmful.

Children may encounter misinformation, disinformation, conspiracy theories, manipulated media, deepfakes and other AI-generated content through social media platforms, online communities, gaming platforms, messaging applications and other digital environments.

The school recognises that generative artificial intelligence technologies may give rise to safeguarding, privacy, security, confidentiality and academic integrity concerns. Staff and learners will be supported to use such technologies safely, responsibly, ethically and appropriately.

The misuse of artificial intelligence may contribute to bullying, harassment, exploitation, fraud, sextortion, child-on-child abuse and the creation, possession or distribution of nude and semi-nude images, videos and live-streamed content.

The school is committed to promoting critical thinking, digital literacy and the safe, responsible and ethical use of technology and will continue to review emerging guidance and developments relating to artificial intelligence within educational settings.

12.15.4 **Cybercrime**

The school recognises that cybercrime is an increasingly significant and rapidly evolving safeguarding concern. Cybercrime may include phishing, hacking, malicious software attacks, denial-of-service attacks, online fraud, identity theft, data theft, unauthorised access to computer systems and other offences committed under the Computer Misuse Act 1990.

The school also recognises that children may become involved in cyber-enabled or cyber-dependent offending without fully understanding the consequences of their actions and that children may be vulnerable both as victims and perpetrators of cybercrime.

Where concerns arise, staff should seek advice from the Designated Safeguarding Lead (DSL), who may consult external agencies where appropriate, including the National Crime Agency's *Cyber Choices* programme.

Staff should remain alert to the possibility that an interest in computing, coding, gaming or technology may, in some circumstances, place children at increased risk of exploitation, coercion or involvement in cybercrime.

12.15.5 **Nude and Semi-Nude Images and Videos**

The school recognises that children may create, possess, request, receive, send or share nude and semi-nude images, videos or live-streamed content. Such material may be self-generated, digitally altered or created through the use of artificial intelligence (AI) technologies, including deepfakes and other manipulated content.

The school recognises that these behaviours may expose children to significant safeguarding risks, including coercion, exploitation, bullying, harassment, blackmail, sextortion, child-on-child abuse and criminal exploitation. Artificial intelligence technologies may also be used to facilitate impersonation and the creation or distribution of indecent images.

Any concern involving nude or semi-nude imagery, including AI-generated or digitally manipulated sexual imagery involving a child, must be reported immediately to the DSL/DDSL and managed in accordance with this policy and current statutory guidance.

Staff must not intentionally view, copy, print, store or distribute such material unless this is necessary, proportionate and undertaken in accordance with statutory guidance and the school's safeguarding procedures.

See also Educ8's Acceptable Use of Technology and Online Safety Policy for online safety, acceptable use and AI-generated imagery requirements

12.15.6 Reporting Concerns

All staff are expected to remain vigilant to emerging risks, exercise professional curiosity and report concerns promptly to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL).

Where an online safety, filtering, monitoring, cyber or technology concern also constitutes a safeguarding concern, it must be reported immediately to the DSL/DDSL and recorded on CPOMS in accordance with this policy. **Reporting the matter to IT or another operational lead does not replace the requirement to follow Educ8's safeguarding reporting procedures**

The DSL will consider the immediate safety of the child, their wishes, feelings and lived experiences, assess the level of risk to the child and others, determine the most appropriate course of action and seek support from external agencies where necessary.

Further guidance is provided within the Behaviour Policy, Educ8's Acceptable Use of Technology and Online Safety Policy, Relationships, Sex and Health Education (RSHE) curriculum, PSHE curriculum, PSHE Association-approved resources, staff safeguarding training and the school's safeguarding procedures.

12.16 Child Exploitation

Children may be at risk of exploitation in a variety of forms. Child exploitation is a form of abuse and may involve coercion, manipulation, deception or the misuse of power to exploit a child for criminal, sexual or financial gain.

Child exploitation may be perpetrated by an individual, an organised network or a criminal group. Children may not recognise that they are being exploited and, in some circumstances, may identify with, trust or feel loyalty towards those who are exploiting them.

Child exploitation may include, but is not limited to:

- child criminal exploitation (CCE), including county lines;
- child sexual exploitation (CSE);
- trafficking;
- modern slavery;
- financial exploitation; and
- other forms of organised criminal exploitation.

Child criminal exploitation may involve the use of coercion, intimidation, threats, violence, debt bondage, grooming, the misuse of technology or the use of weapons to facilitate criminal activity. Children may be exploited by individuals or organised networks and may be moved between locations as part of county lines activity.

Child sexual exploitation may be committed by an individual or an organised network and may occur in person or online. The school recognises that most sexual abuse is committed by individuals known to the victim.

Children who have been exploited, trafficked or subjected to modern slavery are victims of abuse and should be treated as such. Children cannot consent to their own exploitation, abuse or trafficking.

The school recognises that victims may be compelled to commit criminal acts as a result of coercion, intimidation, threats, manipulation or exploitation. Learners will not be viewed simply as perpetrators of criminal or harmful behaviour, and staff will take care to avoid victim-blaming or the inappropriate criminalisation of children who have been exploited.

The school recognises that child exploitation may constitute modern slavery and will have regard to relevant statutory guidance, including guidance relating to the National Referral Mechanism (NRM).

National Referral Mechanism (NRM)

Where concerns arise that a child may have been the victim of modern slavery, human trafficking, criminal exploitation or sexual exploitation, the Designated Safeguarding Lead (DSL) will work with children's social care, the police and other relevant agencies to consider whether a referral to the National Referral Mechanism (NRM) is appropriate.

Where applicable, children may also be entitled to support from an Independent Child Trafficking Guardian (ICTG).

Staff will remain alert to indicators of exploitation and will report concerns immediately to the Designated Safeguarding Lead (DSL). Where appropriate, the school will work collaboratively with children's social care, the police and other safeguarding partners to protect learners and reduce the risk of further harm.

Further guidance is provided through *Keeping Children Safe in Education*, statutory guidance relating to modern slavery and the National Referral Mechanism, staff safeguarding training and local safeguarding procedures.

The school recognises that protecting learners from radicalisation and extremism forms an essential part of its wider safeguarding responsibilities and is committed to fulfilling its duties under the Prevent duty.

The school recognises that radicalisation is a safeguarding issue and that children may be susceptible to extremist influences in the same way that they may be vulnerable to other forms of exploitation and abuse.

Radicalisation refers to the process through which an individual comes to support extremist ideologies or forms of terrorism. Extremism can take many forms and may be motivated by political, ideological, religious or other beliefs that seek to promote hatred, violence or the rejection of fundamental values and individual rights.

No single indicator confirms that a learner is being radicalised. However, staff will remain professionally curious and alert to changes in behaviour, presentation, language, online activity, peer associations, emotional wellbeing or patterns of attendance that may indicate increasing vulnerability.

Staff recognise that extremist content may be encountered through social media platforms, gaming platforms, messaging applications, artificial intelligence tools, online forums and other digital platforms.

Additional risk factors may include:

- Social isolation;
- Exposure to extremist views or harmful online content;
- Experiences of trauma, abuse or neglect;
- Mental health difficulties;
- Exploitation by individuals, groups or online communities;
- A desire for belonging, acceptance or status;
- Grievances or feelings of injustice; and
- Other vulnerabilities that may increase a learner's susceptibility to harmful influences.

Staff receive regular safeguarding and Prevent training and understand their responsibility to report concerns immediately to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL).

The DSL will consider the information available, seek advice where appropriate and determine whether additional support, multi-agency intervention or referral is required. Where appropriate, the DSL may seek advice from the local Prevent team or make a referral to Channel in accordance with local safeguarding procedures. The school will

work collaboratively with parents, carers and partner agencies whenever it is appropriate and safe to do so.

The school recognises that the Channel programme is a voluntary, confidential, multi-agency process designed to provide support to individuals who may be vulnerable to being drawn into terrorism or extremist activity. Where concerns indicate that a learner may be vulnerable to radicalisation, the Designated Safeguarding Lead (DSL) will consider whether a referral to Channel is appropriate. The school also recognises the importance of sharing information promptly, lawfully and proportionately with the police and other relevant agencies to support effective decision-making, risk assessment and intervention.

The school also recognises the importance of promoting critical thinking, mutual respect, tolerance, inclusion and a culture in which learners feel safe to express concerns, ask questions and seek support.

Further information is available within the school's Prevent Risk Assessment, Preventing Extremism and Radicalisation Policy, Educ8's Acceptable Use of Technology and Online Safety Policy and local safeguarding procedures.

12.18 **Domestic Abuse**

Domestic abuse can have a significant impact on a child's safety, health and wellbeing, whether it is experienced directly or indirectly. Children may witness domestic abuse within the home, experience the effects of coercive or controlling behaviour, or be exposed to the emotional, psychological, physical, sexual or financial abuse of others.

The school recognises that domestic abuse may include physical, emotional, psychological, sexual, financial, coercive or controlling behaviour and that the effects of domestic abuse may have a significant impact on a child's emotional wellbeing, behaviour, attendance, educational progress and relationships.

The school also recognises that, in some circumstances, children may display abusive, violent or controlling behaviour towards parents, carers or other family members. Such behaviour will be considered within the context of the learner's wider circumstances and safeguarding needs, and staff will adopt a child-centred approach to understanding the underlying causes, risks and support needs of everyone involved.

