

CHILD PROTECTION AND SAFEGUARDING POLICY

This policy applies to the whole School, including EYFS, applies to all students, staff, parents, governors, volunteers, contractors and visitors and is published to parents.

ALL staff, including governors, are required to read this policy in its entirety annually, including the associated appendices / links that are relevant to their roles. **ALL** staff, including governors, must also read and understand KCSIE (September 2026) Part 1, in its entirety annually, confirming they have done so by completing an acknowledgement form.

Key contacts:

Designated Safeguarding Lead (DSL)	Mrs Alex Kingsbury , Senior Deputy Head Tel: 07706 358879 or 01642 786023 ext 207 alex.kingsbury@yarmschool.org
Deputy Designated Safeguarding Leads (DDSL) - Senior	Mrs Kath Gratton , Head of Middle School Tel: 01642 786023 ext 214 kath.gratton@yarmschool.org Dr Alan Goodall , Head of Sixth Form Tel: 01642 786023 ext 245 alan.goodall@yarmschool.org
Deputy Designated Safeguarding Leads (DDSL) - Prep	Mr Gavin Stone , Prep School Deputy Head Tel: 01642 781447 ext 310 gavin.stone@yarmschool.org Mrs Joanne Speight , Head of the Pre-Prep & EYFS Tel: 01642 781447 ext 308 joanne.speight@yarmschool.org
Governors	Mark Thompson (Chairman of Governors) Shazia Akowuah (Designated Safeguarding Governor - DSLG, Chair of Compliance Committee) Rebecca Brown (Vice-Chair of Governors) deputises for Shazia Akowuah when required. Ian Lovat (Online Safety Governor) Governors can be contacted via the Headmaster's office.
External Agencies	External Agency Contact Information can be found here .

Note:

If a child is in immediate danger or is at risk of significant immediate harm, a referral should be made immediately to children's social care and / or the Police (999). [Anyone can make a referral in this context](#). Where referrals are not made by the Designated Safeguarding Lead, the DSL should be informed as soon as possible that the referral has been made.

1 **Rationale and Context**

- 1.1 Parents, guardians and carers have a right to expect that the School has taken steps to develop such a policy and should feel that the staff understand child¹ protection and safeguarding procedures and will be confident in operating them.
- 1.2 The Board of Governors and the Senior Management Team (SMT) share these expectations and recognise their responsibility to ensure that the policies, procedures and training at Yarm School are effective and comply with the law² at all times.
- 1.3 The policy should comply with and has been developed in accordance with the most recent statutory guidance issued by the Department for Education (DfE) under section 175, Education Act 2002, the Education (Independent School Standards) Regulations 2014, the Education and Skills Act 2008 and ISI Regulatory Requirements. In addition, the policy reflects the requirements set out in the Human Rights' Act 1998, the Equality Act 2010, the United Nations Convention on the Rights of the Child and the Counter-Terrorism and Security Act (2015) and specifically the Prevent Duty placed on schools in England and Wales. Under the Human Rights' Act, it is unlawful for schools and colleges to act in a way that is incompatible with the European Convention on Human Rights: being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

Yarm School follows the guidance in the following publications:

- [Working Together to Safeguard Children](#) (March 2026 version)
 - [Keeping Children Safe in Education](#) - effective 1 September 2026
 - [The Early Years Foundation Stage: Statutory Framework](#) - effective 1 September 2026
 - [The Independent School Standards, Guidance for Independent Schools](#) (April 2026)
 - [‘What to do if you are worried a child is being abused’](#) (March 2015 – Advice for Practitioners)
 - [Disqualification under the Childcare Act 2006](#) (August 2018)
 - [Review of Sexual Abuse in Schools and Colleges \(June 2021\)](#)
 - [Statutory Relationships Education, Relationships and Sex and Relationships \(RSE\) and Health Education Guidance](#) - effective 1 September 2026
 - [The Prevent Duty Guidance](#) (June 2015 - updated March 2024)
 - [The Use of Social Media for Online Radicalisation](#) (July 2015)
 - [Sharing nudes and semi-nudes: advice for education settings](#) (updated March 2024)
 - [Preventing Bullying](#) (July 2026)
 - [Behaviour in Schools guidance](#) (February 2024)
 - [Information Sharing Advice for Safeguarding Practitioners](#) (July 2018 - updated May 2024)
 - [Working Together to Improve School Attendance](#) (July 2026)
 - [Generative AI: product safety expectations](#) (January 2026)
 - [Mobile phones in schools guidance](#) (June 2026)
 - The School also adheres to and will operate in accordance with the locally agreed inter-agency safeguarding standards and procedures for Hartlepool and Stockton-on-Tees Safeguarding Children Partnership (HSSCP). ([HSSCP Safeguarding Information for schools](#))
- 1.4 Agencies which offer consultation and advice about child protection matters, and/or who may become involved in issues over individual children, have a right to expect that the staff will act appropriately.

Footnotes : 1 In this policy “child” or “children” refers to all pupils at the school including those who are over the age of 18. Pupils continue to be members of the School until 31 August, if they leave at the end of an academic year. 2 Section 175 Education Act 2002 and Education (Independent School Standards) (England) Regulations 2010, made under section 157 Education Act 2002. Colleges, non-maintained special schools and independent schools: The definition of ‘children’ applies to the statutory responsibilities for safeguarding and promoting the welfare of children i.e., those under 18.

- 1.5 It is important that teaching and support staff³ share aims, knowledge and, as far as possible, values concerning the protection of children and their own conduct towards them, and share a common language about child abuse matters. Developing and then maintaining an agreed policy will help staff be more effective. Staff need to have clear guidelines about the action to be taken to initiate safeguarding protocols and when there is suspicion about child abuse or a safeguarding concern for any particular child.

They need to have confidence that the appointed DSL will implement the appropriate procedures, and will support their concerns over individual children.

- 1.6 The intention is to create a clear, transparent and easy to understand policy which has the agreement and understanding of all staff and is firmly adhered to by management to ensure that children are protected effectively. This policy will be reviewed annually, as a minimum, unless changes in legislation mean that further updates are urgently required by the SMT. Any concerns during the year about either the content or its implementation should be raised with the Head and DSL for consideration; if necessary, this will be referred to the Board of Governors.
- 1.7 The Governors will review this policy and all others associated with safeguarding and child protection, (see [Appendix I](#)), annually, and approve any necessary changes, during their September Main Board Meeting. The Governors' Compliance Committee will also assess the effectiveness of the child protection and safeguarding arrangements during some of their meetings. This policy will be communicated to parents and pupils on the School's website.
- 1.8 Action may be taken by the School to protect a child who is suffering significant harm under section 47 and section 44 of the Children Act 1989. Action may also be taken by the School under section 17 of the Children Act 1989 to promote the welfare of a child in need of additional support, even if they are not suffering harm or at immediate risk. (*Further information on legislation pertaining to this policy can be found in KCSIE, September 2026*).

2 **Aims**

- 2.1 **The School aims to ensure that pupils live and work in a safe environment that provides effective care and where they are respected and listened to by adults. In this environment children will feel confident, safe and be able to approach adults about matters of concern to them, knowing that their feelings will be taken into account and that their concerns will be taken seriously. In order to safeguard children, the adults who work in the School are committed to undertaking all reasonable measures to protect each pupil in the School's care from maltreatment, to promote their development and to support their welfare, including their physical and mental health. They will have knowledge of child protection and safeguarding matters and be sensitive to the signs of children who are in distress or under stress of some kind to ensure that early help strategies can be implemented with the best interest of the child in mind at all times and action is taken to enable all children to have the best outcomes. The School will ensure that systems are well promoted, easily understood and easily accessible for children to confidently report abuse.**
- 2.2 The safety and welfare of all our pupils at Yarm School is our highest priority. We aim to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety. This child centred approach is fundamental to safeguarding and promoting the welfare of every child and ensures that pupils understand how to report concerns and do so freely, knowing these will be taken seriously and dealt with swiftly and appropriately.
- 2.3 All members of staff have a duty to safeguard our pupils' welfare and must therefore familiarise themselves, understand and comply at all times with this policy and all other associated school policies. (See Appendix I).

³ The term "staff" includes all full and part-time supply teaching staff and students on placement / visiting the school and all support staff including all ancillary staff employed by the School.

- 2.4 All staff should be aware that safeguarding or abuse incidents can happen at any time and anywhere, adopting an 'it can and does happen here' approach, and should be alert to any possible concerns. Safeguarding incidents and/or behaviours can also be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSs should consider whether children are at risk of abuse or exploitation in situations outside their families. Harms outside of the home take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, financial exploitation, criminal exploitation, serious youth violence, cybercrime or modern slavery.
- 2.5 All staff should also be aware that children may not feel ready or may not know how to tell someone they are being abused/neglected, or may not identify their experiences as harmful, reinforcing their responsibility as professionals to look at the child as a whole, notice the concern, to be professionally curious and to speak to DSL at an early stage.
- 2.6 All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff can help to fulfil four key roles:
- promoting good mental wellbeing and preventing the onset of mental illness
 - observing pupils and identifying early those who may be experiencing or at risk of developing mental health problems
 - making sure early targeted support is provided
 - liaising with and referring to specialist services where needed.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the procedures in the safeguarding policy and speaking to the DSL.

- 2.7 All staff should recognise that, as well as adults, children are also capable of abusing other children and should therefore have a clear understanding of the School's anti-bullying, sex and relationships, IT, online safety, and other related policies to understand the range of different forms that child on child abuse could take, including those associated with gender, technology, sexual violence or sexual harassment, violence or harassment. **This will ensure that abuse is never tolerated or passed off as "banter" or "part of growing up"** and that staff are equipped to recognise signs of abuse and confident in how to respond to reports. **See also Appendix [VII](#) and [XIII](#).**

3 Objectives (in line with the definition of Safeguarding and Promoting the welfare of young people in Working Together to Safeguard Children)

- To provide help and support to meet the needs of children as soon as problems emerge through a Family Help approach.
- To protect children from maltreatment, whether that is within or outside the home, including online.
- To prevent impairment of and to support children's mental and physical health or development.
- To ensure that children grow up in circumstances consistent with the provision of safe and effective care.
- To promote the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children.
- To take action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.
- To work in partnership with statutory safeguarding partners and proactively share relevant information in a timely manner to keep children safe.
- To set out safeguarding policies and procedures that are transparent, clear and easy to understand for staff, pupils, students, parents, guardians and carers.

- To encourage transparency, respectful communication, and active listening to the wishes and feelings of the child.
- To ensure that staff are kept informed about changes in relevant legislation so that they can maintain good professional standards.
- To ensure that staff follow internal procedures including any updates communicated to them as necessary by the DSL (via email, Staff Briefings, Safeguarding Bulletins, Safeguarding 'Questions of the Week' or sharing resources) and that they are aware of and understand the context of this policy and associated school policies. [See Appendix I.](#)
- To ensure that pupils and their parents, guardians or carers are fully aware of the School's child protection policy and safeguarding procedures.

4 Managing safeguarding and ensuring the safety of children

The Governing body has a strategic leadership responsibility for the School's safeguarding arrangements.

Governors **must** ensure that the School complies with its duties under legislation, and that the School's policies and systems are well promoted, easily understood and easily accessible for pupils to confidently report abuse, knowing concerns will be treated seriously, and knowing they can safely express their views and give feedback. The Head should ensure that the policies and procedures, adopted by the Governing body, are understood, and followed by all staff.

- 4.1 This policy applies to all teaching and support staff, governors, students on placements and volunteers working in the school and engaged in regulated activity. The School is also committed to safeguarding pupils who undertake regulated activities through other providers of services to the School. It should be noted that the School does not use supply agency staff.
- 4.2 This policy applies to all school activities, both on and off-site, undertaken by pupils whilst they are the responsibility of the school. External venues providing instruction or supervision of pupils on behalf of the School will be required to provide confirmation that their staff have been appropriately vetted. With regards to the use of school premises for out-of-school settings, the School will seek assurance that safeguarding measures are in place, regardless of whether the children going to the out-of-school setting are on roll at the school or not.
- 4.3 All Staff and Governors at the School are required to read and to confirm their understanding of, at least, Part 1 and Annex A of KCSIE (September 2026); leaders and staff working directly with children should also read Annex B. All staff, Governors, volunteers, contractors and visitors are made aware of their safeguarding duties and issued with written procedures to be followed, including keeping accurate notes and records.
- 4.4 Staff who report suspected abuse will be supported by the Senior Management Team.
- 4.5 Dr Shazia Akowuah is the designated member of the Board of Governors (DSL) with oversight for child protection issues and with oversight for general safeguarding procedures. She is deputised by Mrs Rebecca Brown.
- 4.6 Mrs Alex Kingsbury, Senior Deputy Head, is the DSL with overall responsibility for all matters of child protection and safeguarding for Yarm School. In this capacity, she also acts as the DSL for the Senior School. Mrs Kath Gratton and Dr Alan Goodall are the Deputy DSLs (DDSL) for the Senior School. Mr Gavin Stone, is the DDSL in the Preparatory School and Mrs Speight is the DDSL for the Pre-Prep and EYFS. Mr Stone and Mrs Speight have day to day responsibility for matters of child protection and safeguarding in these sections of the School and liaise closely with Mrs Kingsbury as the overarching DSL for the school. As a group, they also meet half-termly, alongside the DSL. [Appendix VIII.](#)
- 4.7 The DSL takes a holistic approach to safeguarding and child protection. The DSL and all DDSLs attend some form of professional development and refresher training that is relevant to child protection in relation to KCSIE (September 2026), Prevent and inter-agency working, at least every year.

