# Sylvia Young Theatre School

## Safeguarding and Child Protection Policy

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| **Policy responsibility:** | Menifa Williams<br>Assistant Headteacher - Safeguarding (DSL) |
| **Date reviewed:** | 26th September 2026 |
| **Reviewed** | Annually |

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## SYTS Safeguarding Policy:

To provide an environment in which children and young people feel safe, secure, valued and respected, and in which they can feel confident, and know how to approach adults if they are in difficulties, knowing they will be effectively listened to.

We believe that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, transphobia, sexual violence/harassment and derogatory behaviour or other forms of physical violence and conflict. SYTS aims to create a safe place for students and staff to feel open to disclose any safeguarding concerns and trust that SYTS will support all students and staff making no judgments. SYTS safeguarding staff follow guidance set out in KCSIE 2026 and other relevant DfE documentation. If in doubt they will speak to local MASH/LADO/relevant agencies for advice.

The above will be underpinned by the School's Behaviour, Rewards and Sanctions Policy and pastoral support system, as well as by a planned programme of evidence-based RSE and PSHCE delivered in form time and reinforced throughout the whole curriculum.

SYTS recognises the mantra 'it could happen here' and has systems in place to recognise, record, support, monitor and reflect. SYTS also recognises that children may not feel ready or know how to tell someone they are being abused and therefore SYTS works hard to create an environment where students feel open but also have access to helpline and support numbers/websites.

SYTS acknowledge that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. We recognised that this should not prevent staff from having a professional curiosity and speaking to the Designated Safeguarding Lead (DSL) if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Being subjected to harassment, violence and or abuse, may breach children's rights, as set out in the Human Rights Act.

All safeguarding concerns and processes will be logged in the MyConcern safeguarding system.

## 1. Safeguarding Contact Details

| Position | Name | Phone | e-mail |
|---|---|---|---|
| **Main Safeguarding Email** | Safeguarding Team | 02072582330 | safeguarding@syts.co.uk |
| **Designated Safeguarding Lead** | Menifa Williams | 02072582330 | menifa.williams@syts.co.uk |
| **Deputy Designated Safeguarding Lead** | Andrew Kennedy | 02072582330 | andrew.kennedy@syts.co.uk |
| **Headteacher (For concerns about Staff)** | Anne-Marie Kennedy | 02072582330 | anne-marie.kennedy@syts.co.uk |
| **Managing Director** | Alison Ruffelle | 02072582330 | alison.ruffelle@syts.co.uk |

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| **To report a concern about a child or young person** | **Westminster Access Team**<br>Tel: 020 7641 4000<br>(Out of hours – 020 7641 6000)<br>Email: AccesstoChildrensServices@westminster.gov.uk |
| **Multi Agency Safeguarding Hub (MASH)** | **Karen Duncan**<br>Bi-borough MASH Business Support Officer<br>Telephone: 020 7641 3991<br>Email: kduncan1@westminster.gov.uk<br><br>**Dhruva Vashee**<br>Tri-borough MASH Business Support Officer<br>Telephone: 07866 077169<br>Email: dvashee@westminster.gov.uk<br><br>**Menna Emmanuel**<br>Specialist Community Public Health Nurse:<br>Telephone: 020 7641 5498<br>Email: menna.emmanuel@nhs.net<br><br>**Debra Cox**<br>Specialist Health Practitioner in MASH:<br>Telephone: 020 7641 3485<br>Email: Debra.Cox@nhs.net |
| **Head of Safeguarding, Review and Quality Assurance** | **Angela Flahive, Head of Safeguarding, Review and Quality Assurance**<br>Tel: 020 7361 3467<br>Mobile: 07971 320 888 |

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| | Email: angela.flahive@rbkc.gov.uk |
| **Local Authority Designated Officer** (LADO / Management of Allegations) | **Please contact duty child protection officer for consultations and referrals**<br>Telephone: 020 7361 2120<br>Email: LADO@westminster.gov.uk<br><br>**Aqualma Daniel**<br>Safer Organisations Manager & Local Authority Designated Officer<br>Tel: 07870 481 712<br>Email Aqualma.Daniel@rbkc.gov.uk<br><br>**Sally Smith** LADO Manager<br><br>Royal Borough of Kensington and Chelsea / City of Westminster<br><br>Tel: 07967 764 794<br>Email: Sally.Smith@rbkc.gov.uk |
| **Safeguarding Lead for Schools and Education** | **Elaine Campbell**<br>Bi-Borough Safeguarding Lead for Schools and Education<br>Tel: 020 7361 3000 / Mobile: 07712 236 508<br>Email: elaine.campbell@rbkc.gov.uk |
| **Child Exploitation Lead (Children's Services)** | **Emily Harcombe**<br>Child Protection Advisor<br>Email: eharcombe@westminster.gov.uk |
| **Prevent (Radicalism and Extremism)** | **Kiran Malik**<br>Prevent Programme Manager, Westminster enquiries only<br>Telephone: 020 7641 5071<br>Email: kmalik@westminster.gov.uk |
| **Education and Attendance** | **Wendy Anthony**<br>Bi-Borough Head of Admissions and Access to Education<br>Telephone: 020 7745 6440<br>Email: wendy.anthony@rbkc.gov.uk |
| **CCG Designated Nurse for Safeguarding Children** | **Emelia Bulley**<br>Mobile: 07867185726<br>Email: ebulley@nhs.net |
| **ICB Named GP for safeguarding children** | **Dr Saral Anand**<br>Mobile: 07770 704 486<br>Email: saral.anand@nhs.net<br>CCG working day: Tuesday |
| **Interim Designated Nurse, Looked After** | **Alicia Moncrieffe**<br>Designated Nurse Looked After Children<br>Email: alicia.moncrieffe7@nhs.net |