The school recognises its responsibilities under Operation Encompass and will ensure that information shared by the police relating to incidents of domestic abuse is managed confidentially, shared appropriately and used to provide timely support and protection for affected children. The Designated Safeguarding Lead (DSL) will ensure that notifications are reviewed promptly and that appropriate support, intervention and risk management measures are implemented where necessary.

The school will respond to concerns in a child-centred manner and will work collaboratively with parents, carers and partner agencies, where appropriate and safe to do so, in order to safeguard and support affected learners.

12.19 **Serious Violence**

Some learners may be at risk of serious violence as victims, witnesses or perpetrators. Serious violence may be associated with child criminal exploitation, county lines activity, gang association, coercion, weapons, substance misuse, domestic abuse, online harm, child-on-child abuse or organised criminal activity. These concerns may overlap, and staff should consider the learner's wider circumstances and exercise professional curiosity.

Indicators of increased risk may include:

- unexplained, persistent or severe absence or episodes of going missing;
- declining engagement, attendance or attainment;
- changes in friendships, peer groups, behaviour, appearance or routines;
- unexplained money, gifts, clothing, mobile phones or other possessions;
- increased secrecy, withdrawal or social isolation;
- unexplained injuries, fear, anxiety, aggression or changes in emotional wellbeing;
- substance misuse or criminal/antisocial behaviour;
- coercive, controlling or exploitative relationships;
- gang association or fear of particular individuals, groups or locations;
- carrying knives, weapons or other prohibited items; and
- indicators of child criminal exploitation, including county lines activity.

Staff must record and report concerns promptly in accordance with Educ8's safeguarding procedures. **Any concern that a learner is carrying or using a weapon, or has expressed an intention to carry or use a weapon, must be reported immediately to the DSL/DDSL.**

The DSL/DDSL will assess the risk to the **individual learner and to others in the school**, taking account of wider safeguarding information, peer relationships and contextual factors. Depending on the nature and level of risk, action may include immediate protective measures, individual and/or site-level risk assessment, a safety and support plan, action to de-escalate peer conflict, appropriate information sharing and referral to Children's Social Care, the police or other relevant agencies.

Safeguarding action and risk assessments will be reviewed as circumstances change, taking account of both the learner's vulnerability and any risk they may present to others. Educ8 will work with parents and carers, where appropriate and safe, and relevant safeguarding partners and agencies to reduce risk and safeguard learners from harm.

Further information is available within the **Behaviour Policy, Section 13.8 and Appendix J of this policy, the Prevent Risk Assessment, Attendance Policy and local safeguarding procedures.**

12.20 Educ8 recognises that safeguarding responsibilities extend to sporting, enrichment and off-site activities, whether these take place on school premises or at external venues. Appropriate safeguarding arrangements will be maintained whenever learners participate in such activities, including travel in school vehicles, attendance at gyms and sporting venues and participation in organised competitions.

Risk assessments, staffing and supervision arrangements, communication procedures and any individual safeguarding measures will reflect the nature of the activity, the needs and vulnerabilities of the learners involved and any identified risks. Particular consideration will be given to safeguarding risks associated with:

- one-to-one working arrangements;
- physical contact during sporting activities;
- changing and washing facilities;
- transport arrangements;
- online communication;
- peer interactions; and
- the use of external venues, coaches and providers.

All staff, volunteers, coaches, contractors and external providers must maintain appropriate professional boundaries, comply with Educ8's safeguarding arrangements and report concerns promptly through the school's safeguarding procedures. The welfare, safety, privacy and dignity of learners will remain central to all arrangements.

Participation in Sport

Participation in physical education, sporting activities and competitive sport will be managed in accordance with current statutory requirements and guidance relating to safeguarding, sex, safety, fairness and competitive integrity.

Where a sport needs to be taught or played in single-sex groups for reasons of **physical safety**, Educ8 will apply the relevant single-sex participation requirements and no exceptions will be made where this is necessary to protect participants. Single-sex participation may also be appropriate where necessary to ensure fair competition, having regard to the nature of the activity and relevant guidance from the appropriate National Governing Body.

Where no safety concern arises and a learner requests alternative participation arrangements, the request will be considered individually in accordance with current statutory guidance, taking account of the learner's best interests, the impact on other learners and the need to maintain safe and fair participation.

Any individual arrangements or decisions will be appropriately recorded and reviewed where necessary.

12.21

Regulations and Safeguarding Requirements Relating to School Premises

The school recognises that effective safeguarding extends to the physical environment in which children learn and participate in activities. Appropriate arrangements will therefore be implemented to maintain a safe, secure and suitable environment for all learners.

Safeguarding arrangements relating to school premises will include:

- appropriate supervision of learners;
- effective site security and visitor management procedures;
- arrangements for contractors, volunteers and external providers;
- health and safety procedures;
- first-aid arrangements;
- fire safety procedures;
- risk assessment processes;
- transport arrangements;
- the safe use of external facilities and venues; and
- appropriate safeguarding arrangements for educational visits, sporting activities and enrichment opportunities.

The school will ensure that safeguarding arrangements relating to school premises remain consistent with statutory requirements, the Independent School Standards and local safeguarding procedures.

12.22 **So-called Honour-based Abuse (HBA), Forced Marriage and Female Genital Mutilation (FGM)**

So-called honour-based abuse (HBA) is a form of abuse committed to protect or defend the perceived honour of an individual, family or community. It may include female genital mutilation (FGM), forced marriage and other harmful practices.

Staff receive safeguarding training to recognise potential indicators of so-called honour-based abuse and understand their statutory responsibilities, including the mandatory reporting duty for known cases of FGM involving girls under the age of 18 this will be reported directly to the Police. Any concerns will be reported immediately to the Designated Safeguarding Lead (DSL) and managed in accordance with statutory guidance.

Further information is available in *Keeping Children Safe in Education* and through staff safeguarding training

12.23 **Substance Misuse**

Substance misuse may place learners at increased risk of abuse, neglect, exploitation and other safeguarding concerns.

The school adopts a safeguarding approach to substance misuse, recognising that a learner's involvement with drugs, alcohol, vaping or other substances may indicate wider vulnerabilities requiring support and intervention. Staff will report concerns in accordance

with this policy, with appropriate safeguarding and pastoral support provided in partnership with parents, carers and external agencies where appropriate.

Further guidance is available within the school's Drugs, Alcohol and Substance Misuse Policy.

12.24 **Children Missing Education and Elective Home Education**

Children missing education, including those who are persistently or severely absent, are at increased risk of abuse, neglect, exploitation, radicalisation and other safeguarding concerns.

The school recognises that children living in temporary accommodation may experience additional barriers to education, attendance, health, wellbeing and safeguarding. Staff will work collaboratively with local authorities, families and partner agencies to ensure that appropriate support is identified and provided where additional needs are identified.

Where the school receives notification that a learner has been placed in temporary accommodation, the Designated Safeguarding Lead (DSL) and relevant school leaders will consider any implications for the child's safeguarding, attendance, wellbeing and educational needs and ensure that appropriate support is provided.

The school promotes good attendance and responds promptly to unexplained absence, recognising that attendance concerns may indicate wider safeguarding needs. Attendance and children missing education concerns will be considered alongside all other safeguarding information and managed in accordance with the school's Attendance and Children Missing Education Policy, statutory guidance and local authority procedures

The school also recognises that parents, carers and others with parental responsibility have the legal right to educate their child at home. While Elective Home Education (EHE) is not, in itself, a safeguarding concern, any request to remove a learner from the school roll for EHE will be considered in accordance with statutory guidance, local procedures and the school's safeguarding arrangements to ensure that the welfare of the child remains paramount.

When a learner leaves Educ8, the school will make reasonable enquiries to establish their destination and will transfer safeguarding information securely to the receiving education setting or local authority, where appropriate and in accordance with statutory requirements.

13. **Operational Safeguarding**

The following operational arrangements support Educ8's safeguarding responsibilities and reflect the school's commitment to maintaining a safe, inclusive and child-centred

environment. Safeguarding arrangements are implemented in accordance with statutory guidance, local safeguarding procedures and the school's policies and procedures.

All staff are expected to remain professionally curious, maintain accurate records, share information appropriately and report concerns promptly in accordance with Section 11 of this policy.

Further guidance can be found within the Safeguarding Setting Schedule; Appendix D (Safeguarding Reporting Flowchart), Appendix E (Safeguarding Responsibilities and Accountability) and Appendix F – Thresholds of Need and Referral Guidance

13.1 Attendance

Attendance is a fundamental safeguarding responsibility. Poor attendance, persistent absence, severe absence and children missing education may indicate wider safeguarding concerns, including abuse, neglect, exploitation, criminal activity, mental health difficulties or family difficulties

Attendance information is monitored regularly to identify patterns, trends and emerging concerns. Staff will work proactively with learners, parents, carers and partner agencies to remove barriers to attendance and reduce risk.

Concerns relating to attendance will be managed in accordance with the Attendance and Children Missing Education Policy and referred promptly to the Designated Safeguarding Lead (DSL) where safeguarding concerns are identified.

13.2 Alternative Provision and Dual Registration

Safeguarding responsibilities remain with the school where a learner attends alternative provision, vocational provision, another educational establishment or an off-site placement. The use of alternative provision does not remove or transfer the school's responsibility for safeguarding and promoting the welfare of the learner.