- 4.8 The First Aid Lead (FAL) and Emotional Health and Wellbeing Practitioner (EHWP), support the DSL and DDSLs as required and work closely together to support the mental health and wellbeing of the pupils and to consider when these might become a safeguarding concern. See separate policy [here](#).
- 4.9 The DSL maintains close links with the Hartlepool and Stockton Safeguarding Children Partnership (HSSCP) and with other local agencies, as required. There is a difference between safeguarding children who have suffered or are at risk of suffering serious harm and those who are in need of additional support from inter-agency practice. The former will be reported **immediately** to the Family Help Point and a SAFER Referral Form completed. This gives access to a process for providing inter-agency early help and intervention, through locally agreed common and shared assessment protocols and processes within the Single Assessment Continuum of Need.
- 4.10 The DSL and DDSLs are responsible for maintaining any records relating to child protection and safeguarding in a secure location, separated from routine pupil records. File access is restricted. The DSL is also responsible for ensuring the secure, receipted, transfer of child protection files to a leaving pupil's new school/college as soon as possible, and within 5 working days for an in-year transfer or within the first 5 working days of the start of a new term.
- 4.11 The DSL consults regularly with the DSLG, keeping them abreast of safeguarding issues within the School as well as local trends, and reports at least once a year to the Board of Governors on matters relating to child protection, safeguarding and pupil welfare.
- 4.12 The School must ensure that :
- all new Governors and new staff, both full and part-time, regular volunteers, peripatetic music staff, sports and activity coaches, student teachers and anyone visiting the School more often than three times a month, undergo appropriate Child Protection checks in accordance with the School's staff Appointment Procedures and DBS Policy;
 - where a member of staff works in the EYFS at the Pre-Prep, or provides pre-school or after-school care for children aged eight or younger, they will also be asked at regular intervals to complete a self-declaration, confirming they have no new criminal convictions, cautions, reprimands, warnings, or relevant pending charges/arrests that impact their suitability to work with children;
 - all new Governors and staff are provided with induction training which includes guidance on the School's child protection policies and procedures, the identity of the DSL and DDSLs, whistle-blowing procedures, the Staff Conduct and Behaviour Policy as well as other relevant and associated school policies. Governors and staff will be given a copy of and are required to confirm that they have read and understand KCSIE Part 1 (September 2026). This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in are effective and support the delivery of a robust whole school approach to safeguarding;
 - safeguarding training is organised for all Governors, staff and regular volunteers at least every three years in line with advice from the HSSCP, although in reality training is regular and continuous, delivered annually as a minimum, through refresher training at the start of an academic year;
 - training should also promote staff awareness of child sexual and criminal exploitation, online safety, Honour or faith based abuse to include forced marriage and female genital mutilation (FGM), domestic abuse, radicalisation and child on child abuse to include sexual violence and sexual harassment, such that staff can recognise the signs, symptoms and indicators of such practices and know that they are required to take action without delay if such a practice is suspected;
 - within the EYFS setting, use of mobile phones, cameras and other electronic devices is not permitted by parents or visitors whilst on the EYFS premises. A notice to parents to this effect is displayed within the setting. Staff taking photographs of children playing for the purpose of publicity and record keeping / assessment must ensure the photos are stored securely and available to all relevant staff.

4.13 Members of staff involved in organising after school activities, clubs or holiday schools or overseas excursions will be required to ensure that they adhere to the school guidelines in regard to all child protection and safeguarding policies.

4.14 The governing body should ensure that the School has processes in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour. The School will endeavour to create a culture and environment wherein staff feel comfortable to discuss matters both within and, where it is appropriate, outside of the workplace (for eg, online), which may have implications for children's safety.

The School will report to the Disclosure and Barring Service (DBS), promptly and within one month of leaving the School, any person whether employed, contracted, a volunteer or student whose services are no longer used because he or she is considered unsuitable to work with children and the DBS referral criteria are met. In such circumstances, compromise agreements will not be used. If appropriate, a referral may be made to the Teacher Regulation Agency.

The School will also have systems in place to deal with and record 'low level' concerns (including allegations), which do not meet the harm threshold. As part of the whole school approach to safeguarding, the School will promote an open and transparent culture in which all concerns about **all** adults working in or on behalf of the School are dealt with promptly and appropriately, in order to enable the early identification of concerning, problematic or inappropriate behaviour, ensure that all adults operate within appropriate professional boundaries and ultimately minimise the risk of abuse.

4.15 In summary, the School fulfils its obligations to safeguarding and child protection through:

- a) the safe recruitment of staff and volunteers; relevant staff are trained in safer recruitment, including the Heads and various members of the PrepMT, SMT and key members of the Support Staff team.
- b) raising awareness of safeguarding and child protection issues, including the potential for child on child abuse, through the effective implementation of associated policies and procedures and by organising appropriate training for staff;
- c) emphasising that safeguarding is the responsibility of every member of staff and that anyone is permitted to make a referral to children's social care or for Family Help;
- d) caring for the safety of pupils, including if they are supervised on a site other than the School, for example, by gaining assurance that the staff of another organisation have been checked for suitability during a school outing or residential trip;
- e) promoting a safe learning environment for all pupils, including doing all that it reasonably can to limit children's exposure to online risks and ensuring an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, which is regularly updated.
- f) supporting pupils in understanding the benefits and risks when using Generative AI, by effectively and reliably preventing access to harmful and inappropriate content; maintaining robust activity logs; being secured against malicious use or exposure to harm; prioritising transparency and child safety and being operated with accountability; and respecting data protection and intellectual property laws; supporting pupils in being educated about and protected against the creation, sharing, or targeting of AI-generated harmful content (including deepfakes/nudes).
- g) including opportunities via whole-school preventative and inclusive education and within the PSHEE (SPaCE) curriculum and RSE, or other age-appropriate sessions and assemblies, for pupils to develop the skills needed to recognise and stay safe from abuse. This will also prepare pupils for life in modern Britain and creates a culture of zero tolerance for any type of prejudice, including sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.
- h) developing and implementing procedures for identifying and reporting cases, or suspected cases, of any form of abuse / radicalisation;

- i) ensuring pupils know that there are adults in the School whom they can and should approach if they are worried or have experienced any form of abuse or harassment;
- j) supporting a pupil who has a social worker and/or has been abused in accordance with their agreed Child Protection (CP) plan / Family Help Assessment plan;
- k) supporting pupils with their mental health and wellbeing and recognising that in some cases this can be an indicator of or become a safeguarding concern including self-harm, eating disorders, suicidal ideation or risk of suicide;
- l) identifying and supporting pupils at risk of persistent absenteeism, unexplainable absence or reduced timetables, recognising that attendance issues are frequently an indicator of potential safeguarding concerns or exploitation;
- m) establishing procedures for reporting and dealing with safeguarding concerns and allegations of abuse against members of staff;
- k) following the statutory guidance contained within KCSIE (September 2026) and other related regulatory requirements from The Independent Schools' Standards and ISI.

5 **Safeguarding Training for All Staff**

5.1 The School provides clear and detailed guidance to staff, who are all required to read and **confirm their understanding** of KCSIE, Part 1 and Annex A (September 2026), as part of their appointment and induction process. KCSIE provides detailed safeguarding information and guidance on the following topics in terms of what school staff should know and do :

- a) The child centred and coordinated approach to safeguarding
- b) The role of school staff
- c) What school staff need to know
- d) What school staff should look out for
- e) What school staff should do if they have concerns about a child – making referrals
- f) Record Keeping (including reference to GDPR)
- g) Why is all of this important?
- h) What school staff should do if they have concerns about another staff member who may pose a risk of harm to children, including so-called 'low level' concerns that do not meet the threshold for referral
- i) What school staff should do if they have concerns about safeguarding practices within school
- j) Definitions of abuse; physical abuse; emotional abuse; sexual abuse; neglect; serious violence and child on child abuse including sexual violence and sexual harassment.
- k) Links to up-to-date guidance and support for a list of specific safeguarding issues including children who are absent from school, particularly repeatedly and/or for prolonged periods and those who are missing education; child sexual and / or criminal exploitation, Honour or faith based abuse - female genital mutilation (FGM) and forced marriage; radicalisation; domestic abuse; child on child sexual violence and harassment. [See Appendices.](#)

5.2 New staff induction, regular staff training and additional written guidance, (including the weekly safeguarding questions shared with staff) raise awareness and develop a greater understanding amongst staff, governors and volunteers engaged in regulated activity. In addition to acknowledging that they have familiarised themselves with the relevant policies and procedures, induction and training will include an assessment of understanding. Induction and training includes reference to KCSIE, this policy, staff codes of conduct and pupil behaviour policies, the identity and role of the DSL and Deputy DSLs, online safety and the safeguarding response to children missing education. They focus on:

- potential safeguarding and child protection issues, including child on child abuse;
- Safeguarding information for the School's local area with advice from the HSSCP;
- the expectations required of adults who interact with pupils;
- the procedures necessary to ensure the welfare of pupils;

- ensuring that staff are aware of the identity and function of the Designated Safeguarding Lead (DSL) and of the Deputy Designated Safeguarding Leads (DDSLs) in the School.

5.3 The responsibilities of all school employees are to:

- a) to have read and confirm that they understand KCSIE, Part 1 (September 2026)
- b) undertake the required certificated Safeguarding and Child Protection training
- c) know the relevant Child Protection procedures and how to access them
- d) to know the identity of the DSL and of the DDSL for their section of the School
- e) monitor their own standards and practice
- f) respond appropriately to a disclosure
- g) act upon all suspicion, belief and evidence of abuse by referring the concern immediately to the DSL / DDSL
- h) act as a whistleblower in situations where they suspect inappropriate professional practice or behaviour is taking place by a member of staff or by another adult.

5.4 Codes of conduct and staff training seek to support the School's 'position of trust' stance. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in educational settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. The School's policies therefore seek to prohibit inappropriate physical and social contact between employees and pupils, including contact through text, email or social media.

See [Appendix I](#) - list of relevant policies and [Appendix VI](#) - summary code of good practice.

6 **Procedures for dealing with all disclosures and allegations**

6.1 Safeguarding concerns or allegations of abuse may be made against another child, member of staff, a volunteer, a governor, a pupil, parent or other person connected to the school. Allegations of abuse against teachers and other staff will be dealt with according to the statutory guidance KCSIE (2026).

6.2 ***The flow chart on the next page summarises the procedures that members of staff should follow if they have a concern regarding safeguarding, if they suspect that a child has been abused or if a child discloses that they have been abused. This should be followed in conjunction with the guidelines given in [Appendix II](#) to [IV](#) and the flowcharts provided in [Appendix VIII](#).***

In summary, if a member of staff is made aware of any allegation of abuse, or if knowledge of possible abuse comes to their attention, it is their duty to listen to the child, to provide reassurance and to record the child's statements.

On hearing an allegation of abuse or complaint about abuse directly from a child, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided. All evidence, (for example, notes, mobile phones containing text messages, clothing, computers, etc.), must be safeguarded and preserved.

No inappropriate guarantees of confidentiality should be given to pupils or adults wishing to tell them about matters of Child Protection.

- a) Staff should guarantee only that they will pass on information to the minimum number of appropriate people in positions of responsibility who must be told in order to ensure that the proper action is taken and that they will not tell anyone who does not have a clear need to know.

- b) As a general principle, safeguarding the child always outweighs any right of confidentiality. It is legitimate to share information without consent in certain safeguarding situations.
- c) The School will also take whatever steps it can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure has been made.

The First Aid Lead and Emotional Health and Wellbeing Practitioner follow appropriate professional codes of ethics and protocols in such matters, in conjunction with the requirements of the School's Child Protection and Safeguarding Policy. Any visiting professional counsellors also work to their professional code of ethics.

- 6.3 The DSL holds a file detailing the procedures that will be followed in school and in liaison with the LADO and other agencies should a concern be raised or a disclosure or allegation be made.

In general, we believe that parents should be informed about any concerns regarding their children. It is important that we are honest and open in our dealings with parents. However, concerns of this nature must be referred to the DSL or the Head who will decide on the appropriate response.

In a very few cases, it may not be right to inform parents of a concern immediately as that action could prejudice any investigation, or place the child at further risk. In such cases, advice will be sought from the Family Help Point or the LADO if there is a safeguarding concern about a member of staff's behaviour towards a child.

STAFF FLOW CHARTS FOR SCHOOL PROCEDURES – See Also Appendix II, IV & VIII

Mrs Alex Kingsbury, overall DSL for Yarm School
 Mrs Kath Gratton, DDSL for Senior School
 Dr Alan Goodall, DDSL for Senior School
 Mr Gavin Stone, DDSL and DSP for Preparatory School
 Mrs Joanne Speight, DDSL and DSP for the Pre-Prep and EYFS

Click on the relevant link to view the referral procedures that apply for :

[THE PRE-PREP SCHOOL](#)

[THE PREPARATORY SCHOOL](#)

[THE SENIOR SCHOOL](#)

Abuse is obvious / child discloses abuse / teacher suspects abuse or has concern

Having made reference to "Guidelines for Staff" (Appendix II), member of staff must make note of time, date, observations, what was said (in the child's words) and if there were any witnesses.

The reporting member of staff must not contact the person (for eg another pupil or a parent) against whom an allegation has been made and must inform the relevant member of the Safeguarding Team as soon as possible, on the same day:

Mrs Alex Kingsbury, Mrs Kath Gratton, Dr Alan Goodall, Mr Gavin Stone or Mrs Joanne Speight

If the concern is about a member of staff, the reporting member of staff must speak, as soon as possible, on the same day, to the Headmaster / Head of Preparatory School, or in their absence, to Mrs Alex Kingsbury, who will inform the Headmaster / Head of Preparatory School as soon as possible.

If the pupil is making an allegation against the DSL / DDSL, the member of staff must inform the Headmaster immediately (and in his absence, the Chair of Governors).

If the allegation is made against the Headmaster, the member of staff must inform the Chair of Governors immediately, without the Headmaster being informed.

The DSL / DDSL will speak to child affected by the alleged abuse to confirm the nature of the disclosure and the level of concern to be able to provide sufficient details to the relevant agencies.

The DSL/DDSL will contact the LADO / the Family Help Point within 24 hours, following statutory and HSSCP guidance and procedures. The Police will also be informed in the case of serious harm and in relation to allegations against staff.

The parents / guardians will be contacted by the DSL / DDSL, depending on the nature of disclosure, the level of concern and the advice given by the relevant agency.

If the allegation is against a member of staff or a fellow pupil, the School will take appropriate steps as necessary, in consultation with the above agencies to ensure the safety of all other members of the school community.

6.4 Record Keeping

All disclosures, complaints or concerns should be recorded **at the time and must remain factual in nature**, in accordance with the following guidelines. Examples of the forms available for noting details of a disclosure **are given in [Appendix II](#)**.

Staff should make accurate notes at the time of any allegation or suspicions. These should be made either during the meeting or immediately afterwards to ensure they are as full and accurate as possible. The original notes should not be revised as rough notes carry more 'weight' if a case comes to court. Good record keeping will also help if / when responding to any complaints about the way a case has been handled. The rough notes should be retained alongside any subsequent 'neat summary copy', which should be recorded on CPOMS.

The record should consist of:

- a) the pupil's details, name, date of birth and family details, where relevant
- b) date and time of the event/concern
- c) the nature of the concern raised
- d) the action taken

In the case of disclosure, the record must also include:

- a) as full and accurate account as possible of **what the pupil said**
- b) an account of questions put to the pupil
- c) time and place of the disclosure
- d) who was present at the time of the disclosure
- e) the demeanour of the child
- f) where the child was taken and where returned to at the end of the disclosure

The record should be signed and dated by the person making it, with the name (not just initials) clearly printed at the side. The record must be kept securely and handed to the DSL.

Follow-up notes should also contain details of further actions taken, decisions reached, clear reasons and justifications for actions taken and decisions reached, and the outcome.

Information forming part of a child's Child Protection / Safeguarding Record is logged on CPOMS. Where paper notes are taken, they are scanned, attached to the CPOMS record, and stored securely in a confidential file with a tracking cover sheet in the Senior Deputy Head's Office.

- a) The school retains copies of child protection information until the pupil's date of birth + 25 years.