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| **Children (Bi-borough)** | |
| **School Nursing Teams** | **Central and North West London Foundation Trust (CNWL)**<br>Telephone: 020 7758 0736<br>Email: cnw-tr.westminstershs.cnwl@nhs.net |
| **Named Nurse for safeguarding children** | **Joanna Payne**<br>Named Professional for Safeguarding Children<br>Telephone: 07976 768 545<br>Email: joanna.payne@nhs.net<br><br>**Abigail Skeel**<br>CNWL Named Professional for Safeguarding Children, Child and Adolescent Mental Health Services (CAMHS) and Eating Disorders.<br>• Email: abigail.skeel1@nhs.net |
| **Health Visiting Teams** | **Central London Community Healthcare NHS Trust (CLCH)**<br>Telephone (select option 2): 0208 200 2500<br>Email: CLCHT.ChildHealthInformationHubkcwf@nhs.net |
| **Named Nurse for safeguarding children** | **Catherine Hunter**<br>Named Nurse for Safeguarding<br>Mobile: 07876 313 939<br>Email: catherinehunter4@nhs.net |
| **Mental Health Trusts** | **Central and North West London Foundation Trust (CNWL)** |
| **Acute Hospital Trusts** | **Chelsea and Westminster Hospital NHS Foundation Trust**<br><br>**Named Nurse: Faye Mitchison**<br>Email: Faye.Mitchison@chelwest.nhs.uk<br>Telephone: 0203 315 2751<br>Mobile: 07388 998 373<br>Tel: 020 3315 1000 Bleep 4241<br><br>**Named Doctor: Paul Hargreaves**<br>Email: Paul.Hargreaves@nhs.uk<br>Telephone: 0203 315 3112 (PA)<br><br>**Maternity Lead: Named Midwife Safeguarding Children: Wendy Allen**<br>Telephone: 0203 315 8000<br>Mobile: 07769 648 642<br>Email: wendy.allen1@nhs.net |

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| | **Imperial College Hospital NHS Healthcare Trust including St Mary's Hospital**<br>Email: Imperial.safeguarding.children@nhs.net and Imperial.safeguarding.maternity@nhs.net<br><br>**Head of Safeguarding/Consultant Nurse for Safeguarding: Nicci Wotton**<br>Telephone: Tel: 0203 312 5173<br>Mobile: 07917 374 795<br>Email: nicci.wotton@nhs.net<br><br>**Fiona Menzies**<br>Named Nurse for Safeguarding<br>Mobile: 07825935576<br>Email: fiona.menzies@nhs.net<br><br>**Named Doctor: Kati Malbon**<br>Email: k.malbon@nhs.net<br>**Maternity Lead: Named Midwife Safeguarding: Anna Robinson**<br>Telephone: 0203 313 5294<br>Email: anna.robinson9@nhs.net |
| **LSCP Business Managers** | **Emma Biskupski**<br>Telephone: 07779 348 094<br>Email: Emma.biskupski@rbkc.gov.uk |

**Other useful contact details**

| Name | Phone |
|---|---|
| **Childline** | 0800 1111 |
| **NSPCC**<br>**NSPCC Whistleblowing Advice Line**<br>**NSPCC Victims of Sexual harassment and abuse helpline** | 0808 800 5000<br>0800 028 0285<br>0800 136 663 |
| **Kidscape (Anti-bullying helpline for parents)** | 0845 120 5204 |
| **Report Abuse in Education** | 0800 136 663 |
| **National Domestic Abuse Helpline** | 0800 2000 247 |
| **Child exploitation Online Prevent (CEOP)** | 0870 000 3344 |

# 1. Introduction

1.1 SYTS is committed to safeguarding and promoting the welfare and wellbeing of young people and staff. We believe that everyone, without exception, has a right to be safe and to be treated with dignity and respect regardless of background and live a life free from discrimination. The School recognises that children and young people learn best when they are healthy, safe and secure.