Before any placement begins, the school will satisfy itself that appropriate safeguarding arrangements are in place and that the provision is suitable for the individual learner. This will include, as appropriate:

- safeguarding and child protection policies and procedures;
- appropriate safer recruitment and suitability arrangements for adults working with learners;
- arrangements for attendance monitoring, including prompt notification of unexplained or unexpected absence;

- clear communication and information-sharing arrangements between the school and provider;
- consideration of the learner's individual needs, vulnerabilities and known safeguarding risks;
- appropriate risk assessments and risk-management arrangements;
- clear procedures for reporting safeguarding concerns and allegations concerning adults; and
- arrangements for ongoing monitoring and quality assurance of the placement.

Relevant safeguarding information will be shared with the provider where necessary, proportionate and lawful to enable the provider to safeguard and support the learner effectively.

The school will maintain appropriate contact with the learner and regular communication with the provider and, where appropriate, parents, carers and relevant partner agencies. Attendance, welfare, behaviour, emerging safeguarding concerns and the continued suitability of the placement will be monitored throughout the placement.

Any safeguarding concern arising within alternative provision will be reported promptly to the school's DSL/DDSL and managed in accordance with this policy and relevant local safeguarding procedures. Where concerns arise about the safety, suitability or safeguarding arrangements of a placement, the school will take appropriate action, which may include reviewing, suspending or ending the placement.

Where a learner is dual registered, clear arrangements will be established between settings regarding attendance, behaviour, safeguarding responsibilities, information sharing, reporting concerns and the management of safeguarding information.

13.3 **Work Experience**

The school recognises the value of work experience, employer engagement and vocational learning opportunities while also recognising the importance of maintaining appropriate safeguarding arrangements.

Before a placement commences, the school will ensure that:

1. appropriate risk management arrangements are in place and any necessary risk assessments have been completed;
2. appropriate supervision arrangements have been considered and agreed;
3. safeguarding responsibilities are clearly understood by the school, employer and learner;
4. learners understand how to seek help and report concerns;
5. the employer has appropriate arrangements in place to safeguard and promote the welfare of children; and
6. consideration is given to whether any adult supervising or working with a learner requires an appropriate Disclosure and Barring Service (DBS) check, having regard

to the nature and frequency of the activity, whether it constitutes regulated activity and the requirements of current statutory guidance.

DBS checks will not be requested routinely from all employers or employees involved in work experience. The school will determine whether a check is required or appropriate in accordance with the regulated activity requirements and *Keeping Children Safe in Education*.

Any safeguarding concerns arising during a placement will be reported to the DSL/DDSL and managed in accordance with this policy and current statutory guidance.

Separate safeguarding arrangements apply where learners attend alternative provision, educational visits, trips or other off-site activities. The school will ensure that appropriate safeguarding, suitability, supervision, risk assessment and information-sharing arrangements are considered in accordance with the nature of the provision or activity and relevant statutory guidance and Educ8 policies and procedures.

13.4 **Behaviour and Safeguarding**

Positive relationships and behaviour support effective safeguarding practice. Behaviour management arrangements are intended to promote safety, wellbeing, inclusion and mutual respect.

Staff recognise that changes in behaviour may indicate an underlying safeguarding concern and will consider the wider context surrounding a learner's presentation, experiences and circumstances.

Behaviour concerns will therefore be considered alongside attendance, wellbeing, online activity, peer relationships, exploitation risks and other relevant safeguarding information.

13.5 **Physical Intervention, Reasonable Force and Restrictive Intervention**

The school recognises that there may be circumstances where the use of reasonable force or other restrictive intervention is necessary, lawful and proportionate to prevent a learner from causing injury to themselves or others, committing a criminal offence, damaging property or causing disorder.

Staff will prioritise positive relationships, prevention, de-escalation and positive behaviour support, using the least restrictive intervention and no more force than is necessary for the least amount of time. Reasonable force or restrictive intervention must never be used as a form of punishment.

Any intervention must take account of the learner's individual circumstances and welfare, including SEND, disability, medical needs, communication needs, previous trauma and other safeguarding vulnerabilities. Where there is an identified likelihood that restrictive

intervention may be required, appropriate individual risk assessments and, where appropriate, behaviour support plans will be implemented.

Every significant incident involving the use of force will be recorded as soon as practicable and parents/carers informed as soon as practicable, normally on the same day, in accordance with statutory requirements. Incidents will be reviewed to identify safeguarding concerns, unmet needs, patterns and any additional support, risk-management or staff-training requirements.

Any use of reasonable force or restrictive intervention must be undertaken in accordance with this policy, the Behaviour Policy, relevant individual risk assessments and the Department for Education's *Restrictive interventions, including use of reasonable force, in schools* guidance (July 2026)

13.6 **Site Security, Visitors and Contractors**

Educ8 maintains appropriate arrangements to safeguard learners, staff and visitors while ensuring that the school remains a welcoming and supportive environment.

Appropriate arrangements are in place in relation to:

- Visitor identification procedures;
- Signing-in arrangements;
- Supervision of visitors and contractors;
- Site access and security systems;
- Safeguarding information for visitors;
- Emergency procedures; and
- Appropriate use of technology and recording devices.

Any concerns relating to the conduct of visitors or contractors will be reported immediately in accordance with safeguarding procedures.

13.7 **Mobile Phones, Personal Devices and Smart Technology**

The school recognises that mobile phones, personal devices and smart technology can present safeguarding risks to children. The school will maintain clear and consistent arrangements for their safe and appropriate use and will take proportionate action where their use gives rise to a safeguarding concern.

Learners are required to hand in mobile phones and other personal devices on arrival at school. Devices will be stored securely and returned at the end of the school day. Staff will

remain alert to attempts to retain, conceal or misuse devices and will consider whether such behaviour gives rise to a safeguarding concern.

Staff will remain vigilant to safeguarding risks associated with mobile phones, personal devices and smart technology, including:

- cyberbullying, harassment and online abuse;
- child-on-child abuse;
- online grooming, exploitation and coercion;
- sexually coerced extortion (sextortion);
- the creation, possession, requesting or sharing of nude or semi-nude images, videos or livestreams;
- exposure to inappropriate, harmful or illegal content;
- radicalisation and extremist material;
- the misuse of artificial intelligence (AI), including generative AI and deepfake technology;
- unauthorised photography, audio recording or video recording;
- breaches of privacy, confidentiality or data protection;
- location sharing, tracking or other activity that may place a child at risk;
- contact with unknown or potentially harmful individuals; and
- misuse of social media, messaging platforms, gaming platforms or other online services.

Staff will recognise that the use or misuse of a device may provide an indicator of wider safeguarding concerns, including child-on-child abuse, sexual harassment, exploitation, coercive or controlling behaviour, criminal exploitation, bullying, self-harm, radicalisation or abuse occurring outside school.

Where the use, possession or content of a mobile phone or other device gives rise to a safeguarding concern, staff must report this promptly to the Designated Safeguarding Lead (DSL) or Deputy DSL (DDSL). Safeguarding concerns will be assessed in the context of the child's individual circumstances and any wider information known to the school and will be recorded and managed in accordance with the school's safeguarding procedures.

Where a device may contain evidence of abuse, exploitation, criminal activity or the sharing of nude or semi-nude images, staff must not unnecessarily view, copy, forward, share or store the content. The DSL/DDSL will determine the appropriate safeguarding response and whether advice or involvement from children's social care, the police or another relevant agency is required.

Generative Artificial Intelligence (AI)

The school recognises that generative artificial intelligence (AI) technologies present both educational opportunities and safeguarding risks. Staff and learners will be supported to use such technologies safely, responsibly, ethically and appropriately.

AI-generated content may be inaccurate, misleading, manipulated or harmful and its use may give rise to safeguarding, privacy, security, confidentiality and other concerns. Particular safeguarding risks include the creation or manipulation of abusive, sexualised or sexually explicit material, including images, audio, video and deepfakes involving children.

Staff will remain alert to the potential use of AI to facilitate bullying, harassment, impersonation, grooming, exploitation, coercion, misinformation or other forms of harm. Any safeguarding concern relating to the use or misuse of AI will be reported promptly to the DSL/DDSL and managed in accordance with the school's safeguarding procedures.

The school will continue to review emerging safeguarding risks and relevant statutory guidance relating to artificial intelligence and technology.

The school will work with parents and carers, where appropriate, to promote children's online safety, digital resilience and safe and responsible use of technology.

13.8 **Searching, Screening and Confiscation**

Educ8 recognises that searching, screening and confiscation may be necessary to maintain a safe environment for learners, staff and visitors. Any action taken will place the welfare and safeguarding of the learner at the centre of decision-making and will be carried out lawfully, reasonably and proportionately.

Where appropriate, staff should first seek the learner's cooperation. Where there are reasonable grounds to suspect that a learner is in possession of a prohibited item, the Headteacher or a member of staff authorised by the Headteacher may undertake a search without the learner's consent in accordance with statutory powers and current Department for Education guidance.

Prohibited items include:

- knives and weapons;
- alcohol;
- illegal drugs;
- stolen items;
- tobacco, cigarette papers and associated products;
- fireworks;
- pornographic images;
- any article that has been or is likely to be used to commit an offence, cause personal injury or damage property; and

- any other item identified within the school's rules as an item for which a search may be undertaken.

Searches must be conducted with due regard to the learner's dignity, privacy, individual needs and safeguarding circumstances. Staff should consider whether the learner has SEND, communication needs, a history of trauma or other vulnerabilities which may affect how a search should be conducted.

The possession of a prohibited item, or the circumstances leading to a search, may indicate an underlying safeguarding concern. Where this is the case, the Designated Safeguarding Lead (DSL) or Deputy DSL must be informed and consideration given to any further safeguarding action or support required.