- b) Access to safeguarding and child protection records is strictly limited to the Headmaster, the DSL, DDSLs and the DSLG.
- c) Staff will be given as much information as necessary in order for them to help the pupil concerned. In general, this will mean that, where a pupil is supported under a Child Protection Plan, Child in Need Plan, or Family Help Assessment, or where there are concerns about a pupil, the Sector Head, Head of Year, Tutor, EHWP and any member of staff specifically chosen by the pupil to provide support will be kept informed on a need-to-know basis. It may be appropriate in some cases to inform other staff that a pupil requires support and understanding, without necessarily sharing more details. Whenever information is given, care will be taken to indicate its sensitivity and that confidentiality is required.
- d) If a pupil who is subject to safeguarding monitoring or a Child Protection Plan, the School will contact the receiving School's DSL as soon as possible to alert them, and within 5 working days for an in-year transfer or within the first 5 working days of the start of a new term. The full contents held in the confidential file, including any on-going concerns raised in the previous year, will be transferred to the new school, separately from the main pupil file via secure, encrypted transfer. Any information indicating that the pupil may pose a risk to themselves or others (e.g., concerns regarding serious violence, weapons, or harmful behavior) will be explicitly shared with the receiving setting prior to or alongside the transfer. If the receiving school is not known, a referral will be made to the Child Missing in Education Service so that enquiries can be made.
- e) The School writes to a new pupil's previous school to clarify whether they hold any safeguarding or child protection information pertaining to the child.
- f) Parents do not have automatic right of access to Child Protection records but they may be permitted access depending on the circumstances.
- g) Child protection information is shared in accordance with statutory guidance and data protection legislation (Data Protection Act 2018, UK GDPR, and Data (Use and Access) Act 2025). Child protection information is not routinely shared with agencies other than other schools, Social Services or the Police. Guidance should be obtained from the School's solicitors in respect of any other request.

6.5 Child-on-Child Abuse (including violence and harassment) - See also [Appendix VII](#) and [XIII](#)

All staff should be aware

- **that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.**
- **that abusive behaviour between children should never be tolerated and must be challenged and associated behaviours supported.**
- **that child-on-child abuse is preventable. As well as knowing how to recognise behaviours and indicators of risk early, staff should know that timely, evidence based support can be key to preventing children from going on to commit abuse or violence.**

Should any incidents of child on child abuse arise, either in or out of school, the School implements the relevant protocols detailed in the safeguarding and anti-bullying policies relating to child on child abuse. Staff are aware of the fact that all forms of child on child abuse may be occurring, even if there are no obvious signs or reports of this and therefore must always be alert and observant. As part of this, schools should also try to be alert to when children might be at highest risk around the school day (for example immediately after school). **All concerns must be reported to the DSL.**

The School will liaise directly with the relevant HSSCP and follow their referral protocols. Where allegations of abuse or assault have been made against one or more pupils, risk based decision-making is carried out with a view to ensuring the safety of all pupils and that both the alleged victim and perpetrator pupils receive appropriate support. Decisions arising might include, for example, removing the accused pupil from certain classes or from school for a period of time or supervising or preventing contact between individuals, in addition to using the pastoral support mechanisms detailed in this policy, the anti-bullying policy and health and welfare policies.

The NSPCC has a dedicated helpline (0800 136 663) for both current or past victims of sexual abuse to provide support and advice and how to contact the police if they wish to report a crime. Additionally, the helpline will also support parents and professionals who need advice. The helpline is free and anonymous, and is open Monday to Friday from 8am – 10pm and Saturday to Sunday from 9am – 6pm.

6.6 Guidance for safer working practice when child needs intimate/ personal care with adult support

This guidance is applicable to EYFS and any pupil with specific medical, physical, or developmental needs.

- If pupils are able to undertake personal care, they should be supported to be independent. Staff will always respect the child's privacy, dignity, and right to consent.
- Where routine intimate care is required, an Individual Intimate Care Plan will be developed and agreed with parents/carers prior to admission or as needs arise.
- Best practice should ensure another appropriate adult is in the vicinity, within earshot, and is aware of the task to be undertaken. To protect the child's dignity, two adults are not always required inside the room, but another staff member must know the care is taking place.
- Pupils, parents, unvetted visitors, and volunteers must never be involved in intimate/personal care duties.
- All instances of intimate or personal care provided by staff must be recorded in an Intimate Care Log, noting the date, time, nature of care given, and staff present.
- If a staff member observes any unusual physical signs, injuries, or changes in the child's behavior during intimate care, or if the child seems distressed or makes an allegation, this must be reported immediately to the DSL in accordance with normal safeguarding procedures.

7 Promoting Awareness of Safeguarding amongst pupils

The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching and support staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the school.

We expect all staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff have an important role in insisting that pupils always adhere to the standards of behaviour set out in the behaviour policy and to the expectations as described in other relevant School policies.

Time is allocated in assemblies, tutorials, SPaCE (PSHEE) programme to discussions of what constitutes appropriate behaviour and on why child on child abuse of any form, including bullying/cyberbullying, sexual abuse/harrassment, racial or gender/sexuality abuse and lack of respect for others is never right. These forums, together with curricular lessons and extracurricular activities, amongst other aspects of the School's culture and ethos, are used to promote tolerance and mutual respect and understanding.

Our support to pupils includes the following:

- All pupils know that there are adults to whom they can turn to if they are worried or have concerns. In addition to the specific roles of adults within the Pastoral Teams, our Emotional Health and Wellbeing Practitioner provides counselling support.
- Pupil Planners contain guidance on where to turn for advice.
- Notice boards around school display advice on cybersense and online safety where pupils can seek help, including details of confidential helplines and web addresses for external specialists such as ChildLine, NSPCC, CEOP, Kidscape, Get Connected and the Samaritans.

- We operate a Peer Support Mentor Prefect scheme in the Senior School whereby trained older pupils are encouraged to offer advice and support to younger pupils.
- We provide leadership training to our senior pupils which specifically covers child protection issues and the importance of offering support and assistance to younger and to vulnerable pupils.
- In the Senior School, we provide a programme of sessions and experiences to pupils as part of a spiral curriculum on e-safety and ensure that all pupils understand and adhere to the School's guidelines in this area. This includes building resilience to the risks of radicalisation, as well as increasing understanding of the 4 Cs - content (including misinformation, disinformation (including fake news) and conspiracy theories), contact, conduct and commerce. For more details, refer to the School's SPaCE programme and related school policies such as the online safety and anti-bullying policies. Prep School pupils are taught about online safety issues as part of their computing programme of study, with Years 1-6 completing a module on various age-appropriate topics annually.

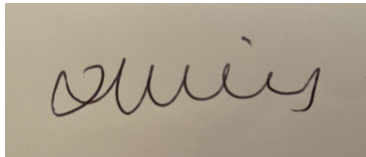
POLICY CREATED BY DGW : JULY 2002

DATE OF LAST UPDATE : August 2026

DATE OF NEXT REVIEW : August 2027* by ACGK

*TO NOTE : This policy is reviewed at least annually but this date is also subject to the impact of legislative change, as required.

This policy is referenced against the ISI Safeguarding and Child Protection Checklist by the DSL and by the Designated Safeguarding Governor as part of each review and update. The master copy held in school is signed and dated by both to confirm ratification by the Board of Governors :



DSL : Mrs A Kingsbury :

Date : September 2026

DSG : Dr Shazia Akowuah :



Date : September 2026

Please read on through Appendix I to XVI for additional information guidance and advice

LIST OF APPENDICES (This list is bookmarked for ease of access)

<u>Appendix I</u>	OTHER SCHOOL POLICIES ASSOCIATED WITH SAFEGUARDING CHILDREN
<u>Appendix II</u>	STAFF GUIDANCE: HOW TO MANAGE A DISCLOSURE OF CHILD ABUSE
<u>Appendix III</u>	RESPONDING WHEN A CHILD DISCLOSES THAT THEY HAVE BEEN ABUSED
<u>Appendix IV</u>	INFORMATION SHARING AND CONSENT (for staff)
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<u>Appendix IX</u>	MANAGING ALLEGATIONS AGAINST STAFF AND LOW-LEVEL CONCERNS
<u>Appendix X</u>	ADVICE FOR PUPILS AND SUPPORT AVAILABLE
<u>Appendix XI</u>	THE PREVENT DUTY AND RADICALISATION
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<u>Appendix XIII</u>	SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN
<u>Appendix XIV</u>	CHILDREN ABSENT AND / OR MISSING FROM EDUCATION, CHILD CRIMINAL EXPLOITATION (CCE), COUNTY LINES, CHILD SEXUAL EXPLOITATION (CSE), SERIOUS VIOLENCE AND DOMESTIC ABUSE
<u>Appendix XV</u>	CONSENSUAL AND NON-CONSENSUAL SHARING OF NUDE AND SEMI-NUDE IMAGES AND / OR VIDEOS (ALSO KNOWN AS YOUTH-PRODUCED SEXUAL IMAGERY)
<u>Appendix XVI</u>	STATUTORY FRAMEWORK FOR EYFS
<u>Appendix XVII</u>	SAFEGUARDING GUIDANCE FOR EXTERNAL CONTRACTORS, SERVICE PROVIDERS AND COACH DRIVERS WORKING WITH YOUNG PEOPLE
<u>Appendix XVIII</u>	GENDER QUESTIONING CHILDREN
Appendix XXIV	FURTHER GUIDANCE AND EXTERNAL AGENCY CONTACT INFORMATION
<u>Appendix I</u>	<i>OTHER SCHOOL POLICIES ASSOCIATED WITH SAFEGUARDING CHILDREN</i>

Please also refer to the following School Policies and Handbooks for further guidance and information regarding the systems in place within Yarm School to safeguard children. These documents are available for viewing on the School Website and the School's Google Drive. Printed copies of these policies are also available to parents on request from the School Office.

- Health & Safety Policy (including Fire Evacuation procedures)
- Risk Assessment and Management Policy
- Critical Incident Policy
- Health Care Policies and Procedures
- Trips and Visits Policy
- Relationship and Sex Education Policies*
- Mobile Phone and Smart Devices Policy
- Search and Confiscation Policy
- Equal Opportunities Policy
- Disability Access Policy and SEND plan
- Learning Support & Special Educational Needs Policy
- Able, Gifted and Talented Policy
- Disciplinary & Behaviour Policies
- Anti-Bullying Policy*
- Drugs and Substance Misuse Policy

- Online Safety Policy*
- Bereavement Policy
- Suicide Postvention Policy
- IT Internet Access, Mobile Technologies Policy* BYOD and Usage Agreements*.
- Privacy Notices, Pupil Data Protection, Retention and other associated Policies
- Procedures for the Appointment of Staff
- DBS Vetting and Suitability Policy
- Visiting Speaker Policy (Prevent)*
- Parents' Handbooks : Preparatory School / Middle School / 6th Form
- Regular Online Safety Guidance for Parents

For staff reference only (no link for parents)

- Staff Behaviour and Conduct Policy
- Staff Handbook
- Staff BYOD, E-mail and Social Media Guidelines & Procedures.

Appendix II

STAFF GUIDANCE : HOW TO MANAGE A DISCLOSURE OF CHILD ABUSE

IF :

- you suspect a pupil of any age may have been abused physically, emotionally or sexually
- a pupil discloses abuse by parent, other adult, teacher, fellow pupil(s) or others
- a third party expresses concerns to you

YOU SHOULD OBSERVE, RECORD AND REPORT

- Listen with concentration and an open mind to what the child is saying.
- Reassure the child that you know it is not her/his fault; say you are sorry about what has happened and ensure that they are reassured that they are being taken seriously.
- Respond without showing signs of disquiet, anxiety or shock.
- Enquire casually about how an injury was sustained or why a child appears upset.
- Confidentiality must not be promised to children or to adults.
- Observe carefully the behaviour or demeanour of the child or the person expressing concern.
- Record in detail what you have seen and heard on CPOMS.
- Do not interrogate or enter into detailed investigation; rather encourage the child to say what he or she wants, using open-ended questions.

REPORT THAT DAY TO :

The Designated Senior Person (DSP) for safeguarding in your section of the school :

Senior School :	Mrs Alex Kingsbury (Senior Deputy Head & DSL) or in her absence, Mrs Kath Gratton or Dr Alan Goodall (Senior Sch DDSLs) or Dr Huw Williams (Headmaster)
Preparatory School :	Mr Gavin Stone (Prep DDSL) or in his absence, Mrs Joanne Speight (Pre-Prep DDSL), Mrs Alex Kingsbury (DSL) or Mr Bill Sawyer (Prep Head)
Pre-Prep and EYFS :	Mrs Joanne Speight (Pre-Prep DDSL) or in her absence, Mr Gavin Stone (Prep DDSL) Mrs Alex Kingsbury (DSL) or Mr Bill Sawyer (Prep Head)

UNLESS :

- A member of staff is the subject of the concern/allegation, in which case report directly to the Headmaster / Prep Head, or Mrs Alex Kingsbury in their absence
- The DSL is the subject of the concern/allegation, in which case report directly to the Headmaster / Prep Head

- The Headmaster / Prep Head that is the subject of the concern, then report directly to the Chair of Governors, or if not available the Vice Chair who is also the Lead Governor for Safeguarding.

It is important to note that if any member of staff believes a child to be in immediate danger or at risk of harm, they should refer this themselves to children's social care and/or the police immediately. They do not need to liaise with the DSL before making the referral. The safety and wellbeing of the child is paramount. Anyone can make a referral to Social Care and/or the Police, not just the Designated Safeguarding Leads. Having made a referral directly, the member of staff must then inform the DSL that the referral has been made at the earliest opportunity.

Should colleagues discover that images of a safeguarding nature may have been or have been created, they must not request to view these images, but must instead take steps to ensure the images are not deleted, and report this immediately to the DSL. This guidance applies equally to AI-generated images, synthetic media and deepfakes. If a staff member discovers, is shown or becomes aware of any digitally altered or artificially created explicit images involving a pupil, they must immediately report the matter to the DSL. **Staff must under no circumstances view, copy, save, forward, or attempt to delete the material or conduct their own investigation.**

Should colleagues uncover any form of technical surveillance (for example hidden cameras, audio recording devices, GPS trackers, and software that monitors computer activity) being used improperly and not in line and in accordance with the School's IT and CCTV policies, they must report this immediately to the DSL and Head, ensuring that the area in which the device has been found is secured as soon as possible, and that no-one, colleague or pupil, is able to access it until the DSL / Head have given further instructions. **The device must not be handled or removed.**

Staff who receive or identify an online safety alert - such as attempts to access blocked content, harmful search terms or filter bypasses - must treat it as a safeguarding concern and alert the DSL / Online Safety Coordinator.

Appendix III *RESPONDING WHEN A CHILD DISCLOSES THAT THEY HAVE BEEN ABUSED*

It is, of course, essential to recognise that any child who has been subject to any form of abuse or harm at any level is a victim and will be in need of pastoral support. Staff must always act in the best interests of the child and make sure their approach is child-centred.

Basic Principles:

- 1 Only ask enough questions to gain basic information.
 - 2 Take the allegation seriously and support – do not interrogate.
 - 3 Use open-ended questions: ✓
 - 4 Avoid leading questions: x
- | | | |
|---------|-----------------------------------|---|
| When : | When did it happen? | ✓ |
| | Did it happen last night? | x |
| Where : | Where did it happen? | ✓ |
| | Was it in your bedroom? | x |
| Who : | Who did it? | ✓ |
| | Was it daddy/your boyfriend/Jane? | x |
| What : | What happened? | ✓ |

5 Avoid using “How” or “Why”. These type of questions require a judgement by a child and may also induce self-recrimination.