1.2 Safeguarding and promoting the welfare of children is defined as:

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

1.3 This policy applies to all students in the School.

1.4 The purpose of this policy is to inform all staff (including supply staff and trainee teachers), parents (including carers), contractors, volunteers and Directors about the School's responsibilities for safeguarding children and to enable all parties to have a clear understanding of how these responsibilities should be carried out. It applies wherever staff members are working with students – even where this is away from the School, such as on educational visits or when delivering lessons online.

1.5 This policy is published on the School's website and is also available to parents of current and prospective students from the Designated Safeguarding Lead (Menifa Williams) on request. Large print or other accessible formats can also be made available.

1.6 The policy is drafted in accordance with the Bi-borough Safeguarding Partnership's agreed local interagency procedures. [Note: Multi-agency arrangements for safeguarding children are now handled by the three safeguarding partner agencies: the local authorities (RBKC, Hammersmith and Fulham and Westminster); Integrated Care Systems; and the police.

1.7 This policy is also in accordance with current legislation and the following statutory guidance:

- Keeping Children Safe in Education September 2025 (KCSIE)
- Working Together to Safeguard Children July 2018 (updated February 2024)
- Working together to improve school attendance (August 2024)

  The School Attendance (Pupil Registration) (England) Regulations 2024
- Prevent Duty Guidance for England and Wales (December 2023)
- Education (Independent School Standards) Regulations 2014
- What to do if you are worried a child is being abused – advice for practitioners (March 2015)
- Disqualification Under the Childcare Act August (August 2018)
- Statutory framework for the Early Years Foundation Stage September 2025)

- Children Missing Education (August 2024)
- Relationships Education, Relationships and Sex Education and Health Education June 2019
- The Equality Act 2010
- The Human Rights Act 1998

1.8 We are advised by the local Safeguarding and Child Protection in Schools and Education Officer and/or a student specific local MASH/Children's Services, whom the DSL/DDSL regularly consults on safeguarding matters. Contact details can be found in Section 1 of this policy.

1.9 Every complaint or suspicion of abuse from within or outside the School will be taken seriously and action will be taken in accordance with this policy.

## 2. Principles

2.1 SYTS expects all staff, Directors and volunteers to share our commitment to safeguarding and promoting the welfare of all students in our care. To achieve this, the School seeks to create a safe School environment with a strong pastoral system, where students who have been subject to any form of abuse can report the matter confident that it will be taken seriously, they will not be made to feel ashamed of making a report and will be fully supported. Staff are trained to listen to students' concerns, identify issues early and respond appropriately following agreed procedures. The School will consider, at all times, what is in the best interest of the child.

2.2 The School will take all reasonable measures to:

- ensure that we practise safer recruitment in checking the suitability of staff, Directors and volunteers (including staff employed by other organisations) to work with children and young people. Staff recruitment procedures are outlined in detail in the School's Safer Recruitment Policy;
- ensure that, where staff from other organisations are working with our students on another site, we have received confirmation that appropriate child protection checks and procedures apply to those members of staff and that any such checks do not raise any issues of concern in relation to the suitability of those staff members working with children;
- follow the local inter-agency procedures of the Bi-Borough Safeguarding Children's Partnership and contribute to inter-agency working;
- support students in need through early intervention and, where appropriate, support them in co-operation with multi-agencies who are working to the Common Assessment Framework (CAF) and as part of the Team around the Child (TAC) approach;
- be alert to signs of abuse, both in the School and from outside and to protect each student from any form of abuse, whether from an adult or another student;
- deal appropriately with every suspicion or complaint of abuse and support students who have been abused in accordance with their agreed child protection plan;
- design and operate procedures which promote this policy, but which, so far as possible, ensure that students and staff who are innocent are not prejudiced by false allegations;
- be alert to the needs of students with physical and mental health conditions;
- operate robust and sensible health and safety procedures;

- operate clear and supportive policies on drugs, alcohol and substance misuse;
- assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- identify children who may be susceptible to radicalisation, and know what to do when they are identified;
- take all practicable steps to ensure that the School premises are as secure as circumstances permit;
- teach students about safeguarding issues and about how to keep themselves safe (including online and when working from home online); and
- ensure that any deficiencies in our child protection and safeguarding procedures are remedied without delay.

## 3. Roles and responsibilities

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

- contribute to providing a safe environment in which students can learn;
- consider at all times the best interests of the student and take action to enable all students to have the best outcomes;
- attend appropriate safeguarding and child protection training on an annual basis or additionally as directed by the DSL;
- be aware of the indicators of the different forms of abuse and neglect and of emergent mental health issues;
- be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and that they may also not recognise their experiences as harmful;
- assist children in need and to protect children from abuse, neglect, exploitation, radicalisation and extremism;
- be familiar with the School's policies pertaining to safeguarding and child protection procedures and follow them;
- know how to access and implement the procedures, independently if necessary;
- keep a sufficient record of any significant complaint, conversation or event;
- report any matters of concern to the DSL or, where appropriate, to one of the key contacts in accordance with this policy; and
- support social services and any other agencies following any referral.