Searches, confiscation and the disposal or retention of items will be undertaken in accordance with statutory guidance, the school's Behaviour Policy, Offensive Weapons Policy and the procedures contained within Appendix J – Online Safety, Mobile Phone, Mobile Device and Searching Procedures.

13.9 Whistleblowing

Educ8 promotes a culture of openness, accountability, professional curiosity and respectful challenge in which staff feel able to raise concerns about poor or unsafe safeguarding practice, failures within the school's safeguarding arrangements, unsafe behaviour, policy breaches or other wrongdoing without fear of detriment.

All staff, volunteers, contractors, agency workers and other adults working with or on behalf of Educ8 have a responsibility to raise safeguarding concerns and should be confident that concerns will be taken seriously and addressed promptly.

Immediate concerns about the safety or welfare of a child must be reported through the safeguarding procedures set out in this policy and must not be delayed while a whistleblowing concern is considered or raised.

Where a concern relates to the conduct of a member of staff, volunteer, contractor, agency worker or another adult working with children, staff must follow **Section 14 – Allegations Against Adults Working With Children**, the **Staff Code of Conduct** and **local LADO procedures**, as applicable.

Concerns about poor or unsafe safeguarding practice, systemic safeguarding failures, the suppression or mishandling of safeguarding concerns, or wider organisational wrongdoing should be raised and managed in accordance with Educ8's **Whistleblowing Policy**.

Staff may seek advice from the DSL or Head of Safeguarding where they are uncertain about the appropriate safeguarding route. However, uncertainty about the correct reporting route must never delay action where a child may be at risk.

Individuals raising or supporting a genuine concern or protected disclosure will be supported and must not suffer detriment as a result of doing so. Concerns may be raised anonymously where appropriate and in accordance with Educ8's **Whistleblowing Policy**.

Where a member of staff believes that a safeguarding concern has not been addressed appropriately, they are expected to escalate the matter in accordance with this policy and/or Educ8's **Whistleblowing Policy**, as appropriate.

Staff may also seek independent advice from the **NSPCC Whistleblowing Advice Line**. External disclosures should be made in accordance with the routes and protections set out within Educ8's **Whistleblowing Policy**.

- 13.10 **Medical Conditions, Medical Needs and Anaphylaxis** Educ8 recognises that learners with medical conditions, including severe allergies and those at risk of anaphylaxis, may require additional arrangements to support their **health, safety, wellbeing, inclusion and participation in education**.

Medical conditions may affect a learner's attendance, participation, communication, behaviour and emotional wellbeing and, in some circumstances, may increase safeguarding vulnerability, including the risk of bullying, isolation, discrimination, abuse, neglect or exploitation, or create additional barriers to recognising, responding to or reporting concerns.

A medical incident, including one relating to an allergy or other medical condition, does not in itself constitute a safeguarding concern or automatically require a safeguarding referral. However, safeguarding procedures must be followed where the circumstances indicate that a learner may be at increased risk of abuse, neglect or exploitation because of their medical condition or medical needs. This may include, for example, where relevant medical information has not been provided to the school or a learner is repeatedly sent to school without essential medication in circumstances that place them at risk.

Educ8 will ensure that appropriate arrangements are in place to identify and support learners with known medical conditions, reduce identified risks and respond effectively to medical emergencies. Where appropriate, this will include **Individual Healthcare Plans (IHPs), Allergy Action Plans, risk assessments and emergency response arrangements**, developed in consultation with the learner, parents and carers, healthcare professionals and, where relevant, social workers and other agencies.

Staff must be aware of and follow the individual arrangements established for learners in their care. Relevant medical information will be shared appropriately with those who need it to keep the learner safe, including where learners attend **alternative provision, work experience, educational visits or other off-site activities**. Learners should not be unnecessarily disadvantaged or excluded from educational opportunities where their medical needs and associated risks can be reasonably and safely managed.

Educ8 will maintain appropriate arrangements for staff awareness and training, communication, record keeping and the safe storage, accessibility and use of emergency medication. Staff who may be required to respond to an allergic reaction or other medical emergency will receive appropriate information and training to enable them to respond promptly and appropriately.

The wishes, feelings, lived experiences and individual circumstances of the learner will be considered when decisions are made about their safeguarding, health and support, taking account of their age and understanding.

Where a medical condition, allergy or related incident gives rise to a **safeguarding concern**, including concerns about neglect of a learner's medical needs, their welfare or their ability to participate safely in education, staff must report the concern to the **DSL/DDSL** in accordance with this policy.

Detailed operational arrangements for the management of allergies and anaphylaxis, including Allergy Action Plans, risk assessment, staff training, medication and adrenaline auto-injectors (AAIs), are set out in Educ8's **Allergens and Anaphylaxis Policy** and associated **Supporting Learners with Medical Conditions, First Aid, Medicines Management and Health and Safety procedures**.

13.11 Protective Security and Martyn's Law

Educ8 recognises the importance of maintaining effective arrangements to protect learners, staff and visitors from potential security threats and major incidents.

Although the school does not currently meet the threshold requirements associated with Martyn's Law, Educ8 remains committed to adopting a proportionate and risk-based approach to protective security, emergency planning and incident response.

This includes the regular review of site security arrangements, visitor procedures, lockdown arrangements, staff training, communication procedures and risk assessments. The school will continue to monitor developments in legislation and guidance and will review its arrangements accordingly.

14. Allegations Against Adults Working With Children

Educ8 is committed to safeguarding children and maintaining a culture of openness, transparency, accountability, professional curiosity and respectful challenge. All concerns relating to the conduct of adults working with children will be taken seriously and managed promptly, fairly and consistently in accordance with statutory guidance and local safeguarding procedures.

This section applies to all adults working with or on behalf of Educ8, including employees, supply and agency staff, volunteers, governors, proprietors, contractors, visitors, trainee teachers and other adults undertaking work within the school environment.

Concerns about adults will be considered under one of two safeguarding processes:

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

Concerns may arise from behaviour within or outside the school environment. Conduct outside school will be considered where it may indicate that an individual is unsuitable to work with children or may present a transferable risk to children.

Where safeguarding concerns relate to an individual employed by an external organisation, including supply agencies, contractors, training providers or other organisations, Educ8 will work collaboratively with the relevant employer or organisation to ensure that concerns are managed appropriately and information is shared lawfully and without delay.

The welfare and safety of the child will remain paramount throughout the management of any allegation or concern.

Further guidance is contained within the **Staff Code of Conduct**, local safeguarding procedures and Local Authority Designated Officer (LADO) arrangements.

14.1 **Allegations Meeting the Harm Threshold**

Any concern or allegation that an adult working with children may have:

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

must be reported immediately to the **Headteacher**.

The final criterion may include behaviour that has occurred outside the school and does not necessarily involve a child, where that behaviour may indicate a transferable risk to children.

Where the concern relates to the Headteacher, it must be reported immediately to the **Proprietor**. Concerns relating to the Proprietor will be managed in accordance with statutory guidance and local safeguarding procedures.

Where a child is at immediate risk of harm, appropriate action must be taken without delay to secure the child's safety. This may include contacting Children's Social Care, the Police or emergency services.

The person responsible for managing the allegation will act as the **case manager** and will ensure that the matter is managed in accordance with statutory guidance and local LADO procedures.

The case manager will undertake appropriate basic enquiries to establish the facts and determine whether there is sufficient information to suggest that the harm threshold may have been met. Such enquiries must not compromise or jeopardise any potential Police, Children's Social Care or LADO investigation.

Where the harm threshold may have been met, or where there is uncertainty about whether the threshold has been met, advice will be sought from the **Local Authority Designated Officer (LADO)** without delay.

The school will not undertake a substantive internal investigation before consultation with the LADO, Police or Children's Social Care where their involvement may be required.

The Designated Safeguarding Lead (DSL) will ensure that the safeguarding needs of any child involved are assessed and that appropriate support, protection and risk-management arrangements are implemented.

Where allegations involve supply staff, trainee teachers, volunteers, contractors or agency workers, Educ8 will work collaboratively with the relevant employer, agency or training provider. The school will ensure that safeguarding responsibilities are fulfilled and will not cease using an individual's services solely as an alternative to properly investigating and resolving a safeguarding concern.

Suspension will not be an automatic response to an allegation. Any decision regarding suspension or alternative working arrangements will be considered carefully on a case-by-case basis, taking account of the welfare of children, identified risks and advice received from the LADO or other relevant agencies.

Appropriate confidentiality will be maintained throughout the process. Information will be shared only with those who have a legitimate professional need to know and in accordance with statutory requirements.

The school will ensure that appropriate support is available to the child or children involved and to the individual who is the subject of the allegation.

Where an allegation is investigated, the outcome will be recorded using the appropriate terminology:

- **substantiated;**
- **unsubstantiated;**

- **unfounded**;
- **false**; or
- **malicious**.

Where the circumstances meet the relevant statutory threshold, Educ8 will fulfil its responsibilities regarding referral to the **Disclosure and Barring Service (DBS)** and will consider whether referral to the **Teaching Regulation Agency (TRA)** or another relevant professional or regulatory body is required.

Allegations relating to historical or non-recent incidents will also be taken seriously and managed in accordance with statutory guidance. Where an allegation relates to an incident when an individual or organisation was responsible for the child, the matter will be reported to the Police and/or Children's Social Care as appropriate.

14.2 **Low Level Concerns**

Educ8 recognises the importance of creating a culture in which all concerns about adults working with children are shared responsibly, recorded and dealt with appropriately.