6 **REMEMBER :**

- a Keep the questions open-ended.
- b Do not prompt or suggest to obtain the answer you think you want to hear.
- c Keep notes of initial disclosure on the same working day.

On the same day:

- d Report to the DSL / DDSL **immediately** any concerns or a disclosure.

Appendix IV

Information Sharing and Consent (for staff)

The policy of the School is to work in partnership with parents in order to promote the welfare of children. The School also aims to build up relationships of trust with children. Children and parents should feel able to raise with the School concerns about safety and welfare in the knowledge that these will be dealt with sensitively.

Because of the sensitivity of child protection matters, the School will operate on the presumption that anything imparted in confidence will be treated in confidence. However, this is subject to three qualifications:

- 1 Anything imparted “in confidence” to one member of staff or person approached as an associate of the School, may be shared with a restricted number of colleagues if that person feels in need of support and guidance from them.
- 2 If serious concerns are raised about the safety or welfare of a child, or it comes to your attention through a child that someone they knows is at risk, or there are implications regarding a member of staff’s conduct, the person approached is obliged, in terms of the School’s child protection procedures, to pass that information on to the DSL (or Headmaster / Prep Head should their concern concern a member of staff) for consideration as to whether it should be shared with the appropriate authorities. Where appropriate and safe to do so, staff will inform the individual before sharing confidential information. However, staff must not delay a referral or inform the individual if doing so would place a child or adult at increased risk of harm, or prejudice a police investigation.
- 3 The School must pass on information when legally obliged to do so, for example, by a court of law.

Children must also feel able to share concerns with staff. Problems may arise when a child consults a member of staff about a problem and does not want that information to be shared with parents. Whilst staff will try to encourage children to share the information with parents where that is appropriate, there may be circumstances in which any pressure to pass on the information could result in the child keeping the problem to himself or herself or not sharing concerns in the future. Parents should be reassured that it is the aim of the School to always act in the best interests of the child and to encourage the fullest possible involvement and consultation with parents.

Matters which must be referred by members of staff immediately:

- Illegal activity presenting a risk of harm (eg illegal drug supply, serious violence)
- Any form of child-on-child abuse, sexual violence or sexual harassment (including upskirting, nudes/semi-nudes and AI generated images)
- Sexual exploitation, coercion or non-consensual sexual activity
- Bullying and online safety concerns

- Physical abuse, neglect or emotional abuse
- Indicators of County Lines, serious violence or radicalisation
- Self-harm, suicidal ideation or severe mental health crisis
- Child exploitation
- Historic sexual abuse

Note on sexual health & Medical Conditions: Requests for contraception, pregnancy advice or medical conditions (such as HIV/Hepatitis) do not automatically require a safeguarding referral if the pupil is assessed as Gillick competent, unless there are indicators of abuse, exploitation, or lack of consent. Advice can, however, be sought by the member of staff with the DSL.

Early sharing of information is the key to providing effective early help where there are emerging problems. At the other end of the continuum, sharing information can be essential to put in place effective child protection services. Child Safeguarding Practice Reviews (CSPRs) have consistently shown how poor information sharing contributes to serious harm or fatal outcomes for children. **Where there is any concern about a child you should not regard refusal or absence of consent as a reason to stop the sharing of confidential and sensitive information.'**

Sensitivity surrounding personal data must not prevent necessary information sharing for safeguarding purposes. Under UK GDPR and the Data Protection Act 2018, the primary legal basis for sharing safeguarding information is Public Task (Article 6(1)(e)) and Substantial Public Interest / Safeguarding of Children (Article 9(2)(g) and Schedule 1). While staff should aim to be open and seek agreement where appropriate, consent is not the legal condition required to share safeguarding data, and a lack of consent must never delay sharing information where a child may be at risk of harm.

Consent

Many issues surrounding the disclosure of personal information can be avoided if the consent of the individual has been sought and obtained. Obtaining consent remains a matter of good practice and in circumstances where it is appropriate and possible, informed consent should always be sought. It must be remembered that individuals have the right to withdraw consent at any time.

Informed consent means that the person giving consent needs to understand why information needs to be shared, who will see their information, what it will be used for and the implications of sharing that information. There should be a climate of openness and honesty with children and families where, in the main, informed consent is obtained at the start of intervention in children's lives and gained again where circumstances alter for example where an agency wishes to make a referral of a child with additional needs or a child in need to another agency.

Children and families should be encouraged to see information sharing (and giving their consent to share their personal information) in a positive light, and as something which makes it easier for them to receive the services that they need.

However, the UK GDPR and Data Protection Act 2018 do not prevent, or create barriers to, the sharing of information for the purposes of safeguarding and promoting the welfare of children. Fears about sharing information must not be allowed to stand in the way of protecting a child's safety. Under data protection law, the School does not rely on statutory 'consent' as the legal gateway for safeguarding data processing. Instead, the School relies on the following lawful bases:

- Article 6(1)(e) UK GDPR (Public Task): Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.
- Article 9(2)(g) UK GDPR & Data Protection Act 2018 (Substantial Public Interest / Safeguarding): Processing special category data necessary for statutory purposes and safeguarding children and individuals at risk (Schedule 1, Part 2).

Because the legal basis is not 'consent', individuals do not hold a statutory right to veto or withdraw permission where information sharing is necessary to safeguard a child or fulfill statutory duties.

Whose Consent to Seek

Where appropriate, staff should aim to engage both parents and the child. Children over 16, and younger children who possess sufficient maturity and understanding (assessed under Fraser competency), have a right to be consulted about how their personal information is handled. However, seeking agreement must never compromise the child's safety or delay necessary action.

Informing the family

Staff will aim to seek agreement and inform families before sharing confidential information. However, staff must not seek agreement or inform parents/children if doing so would:

- Place a person (a child, family member, staff, or third party) at increased risk of harm;
- Prejudice the prevention, detection, or prosecution of a crime; or
- Lead to an unjustified delay in making enquiries about safeguarding concerns or protecting a child.

Information sharing when consent cannot be sought or is refused

Where agreement cannot be obtained, or where seeking it is refused or inappropriate, staff must evaluate whether sharing the information is a necessary and proportionate response to safeguard the child or promote their welfare.

When deciding whether to share information without agreement, staff must consider:

- The risk of what might happen to the child or others if the information is withheld versus shared;
- Information can and should be shared to provide early support or intervention before concerns escalate. Staff do not need to wait for a child to be at risk of 'significant harm' before sharing relevant information with statutory partners (such as local authority children's social care or the police);
- Protecting a child from harm, promoting their welfare and preventing crime and supporting adult safeguarding are all recognised within data protection law as being in the public interest.

If the Designated Safeguarding Lead (DSL) decides to make a referral to children's social care or the police against the wishes of the victim or family, this decision must be documented alongside the legal rationale, handled with sensitivity, and supported by appropriate specialist advice for the individual.

Appendix V

CPOMS Incident Reporting - Best Practice

(shared with colleagues at the start of each academic year)

CPOMS should be used to report safeguarding / child protection and child-on-child / bullying concerns or incidents. When logging an incident on CPOMS, please follow the guidelines below:

- Ensure the incident is logged factually and is neutral in tone. Incident reports should never be critical or judgemental in nature;
- Ideally, write the incident report in the 3rd person, using your initials instead of 'I' (eg *ACGK spoke to Emily at Morning Break*);
- Do not use initials to refer to pupils - full names must be used. Staff initials can be used;

- Use the words of the pupil / student / parents etc as far as possible and where appropriate, highlighting this in speech marks (eg *Jane noted that she had 'had enough' and 'just wanted everyone off my back'*);
- Note who was present, what questions were asked and what the answers were;
- It is important to avoid making assumptions, but equally appropriate to share your observations about a pupil's or parent's demeanour (for eg, *Mrs S seemed anxious* as opposed to *Mrs S was anxious*);
- Log the incident as soon as you are able, in order to ensure facts are remembered. If you are logging an incident the day after it occurred, please change the date on the entry using the timestamp so that the chronology of events is maintained and is accurate;
- Copy / paste emails into the body of the incident box; attach relevant documentation;
- Use the body map function to record any bruises, etc that you have observed;
- Consider carefully the appropriate category / subcategory for the incident you are logging; if you feel that there is not an appropriate category / subcategory for the incident you are logging, please let ACGK know;
- Please note that those who need to be aware of safeguarding / bullying concerns will be automatically alerted;
- Ensure actions taken or decisions made are also logged, including reasons and justifications for them. This should be included either within the initial *Incident* box, or as a later *Action*;
- Ensure you link all pupils involved in the incident (and remember to tick 'monitor' for each linked pupil).

Appendix VI *CODE OF GOOD PRACTICE FOR ALL STAFF*

*To help all staff and volunteers protect themselves from possible allegations of abuse from children and young people, the following points are offered for guidance and advice. **The list is not exhaustive and should be read in the context of all other staff policies, especially the Staff Conduct and Behaviour Policy** and should take into account the age and stage of development of the children and young people who fall within your care.*

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.

- 1 Do not rely on your 'good name' to protect you.
- 2 Do not for one moment believe '*it could never happen to me*'.
- 3 The use of physical restraint on a child or young person should involve only the absolute minimum force necessary and is permissible only when you are certain that they are at imminent risk of endangering themselves, yourself, others or property. Where possible, summon a colleague to witness the situation and to give you appropriate help. Restraint should always be proportionate, necessary, and reasonable. Any use of restraint or seclusion should be logged on CPOMS and communicated with parents as soon as possible.
- 4 Any physical contact between a member of staff and a child or young person should be a considered action and used only for the purposes of instruction or immediate care.
- 5 Where possible, avoid being alone with a child or young person. Where circumstances make this unavoidable try to ensure that others are within earshot and preferably within vision.

- 6 Never make salacious, suggestive or demeaning remarks/gestures to, or in the presence of, children and young people.
- 7 Do not engage in inappropriate written or electronic communication with a pupil (including texts, chat-rooms, social networking sites, email, photographs, etc). See IT Policies.
- 8 If you suspect that a child or young person is becoming inappropriately attracted to you then you are strongly advised to share your concerns with the DSL.
- 9 In circumstances where your relationship with, or feelings towards, a child or young person are placing you at risk of unprofessional behaviour you are urged to seek advice and support from the DSL.
- 10 From time to time personal circumstances arise which can adversely affect your professional relationships (e.g. bereavement, health or relationship breakdown). Should this be the case you are encouraged to seek advice and support from your Line Manager / SMT.
- 11 Avoid any physical horseplay (e.g. tickling) which the child or young person, or indeed another member of staff might misinterpret, no matter how innocent or well-intentioned your actions might be.
- 12 Always respect a child's or young person's right to personal privacy.
- 13 Always encourage children and young people to feel comfortable and caring enough in your class or under your care to point out to you attitudes or behaviour they do not like.
- 14 It is your responsibility to be familiar with the School's policies and procedures that relate to child protection and safeguarding, including whistleblowing protocols. Advice is always available from the DSL, DDSs or SMT.

KCSIE (2026), Part 4 makes it clear that there is a duty on the School as an employer and on all employees to report any adult who has behaved in a way that has harmed a child, or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Part 4 also details processes to deal with concerns (including allegations) which do not meet the harm threshold of referral. The term 'low-level' concern does not mean that it is insignificant, it is 'any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

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

It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly with the Headmaster / Prep Head and / or the DSL, and recorded and dealt with appropriately. The DSL will also on occasion seek advice from the LADO on any low level concerns.

Appendix VII TYPES OF ABUSE AND NEGLECT

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

KCSIE (September 2026) states that ABUSE is : *“a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family*

members, often referred to as child to parent or caregiver abuse.” Staff should refer to KCSIE Part 1 (September 2026) for further guidance on the types of abuse, in addition to reading the following summary.

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Staff should note that sexualised abuse, including verbal abuse, by other children is a specific potential safeguarding issue in education. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Neglect: the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

CHILD ON CHILD ABUSE

*“Staff... should recognise that, as well as adults, **children are also capable of abusing another child** and therefore they should appreciate the significance of the need to have a clear understanding of the school’s anti-bullying, sex and relationship, IT, online safety, and other related policies to understand the range of different forms that child on child abuse could take, including those associated with gender or technology.”*

It is important that all staff recognise the importance of challenging abusive behaviours between children, and that even if there are no reported cases of child on child abuse, such abuse is still be taking place and is simply not being reported. This abuse is most likely to include but may not be limited to:

- Bullying (including cyberbullying - including, abusive messaging in group chats, prejudiced-based and discriminatory bullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, causing physical harm or anything off- or online which facilitates, threatens and/or encourages physical abuse;
- Serious Violence such serious physical assault and harm, or the threat of harm with a weapon;

- Upskirting *
- Sexual violence and sexual harassment – See KCSIE (September 2026) Part 5 and [Appendix XIII](#);
- Initiation / hazing type violence and rituals;
- Gender discrimination;
- Misogynistic or misandrist behaviors;
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse');
- Consensual and non-consensual making or sharing of nudes and semi-nudes, including content generated or altered by AI, such as deepfakes or deep nudes;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

It can be difficult to separate child on child abuse from general behavioural issues. However, such actions become a safeguarding matter when there is a large difference in power between the young people concerned or there are concerns about the intentions of the alleged perpetrator. It should also be recognised that there can be a gendered nature to child on child abuse (i.e. it is more likely that girls will be victims and boys the perpetrators). All cases will be taken seriously and we must :

- Promote and uphold our school values, especially in front of the children;
- Educate our children, within PSHEE / SPaCE, assemblies, etc to engage in positive and appropriate relationships with others, to recognise and report bullying, physical abuse and sexual harassment, that any form of initiation ritual or hazing is totally unacceptable, the dangers of sharing nudes and semi-nudes, stranger danger, etc;
- 'Signposting' available services (e.g. Childline, NSPCC, etc);
- **Continue to ensure our school is a place where children feel safe and can talk.** This includes challenging the perceptions children have of what is appropriate language and behaviour.

As already stated, the DSL will liaise directly with the relevant LA and follow their referral protocols. Where allegations of abuse or assault have been made against one or more pupils, risk based decision-making is carried out with a view to ensuring the safety of all pupils and that both the alleged victim and perpetrator pupils receive appropriate support. All staff should be clear that if they suspect any form of child on child abuse, it must be reported following the School's agreed protocols and that we have a responsibility to support both the victim and perpetrator.

REMEMBER : Abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. Downplaying behaviors creates an unsafe environment and normalises abuse.

*** Upskirting is a criminal offence under the Voyeurism Act 2019 with offenders facing up to a 2 year jail sentence and being placed on the sex offenders' register.**

Signs of Possible Abuse

It is important to remember that lists such as these ones are neither definitive nor exhaustive and the information must be used in the context of the child's whole situation and in combination with a range of other information related to the child and their circumstances.

1 PHYSICAL ABUSE

- Unexplained injuries or burns, particularly if they are recurrent.
- Improbable excuses given to explain injuries.
- Refusal to discuss injuries.
- Untreated injuries, or delay in reporting them.
- Excessive physical punishment.
- Arms and legs kept covered in hot weather.
- Fear of returning home.