3.2 The Designated Safeguarding Lead (DSL)

The School has appointed a Designated Safeguarding Lead (DSL) who is a senior member of staff and member of the School's leadership team. The DSL takes lead responsibility for safeguarding (including on-line safety) and child protection and is th**e first point of contact for parents,** students, staff and others if they have any concerns about safeguarding or child protection. The

School also has Deputy DSLs, ensuring that there is always an appropriately trained and designated person in the School at all times.

The DSL will be given the time, funding, training, resources and support to ensure they are able to fulfil all the key aspects of their role as described in KCSIE (Sept 2026) effectively:

- Managing Referrals: the DSL will manage the referral of cases of suspected abuse, neglect, radicalisation or any other relevant issue to the Local Authority Social Care Service, Channel programme, DBS and/or Police as appropriate.
- Working with others: the DSL will be the principal point of contact for all staff and when coordinating different departments and functions within and outside the School in the management of a case. They will promote supportive relationships with parents and carers to safeguard students' welfare, be able to identify the causes and consequences of issues that children are experiencing and to support staff to make appropriate adjustments in the provision of educational programmes.
- Information sharing and managing the child protection file: the DSL is responsible for keeping child-protection files up to date with accurate and complete records of any actions or decisions taken and ensuring these confidential records are securely stored.
- Transference of records: Where children leave the School, the DSL/DDSL will as far as possible try to ensure child protection file is transferred to new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. Due to SYTS school dates not consistently matching other schools, the DSL/DDSL will notify the new school for vulnerable children and summarise key information alerting them to expect records.

The transfer of records will be logged and recorded by the School.

- Raising Awareness: the DSL is responsible for reviewing and updating the School's safeguarding policy at least annually, for ensuring that all staff members have had appropriate training regarding its implementation, and that parents can access the policy and know that the School may make referrals where abuse, neglect or exploitation is suspected.
- Training, knowledge and skills: the DSL will receive the appropriate level of training, together with regular updates, to ensure they are able are able to understand the unique risks associated with online safety, to be confident that they have the relevant knowledge and up-to-date capability required to keep children safe whilst they are taking part in school online or at School and to diagnose and respond to the specific needs of vulnerable children and work effectively with agencies such as the LADO, the Police and the Channel agency.
- Providing support to staff: the DSL should receive sufficient support and training so that they can support staff and help them feel confident on welfare, safeguarding and child-protection matters, including referrals and taking into account safeguarding, welfare and SEN in the provision of academic and pastoral support.
- Understanding the views of children: the DSL should, through training, develop the knowledge and skills needed to encourage a culture of listening to children and taking account of their wishes and feelings among all staff. They should promote an understanding of the difficulties that children may have in approaching staff about their circumstances and help staff consider how to build trusted relationships which facilitate communication.

Note: A full description of the responsibilities of the DSL is set out in Appendix 6 of this policy.

3.3 Deputy Designated Safeguarding Leads (DDSL)

DDSLs are trained to the same standard as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of students. In the event of a long-term absence of the DSL, a Deputy will assume responsibility for all the activities described above. On a day-to-day basis safeguarding activities may be delegated to a DDSL but final lead responsibility for safeguarding and child protection remains with the DSL. The school has a confidential shared mailbox to ensure that safeguarding concerns are received, monitored, and acted upon without delay.

3.4 Headteacher

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

- the safeguarding and child protection policy and procedures adopted by the Board of Directors are implemented and followed by all staff;
- sufficient time, training, funding, support and resources necessary to enable the DSL and DDSLs to carry out their roles effectively are allocated, including the assessment of students and attendance at strategy discussions and other necessary meetings;
- matters which affect student welfare are adequately risk-assessed by appropriately-trained individuals and for ensuring that the relevant findings are implemented, monitored and evaluated;
- systems for students exist that enable them to express their views and give feedback;
- staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the School's Whistleblowing Policy and low-level concerns procedures;
- students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online;
- safer recruitment procedures are being adhered to in line with Part 3 of KCSIE, September 2025;
- she acts as the 'case manager' in the event of concerns and allegations of abuse made against another member of staff (including contractors, supply staff, trainee teachers and volunteers) and liaises with the Local Authority Designated Officer (LADO); and
- she notifies the Disclosure and Barring Service and, where appropriate, the Teaching Regulatory Authority and/or the Police of anyone who has harmed or may pose a risk to a child.
- Contact details for the Headteacher are contained in section 1 of this policy

3.5 Directors

The Board of Directors has overall responsibility to ensure compliance with child protection statutory requirements and actively promote the wellbeing of students. It is the role of the Directors to provide scrutiny of the safeguarding policy and safeguarding practice. The Board takes seriously its responsibility to fulfil its duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. To this end, the Directors will ensure that:

- they facilitate a whole-School approach to safeguarding, ensuring safeguarding and child protection underpin all aspects of policy and process and policy development;
- an effective, up-to-date child protection policy is in place that is clear and easy to understand for staff, students and parents and made available on the School's website;
- other policies, as prescribed in Part 2 of KCSIE, are in place and operational;
- the obligations imposed by the Human Rights Act (1998) and the Equality Act (2010) are met this extends to staff as well as students;
- students are being taught about how to keep themselves and others safe, including online, and that there is appropriate provision for the specific needs and vulnerabilities of individual children, including those who are victims of abuse and/or have SEN/D needs;
- required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register;
- an appropriate member of staff from the School's leadership team is appointed to the role of DSL
- all staff receive safeguarding induction and ongoing training in accordance with this policy;
- the School's safeguarding arrangements take into account the procedures and practice of the Bi-borough Safeguarding Children Partnership;
- the School contributes to inter-agency working, including providing a co-ordinated offer of early help assessment when additional needs of students are identified;
- clear systems and processes are in place for identifying and managing students with mental health problems;
- child protection files are maintained and, where appropriate, such records are transferred to a student's new school or college in accordance with statutory guidance;
- DSL takes lead responsibility for ensuring that IT systems have filters in place which block harmful and inappropriate content and that there are effective monitoring strategies to keep children safe online and that these are reviewed at least annually;
- the School reports to their local authority any student who joins or leaves the School at non-standard transition times in line with statutory and local authority guidance; and
- written assurances are provided by individuals or organisations who hire School premises confirming safeguarding and child protection procedures are in place in line with DfE Guidance 'Keeping Children Safe during Community activities, after-school clubs and tuition'. The School will follow its own Safeguarding policies and procedures if there is an allegation relating to an incident on the School's premises including informing the LADO.

3.6 Safeguarding Director

The Managing Director is Alison Ruffelle and she is also the nominated Safeguarding Director who takes lead responsibility for monitoring the operation of safeguarding arrangements in the School. This is done in a number of ways, these being:

- conducting discussions about safeguarding matters with the DSL at least once a term and more regularly, if needed;
- liaising with the local authority and/or partner agencies where appropriate; and
- conducting an annual audit of the School's safeguarding procedures and reporting to the Board of Directors with recommendations for further improvements. These audit reports will typically consider: the effectiveness and implementation of relevant policies; staff

safeguarding training; staff recruitment procedures; management of the SCR; the handling of safeguarding issues; referral management; the contribution the School is making to inter-agency working; and the provision for teaching students how to keep themselves safe. This audit will form part of the annual review undertaken by the Board as a whole to ensure that all policies, procedures and training provided by the School are effective and comply with the law.

3.7 4.7 The contact details for the Safeguarding Director are set out in Section 1 of this policy.

## 4. Key personnel

4.1 The DSL at the School is Menifa Williams. If the DSL is unavailable, the role will be carried out by a Deputy DSL (Andrew Kennedy or Anne-Marie Kennedy). The DSL or Deputy DSLs are always available when the School is open to discuss safeguarding concerns with staff, either in person or via telephone, email or Zoom or other such media.

4.2 If the DSL and Deputy DSLs are unavailable, the role will be carried out by the Managing Director. Outside School hours and during out-of-term activities, a designated member of the SLT will assume temporary responsibility and the duty rota will be made available to all staff.

4.3 Menifa Williams is the designated member of staff who oversees the welfare of looked-after children.

4.4 Contact details for the above are contained in section 1 of this policy.

## 5. Staff training

5.1 Staff training encourages all members of staff to maintain an attitude of 'it could happen here' where abuse and neglect are concerned.

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

- This safeguarding policy and related policies on Anti-Bullying and Cyber-bullying, E-Safety, Mental Health and Prevent*;
- Part 1 of KCSIE*;
- the role, identity and contact details of the DSL and Deputy DSLs;
- policies on acceptable use of IT and online safety (including when they are online at home)*;
- the expectations, roles and responsibilities of staff in relation to filtering and monitoring of online content;
- the student Behaviour, Rewards and Sanctions Policy*;
- the School's safeguarding response to students who go missing from education;
- the Staff Code of Conduct and low-level concerns procedures*;
- the School's policy on Whistleblowing*; and
- an overview of the Local Safeguarding Children Partnership's procedures.

* Copies of these documents will be provided either in paper form or electronically as part of the induction process and new staff will be required to sign a declaration confirming they have read

and understood them. A proportional, risk-based approach will be taken to determine the level of information provided to temporary staff and volunteers.

5.3 All staff, including volunteers involved in regulated activity, will undertake appropriate child-protection training which, in line with LSCP guidance, is updated annually. In addition, all staff will receive safeguarding updates delivered through a combination of INSET, bulletin updates, and the completion of relevant courses on a regular basis and at least annually. Safeguarding training is coordinated by the DSL and includes online safety and Prevent training, where appropriate.