A **low-level concern** is any concern, no matter how small and even where it may amount to no more than causing a sense of unease or a "nagging doubt", that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the **Staff Code of Conduct**, including inappropriate conduct outside work; and
- does not meet the harm threshold or is otherwise not sufficiently serious to require referral to the LADO.

Examples may include, but are not limited to:

- being over-friendly with children;
- having favourites;
- taking photographs of children on a personal mobile phone contrary to school procedures;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door where this is inappropriate;
- using inappropriate sexualised, intimidating or offensive language;
- breaches of professional boundaries;
- inappropriate use of technology or social media;
- breaches of safeguarding procedures; or
- other behaviour that is inconsistent with expected professional conduct.

Low-level concerns may arise in a number of ways, including through observation, disclosure, information received from another person, a complaint or a concern raised by the individual themselves.

Staff are encouraged to **self-refer** where they believe that they may have acted in a way that could be misinterpreted, may appear compromising to others or may have fallen below expected professional standards.

All low-level concerns must be reported promptly to the **Headteacher**. Where the concern relates to the Headteacher, it must be reported to the Proprietor.

The Headteacher will be the ultimate decision-maker in respect of low-level concerns and will determine the appropriate response, seeking advice from the DSL, Head of Safeguarding, Human Resources or LADO where appropriate.

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

Where a low-level concern relates to an individual employed by a supply agency, contractor or other external organisation, the concern will also be shared with the individual's employer so that appropriate action can be considered collaboratively.

All low-level concerns will be **recorded in writing on Educ8's Low-Level Concerns spreadsheet**.

The record will include:

- details of the concern;
- the context in which the concern arose;
- the action taken;
- decisions reached and the rationale for those decisions; and
- where appropriate, the name of the individual raising the concern.

Where an individual wishes to remain anonymous, this will be respected as far as reasonably possible.

The Low-Level Concerns spreadsheet will be maintained securely and confidentially, with access restricted to authorised personnel and managed in accordance with data-protection and record-retention requirements.

Low-level concerns will be reviewed regularly to identify patterns of inappropriate, problematic or concerning behaviour.

Where a pattern is identified, the school will consider whether further action is required. This may include:

- additional supervision, guidance or training;
- review of working practices or professional boundaries;
- disciplinary or capability procedures where appropriate;
- review of the Staff Code of Conduct or other safeguarding arrangements;
- consideration of wider cultural or organisational issues; or

- consultation with or referral to the LADO where the harm threshold may have been met.

Low-level concerns will not be ignored simply because an individual incident appears minor. The cumulative picture will be considered when assessing risk and determining whether further action is required.

14.3 **Confidentiality, Record Keeping and Support**

Records relating to allegations and low-level concerns will be maintained securely and confidentially in accordance with statutory guidance, data-protection legislation and Educ8's record-retention arrangements.

Records relating to allegations that meet, or may meet, the harm threshold will be maintained separately from the Low-Level Concerns spreadsheet and managed in accordance with statutory and local LADO requirements.

Information will be shared only with individuals who have a legitimate professional need to know and where sharing is lawful, necessary and proportionate.

Records will clearly document:

- the nature of the allegation or concern;
- relevant contextual information;
- actions taken;
- advice received;
- decisions reached and the rationale for those decisions;
- referrals made;
- outcomes; and
- any ongoing safeguarding or support arrangements.

The school recognises that allegations and concerns can be distressing for everyone involved. Appropriate support, guidance and supervision will therefore be provided to the child or children concerned, the individual who is the subject of the allegation or concern and other affected individuals where appropriate.

The wishes, feelings and lived experiences of the child will be considered throughout the safeguarding process, and the welfare of the child will remain paramount.

14.4 **Learning Lessons and Quality Assurance**

Educ8 will review allegations, low-level concerns and their outcomes to identify patterns, emerging themes, safeguarding risks, training needs and opportunities for organisational learning and improvement.

Reviews will consider whether:

- safeguarding policies and procedures were followed;
- concerns were identified and reported promptly;
- appropriate professional challenge was demonstrated;
- information was shared effectively;
- appropriate advice and referrals were sought;
- professional boundaries and expectations are sufficiently clear;
- additional staff training, supervision or support is required;
- patterns of low-level concerns indicate a wider safeguarding or cultural issue; and
- changes to policies, procedures, working practices or safeguarding arrangements are required.

Where lessons are identified, appropriate actions will be recorded, implemented and monitored.

Information arising from allegations and low-level concerns will contribute to Educ8's wider safeguarding quality assurance arrangements, staff training, policy review and governance oversight.

The Head of Safeguarding will monitor relevant themes and trends across Educ8 and provide appropriate safeguarding assurance to senior leaders, governors and the Proprietor while maintaining necessary confidentiality.

This process supports Educ8's commitment to maintaining a strong safeguarding culture in which concerns about adults are identified early, reported appropriately, managed effectively and used to support continuous improvement.

15. Safeguarding Management

Educ8 is committed to maintaining a strong safeguarding culture in which the welfare of children is paramount. Safeguarding arrangements are reviewed continuously to ensure that they remain effective, child-centred and fully aligned with statutory guidance, local safeguarding arrangements and emerging risks.

Safeguarding management arrangements are designed to ensure effective leadership, clear accountability, continuous improvement, robust quality assurance and appropriate governance oversight across all Educ8 provisions.

Further guidance can be found within the Safeguarding Setting Schedule, Appendix E (Safeguarding Responsibilities and Accountability),

15.1 Safer Recruitment

Recruiting and retaining suitable adults is a fundamental element of safeguarding and promoting the welfare of children.

The school will comply with all relevant legislation and statutory guidance, including *Keeping Children Safe in Education (KCSIE)*, the Independent School Standards, safeguarding legislation, safer recruitment requirements, and current requirements relating to regulated activity, volunteer supervision arrangements and the maintenance of the Single Central Record (SCR).

Appropriate checks will be completed before any member of staff, volunteer, governor, proprietor, agency worker, contractor or other adult begins work where such checks are required. These checks may include:

- identity verification;
- enhanced Disclosure and Barring Service (DBS) checks;
- barred-list checks;
- prohibition checks;
- overseas checks;
- qualification verification;
- right-to-work checks;
- references; and
- consideration of an online search, using an appropriate online search engine, as part of due diligence on shortlisted candidates, in accordance with Keeping Children Safe in Education and Educ8's Safer Recruitment Policy. Shortlisted candidates will be informed that such searches may be undertaken as part of the due-diligence process.

The school recognises that safeguarding responsibilities apply equally to employees, volunteers, agency workers, contractors, self-employed individuals, visitors and others working within the school environment, and appropriate levels of supervision, risk assessment and vetting will be undertaken in accordance with statutory requirements.

The school recognises that changes to the definition of regulated activity from 1 September 2026 removed the previous supervision exemption for certain volunteer roles and strengthened the safeguarding requirements that apply to volunteers and other adults working with children. Appropriate safeguarding arrangements, risk assessments and vetting checks, including enhanced DBS checks with children's barred list information where required, will be undertaken in accordance with current statutory guidance and legal requirements.

The school recognises that certain volunteer roles may constitute regulated activity where they involve teaching, training, instructing, caring for or supervising children, including circumstances in which these activities take place more than three days within a 30-day period or overnight. Appropriate checks will be

undertaken in accordance with current statutory requirements and the school's safer recruitment procedures

The school maintains an accurate and up-to-date Single Central Record (SCR), which is subject to regular review and quality assurance activities.

At least one member of every recruitment panel will have completed recognised safer recruitment training.

Any safeguarding concerns arising during recruitment, vetting or employment processes will be managed promptly and referred to the appropriate agencies where necessary. The school recognises its duty to make referrals to the Disclosure and Barring Service (DBS), the Teaching Regulation Agency (TRA) and any other relevant professional or regulatory body where the legal threshold for referral has been met.

Further information is contained within the school's Safer Recruitment Policy.

15.2 **Staff Induction and Safeguarding Training**

The school recognises that effective safeguarding arrangements depend upon all staff understanding their individual and collective responsibilities for safeguarding and promoting the welfare of children.

All staff, governors, volunteers, agency staff, contractors and regular visitors will receive appropriate safeguarding information, induction and training upon appointment and at regular intervals thereafter.

As part of the induction process, staff will be required to read and understand:

- Part One of *Keeping Children Safe in Education (KCSIE) 2026*;
- Annex B of *Keeping Children Safe in Education (KCSIE) 2026*, where appropriate to their role;
- This Safeguarding and Child Protection Policy;
- The Staff Code of Conduct;
- The Behaviour Policy;
- Educ8's Whistleblowing Policy;
- Educ8's Acceptable Use of Technology and Online Safety Policy
- The school's safeguarding response to children who are absent from education; and

All staff will be required to read Part One of *Keeping Children Safe in Education (KCSIE) 2026*. Staff with additional safeguarding responsibilities, including governors, senior leaders, Designated Safeguarding Leads (DSLs), Deputy

Designated Safeguarding Leads (DDSLs), Special Educational Needs Coordinators (SENCOs) and other designated safeguarding personnel, will also be required to read Annex B and any additional guidance relevant to their role.

Staff will receive safeguarding updates, briefings and training throughout the academic year to ensure that knowledge remains current and reflects changes in legislation, statutory guidance, local procedures and emerging safeguarding risks.