Aggression towards others.
Running away.

2 **EMOTIONAL ABUSE**

Low self-esteem.	Self-mutilation.
Continual self-depreciation.	Compulsive Stealing.
Sudden speech disorder.	Extremes of passivity or aggression
Significant decline in concentration.	Running away
Socio-emotional immaturity.	Indiscriminate friendliness
"Neurotic" behaviour (e.g. rocking, head-banging)	

3 **SEXUAL ABUSE**

a **BEHAVIOURAL**

Lack of trust in adults or over familiarity with adults.
Fear of a particular individual.
Social isolation-withdrawal and introversion.
Sleep disturbance (nightmares, irrational fears, bed wetting, fear of sleeping alone, needing a night-light).
Running away from home.
Girls taking over the mothering role.
Reluctance or refusal to participate in physical activity or to change clothes for activities
Low self-esteem.
Drug, alcohol or solvent abuse.
Display of sexual knowledge beyond child's years.
Unusual interest in the genitals of adults or children or animals.
Expressing affection in inappropriate ways, e.g. "French kissing".
Fear of bathrooms, showers or closed doors.
Abnormal sexualised drawings.
Fear of medical examinations.
Development regression.
Poor peer relations.
Over sexualised behaviour.
Compulsive masturbation.
Stealing.
Psychosomatic factors e.g. recurrent abdominal pain or headache.
Sexual promiscuity.

b **PHYSICAL/MEDICAL**

Sleeplessness, nightmares, fear of the dark.
Bruises, scratches, bite marks to the thighs or genital areas.
Itch, soreness, discharge, unexplained bleeding from the rectum, vagina or penis.
Pain on passing urine or recurrent urinary infection.
Stained underwear.
Unusual genital odour.
Anxiety/depression.
Eating disorder.
Discomfort/difficulty in walking or sitting.
Pregnancy-particularly when reluctant to name the father.
Recurring urinary tract problems, vaginal infection or genital damage.
Venereal disease/sexually transmitted diseases.
Soiling or wetting in children who have been trained.
Self mutilation/suicide attempts.

c **FEMALE GENITAL MUTILATION** See KCSIE (September 2026), Annex B and Appendix XIII

d **CHILD SEXUAL AND CRIMINAL EXPLOITATION** See KCSIE (September 2026), Annex B

4 PHYSICAL NEGLECT

Constant hunger.
Poor personal hygiene.
Constant tiredness.
Poor state of clothing.
Frequent lateness and/or unexplained non-attendance at school.
Untreated medical problems.
Low self-esteem.
Poor peer relations.
Stealing.

NON-ORGANIC FAILURE TO THRIVE

Significant lack of growth.
Weight loss.
Hair loss.
Poor skin or muscle tone. Circulatory disorders.

A degradation of a child's mental health can sometimes be an indicator of all forms of abuse. Furthermore, being absent from school, particularly repeatedly and / or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities.

POSSIBLE EFFECTS OF ABUSE:

The sustained physical, emotional, sexual abuse or neglect of children can have major long-term effects on all aspects of their health, development and wellbeing. Children can grow up to feel worthless, unlovable, betrayed, powerless, confused, frightened and mistrustful of others. They might feel, wrongly, that the abuse is their fault.

Physical abuse

Physical abuse can lead directly to neurological damage, physical injuries, disability and in extreme cases death. Physical abuse has been linked to aggressive behaviour in children, emotional and behavioural problems and learning difficulties.

Emotional abuse

If a child suffers sustained emotional abuse there is increasing evidence of adverse long-term effects on their development. Emotional abuse has a significant impact on a developing child's mental health, behaviour and self-esteem. It can be especially damaging in infancy and can be as important as the other more visible forms of abuse, in terms of its impact on the child. Domestic violence, adult mental health problems and parental substance misuse may feature in families where children are exposed to such abuse.

Sexual abuse

Disturbed behaviour including self-harm, inappropriate sexual behaviour, sadness, depression and loss of self-esteem have all been linked to sexual abuse. Its adverse effects may last long into adult life. The severity of the impact on the child is believed to increase the longer the abuse continues, the more serious the abuse, the younger the child at the start, and the closeness of the relationship to the abuser. The child's ability to cope with the experience of sexual abuse, once recognised, can be strengthened by the support of a non-abusive adult carer who believes the child, helps the child understand the abuse, and is able to offer help and protection. Some adults who sexually abuse children were themselves sexually abused as children.

Neglect

Neglect can seriously impair a child's health, physical and intellectual growth and development, and can cause long term difficulties with social functioning, relationships and educational progress. Extreme cases of neglect can cause death.

CHILDREN POTENTIALLY AT GREATER RISK OF HARM:

Whilst all children should be protected, it is important that schools and governing bodies recognise that some groups of children are potentially at greater risk of harm than others (both online and offline).

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities will share the fact that a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes, e.g. in responding to unauthorised absence or missing education where there are known safeguarding risks or considering the provision of pastoral and/or academic support, alongside action by statutory services).

Looked after children and previously looked after children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The Senior Management Team will ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility, together with information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The DSL will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

A previously looked after child potentially remains vulnerable and **all** staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

Children with special educational needs and disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

Children requiring mental health support

The School has an important role to play in supporting the mental health and wellbeing of the pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Children who are absent from education

Unexplainable and or/persistent, prolonged or repeated absences from education can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county

lines. It is important the school's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. Further information and support, includes:

- Guidance on school attendance '[Working together to improve school attendance](#)' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.
- Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: [Children Missing Education](#).

SPECIFIC SAFEGUARDING ISSUES:

KCSIE (September 2026), Annex A, also provides additional information and hyperlinks to further information about specific safeguarding issues:

- Bullying including cyberbullying
- Children missing education*
- Children missing from home or care
- Children with family members in prison
- Child sexual exploitation (CSE)*
- Child criminal exploitation (CCE): county lines and / or gangs*
- Serious Violence (including knife and gun crime, peer conflict, and weapons)
- Domestic violence and relationship abuse
- Homelessness
- Drugs
- Fabricated or induced illness
- Faith abuse
- Gangs and youth violence
- Hate
- So-called Honour or faith based abuse: gender-based abuse or violence/violence against women and girls (VAWAG). This category now incorporates Female Genital Mutilation (FGM)* and Forced Marriage.
- Mental health
- Missing children and adults strategy
- Child on child abuse*, including misogyny and misandry
- Private fostering
- Preventing radicalisation, Prevent Duty and Channel guidance *
- Serious violence - knife and gun crime*
- Sexual violence and sexual harassment between children in schools*
- Consensual and non-consensual sharing of nudes and semi-nudes, including AI / Deepfakes
- Trafficking
- Upskirting*
- Cybercrime
- Modern slavery
- Child Abduction and community safety incidents

All staff can refer to Annex B (KCSIE, September 2026) or consult the DSL for further information.

***See also Appendix XIII to XVI of this policy for additional guidance.**

Appendix VIII

RESPONSIBILITIES OF THE DESIGNATED SAFEGUARDING LEAD

The Designated Safeguarding Lead (DSL) should take the lead responsibility for safeguarding and child protection (including online safety and understanding, overseeing and managing the filtering and monitoring systems and processes in place, working closely with IT staff and governors. Through her, the Deputy DSLs (DDSLs) as Designated Senior Persons for each school section and the Online Safety Co-ordinator will be responsible for matters relating to Child Protection, Safeguarding and online safety and will adopt a holistic safeguarding model. This means that assessments of children will also consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

The responsibilities and role of the DSL and DDSL are summarised as follows:

- a) to advise and act upon all suspicion, belief and evidence of abuse reported to him/her.
- b) to make prompt contact with relevant agencies, according to the concern raised, and to support other staff in doing so: to the CHub for cases of suspected abuse and neglect; to the Channel programme where there is a radicalisation concern as required; where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and where a crime may have been committed to the Police as required.
- c) work with other relevant members of staff (for example, EHWP or Director of Learning Skills) when supporting a child, to ensure that that children's needs are considered holistically
- d) work with relevant colleagues, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college.
- e) be the first point of contact for parents, pupils, teaching and support staff, external agencies and any other in all matters of child protection and safeguarding, including online safety.
- f) ensure all staff are aware of the need to be alert to signs of abuse and know how to respond to a pupil who may tell of abuse.
- g) co-ordinate, update and review all child protection and safeguarding procedures, including all online safety policies and procedures, in liaison with other key staff, and ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school in this.
- h) liaise with the Local Authority Designated Officer and the Children's Hub, as well as other designated services, on behalf of the School.
- i) ensure that all members of staff and volunteers receive basic and induction training in safeguarding and child protection issues and are aware of the School's child protection procedures.
- j) ensure that child protection files are kept up to date. Information should be kept confidential and stored securely, in a separate child protection file for each child.
- k) understand the importance of information sharing as well as relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- l) be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency.
- m) transfer information to the new school when a pupil on the Child Protection Register or about whom there have been any safeguarding or child protection concerns, ensuring information is transferred securely, separately from the main file, within 5 working days (or within 5 working days of the start of term), with confirmation of receipt requested..
- n) ensure that all students are encouraged to talk, and that students know who to approach with any concerns, whilst understanding and supporting the difficulties that children may have in approaching staff about their circumstances
- o) ensure that the duty of care towards pupils and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour and assist staff to monitor their own standards and practice
- p) keep the Headmaster informed of all actions, unless the Headmaster is the subject of a complaint

- q) Designated Safeguarding Lead training should be updated at least every two years, supplemented by regular ongoing updates to knowledge and skills at least annually, and including regular attendance at the termly Stockton Safeguarding Forums.
- r) have a full working and up to date knowledge of the assessment process for providing early help and statutory intervention, including local criteria for referral arrangements; understand the importance of providing information; understand the lasting impact that adversity and trauma can have on children; are alert to the specific needs of children, including those with special educational needs and disabilities (SEND) and the additional risks they face online; understand and support the school or college with regards to the requirements of the Prevent duty; understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
- s) contact the Child Missing Education Service if the School does not know which school a former pupil has moved to, or becomes aware that they are no longer in formal education
- t) be aware of the requirement for children to have an Appropriate Adult during police investigations.
- u) professional challenge if a child's situation does not appear to be improving to press for reconsideration.

The school has implemented robust cover arrangements for periods when the DSL is unavailable. This includes a confidential shared safeguarding mailbox to ensure that safeguarding concerns are received, monitored, and acted upon without delay: safeguardingsenior@yarmschool.org or safeguardingprep@yarmschool.org

Further details of the general role and responsibilities expected of the School's Designated Safeguarding Leads, with regard to managing referrals, undertaking training and raising awareness, are published in KCSIE, (September 2026).

Appendix IX MANAGING ALLEGATIONS AGAINST STAFF AND LOW-LEVEL CONCERNS

1. INTRODUCTION AND LEGAL FRAMEWORK

Yarm School is committed to creating and maintaining an environment where pupils are safe, valued, and respected. This Appendix operates in compliance with Part 4 of Keeping Children Safe in Education (KCSIE), Working Together to Safeguard Children, and statutory guidance governing independent schools and applies to all employees, supply/agency staff, external tutors, contractors, volunteers, teacher trainees and governors across both the Prep and Senior Schools.

Procedures are divided into two distinct operating frameworks:

- Section A: Managing allegations that meet the Harm Threshold.
- Section B: Managing Low-Level Concerns that do not meet the Harm Threshold.

2. SECTION A: ALLEGATIONS THAT MEET THE HARM THRESHOLD

Definition of the Harm Threshold

An allegation meets the Harm Threshold where it is alleged or suspected that an adult working in or on behalf of the School has:

- Harmed a child or may have harmed a child;
- Committed a criminal offence against or related to a child;
- Behaved in a way that indicates they may pose a risk of harm to children; or

- Behaved in a way that indicates they may be unsuitable to work with children (including behaviour in their personal life, social media activity, or online interactions).

Immediate Reporting Procedure

Any member of staff who receives an allegation or forms a suspicion that a colleague meets the Harm Threshold must report it immediately to the Headmaster. Allegations against the Headmaster must be reported directly to the Chair of Governors; allegations against the Designated Safeguarding Lead (DSL) must be reported to the Headmaster.

Staff must not attempt to investigate, interview witnesses or inform the accused individual prior to reporting to the Headmaster or Chair of Governors.

LADO Referral and Multi-Agency Collaboration

The Headmaster or Chair of Governors must contact the Local Authority Designated Officer (LADO) within 1 working day (24 hours) of receiving the allegation. The School will not undertake internal disciplinary investigations before consulting with the LADO, Children's Social Care, and/or the Police where criminal behavior is suspected.

If there is an investigation by an external agency, for example the Police, the Headmaster (or DSL) should normally be involved in, and contribute to, the inter-agency strategy discussions. The Headmaster (or DSL) is responsible for ensuring that the School gives every assistance with the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The Headmaster (or DSL) shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

Subject to objections from the Police or other investigating agency, the Headmaster (or DSL) shall:

- a) inform the child/children or parent/carer making the allegation that the investigation is taking place and what the likely process will involve
- b) ensure that the parents/carers of the child making the allegation have been informed that the allegation has been made and what the likely process will involve.
- c) inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve
- d) inform the Chair of Governors and the DSL Governor of the allegation and the investigation, although there should be no disclosure of details, as this may prejudice the outcome of a disciplinary panel

The Headmaster (or DSL) shall keep a written record of the action taken in connection with the allegation.

Suspensions and Duty of Care

Suspension is not an automatic response or a default sanction; it will only be considered after consultation with the LADO where:

- A child is at risk of immediate harm;
- The allegation is so serious that gross misconduct is indicated; or
- The presence of the staff member hinders a fair investigation.

Before deciding, the Headmaster/Chair of Governors must interview the staff member, subject to prior approval/consultation with the LADO or Police.

- The employee may be accompanied by a colleague or trade union representative and given a brief adjournment to prepare a response.
- The interview is not a formal disciplinary hearing to determine guilt, but an opportunity to explain the allegation, provide reasons for potential suspension (without compromising the investigation), and hear the employee's representations.
- If suspended, written confirmation stating the reasons must be sent within one working day.

Upon suspension, the Headmaster/Chair must:

- Notify the Chair and Governing Body (in confidence, with minimal detail).
- Inform parents/carers of the child (and consider informing the child), requesting confidentiality.
- Inform essential senior staff, and review who else needs to know in consultation with the LADO/investigators.
- Consider issuing a controlled statement to students/parents if appropriate, protecting pupil anonymity.
- Arrange alternative school management if the Headmaster is suspended.

Suspended staff must receive regular updates, pastoral support, and remain available for interviews during working hours. The suspension must be kept under regular review. Staff suspended for three weeks or more have the right to appeal under the School's disciplinary procedures.

Disciplinary Investigation

A disciplinary investigation and disciplinary hearing should be conducted in accordance with the existing staff disciplinary procedures, found [here](#).

Unfounded Allegations

False allegations may indicate abuse elsewhere; the LADO will refer these to Children's Social Care to assess if the child needs support. If an allegation is proven malicious, the Headmaster may take disciplinary action against a pupil, or the Police may investigate non-pupil accusers.