5.4 All staff receive updated copies of the School policies referred to above and are required to confirm that they have read and understood them. In addition, Part 1 and, where appropriate, Annex B of KCSIE are reissued to staff whenever this statutory guidance is updated by the DfE. Staff training provides an opportunity to check and consolidate their understanding of the policies. Staff can also access the policies and further reading via the staff links.

5.5 The DSL team will regularly assess the appropriate level and focus for staff training so that it can respond to specific safeguarding concerns such as mental health, child on child abuse, online safety, radicalisation, child sexual exploitation, child criminal exploitation, sexual violence and harassment, prejudiced-based and discriminatory bullying, and female genital mutilation.

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

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

5.7 New appointees to the Board of Directors receive appropriate safeguarding and child protection (including online) training at induction. This training is designed to ensure they understand their responsibilities as Directors and equip them with the knowledge to provide strategic challenge to test and assure themselves that the School's safeguarding policies and procedures are effective and support the delivery of a robust whole School

approach to safeguarding. All members of the Board of Directors receive update training at least on an annual basis.

The Sylvia Young Theatre School promotes an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of safeguarding responsibilities.

## 6. Hierarchy of intervention

6.1 All staff should be aware of the process for community-based Family Help assessments:

• the criteria, including the level of need, for when a case should be referred to Family Help support and services provided at:

- Targeted early help level (under sections 10 and 11 of the Children Act 2004), and
- Statutory services delivered under section 17 of the Children Act 1989 (children in need,including how this applies for disabled children)
- the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under Section 47 of the Children Act 1989 (reasonable cause to suspect a child is suffering or likely to suffer significant harm)
- Section 31 of the Children Act 1989 (care and supervision orders), and
- Section 20 of the Children Act 1989 (duty to accommodate a child)
- and clear procedures and processes for cases relating to:
  - the abuse, neglect, and exploitation of children
  - children managed within the youth secure estate
  - disabled children

6.2 The Bi-borough publishes threshold guidance that all agencies, professionals and volunteers in the Bi-borough can use to consider how best to meet the needs of individual children and young people. This guidance provides a summary of thresholds for intervention in relation to a continuum of need, ranging from children who need no additional intervention to those who require intensive help and specialist support. Children's needs are not static and they may experience different needs – at different points on the continuum – throughout their childhood years.

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

Level 1: Universal

These are children with no additional needs; all their health and developmental needs will be met by universal services such as housing, mainstream education, primary health care, community resources alone. Children and young people at this level are achieving expected outcomes. There are no identified unmet needs, or the need is at a low-level and can be met by the universal services or with some limited additional advice or guidance. Children, young people, parents and carers can access these services directly.

Level 2: early help assessment and targeted support

These are children whose needs are not clear, not known or not being met. They may be vulnerable and showing early signs of abuse and/or neglect. Children and young people at this level are in need of coordinated early help assessment and support from services to prevent problems from escalating and difficult to resolve.

Level 3: Children and families with complex needs

Children and families at this level will be facing complex problems which will require an integrated and coordinated response from a number of agencies e.g. children's social services, CAMHS, health services etc. Children at this level, often described as children 'in need', are unlikely to achieve or maintain a satisfactory level of health or development, or their health and development will be significantly further impaired, without the provision of external services.

Level 4: Children with acute needs

These are children who are suffering or are likely to suffer significant harm. This is the threshold for child protection. These children are likely to have already experienced adverse effects and to be suffering from poor outcomes.

## 7. Early help assessment

7.1 SYTS recognises the importance of providing support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. We recognise that young people may face many challenges that put them in need of support and ensure that staff are aware of them. These include: stress, peer pressure, body image concerns, mental health and relationship issues.

7.2 Students are encouraged to raise concerns as soon as they are identified, either through their form tutors / someone they feel safe talking to/ the School nurse or directly to the Designated Safeguarding Lead, so that effective early support can be provided. They should be taken seriously and never be made to feel that they are creating a problem by reporting concerns or abuse.

7.3 If staff believe that a student could benefit from early help assessment, they should discuss the matter with the DSL who will, taking into account the Bi-borough's threshold criteria, consider what action should be taken, including whether a referral should be made to Early Help services. Community based Early Help and the option to manage a report internally do not need to be mutually exclusive.

7.4 If early help assessment is provided, the situation will be monitored carefully and a referral to children's social services made if the student's situation does not appear to be improving.

7.5 The School has various mechanisms to help identify emerging problems, including a thorough student recruitment process, the School's pastoral system, the PSHE programme and various policies, including Anti-Bullying and Cyber-bullying, E-Safety, Mental Health and Prevent. Staff training also prepares staff to identify students who might benefit from early help assessment.