The school will maintain appropriate records of safeguarding induction and training. All staff will be required to confirm annually that they have read and understood *Keeping Children Safe in Education – Part One* and understand their safeguarding responsibilities. The Annual Safeguarding Declaration will provide a record of this confirmation

Further information can be found within Appendix H (Acronyms and Key Safeguarding Terms)

16. **Safeguarding Management, Quality Assurance and Review**

Educ8 is committed to ensuring that safeguarding arrangements remain effective, child-centred and responsive to emerging risks. Safeguarding arrangements will be regularly monitored, evaluated and reviewed to support continuous improvement and compliance with statutory requirements.

Responsibilities for safeguarding leadership, oversight and assurance are set out in Section 10.

The effectiveness of safeguarding arrangements will be monitored through:

- safeguarding audits and quality assurance activities;
- safeguarding case reviews and review of safeguarding records and referrals;
- analysis of safeguarding, attendance and behaviour trends;
- review of vulnerable learners, including Child Protection, Child in Need and Family Help arrangements;
- monitoring of online safety, filtering and monitoring arrangements;
- review of safer recruitment practices and the Single Central Record (SCR);
- monitoring of safeguarding training and staff compliance;
- learner, parent/carers and staff voice;
- strategic scrutiny and challenge; and
- external review and quality assurance, where applicable.

Safeguarding monitoring will consider emerging risks, significant incidents, audit findings, lessons learned from practice and changes to legislation or statutory guidance.

Where areas for development are identified, actions will be recorded, assigned, monitored and reviewed to ensure that improvements are implemented and their impact evaluated.

Safeguarding information and assurance will be reported through Educ8's agreed governance and leadership arrangements, with appropriate regard to confidentiality.

17. Related Policies and Documents

Safeguarding is underpinned by a wide range of policies, procedures and operational arrangements that collectively support the welfare, safety and wellbeing of learners.

This policy should therefore be read alongside the following documents, which contribute to the school's wider safeguarding arrangements:

Safeguarding and child protection

- 13 Staff Code of Conduct;
- 14 Educ8's Whistleblowing Policy;
- 15 Section 14 – Allegations Against Adults Working With Children, the Staff Code of Conduct and local LADO procedures;
- 16 Safer Recruitment Policy;
- 17 Preventing Extremism and Radicalisation Policy, Prevent Risk Assessment;
- 18 Educ8's Acceptable Use of Technology and Online Safety Policy
- 19 Data Protection and Information Sharing Policies;
- 20 First Aid and Supporting Learners with Medical Conditions Policy; and
- 21 Alternative Provision Procedures
- 22 Safeguarding Setting Schedule

Learner welfare and wellbeing

- Admissions Policy
- Attendance and Children Missing Education Policy;
- Absconding Policy
- Behaviour Policy;
- Anti-Bullying Policy;

- Equality, Diversity and Inclusion Policy;
- SEND Policy;
- Relationships, Sex and Health Education (RSHE) Policy;
- Mental Health and Wellbeing Procedure

Health, safety and security

- Health and Safety Policy;
- Educational Visits Procedures;
- Fire Safety Procedures;
- Lockdown and Emergency Procedures; Site Security Procedures.
- Offensive Weapons Policy

These policies and procedures should be read in conjunction with the appendices to this policy, particularly:

- Appendix C – National Safeguarding Contacts;
- Appendix D – Safeguarding Reporting Flowchart;
- Appendix E – Safeguarding Responsibilities and Accountability;
- Appendix F – Thresholds of Need and Referral Guidance
- Appendix G – Legislative Framework;
- Appendix H – Acronyms and Key Safeguarding Terms
- Appendix J – Online Safety, Mobile Phone, Mobile Device and Searching Procedures.

Together, these documents support Educ8's commitment to maintaining a strong safeguarding culture in which the welfare of every learner remains paramount.

Appendix C - National Safeguarding Contacts

Role / Organisation	Contact details
Childline	0800 1111
NSPCC Helpline	0808 800 5000
NSPCC Whistleblowing Advice Line for professionals – independent advice for professionals with concerns about how child protection issues are being handled in their organisation	0800 028 0285 or email: help@nspcc.org.uk
Educ8's Whistleblowing policy - for Educ8's internal whistleblowing procedure and the appropriate prescribed person or external reporting route	Document library
Kidscape (Anti-bullying helpline for parents)	0845 120 5204
Child Exploitation Online Prevention (CEOP) https://www.ceop.police.uk/safety-centre	0870 000 3344
Samaritans	116 123
Ofsted - enquiries@ofsted.gov.uk	0300 123 1231 (General Enquiries)
The Disclosure and Barring Service (DBS)	03000 200 190
Department for Education	0207 340 7264
Independent Schools Inspectorate (ISI)	0207 6000100
Refuge: National Domestic Abuse Helpline	0808 2000 247
National Referral Mechanism (NRM) – Modern Slavery and Human Trafficking Government referral mechanism for potential victims of modern slavery and human trafficking. Schools should work with children's social care, police or another authorised First Responder Organisation where an NRM referral for a	Referral information and forms are available through GOV.UK.

child may be required. Referral information and forms are available through GOV.UK.	
Operation Encompass: Teacher Helpline (<i>Advice from an Educational or Clinical Psychologist about how best to support children who may be experiencing abuse</i>)	operation encompass 0204 513 9990 Monday to Friday, 8am-1pm
Guidance - Sharing nudes and semi- nudes: how to respond to an incident. (UKCIS) (published March 2024) Mostly related to images created by Artificial Intelligence (AI)	Guidance
Information sharing - advice for practitioners providing safeguarding services for children, young people, parents & carers	Guidance

Appendix D - Safeguarding Reporting & Escalation

The KCSIE flowchart (figure 1) below sets out the statutory safeguarding response where there are concerns about a child.

The Educ8 Safeguarding Reporting and Escalation Quick Guide beneath it explains the immediate actions expected of staff when a safeguarding concern is identified.

Both should be read alongside this policy, local safeguarding procedures, the Staff Code of Conduct and relevant statutory guidance.

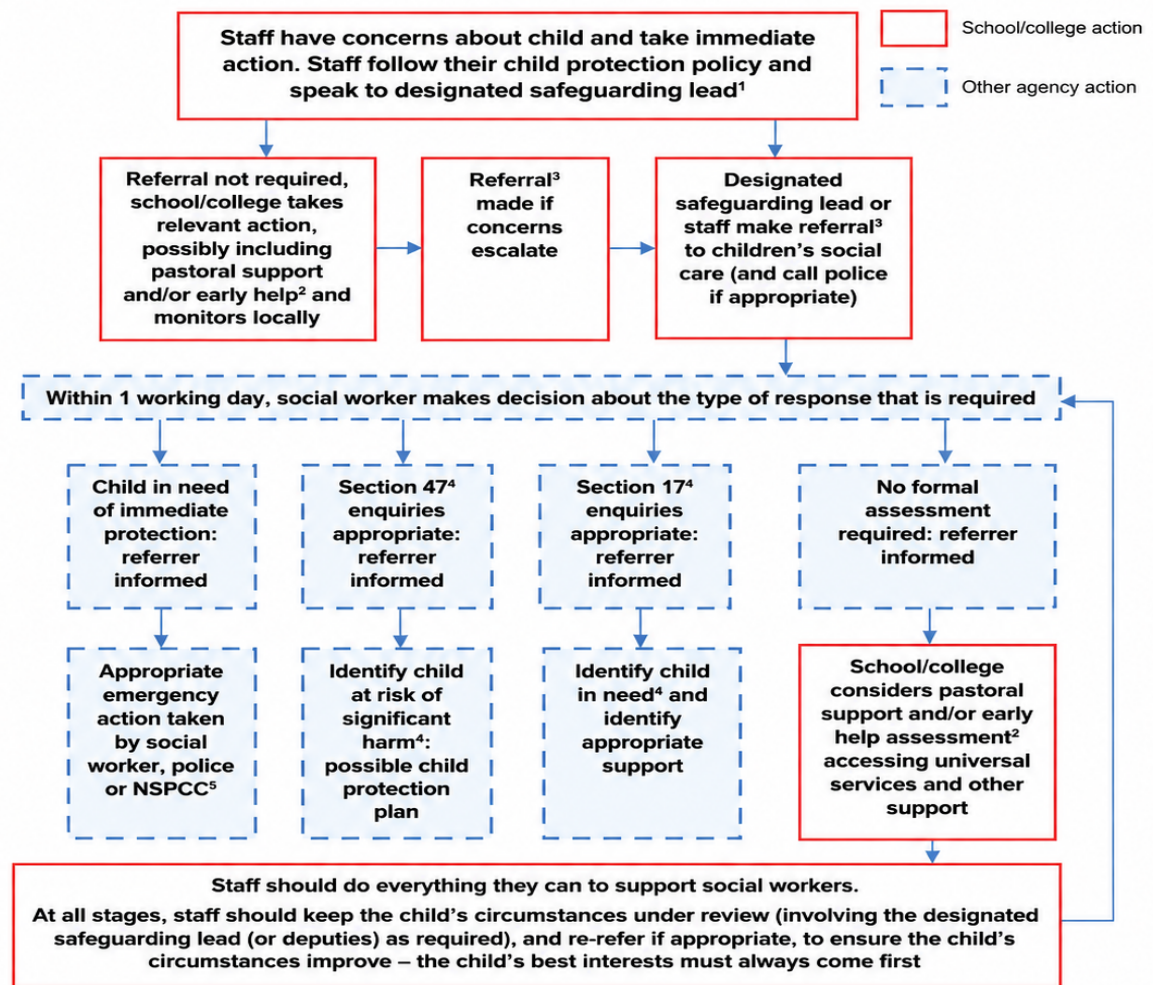
Staff should remember that safeguarding is everyone's responsibility. Concerns should be reported immediately, recorded promptly and managed in accordance with the school's safeguarding procedures. Staff should never assume that somebody else has taken action and should continue to escalate concerns where they believe a learner remains at risk.