In consultation with the DSL/Chair of Governors, the Headmaster will:

- Notify the staff member in writing that no further action will be taken, offering support/counselling.
- Notify parents of the alleged victim (and accuser, if different) of the outcome.
- Record a final report detailing the allegation, the outcome, and completed actions.

Record Keeping and References

Substantiated Allegations: Detailed records of substantiated allegations, outcome summaries and disciplinary actions will be retained on the individual's confidential personnel file until the person reaches normal pension age or for 10 years from the date of the allegation (whichever is longer).

References: Substantiated allegations that meet the Harm Threshold will be included in future employment references. Unsubstantiated, unfounded, false, or malicious allegations will not be included in references.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed that the School has a statutory obligation to inform the Disclosure and Barring Service. In addition, if the actions of a teacher might constitute misconduct then, The Teacher Regulation Agency (TRA) will also be informed and may consider prohibition of a teacher from the teaching profession. If there is an allegation of harm or abuse by any person living, working or looking after children at the premises or elsewhere, or any other abuse on the premises, a report must be made to Ofsted within 14 days [EYFS Statutory Framework, sec 3.8]. Please note that under the updated EYFS statutory framework effective from September 2026, the reporting threshold is lowered to any allegation of 'harm' (rather than only 'serious harm'), meaning certain lower-level concerns that were previously handled internally may now require official notification to Ofsted.

3. SECTION B: MANAGING LOW-LEVEL CONCERNS

Definition and Purpose

A 'low-level concern' is any concern - no matter how small, subtle or seemingly trivial - that an adult working in or on behalf of the School may have acted in a way that is inconsistent with the Yarm School Staff Code of Conduct, but does not meet the Harm Threshold set out in Section A.

The purpose of capturing low-level concerns is to create an open culture of transparency, address minor boundary slips early, protect staff from false allegations, and identify potential grooming or harmful behavioral patterns.

Examples of Low-Level Concerns

Examples include, but are not limited to:

- Being alone with a pupil in an unmonitored or isolated area without clear educational justification.
- Being overly friendly or showing favoritism toward specific pupils.
- Sharing personal contact details, personal social media handles, or engaging in informal digital messaging with pupils outside approved school systems.
- Using inappropriate, crude or double-entendre language in front of pupils.
- Engaging in inappropriate physical contact, such as tickling.

Reporting Pathway for Low-Level Concerns

All low-level concerns must be submitted in writing to the Headmaster (or DSL if delegated) as soon as possible and within 24 hours. Reports must be factual and include the name of the individual involved, date/time/location of the incident, full context, details of any witnesses and the signature/date of the reporter.

Handling, Storage and Pattern Analysis

All low-level concerns will be logged on a central, confidential low-level concerns register maintained securely by the DSL. These records are stored separately from personnel files.

The DSL will conduct regular reviews of the Register to identify patterns of behavior, cumulative risks or broader cultural issues requiring staff retraining.

If a series of low-level concerns indicates a pattern of escalating risk, the Headmaster and DSL will re-evaluate the matter under Section A and consult the LADO.

Low-level concerns that have not escalated to a formal disciplinary sanction or LADO referral will not be disclosed in external employment references. Other than in exceptional circumstances, the School will retain such information for 6 years after their leaving date for legal purposes.

4. WHISTLEBLOWING AND EXTERNAL ESCALATION

If a staff member feels that an allegation or low-level concern is not being handled appropriately by School leadership, or feels unsafe reporting internally, they must utilise the Yarm School Whistleblowing Policy. Staff may also report safeguarding concerns directly to external bodies, including the LADO, Children's Social Care, or the NSPCC Whistleblowing Advice Line.

Important Exception for EYFS Settings: Under the updated September 2026 EYFS statutory framework, any allegations of 'harm' (not just 'serious harm') must be officially reported to Ofsted within 14 days. In EYFS settings, some lower-level concerns regarding adult conduct that would ordinarily be managed and logged purely internally must be evaluated immediately by the DSL and EYFS DDSL to determine if they constitute 'harm' and therefore trigger a mandatory Ofsted notification.

Appendix X

ADVICE FOR PUPILS AND SUPPORT AVAILABLE :

The safety and welfare of all our pupils at Yarm School is our highest priority. We aim to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety. This child centred approach is fundamental to safeguarding and promoting the welfare of every child. Processes are in place to allow pupils to report concerns freely, knowing these will be taken seriously and dealt with swiftly and appropriately, if you:

- have something important to talk to staff about.
- are worried about things that are happening to you.
- need help or if you need to know how to seek help.

Who is available:

All members of the Senior Management Team and staff are there to listen and to help – they will try and do what they can. Examples of adults you can turn to for pastoral support include :-

In the Senior School :

Your Tutor	Dr Williams	Headmaster
Your Head of Year	Mrs Kingsbury	Senior Deputy Head, DSL
Your Head of House	Mrs Gratton	Head of Middle School* & DDSL
Your Subject Teachers	Dr Goodall	Head of Sixth Form*
	Miss Gamble	Deputy Head of Sixth Form

Mrs Hall and Mrs Harkness	Emotional Health & Wellbeing Practitioners*
Mrs Wheatley	First Aid Lead
Miss Algate	School Office Manager

In the Preparatory School :

Your Form / Class Teacher	
Mr Sawyer	Head
Mr Stone	Deputy Head & DDSL*
Mrs Speight	Head of Pre-Prep and EYFS & DDSL*
Mrs Hall	Emotional Health & Wellbeing Practitioner*
Mrs Wheatley	First Aid Lead
Mrs White	School Office (Prep)
Mrs Banham	School Office (Pre-Prep)

*These staff can also assist with referrals to other external support agencies.

DSL = Designated Senior Lead with overall responsibility for safeguarding and child protection.

DDSL = Deputy Designated Safeguarding Lead with delegated responsibility by school section.

Outside School :

Your Parents

Your local Health Centre / GP / CAMHS

- If you are worried about confidentiality, tell the staff; they will understand. They may be concerned about your safety and may need to share this with others, but they would tell you first.
- If you are still unsure about talking to a member of staff you can phone **ChildLine on 0800 1111** . Calls are free and will not show up on your phone bill . ChildLine will help you work out what to do next.
- Other help lines also exist to listen to young people with specific problems. For example, call the **NSPCC helpline on 0800 136 663** if you are a victim of sexual abuse or harassment.
- Please also see the notice boards around school for reference to these and to useful websites such as CEOP that can also offer help and advice.

Appendix XI *The Prevent Duty and Radicalisation*

As of July 2025, there is no specific terrorist or violent extremist threat to the Cleveland area. Nevertheless, anyone can report concerns about children becoming radicalised to Cleveland Police on their direct number 101 or by calling the Anti-Terrorist hotline on 0800 789321. (SPOCS/named teams and individuals within the Police are allocated to deal with reports relating to FGM, forced marriages or radicalisation under this mandatory duty).

Preventing radicalisation

The Counter Terrorism and Security Act 2015 places a duty on schools to prevent people being drawn into terrorism. This duty applies to all schools, whether publicly-funded or independent, and organisations covered by the Early Years Foundation Stage framework.

Schools Leaders must:

- Establish or use existing mechanisms for understanding the risk of extremism
- Ensure staff understand the risk and build capabilities to deal with it
- Communicate and promote the importance of the duty
- Ensure staff implement the duty effectively

Other duties on schools include:

- Effective partnership working with other local agencies, e.g. HSSCP, police, health, etc.
- Information sharing
- Maintaining appropriate records
- Assessing local risk of extremism (including Far Right extremism)
- Demonstrating they are protecting children
- Developing and adhering to clear protocols for visiting speakers
- Safeguarding policies that take account of HSSCP policies and procedures
- Training staff to give them knowledge and confidence
- Ensuring there is robust ICT protocols that filter out extremist materials

Understanding and recognising risks and vulnerabilities of radicalisation

Children and young people may be susceptible to extremist ideology and radicalisation. These can include through the influence of family members or friends and/or direct contact with extremist groups and organisations or, increasingly, through the internet. This can put a young person at risk of being drawn into criminal activity and has the potential to cause significant harm. The risk of radicalisation is the product of a number of factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified.

Potential indicators include:

- Use of inappropriate language;
- Possession of violent extremist literature;
- Behavioural changes;
- Advocating violent actions and means;
- Association with known extremists;
- Seeking to recruit others to an extremist ideology.

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. **Extremism** is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. Extremism also includes calls for the death of members of our armed forces, whether in the UK or overseas. Protecting children from the risk of radicalisation is an essential part of our wider safeguarding duties.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in

identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Prevent

From July 2015 specified authorities, including all schools as defined in the summary of this guidance, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (“the CTSA 2015”), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools and colleges should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools and colleges to have distinct policies on implementing the Prevent duty.

The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of Local Safeguarding Children Partnership (HSSCP) .

The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. All school staff receive regular, updated safeguarding and Prevent awareness training so they have the knowledge and confidence to identify indicators of concern and act early. As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering is in place. It is also important that schools teach students about online safety more generally.

The Department for Education has also published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

Channel

School staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be at risk of being drawn into radicalisation. An individual’s engagement with the programme is entirely voluntary at all stages and they will be required to provide their consent before any support is delivered through the programme.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral, the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges which are required to have regard to ‘KCSIE, September 2025’ are listed in the CTSA as partners required to co-operate with local Channel panels.

Appendix XII Honour or faith based abuse & FEMALE GENITAL MUTILATION (FGM)

So-called “honour or faith based” violence/abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators, not from the UK but also from abroad.

Honour or faith based abuse can be physical, emotional and / or sexual. Victims can be of any age, gender or sexual orientation. Karma Nirvana is a recognised charity that provides advice and support to those at risk of Honour or faith based abuse : www.karmanirvana.org.uk

Crimes committed in the name of so called honour may include :

- Female genital mutilation (FGM) - see below for further details
- forced marriage
- breast ironing (the use of heated objects to flatten a girl’s breasts / stop them developing)
- domestic abuse (see Appendix XVI)
- being held against their will.

KCSIE (September 2026) includes FGM and Forced Marriage under the category of Honour or faith based abuse. It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM or Honour or faith based abuse.

What is Forced Marriage?

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

What is FGM?

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl’s virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement

- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries including the UK.

Circumstances and occurrences that may point to FGM happening

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinary tract infection
- Disclosure

ACTIONS

If staff have a concern they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Mandatory reporting commenced in October 2015 and these procedures will remain when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a statutory duty upon **that individual** to report it to the police.

Mandatory Reporting Duty Section 5B of the Female Genital Mutilation Act 2003 (see section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police (by calling 101) by the close of the next working day at the latest where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. While teachers must inform the school's Designated Safeguarding Lead (DSL) and involve Children's Social Care as soon as possible, seeking advice or consulting the DSL must never delay or prevent a direct report to the police.

Anyone can report concerns about FGM to Cleveland Police on their direct number 101.

(SPOCS/named teams and individuals within the Police are allocated to deal with reports relating to FGM, forced marriages or radicalisation under this mandatory duty).

The national helpline is 0800 028 3550 and fgmhelp@nspcc.org.uk

In addition there are a local support groups to help victims:

Appendix XIII SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN

This section should be read alongside KCSIE guidance and local safeguarding partnership procedures. Further operational guidance can be found in the [Farrer & Co Addressing Child-on-child Abuse Guidance \(2022\)](#).

Core Principles & Context

Sexual abuse, harassment, and harmful sexual behaviours can occur between children of any age, gender or sex. They can involve individuals or groups, occur online or offline (both physical and verbal), and are never acceptable.

Staff must operate under the principle that even if there are no reported cases, child-on-child abuse and harmful sexual behaviours are likely taking place and simply going unreported.

All staff must actively promote a culture where:

- Sexual harassment and violence are never tolerated, normalised, or dismissed as “banter,” “part of growing up,” or “boys being boys.”
- Behaviours such as grabbing, flicking bras, lifting skirts, or unwanted touching are challenged immediately - tolerating them risks normalising abuse.
- Hazing, bullying, or initiation rituals of any kind are strictly prohibited.
- Staff remain aware that certain groups are at higher risk of victimisation, including girls, children with SEND, and LGBT+ pupils.

The Continuum of Sexual Behaviours

To effectively identify and respond to concerns, staff must understand where a child’s conduct falls on the continuum of sexual behaviours, ranging from developmentally expected actions to severe criminal offences.

Developmentally Expected → Concerning / Problematic → Sexual Harassment → Sexual Violence

1. Early Indicators & Harmful Sexual Behaviour (HSB)

Harmful Sexual Behaviour (HSB) refers to sexual behaviours expressed by children that are developmentally inappropriate, may be harmful to themselves or others, or are executed through coercion or force.

When evaluating early indicators or concerning behaviours, staff and the DSL should consider:

- Developmentally expected behaviour: natural curiosity or play appropriate for the child’s age and developmental stage, occurring between peers of similar age/development without coercion or secrecy;
- Concerning or problematic behaviour: behaviours that cross boundaries, show an unusual preoccupation with sexual topics, involve minor age/power imbalances, or cause distress;
- Harmful or abusive behaviour: explicitly intrusive, persistent or coercive sexual behaviours that violate boundaries and cause harm to another child.
- Misogyny: staff must recognise the escalatory nature of misogynistic attitudes, language, and behavior.

Early identification and intervention at the ‘concerning’ or ‘problematic’ stage are vital to prevent escalation into sexual harassment or violence.

2. Child-on-Child Sexual Harassment

Sexual harassment is defined as ‘unwanted conduct of a sexual nature’ that occurs online or offline. It violates a child’s dignity, makes them feel intimidated, degraded, or humiliated, or creates a hostile, offensive or sexualised environment.

Sexual harassment can occur in person, online, or within intimate teenage relationships, and includes:

- Sexual comments, lewd remarks, sexual 'jokes' or taunts, spreading sexual rumors, and calling peers sexualised names.
- Deliberately brushing against someone, interfering with clothes, displaying sexual images/drawings and 'upskirting'.
- Non-consensual or consensual sharing of nude or semi-nude images/videos (including AI generated images or deepfakes) sexualised cyberbullying, unwanted sexual messages on social media, or online coercion. All incidents involving the sharing of nude or semi-nude images or videos - consensual or non-consensual – require an immediate safeguarding response and assessment by the DSL.

3. Child-on-Child Sexual Violence

Sexual violence refers to serious sexual offences under the Sexual Offences Act 2003. School staff must recognise that children can, and do, commit these offences against other children:

- Rape: Intentionally penetrating the vagina, anus, or mouth of another person with a penis without consent (or without a reasonable belief in consent).
- Assault by Penetration: Intentionally penetrating the vagina or anus of another person with any body part or object without consent, where the penetration is sexual.
- Sexual Assault: Intentionally touching another person sexually without their consent.
- Causing a child to engage in sexual activity without consent: coercing or forcing a child to engage in a sexual act, touch themselves sexually, or perform a sexual act on another.

NB: Consent is having the freedom and capacity to choose. It can be given for one activity but not another, and can be withdrawn at any time. A child under the age of 13 can never consent to any sexual activity. The legal age of consent is 16.