7.6 The School recognises the importance of early identification the increased vulnerability of and makes reasonable adjustments for children and young people who:

- are Disabled or has certain health conditions and has specific additional needs or have Special Educational Needs (whether or not they have a statutory Education, Health and

Care plan) as they are more prone to peer-group isolation or bullying (including prejudice-based bullying)

- has a mental health need
- do not have English as a first language
- are living away from home for the first time
- is a privately fostered child
- is frequently missing/goes missing from education, care or home
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from school
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- has a parent or carer in custody, or is affected by parental offending
- are faced with challenging family circumstances such as drug and alcohol misuse, adult mental health issues and domestic abuse
- are showing signs of being drawn into antisocial or criminal behaviour including gang involvement and association with organised crime groups or county lines
- are looked after children
- are acting as a young carer recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing
- is pregnant and/or is a parent themselves
- are misusing drugs or alcohol themselves
- are at risk of being radicalised into terrorism
- is at risk of honour or faith-based abuse such as female genital mutilation or forced marriage
- are showing early signs of abuse, exploitation, neglect or mental health problems
- has exhibited early signs of abusive, violent and/or harmful behaviours
- may be subject to discrimination and maltreatment on the grounds of race, religion, ethnicity, sexual orientation or sexual identity.

Such children may be more likely to need early help assessment. Any reports of abuse involving children with SEND will therefore require close liaison with the DSL/DDSL and the special educational needs coordinator (SENCO). Also, recognising abuse, exploitation or neglect may be more difficult for these young people for many reasons, including:

- assumptions that indicators of possible abuse such as behaviour, mood or injury relate to a student's disability without further exploration;
- SEN/D students are more prone to peer group isolation (including prejudice-based bullying) than other young people
- students with Special Educational Needs or Disabilities (SEN/D) can be disproportionately impacted by bullying/child-on-child abuse without outwardly showing any signs;
- communication barriers and difficulties overcoming these barriers;
- communication barriers and difficulties in managing or reporting these challenges risks

that they do not understand that what is happening to them is abuse,

- the need for intimate care or that these children are isolated from others,
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in the real world.

7.7 For children with medical conditions, the fact that there has been an incident relating to the management of a child or young person's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to the school or where they are repeatedly sent without essential medication, thereby putting the individual at risk.

## 8. What to look out for and when to be concerned

8.1 All staff should be aware of the types and signs of abuse, exploitation, neglect and modern slavery, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online so that they are able to identify students who may be in need of help or protection. They also must be mindful that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or may not recognise their experiences as harmful. To reduce barriers to a potential disclosure it is incumbent on staff to build trusted relationships with children which facilitate communication. Staff must also exercise professional curiosity and speak to the DSL if they have concerns.

8.2 All staff should be aware of the types and signs of abuse and neglect so that they are able to identify students who may need help or protection. If staff are unsure, they should always speak to the DSL.

8.3 Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can also include ill-treatment that is not physical as well as the impact of witnessing the 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 (child-on-child abuse). Serious bullying is a form of abuse and therefore will be treated as a child protection concern if there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm. Children may also cause harm to other family members, often referred to as child to parent or caregiver abuse.

8.4 Staff should be aware of the four main categories of child abuse which are commonly identified:

- Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as 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 cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- Sexual abuse: involves forcing, causing or inciting a child or young person to take part in sexual activities, not necessarily through 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the nonconsensual making or sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) and is covered in greater detail later in this policy (section 19).
- Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing or shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

8.5 All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm. Other forms of abuse which staff should be aware of include (but are not limited to) the list below:

- Unexplainable and/or persistent absences from education

- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- County lines
- Domestic abuse
- Honour-Based Abuse (HBA) and Female Genital Mutilation (FGM)
- Child marriage
- Radicalisation
- child-on-child
- Sexual violence and harassment (including upskirting and may include misogyny/misandry)
- Further information is provided in Appendix 1 of this policy and in Part 1 and Annex B of KCSIE.

## 9. Contextual safeguarding

All staff should be aware that children may be vulnerable to abuse or exploitation from outside their families, and safeguarding risks must consider risks in contexts such as peer groups, schools, neighbourhoods, and online environments. This is known as contextual safeguarding.
Extra-familial harms take a variety of forms and young people may be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), sexual abuse, serious youth violence, county lines and radicalisation.

## 10. Signs of abuse

10.1 All staff need to be aware that students may be reticent about reporting abuse generally, and particularly so about child-on-child abuse, and therefore need to be vigilant for potential indicators that abuse may be taking place. MyConcern should be used to inform the DSL team of any concerns they might have.