The welfare of the child, the voice of the child and the child's lived experience must remain central to all decision-making processes.

Key points:

- **Immediate danger or emergency – call 999.**
- **Report safeguarding concerns without delay to the DSL/DDSL.**
- **Record concerns promptly and accurately on CPOMS.**
- **Do not assume somebody else has acted.**
- **Continue to follow up and escalate where a learner remains at risk.**

Figure 1: Flowchart setting out the actions taken where there are concerns about a child



¹ In cases which also involve potential safeguarding issues for staff, see Part 4 of KCSIE.

² Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated support, an early help assessment should be arranged.

³ Referrals should follow the local authority's referral process.

⁴ Under the Children Act 1989.

⁵ or equivalent locally agreed emergency action.

Safeguarding Reporting and Escalation Quick Guide

Use with the Educ8 Safeguarding and Child Protection Policy and the current Setting Schedule

IMMEDIATE DANGER OR CRIME IN PROGRESS? Call 999 and take action to protect the child. Inform the DSL/DDSL at the earliest safe opportunity. Never delay immediate action to find a manager or complete CPOMS.

CONCERN ABOUT A LEARNER	CONCERN ABOUT AN ADULT
1 Receive the concern Listen, stay calm and use the child's own words. Do not investigate, ask leading questions or promise confidentiality.	1 Recognise the concern Report any conduct that may meet the harm threshold and any low-level concern, no matter how small.
↓	↓
2 Report immediately Tell the DSL/DDSL straight away. An urgent concern must be communicated directly; recording it on CPOMS alone is not enough.	2 Use the correct route Adult or staff concern → Headteacher. Headteacher concern → registered proprietor. Proprietor concern → LADO / identified external route. Immediate risk → 999.
↓	↓
3 Record promptly Record facts, the child's words, time and action on CPOMS. If no DSL is available and risk cannot wait, contact Children's Social Care or Police directly.	3 Do not investigate Do not confront the adult or carry out a substantive investigation. Preserve evidence, maintain confidentiality and record facts promptly.
↓	↓
4 DSL assesses and acts Assess immediate and wider risk; decide support or referral; consider parents unless unsafe; record decisions, rationale and actions.	4 Case manager acts The Headteacher or proprietor makes basic enquiries and consults the LADO where the harm threshold may be met or there is uncertainty. Low-level concerns are recorded and reviewed.
↓	↓
5 Review and escalate Monitor and follow through. If action is insufficient or the child remains at risk, escalate through leadership or contact an external safeguarding agency.	5 Escalate or whistleblow If the matter is mishandled, suppressed or remains unsafe, escalate to the Head of Safeguarding and use the Whistleblowing Policy or external advice route.

STILL WORRIED? Do not assume somebody else has acted. Continue to escalate until appropriate action has been taken.

Current names, telephone numbers and local referral routes are held in the Setting Schedule. See policy Sections 11 and 14 for the full procedures.

Appendix E – Safeguarding Responsibilities at a Glance

This appendix provides a summary of safeguarding responsibilities across Educ8 and should be read alongside Section 11 (Roles and Responsibilities), Appendix D (Safeguarding Reporting Flowchart) and the Safeguarding Quality Assurance Framework.

Safeguarding is everyone's responsibility, and all adults working with or on behalf of Educ8 have a duty to protect children and promote their welfare.

Role	Key responsibility
Proprietor and Governors	Strategic oversight, accountability, challenge and assurance
Executive Board	Strategic leadership, quality assurance and continuous improvement
Headteacher	Day-to-day leadership and implementation of safeguarding arrangements
Head of Safeguarding	Group-wide safeguarding leadership, quality assurance and support
DSL	Safeguarding leadership, referrals, record-keeping and multi-agency working
DDSL	Support for the DSL and management of safeguarding concerns
Staff	Identification, reporting and recording of concerns
Volunteers, agency staff and contractors	Compliance with safeguarding procedures and reporting arrangements
Learners	Seeking support and reporting concerns
Parents and carers	Working collaboratively with the school to safeguard children

All adults working with or on behalf of Educ8 must:

- place the welfare of the child at the centre of decision-making;
- maintain professional curiosity;
- recognise and respond appropriately to safeguarding concerns;
- report concerns immediately;
- share information appropriately;
- maintain accurate records; and
- contribute to a culture of vigilance, accountability and safeguarding.

If a member of staff has concerns regarding the safety or welfare of a learner, they must act immediately, follow the school's safeguarding procedures and seek advice from the DSL or DDSL without delay.

Appendix F – Thresholds of Need and Referral Guidance

This appendix provides an overview of the continuum of need used to support decision-making and referrals. The guidance should be read alongside local safeguarding procedures, statutory guidance and professional judgement.

Safeguarding decisions should always take account of the child's wishes, feelings, lived experiences, vulnerabilities, protective factors and the wider context of the concern.

Level 1 – Universal Services

Children whose needs are being met through universal services and whose development, health and wellbeing are progressing appropriately.

Level 2 – Additional Support

Children who may require additional support from one or more agencies because emerging concerns or vulnerabilities have been identified.

Level 3 – Complex and Multiple Needs

Children who require coordinated support from several agencies and who may require Family Help or targeted intervention.

Level 4 – Acute or Specialist Intervention

Children who are experiencing, or are at risk of experiencing, significant harm and who require statutory intervention from Children's Social Care, the police or other specialist agencies.

Key questions for practitioners

- What has happened?
- What are the child's wishes and feelings?
- What is the child's lived experience?
- What level of need has been identified?
- What evidence supports this assessment?
- What action is required?
- Is there an immediate risk of harm?
- Is a referral required?
- Does the concern require ongoing review?

Appendix G – Legislative and Statutory Framework

This policy has been developed in accordance with current legislation, statutory guidance, local safeguarding arrangements and recognised safeguarding practice. Educ8 will ensure that safeguarding arrangements remain consistent with the requirements applicable to independent schools.

This policy has particular regard to the following statutory guidance:

- *Keeping Children Safe in Education (KCSIE) 2026;*
- *Working Together to Safeguard Children (WTSC) 2026;*
- *The Prevent Duty Guidance;*
- *Information Sharing to Safeguard Children and Young People – statutory guidance, including the Information Sharing Duty under section 16LA of the Children Act 2004;*
- *Relationships Education, Relationships and Sex Education (RSE) and Health Education Guidance;*
- *Searching, Screening and Confiscation;*
- *The Use of Reasonable Force;*
- *Supporting Pupils at School with Medical Conditions;*
- *Working Together to Improve School Attendance;* and
- DfE guidance relating to allergy safety and anaphylaxis in schools, adopted by Educ8 as good practice where requirements do not directly apply to independent schools.

This policy also reflects guidance relating to attendance, children missing education, mental health, online safety, filtering and monitoring, child exploitation, information sharing and alternative provision.

This policy has regard to legislation, including the:

- Human Rights Act 1998;
- Children Act 1989;
- Children Act 2004;
- Education Act 2002;
- Safeguarding Vulnerable Groups Act 2006;
- Education and Inspections Act 2006;
- Children's Wellbeing and Schools Act 2026
- Equality Act 2010;
- Protection of Freedoms Act 2012;
- Children and Families Act 2014;
- Serious Crime Act 2015;
- Children and Social Work Act 2017;
- Human Medicines (Amendment) Regulations 2017;
- Data Protection Act 2018;
- Domestic Abuse Act 2021;
- Online Safety Act 2023; and
- Data (Use and Access) Act 2025.

Data protection and information sharing

Educ8 recognises that effective safeguarding depends upon the lawful, proportionate and timely sharing of information. The school will process personal information in accordance with applicable legislation and guidance, including:

- the UK General Data Protection Regulation (UK GDPR);
- the Data Protection Act 2018;
- the Data (Use and Access) Act 2025; and
- *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers.*

The school recognises that data protection legislation does not prevent the sharing of information where this is necessary to safeguard and promote the welfare of children.

Educ8 will also have regard to:

- the Education (Independent School Standards) Regulations;
- local multi-agency safeguarding arrangements;
- local threshold documents and assessment protocols; and
- the requirements of awarding organisations and examination bodies, where applicable.

All staff must follow the safeguarding procedures applicable to their site and seek advice from the Designated Safeguarding Lead (DSL) whenever concerns arise.

Further information can be found in:

- The Safeguarding Setting Schedule
- Appendix C – National Safeguarding Contacts;
- Appendix D – Safeguarding Reporting Flowchart;
- Appendix F – Thresholds of Need and Referral Guidance and
- Appendix E – Safeguarding Responsibilities and Accountability.

Appendix H - Acronyms and Key Safeguarding Terms

This appendix provides an overview of the abbreviations, acronyms and safeguarding terminology used throughout this policy. It is intended to support staff, governors, volunteers, agency staff, contractors and other adults working with learners and should be read alongside Appendix G (Legislative Framework) and the other appendices contained within this policy.