Responding to Reports and Allegations

Initial Response

Take all disclosures seriously: ensure the reporting child feels heard, safe and supported. Never give the impression that they are causing a problem or should feel ashamed. During the initial report and facts-gathering phase, staff and DSLs should refer to the alleged victim and alleged perpetrator (or child raising concerns / child about whom concerns are raised) to protect objectivity and anonymity rights. Explain that information must be shared with the DSL to keep children safe, but reassure them that it will be handled discreetly.

The DSL will conduct a contextual risk assessment considering the alleged victim, alleged perpetrator, witnesses, and the wider school community (including physical spaces and times of day).

While facts are established, the alleged perpetrator should be removed from shared classes with the alleged victim. The school will ensure both children continue to receive an education and appropriate pastoral support.

Four Management Pathways:

Internal Management: Suitable for minor, isolated incidents of non-violent sexual harassment.

Family Help / HSB Interventions: Used for concerning or problematic sexual behaviors to provide early support and prevent reoffending.

Children's social care referral: Mandatory where a child has suffered significant harm or is at immediate risk.

Police Reporting: Mandatory for allegations involving rape, assault by penetration, sexual assault, or severe coercion.

The school does not need to wait for the outcome of a police or social care investigation before taking internal protective or disciplinary action. The school can determine sanctions based on its own assessment on the balance of probabilities.

Ongoing Support

The school will actively monitor peer groups to prevent victim-blaming, rumors, bullying, or the taking of 'sides', and will strictly preserve the anonymity of all children involved, including managing social media risks to prevent public exposure.

If an allegation is found to be unsubstantiated or invented, the DSL will evaluate whether the reporting child requires safeguarding support (eg a potential cry for help) before considering any disciplinary action under the behavior policy.

Working with parents and carers :

- Schools will, in most cases, engage with the parents of both the victim and the perpetrator and should consider carefully what information they provide.
- It is good practice for the school to meet the victim's parents with the victim present to discuss safeguarding arrangements and also good practice to meet the perpetrator's parents to discuss what arrangements are being put in place.

All concerns, decisions, and rationale must be recorded in writing on CPOMS to identify emerging patterns or concerning behaviors over time.

NSPCC Dedicated Helpline : 0800 136 663

[The Lucy Faithfull Foundation's "Shore Space"](#) (a confidential chat service to assist young people who are concerned about their own or someone else's sexual thoughts or behaviour).

Appendix XIV

CHILDREN ABSENT AND / OR MISSING FROM EDUCATION, CHILD CRIMINAL EXPLOITATION (CCE), COUNTY LINES, CHILD SEXUAL EXPLOITATION (CSE), SERIOUS VIOLENCE AND DOMESTIC ABUSE

Children absent From education or missing from education

All staff should be aware that children being absent from education, whether through persistent/unauthorised absence or by becoming a Child Missing Education (CME) (a child not on a school roll and not receiving suitable education), can act as a vital warning sign to serious safeguarding risks including neglect, child sexual and child criminal exploitation - particularly county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

All Staff should be aware of the details in the Staff Handbook relating to registration procedures, arrangements for pupils to sign in / out and the procedures parents and pupils should follow to seek permission to be absent from school. If a member of staff has a concern regarding the attendance of a specific pupil or an issue arises where they suspect that a child has gone missing, they should contact the School Office and the relevant Pastoral Leader from the Senior Management Team immediately. Liaison with parents and / or other agencies and the police will take place as appropriate to the circumstances. Due regard must be given to the statutory guidance 'Working Together to Improve School Attendance'.

Where children leave the school or college, the designated safeguarding lead will ensure that if a child protection file or safeguarding concerns exists, it is transferred, separately from the main pupil file, to the new school or college as soon as possible, and within 5 working days for an in-year transfer or within the first 5 working days of the start of a new term, ensuring secure transit, and confirmation of receipt should be obtained. In addition, the

DSL will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. When deciding what information to share, schools should consider the relevancy of the information, what the receiving setting needs to know and whether the information is clearly presented and suitably contextualised. Where a pupil is changing settings and information indicates a risk to others and/or the individual pupil, the receiving school is responsible for assessing risk and putting a safety and support plan in place; the DSLs from both settings should have a conversation where there are concerns.

The DSL also makes a request to the previous school of each new pupil joining the school for any records to be transferred. Information will be disseminated to key staff in the school, e.g. Pastoral staff, the SENCO, as required and on a need to know basis. This also includes relevant details for a looked after/previously looked after child.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity :

- (a) in exchange for something the victim needs or wants, and/or
- (b) for the financial or other advantage of the perpetrator or facilitator and/or
- (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket, or to threaten other young people. This type of harm can be committed or facilitated by an organised network or gang and children may identify as part of one of these groups. Children are not always recognised as victims and can be criminalised for actions they take while under coercion.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Key to identify potential involvement in County lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs.

Like other forms of abuse and exploitation, county lines exploitation :

- can affect any child or young person under the age of 18;
- can affect any vulnerable adults over the age of 18;
- can still be exploitation even if the activity appears consensual;
- can involve force and or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups males or females and young people and adults;
- is typified by some form of imbalance of power in favour of those perpetrating exploitation.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Child Sexual Exploitation

Child exploitation is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity is consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology.

Like all forms of child abuse, child sexual exploitation :

- can affect any child or young person under the age of 18 including 16-17 year olds who can legally consent;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact and non-contact sexual activity;
- can take place in person or via technology;
- can involve force or enticed methods of compliance;
- may occur without the child or young person's immediate knowledge (e.g. by the copying of videos);
- can be perpetrated by individuals or groups, males or females, and children or adults;
- it is typified by some form of power imbalance in favour of those perpetrating the abuse.

Some of the following signs may be indicators of child sexual exploitation :

- Children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have all the boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for a period of time or regularly come home late;
- children who regularly miss school or education or do not take part in education.

Staff must recognise that Child Criminal Exploitation (CCE), County Lines, and Child Sexual Exploitation (CSE) frequently overlap. A child who is being criminally exploited or trafficked may also be subject to sexual exploitation, physical abuse, or emotional coercion.

Serious Violence

The Serious Violence Strategy, which was introduced by the government in 2018, identifies offences such as homicides and knife and gun crime as key factors which account for around one percent of all recorded crime. The impact of serious violent crime on individuals and the community is significant. In line with the Serious Violence Duty, the school works in close partnership with local multi-agency partners (including police, local authorities, and violence reduction units) to identify children at risk of serious violence early. Staff should be alert to contextual risk factors, such as weapon carrying, unexplained injuries, sudden changes in peer groups, or involvement in local gang networks.

Tackling serious violence is not a law enforcement issue alone; it requires a multiple-strand approach involving a range of partners across different sectors. The main areas that the Serious Violence Strategy focuses on are:

- tackling county lines
- early intervention and prevention
- supporting communities and local partnerships
- effective law enforcement and the criminal justice response.

Early intervention is about recognising and responding to the indicators of potential vulnerability, providing early support that is effective. When a young person begins to show the signs of exploitation or vulnerability to exploitation, and therefore at increased risk from Serious Violence, we should be able to intervene as early as possible to help reduce the risk factors and increase the protective factor.

Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, including where they see, hear, or experience its effects. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse, and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act). More guidance will follow in this regard from the Government.

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

It is important to note that young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass operates in Teesside. When police respond to a domestic incident they will liaise with the School to make sure that we are aware of the issue and can provide emotional and practical help to the affected children.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the [Modern Slavery Statutory Guidance](#) (February 2026).

Cybercrime

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

- unauthorised access to computers (illegal ‘hacking’), for example accessing the School’s computer network;
- denial of Service (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,

- making, supplying or obtaining malware (malicious software) with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL should consider referring into the [Cyber Choices](#) programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

APPENDIX XV

CONSENSUAL AND NON-CONSENSUAL SHARING OF NUDE AND SEMI-NUDE IMAGES AND / OR VIDEOS (ALSO KNOWN AS YOUTH-PRODUCED SEXUAL IMAGERY)

This Appendix should be read alongside the [‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’](#) (December 2020, updated March 2024) UKCIS guidance.

Definition and Context

The term ‘sharing nudes and semi-nudes’ is taken to mean the sending, posting or streaming of nude or semi-nude images, videos or live content by young people under the age of 18 online, including children of pre-prep and prep school age. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop, which works offline.

The term ‘nudes’ is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include ‘dick pics’ or ‘pics’. Many adults may use the term ‘sexting’, however some young people interpret sexting as ‘writing and sharing explicit messages with people they know’ rather than sharing images.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them, claiming to be from a another child
- children and young people digitally manipulate an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new nude or semi-nude image of a young person
- images created or shared are used to abuse or blackmail peers. Situations could include:
 - children and young people selling nudes or semi-nudes of others online
 - children and young people coercing a peer into sharing a nude or semi-nude to blackmail them for money, further images, or force them into illegal activity
 - children and young people hacking a peer’s account to share images more widely without consent to publicly shame
- children and young people create and share a nude or semi-nude with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them

Producing and sharing nudes and semi-nudes of under-18s, including images created consensually or generated via AI/digital manipulation, is illegal under UK law. In line with KCSIE requirements, all incidents involving the sharing of nude or semi-nude images or videos require a formal safeguarding response and assessment by the DSL, whether the sharing was consensual or non-consensual. The sharing of nudes and semi-nudes falls under the category of

child-on-child abuse / harmful sexual behaviour. Yarm School is committed to responding swiftly, confidently, and in a proportionate manner to ensure all young people involved are safeguarded, supported, and educated.

Defining the incident

Incidents can broadly be divided into two categories:

- **aggravated:** incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes. These can further be sub-categorised into:
 - adult involved
 - youth only – intent to harm, arising from interpersonal conflict, break-ups and fights among friends, or criminal/abusive conduct such as blackmail, threats or sexual exploitation by young people
 - youth only – reckless misuse: no intent to harm but images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result
- **experimental:** incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse. These can further be subcategorised into:
 - **romantic**
 - **‘sexual attention seeking’:** it is important to note that incidents within this category can be a part of normal childhood. A child or young person should not be blamed for taking and sharing their image
 - **other:** these involve either young people who take pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives.

Assessing behaviour

The School will be mindful that behaviour, which may not initially appear to be sexually motivated, may have occurred as a result of risky or harmful behaviour or sexual abuse being ‘normalised’ for children and young people. [Hackett’s ‘Continuum of children and young people’s sexual behaviours’](#) model helps to highlight that children and young people’s sexual behaviours exist on a wide continuum. It is also important to place a child’s sexual behaviour within the context of their age and development. All incidents should be dealt with proportionally to the behaviour being displayed.

The law

Responding to incidents of sharing nudes and semi-nudes is complex because of its legal status.

Making, possessing, or sharing nude or semi-nude images or videos of anyone under the age of 18 is illegal. This includes situations where children create, send or post images of themselves, whether consensually or under duress/coercion. The non-consensual sharing of private sexual images or videos with the intent to cause distress is also illegal. It is now an offence to make threats to disclose private sexual photographs and/or films.

The term nudes and semi-nudes applies to all visual content, including images taken by a child as well as digitally altered or computer-generated imagery (such as AI-generated content or ‘deepfakes’). Creating or sharing AI-generated sexual imagery of a peer or using such images for blackmail or extortion constitutes child sexual abuse material and will be responded to as a safeguarding concern.

Where children are involved in making or sharing nudes or semi-nudes, the school will apply a proportionate, trauma-informed safeguarding response in line with UKCIS guidance, prioritising the child’s protection and well-being while avoiding unnecessary criminalisation of young people.

Avoiding unnecessary criminalisation of children

Whilst children and young people creating and sharing images can be risky, it is often the result of natural curiosity about sex and exploration of relationships; it is therefore not always 'harmful' to all children and young people. Situations should be considered on a case by case context, considering what is known about the children and young people involved and if there is an immediate risk of harm.

Where there are abusive and/or aggravating factors, incidents should always be referred to the police through the HSPCC CHUB. Investigation by police does not automatically mean that the child/young person involved will have a criminal record, and the police has made it clear that incidents involving sharing nudes and semi-nudes should have an immediate focus on safeguarding children. The Outcome 21 code states that even though a child or young person has broken the law and the police could provide evidence that they have done so, the police can record that they chose not to take further action as it was not in the public interest.

Initial response

When an incident involving nudes and semi-nudes is disclosed to a member of staff at Yarm School, the following action will be taken:

- It will be reported to the DSL immediately
- The imagery should never be viewed, copied, printed, shared, stored or saved; the child must also not be asked to share or download the imagery – this is illegal
- If the imagery has already been viewed by accident, this should be reported to the DSL and support sought
- The imagery should not be deleted, nor should the young person be asked to delete it; further, the child or young person involved in the incident should not be asked to disclose additional information regarding the imagery: this is the responsibility of the DSL
- Information about the incident should not be shared with other members of staff, the young person(s) it involves or their, or other, parents
- The young person will not be made to feel as though it is their fault, or ashamed in any way; they will be reassured that they will receive support and help from the DSL.

An immediate referral to police and/or children's social care through the Family Help Point by the DSL should be made if at this initial stage:

- The incident involves an adult
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent
- What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The images involves sexual acts and any pupil in the images or videos is under 13
- You have reason to believe a child or young person is at immediate risk of harm, for example, they are presenting as suicidal or self-harming.

If none of the above apply, an education setting may decide to respond to the incident without involving the police or children's social care. The decision to respond to the incident without involving the police or children's social care should only be made in cases where the DSL is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the education setting's pastoral support and disciplinary framework. The decision should be made and recorded in line with the Child Protection and Safeguarding Policy procedures and should be based on consideration of the best interests of any child or young person involved.

The DSL will reflect on the following questions when making this assessment:

- why was the nude or semi-nude shared? Was it consensual?
- has the nude or semi-nude been shared beyond its intended recipient? Was it shared without the consent of the child or young person who produced the image?
- has the nude or semi-nude been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread?
- how old are any of the children or young people involved?
- did the child or young person send the nude or semi-nude to more than one person?
- do you have any concerns about the child or young person's vulnerability?
- are there additional concerns if the parents or carers are informed?

Once a school has assessed a child or young person as not at immediate risk, a conversation should be had with them to decide the best course of action. If possible, the DSL should carry out this conversation. However, if the child or young person feels more comfortable talking to a different member of staff, this should be facilitated where possible, and appropriate support given. It is important that the child or young person is given a sense of control over the reporting process.

During this conversation, the DSL or member of staff will seek to:

- identify, without viewing wherever possible, what the image contains and whether anyone else has been involved
- find out whether the image has been shared between two people or shared further.
- discuss what actions and support might be needed, including preventing further distribution; discusses issues of consent and trust within healthy relationships
- reassure the child or young person that they are not alone, and that they can be helped and that they will be kept informed throughout the process
- recognise the pressures that children and young people can be under to take part in sharing an image
- remain solution-focused and avoid any victim-blaming questions
- discuss issues of consent and trust within healthy relationships
- explain the law on the sharing of nudes and semi-nudes, and where relevant, ensure they understand that it still applies to digitally manipulated or AI-generated imagery of other children and young people
- where relevant, signpost to the IWF and Childline's Report Remove tool at: <https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/remove-nude-image-shared-online/>. NCMEC's Take It Down tool can also be used to help them to anonymously remove nudes or semi-nudes that have yet to be shared online but they think might be
- agree next steps

Informing parents

Parents or carers should be informed and involved in the process at an early stage, unless informing them will put a child or young person at risk of harm. Any decision not to inform the parents or carers should be made in conjunction with other services such as children's social care and/or the police, and logged accordingly. Where appropriate, the DSL will support any child or young person in determining the best approach for informing parents, and allow them to be a part of this process if they want to be.

Supporting parents

In such situations, parents may find it difficult to know how to deal with the knowledge that their child has been involved in an incident and may display differing emotions. In all situations, parents should be:

- given information about the sharing of nudes and semi-nudes, what they can expect to happen next, and who will be their link person within the School
- given support to deal with their own feelings of upset and concern
- given support on how to speak to their child about the incident
- advised on the law around the sharing of nudes and semi-nudes
- kept updated about any actions that have been taken or any support that their child is accessing (unless the child involved has specifically asked for this not to happen and is judged to be old enough to make that informed decision)

- informed about sources of support for their child, in case they are feeling anxious or depressed about what has happened
- directed to NCA-CEOP at www.ceop.police.uk/safety-centre for further support, including #AskTheAwkward, guidance on how to talk to their children about online relationships
- support their child use the IWF and Childline's Report Remove tool to report an image that has been shared online: www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety sexting/report-nude-image-online/. They can also help their child to use NCMEC's Take It Down tool to help them remove or limit the spread of nudes or semi-nudes that have been shared online: <https://takeitdown.ncmec.org>.

Multi-agency working

If it is necessary to report to the police, contact should be made through existing local arrangements. Once a report is made to the police, it has to be recorded and the police will conduct an investigation. This may include taking devices and interviews with any child or young person involved.

The DSL should contact children's social care if any child or young person involved is already known to them, for example if they are or have been on a Family Help or Child Protection Plan.

If, because of the investigation, the DSL believes there are wider issues which meet the threshold for children's social care involvement, they should make a referral in line with HSCCP procedures, which will involve a conversation with a social worker in the Family Help Point, and if appropriate, completion of a Safer Referral Form.

Searching devices, viewing and deleting nudes and semi-nudes

Viewing the imagery

Staff and parents must not intentionally view any nudes and semi-nudes unless there is good and clear reason to do so. Viewing imagery must be an absolute last resort. Staff are reminded that viewing indecent imagery of children carries legal risks. Where viewing is unavoidable to safeguard a child or report to IWF, it must be pre-authorised by the Headmaster. The Headmaster and the DSL would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved
- is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child or young person or parent in making a report
- is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network

If it is necessary to view the imagery then the DSL should:

- never copy, print, share, store or save them; this is illegal
- discuss the decision with the Headmaster
- make sure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Headmaster
- make sure viewing takes place with another member of staff present in the room, ideally the Headmaster, who does not need to view the images
- wherever possible, make sure viewing takes place on the premises of the education setting, ideally in the Headmaster's office
- if possible, the DSL / member of the safeguarding team viewing the image will be of the same sex as the child or young person in the images
- record how and why the decision was made to view the imagery, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions. Ensure this is factual, signed, and dated

- if any devices need to be taken and passed onto the police, confiscate the device(s) and call the police. The device should be disconnected from Wi-Fi and data and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device should be placed in a secure place, until the police are able to come and collect it.

Deletion of imagery

If the school has decided that other agencies do not need to be involved, then consideration should be given to deleting nudes and semi-nudes from devices and online services to limit any further sharing. In most cases, children and young people should be asked to delete the imagery and to confirm that they have deleted them across all devices, online storage or social media sites. All of these decisions need to be recorded and logged in the safeguarding records. Parents should also be informed unless this presents a further risk to any child or the young person.

In line with DfE Searching, Screening and Confiscation guidance, staff may search a pupil's device with their consent, or without consent if there are reasonable grounds to suspect the device contains evidence of a prohibited item or offence.

Recording incidents All incidents relating to nudes and semi-nudes being shared need to be recorded. This includes incidents that have been referred to external agencies and those that have not. Records should be kept in line with statutory requirements set out in KCSIE 2026.

APPENDIX XVI 'The Early Years Foundation Stage: Statutory Framework'

This framework is mandatory for all early years providers in England from 1st September 2026. Ofsted and inspectorates of independent schools have regard to the Early Years Foundation Stage (EYFS) in carrying out inspections and report on the quality and standards of provision. Ofsted publishes inspection reports at www.gov.uk/ofsted.

Yarm School recognises that every child deserves the best possible start in life and the support that enables them to fulfil their potential. Children develop quickly in the early years and a child's experiences between birth and age five have a major impact on their future life chances. A secure, safe and happy childhood is important in its own right. Good parenting and high quality early learning together provide the foundation children need to make the most of their abilities and talents as they grow up.

The Early Years Foundation Stage (EYFS) Framework sets the standards that we aim to meet to ensure that children learn and develop well and are kept healthy and safe. It promotes teaching and learning to ensure children's 'school readiness' and gives children the broad range of knowledge and skills that provide the right foundation for good future progress through school and life.

The EYFS seeks to provide:

- quality and consistency in all early years settings, so that every child makes good progress and no child gets left behind
- a secure foundation through planning for the learning and development of each individual child, and assessing and reviewing what they have learned regularly
- partnership working between practitioners and with parents and/or carers
- equality of opportunity and anti-discriminatory practice, ensuring that every child is included and supported.

The EYFS specifies requirements for learning and development and for safeguarding children and promoting their welfare. The learning and development requirements cover:

- the areas of learning and development which must shape activities and experiences (educational programmes) for children in all early years settings

- the early learning goals that providers must help children work towards (the knowledge, skills and understanding children should have at the end of the academic year in which they turn five)
- assessment arrangements for measuring progress (and requirements for reporting to parents and/or carers).

The safeguarding and welfare requirements cover the steps that Yarm School takes to keep children safe and promote their welfare.

Overarching principles

Four guiding principles shape practice in our early years setting. These are:

- Every child is a unique child, who is constantly learning and can be resilient, capable, confident, and self-assured.
- Children learn to be strong and independent through positive relationships.
- Children learn and develop well in enabling environments with teaching and support from adults, who respond to their individual interests and needs and help them to build their learning over time. Children benefit from a strong partnership between practitioners and parents and/or carers.
- Importance of learning and development. Children develop and learn at different rates. (See “the characteristics of effective teaching and learning” at paragraph 1.18). The framework covers the education and care of all children, including children with special educational needs and disabilities (SEND).

Ofsted Notification Threshold: The School adheres to the updated statutory requirement to inform Ofsted of any allegations of 'harm' (lowering the threshold from 'serious harm'). Any such allegation involving individuals working with or looking after children in our EYFS provision must be reported to Ofsted within 14 days.

Appendix XVII

SAFEGUARDING GUIDANCE FOR EXTERNAL CONTRACTORS, SERVICE PROVIDERS AND COACH DRIVERS WORKING WITH YOUNG PEOPLE

This guidance aims to safeguard children and young people and reduce the risk of contractors or their employees being accused of improper or unprofessional conduct. A copy of this guidance is provided to each contracting company as part of the terms and conditions of any contractual work or service provision agreed by the School.

All adults working on School premises or in a School situation (such as sporting or other trips and activities) are in a position of trust and have a duty to keep children and young people safe and to protect them from neglect and physical and emotional harm. This duty is in part exercised through the development of respectful caring and professional relationships between adults, children, and young people.

This means that contracted adults will:

- Act, and be seen to act, in the child's or young person's best interest;
- Avoid any contact which may lead any reasonable person to question their motivation and intentions;
- Take responsibility for their own actions and behaviour;
- Understand the responsibilities which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached.

Contracted adults should not establish or seek to establish social contact with children or young people for the purpose of securing a friendship. This includes online relationships established through the use of social networking sites. Contracted adults should on no account engage in inappropriate conversation, electronic communication or texting with a pupil. If a child or young person seeks to establish contact, the contracted adult should exercise his/her professional judgement in making a response, be aware that such social contact could be misconstrued and alert their line manager or a member of the School staff immediately.

This means that contracted adults must:

- Be aware that even well intentioned social or physical contact may be misunderstood by the child or young person, an observer, or by anyone to whom the action is described;

- Always follow the management procedures for obtaining prior approval for any planned social contact with children or young people;
- Always be prepared to explain actions and accept that all physical and social contact will be open to scrutiny;
- Never indulge in banter, horse-play, tickling or fun fights.

Contracted adults should avoid working in a one to one situation with children and young people as they may be more vulnerable to potential allegations. Every attempt should be made to ensure that the safety and security needs of all parties are met.

This means that contracted adults will:

- In the event of finding themselves together with children or young people, consider the needs and circumstances of the child or young person involved;
- Ensure there is visual access and/or an open door;
- Inform their line manager or a member of the School teaching staff of the situation immediately in order to establish whether the contractor needs to be accompanied to continue working;
- Always report any situation where a child or young person becomes distressed or angry.

This guidance has been produced to help contracted adults establish the safest possible play, learning and working environments. Contracted adults should be familiar with the local child protection arrangements and understand their responsibilities in order to safeguard and protect children and young people. **All contracted adults should know that the School's Designated Safeguarding Lead is the Senior Deputy Head, Mrs Alex Kingsbury.**

Organisations or Individuals using school premises

The School may receive an allegation relating to an incident that happened when an individual or organisation was using its school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the School will follow its safeguarding policies and procedures, including informing the LADO. The School makes this explicitly clear in the Contract of Hire of Yarm School facilities as a condition of use, and that failure to comply with this will result in a termination of the agreement.

Appendix XVIII

GENDER QUESTIONING CHILDREN

Schools and colleges have a statutory duty to safeguard and promote the welfare of all children. They should consider how best to fulfil that duty towards a child who is questioning their gender, as well as their peers, ensuring that any agreed course of action takes account of the impact on all of those affected. Gender questioning is not in itself a safeguarding issue, but children experiencing distress around gender may be at heightened risk of bullying, isolation or mental health difficulties. All requests and disclosures must be managed through the standard safeguarding framework led by the DSL.

In line with the Cass Review findings, social transition is recognised as an active intervention with long-term psychological impacts. Decisions must not be made in haste and should involve a cautious, holistic assessment considering the child's age, maturity, neurodiversity (SEND), and wider vulnerabilities. The first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes

Accommodating social transition is an active intervention so schools and colleges should take a very careful approach. Schools do not have a duty to actively identify, encourage or initiate discussions about gender transition with pupils. **Staff must not suggest or promote social transition to any child.** The school's role is strictly reactive: to respond appropriately, cautiously and safely if a child or parent proactively brings a request or disclosure to the school. Members of staff should not adopt any changes relating to social transition unless a decision has been made by a school or college and a child's parents or carers have been involved.

Schools should be particularly conscious of safeguarding concerns relating to primary aged children. For example, the Cass Review noted evidence that children who socially transition before puberty, and those who transition prior to receiving clinical advice, are more likely to proceed to a medical pathway than those who do not. Schools should also keep in mind that some children who socially transition before puberty will be 'living in stealth' meaning other pupils and/or staff may be unaware of their biological sex, and schools should be aware of related safeguarding concerns on 'living in stealth'.

Parents and carers should be actively involved and their views treated with importance. The only exception to involving parents is where the DSL determines there is clear, evidence-based reason to believe doing so would expose the child to a risk of significant harm. This decision must be fully documented in safeguarding records. Equally, if a child confides feelings to a staff member without requesting any operational or social changes at school, staff are not automatically required to inform parents unless there is an underlying safeguarding or wellbeing concern.

Operational Guidance

Schools and colleges should comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition.

In line with the responsibilities of schools and colleges to adhere to the highest standards of safeguarding for the children and young people in their care, alongside obligations under the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, schools must not allow pupils into toilets, changing rooms, or boarding or residential accommodation designated for the opposite sex, **with no exceptions**. Where a pupil requests alternative provision, individual self-contained neutral facilities should be offered. Similarly, where schools have implemented single-sex sports as being necessary for safety reasons, there should be no exceptions and pupils must not be allowed to participate in sports designated for the opposite sex.

Official administrative systems such as iSAMS must maintain an accurate record of biological sex, and ensure that all staff are aware of a child's biological sex. Informal name changes require parental agreement and a documented risk assessment.

FURTHER GUIDANCE AND EXTERNAL AGENCY CONTACT INFORMATION

- A. ISI Handbook for the Inspection of Schools, The Regulatory Requirements www.isi.net
- B. '[The Early Years Foundation Stage: Statutory Framework](#)' - effective 1 September 2026
- C. '[Keeping Children Safe in Education](#)' DfE guidance September 2026
- D. '[Working Together to Safeguard Children](#)', DfE guidance December 2023, updated March 2026
- E. The definition and signs of child abuse : (<http://www.nspcc.org.uk/>)
- F. National Police Chief Council (NPCC) [When to call the Police](#) guidance
- G. [The Prevent Duty: Guidance for England and Wales](#)
- H. [The Prevent Duty: Support for those working in education settings with safeguarding responsibilities.](#) (September 2023)
- I. "[Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers](#)" (updated May 2024)

External Agency Contact Information [See also internal contact details for Yarm Safeguarding Team on page 1]

Stockton Family Help Point	01642 130080	familyhelppoint@stockton.gov.uk
Out of Hours Emergency Duty Team	01642 524552	
LA Designated Officer (LADO) - Phil Curtis	01642 527864 / 07471880331	lado@stockton.gov.uk
SPOC:	03333 202302	
Social Care Team Clerks	01642 526114	
Police Non-Emergency	101	SPOC for Cleveland Police = Vanessa Housley
Police Emergency	999	
Prevent Advice line	0800 011 3764	
Prevent LA SPOC - Marc Stephenson	01642 526203 / 07341 073745	marc.stephenson@stockton.gov.uk
Channel Panel Cleveland - DS Ian Charlesworth	01642 301412	
Anti-Terrorist Hotline	0800 789 321	
Operation Encompass		PVPdomesticabuse@cleveland.police.uk
NSPCC Helpline	0808 800 5000	www.nspcc.org.uk/helpline
NSPCC sexual assault/abuse Helpline	0800 136 663	
NSPCC Whistleblowing Helpline	0800 800 5000	(for employees who want to report concerns)
Childline	0800 1111	
Samaritans	116 123	
Cruse Bereavement Counselling	0808 808 1677	
Washington Mind – Mental Health	0191 4178043	
OFSTED Safeguarding Children	0300 123 4666 or 0300 123 1231	Whistleblowing@ofsted.gov.uk
Disclosure and Barring Service	03000 200190	PO Box 181, Darlington, DL1 9FA
TRA	020 7593 5393	misconduct.teacher@education.gov.uk
ParentZone		https://parentzone.org.uk/home
TooledUp Education		https://members.tooledupeducation.com/sign-up (sign-up information for parents can be obtained by contacting the School Office)