Abbreviations and Acronyms:

Abbreviation	Meaning	Abbreviation	Meaning
ACEs	Adverse Childhood Experiences	Family Help	The coordinated multi-agency system through which support and intervention may be provided to children, young people and families in accordance with local arrangements and statutory guidance.
AI	Artificial Intelligence	FGM	Female Genital Mutilation
AP	Alternative Provision	HSB IHP	Harmful Sexual Behaviour Individual Healthcare Plan,
CAMHS	Child and Adolescent Mental Health Services	KCSIE	Keeping Children Safe in Education
CCE	Child Criminal Exploitation	LAC	Looked-After Child
Channel	Multi-agency programme that supports individuals who may be vulnerable to radicalisation	LADO	Local Authority Designated Officer
CIN	Child in Need	MARAC	Multi-Agency Risk Assessment Conference
CP	Child Protection	MARF	Multi-Agency Referral Form
CPOMS	Child Protection Online Management System	MASH	Multi-Agency Safeguarding Hub
CSC	Children's Social Care	NSPCC	National Society for the Prevention of Cruelty to Children
CSE	Child Sexual Exploitation	PACE	Police and Criminal Evidence Act 1984
DBS	Disclosure and Barring Service	PLAC	Previously Looked-After Child
DDSL	Deputy Designated Safeguarding Lead	PSHE	Personal, Social, Health and Economic Education
DSL	Designated Safeguarding Lead	RSHE	Relationships, Sex and Health Education
EHE	Elective Home Education	SCR	Single Central Record

EHCP	Education, Health and Care Plan	SEND	Special Educational Needs and Disabilities
Early Help	Support provided at the earliest opportunity to prevent difficulties from escalating and to improve outcomes for children, young people and their families.	TRA	Teaching Regulation Agency
		WTSC	Working Together to Safeguard Children

Key Safeguarding Terms

Alternative Provision (AP)

Education arranged for learners whose needs cannot be met within a mainstream setting or who require additional support.

Child-centred approach

An approach that places the child's wishes, feelings, experiences and best interests at the centre of safeguarding decisions.

Contextual safeguarding

An approach that recognises that children can experience significant harm outside the family home, including within schools, communities, peer groups and online environments.

Filtering and monitoring

Systems and procedures used to identify, manage and reduce the risks associated with the use of technology and online content.

Low-level concern

A concern relating to behaviour that is inconsistent with the Staff Code of Conduct but does not meet the threshold for referral to the Local Authority Designated Officer (LADO).

Persistent absence

Attendance that falls below the threshold defined within national guidance and local procedures.

Professional curiosity

The process of exploring and understanding a learner's circumstances, experiences and presentation to identify whether further support or intervention is required.

Severe absence

Attendance that falls significantly below expected levels and may indicate increased safeguarding risks.

Voice of the child

The process of listening to, understanding and taking account of the wishes, feelings, views and experiences of learners when making safeguarding decisions.

Where terms are not defined within this appendix, staff should refer to the relevant statutory guidance, local safeguarding arrangements or the Designated Safeguarding Lead (DSL).

Vulnerability

Factors or circumstances that may increase a learner's susceptibility to abuse, neglect, exploitation or harm.

Where terms are not defined within this appendix, staff should refer to the relevant statutory guidance, local safeguarding procedures or seek advice from the Designated Safeguarding Lead (DSL).

This is intended to support understanding and should be read alongside the main body of this policy, statutory guidance and local safeguarding procedures.

Appendix J - Online Safety, Mobile Phone, Mobile Device and Searching Procedures

Mobile Phones, Personal Devices and Smart Technology

Where a concern involves a mobile phone, personal device or other smart technology, staff should:

- ensure the immediate safety and welfare of the learner and others;
- avoid unnecessarily viewing, forwarding, copying, downloading, deleting or sharing content;
- secure the device where this is necessary and lawful;
- report any safeguarding concern promptly to the DSL or DDSL;
- record the concern and action taken factually on the school's safeguarding recording system; and
- preserve potential evidence and seek advice from the DSL, police or other relevant agency where appropriate.

Where a concern involves nude or semi-nude imagery, staff must follow the procedures contained within the safeguarding policy and current statutory and non-statutory safeguarding guidance. Staff should **not routinely view such imagery**. Any decision that viewing is necessary should be made by the DSL or equivalent based upon professional judgement and the circumstances of the case.

Searching Learners

Before a search

Before carrying out a search, the authorised member of staff should:

1. assess how urgent the search is and consider the risk to the learner and others;
2. consider the learner's safeguarding needs, SEND, communication needs, age and other relevant vulnerabilities;
3. explain to the learner why a search is being considered, how and where it will take place and provide an opportunity for the learner to cooperate;
4. seek the learner's cooperation wherever practicable; and
5. ensure that the search is necessary, lawful and proportionate.

Where a learner cooperates, a member of staff may search for an item with their agreement.

Where a learner does not cooperate, a search without consent may only be undertaken by the Headteacher or a member of staff authorised by the Headteacher where the statutory conditions for such a search are met.

Conducting a Search Without Consent

Where a statutory search without consent is undertaken:

- the member of staff conducting the search should normally be the same sex as the learner;
- another member of staff should normally be present as a witness;
- the witness should also be the same sex as the learner where possible;
- the search should take place away from other learners wherever practicable and with appropriate regard for privacy and dignity; and
- the learner must not be required to remove clothing other than **outer clothing**.

The limited exception to the same-sex and witness requirements applies where the member of staff reasonably believes that there is a risk that serious harm will be caused if the search is not carried out immediately and it is not reasonably practicable to summon another member of staff.

School staff must not conduct a strip search.

Police and Strip Searches

A strip search is a search involving the removal of more than outer clothing and can only be carried out by the police in accordance with their statutory powers and procedures.

Where police consider that a strip search of a learner may be necessary on school premises, school staff must maintain a safeguarding role and should challenge the police where they believe the proposed action may be disproportionate or harmful to the learner.

The DSL should be informed immediately and appropriate arrangements made in accordance with current DfE guidance, including consideration of the learner's welfare, the presence of an appropriate adult and the support required before and following any police search.

The learner should not be left alone following a strip search and appropriate safeguarding and pastoral support should be provided.

This is an important addition to your existing Appendix J. The stronger safeguarding requirements were introduced following the Child Q safeguarding review, and Ofsted

has specifically highlighted the importance of schools maintaining a safeguarding focus and appropriately challenging police action.

Searching Possessions

Where the statutory requirements are met, authorised staff may search a learner's possessions, including bags and other items under the learner's control.

Searches of possessions should be undertaken in accordance with the same principles of necessity, proportionality, dignity and safeguarding that apply to searches of learners.

Electronic Devices

Where an electronic device is found during a lawful search, staff must exercise particular care before examining data or files contained on the device.

Where there is reason to suspect that material on the device has been, or could be, used to cause harm, disrupt teaching or commit an offence, the matter should be referred to the DSL and managed in accordance with statutory guidance.

Where nude or semi-nude imagery may be involved, staff must follow the specific safeguarding procedures contained within this policy and relevant DfE guidance and must not routinely view the imagery.

Where a device may contain evidence of a criminal offence, staff should preserve the device and seek advice from the police rather than unnecessarily accessing, deleting or altering potential evidence.

Confiscation

Items found during a lawful search may be confiscated where permitted by law and school policy.

The member of staff should consider the nature of the item, any safeguarding implications and whether the item should be:

- returned to the learner or parent/carer;
- retained by the school;
- safely disposed of; or
- passed to the police or another appropriate agency.

Weapons, controlled drugs and items suspected to constitute evidence of an offence should be managed in accordance with statutory guidance and, where appropriate, passed to the police.

Recording Searches

The school will maintain an appropriate record of searches for prohibited items and searches undertaken by the police.

The record should include, as appropriate:

- the date, time and location of the search;
- the name of the learner;
- the reason and grounds for the search;
- the item being searched for;
- the names of staff involved;
- whether the learner cooperated;
- any items found;
- action taken following the search;
- whether the DSL/DDSL was informed;
- whether parents/carers were informed; and
- any safeguarding concerns or follow-up actions identified.

Where the circumstances indicate a safeguarding concern, the incident and subsequent safeguarding actions must also be recorded on **CPOMS**.

Informing Parents and Carers

Parents or carers should be informed of any search for a prohibited item and the outcome of the search as soon as practicable, unless there is a specific safeguarding reason why doing so would place the learner or another person at increased risk.

Where a prohibited item is found, parents or carers should be informed of the item found and any resulting action, including appropriate sanctions and safeguarding support.

Following a Search

Following any search, staff should consider the learner's welfare and whether further support is required.

The DSL/DDSL should consider whether the circumstances indicate:

- abuse, neglect or exploitation;
- child criminal exploitation or county lines involvement;
- serious violence or weapon-related risk;
- substance misuse;
- child-on-child abuse;
- online harm;
- coercion or pressure from others; or

- another safeguarding vulnerability.

Where appropriate, a risk assessment, pastoral intervention, Family Help, referral to Children's Social Care, police involvement or other multi-agency support should be considered.

Issue and Revision History

Issue	Date	Summary of Revision	Author
5.0	01/09/2026	Full policy review and update in line with KCSIE 2026 and current statutory guidance.	D. Payne
5.1	14/09/2026	Updated following final KCSIE 2026 publication, including discrimination and faith-targeted harm, sexual abuse, child-on-child abuse, safer recruitment and information sharing. Updated to reflect the statutory Information Sharing Duty under section 16LA of the Children Act 2004, effective from 30 September 2026, including strengthened requirements for lawful safeguarding information sharing and recording decisions to share or not to share.	D. Payne