10.2 Possible signs of abuse include (but are not limited to) the following (and these do not necessarily mean that abuse is occurring):

- the student discloses that he or she has been abused, or asks a question which gives rise to that inference
- the student has an injury that cannot be reasonably or consistently explained, or is unusual in type or location
- the student shows signs of injury on a regular or patterned basis
- the student engages in extreme or challenging behaviour or there is a sudden change in the student's behaviour
- the student asks to drop subjects with a particular tutor and seems reluctant to discuss reasons
- the student appears neglected (e.g. dirty, hungry, inadequately clothed)
- the student appears reluctant to return home or has been openly rejected by parents or carers

- the student's development is delayed in terms of emotional progress
- the student withdraws emotionally – showing a lack of trust in adults
- the student shies away from being touched or flinches at sudden movements
- the student loses or gains weight

10.3 Further guidance is provided in Appendix 2. Other sources of information on the signs of abuse include: the DfE advice note What to do if you're worried a child is being abused (2015) and the NSPCC website.

## 11. Listening to students and record keeping

11.1 The School provides a range of opportunities for students to be listened to. Students can speak with subject teachers, form tutors, a member of the pastoral team or make use of the School counselling service. Concerns can also be brought to our attention via the student council. Contact details for external agencies such as Childline and Office of the Children's Commissioner are available around the School and in the library.

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

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

11.3 Staff must record in writing all concerns, discussions and decisions made about a student as soon as possible on My Concern. The recording must be a clear, precise and factual account of the conversation or observations. Where a child has made a disclosure, the record must include details of:

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

Any other evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers) must be kept securely and passed on to the DSL as soon as possible. No

copies should be retained by the member of staff or volunteer. The DSL or DDSL will organise for the evidence to be scanned and added to the MyConcern incident record.

Where a report includes an online element, staff must not deliberately view illegal images of a child and under no circumstances should such images be forwarded electronically. Inform the DSL if you have unintentionally viewed an image. Further guidance is available on: Searching, screening and confiscation in schools - GOV.UK

- https://www.gov.uk/government/publications/searching-screening-and-confiscation
- *Sharing nudes and semi nudes: advice for education settings working with children and young people (December 2020)*.

## 12. Procedure to be followed by staff if they have concerns about a student's welfare

12.1 If a member of staff has concerns about a student's welfare, including any mental health concerns, they should act on them immediately, they must inform the DSL or a DDSL as soon as possible, unless the concerns involve an allegation against a member of staff, in which case the procedures set out in the section Allegations against members of staff, supply staff, trainee teachers, contractors and volunteers below should be followed. Staff should not assume that somebody else will act and share information that might be critical in keeping a student safe.

12.2 All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL.

12.3 If a teacher or regulated healthcare professional discovers that an act of female genital mutilation (FGM) appears to have been carried out on a girl under 18, the teacher or regulated healthcare professional must report this directly to the police. Unless the member of staff has a good reason not to, they should also still inform the DSL. This statutory duty does not apply to suspected cases of FGM, those at risk of FGM or to other members of staff, which should be addressed in accordance with the safeguarding procedures described in this policy. (For further details, see Annex B of KCSIE and 'Guidance for Schools' information.)

12.4 The normal safeguarding procedures outlined in this Policy must be used when there are concerns about children who may be at risk of being drawn into terrorism.

12.5 Parents can report to the DSL on the welfare of any student in the School, whether their own child or not. If preferred, parents may discuss concerns in private with the student's form tutor, School nurse or other member of staff, who will notify the DSL.

12.6 Any member of staff may refer a matter to children's social services directly. This could happen in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken.

## 13. Duties of the DSL on being notified of a concern about a student's welfare

13.1 When the DSL is notified of any concerns about a student's welfare, they will decide on the appropriate course of action. Options will include:

- managing any support for the child internally via the school's own pastoral support processes, including considering where doing so does not place the child at additional risk, whether the designated safeguarding lead (or a deputy) should inform parents or carers to further support the child's wellbeing,
- undertaking a family help assessment, or
- making a referral to statutory services, for example as the child could be in need, is in need or is suffering, or likely to suffer harm.

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

- the best interests of the child
- the nature and seriousness of the complaint
- contextual factors
- the referral threshold set by the relevant Local Authority
- the student's wishes or feelings
- the inter-agency procedures of the Local Safeguarding Children Partnership
- where relevant, local information sharing protocols relating to Channel referrals.

13.3 If children do not require the support of statutory children's services, the DSL will generally lead the liaison with other agencies. Staff may be required to support other agencies and professionals in carrying out this assessment, in some cases acting as the lead practitioner. The DSL will keep the situation under review and consider a later referral to children's social services if the student's situation does not appear to be improving. Alternatively, qualified lead practitioners (i.e. not a social worker) who may lead assessments before statutory intervention can continue to lead work with families up to and including section 17.

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

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

These records will be saved in the students' chronology on MyConcern. If paper records are also transferred from previous settings these will be stored in a locked cabinet in the DSL's office.

The DSL is responsible for ensuring that all safeguarding records are accurate, up to date and that recording is of a high standard.

## 14. Making a referral to children's social services

14.1 When a student is not considered at risk of harm, but still has an unmet need that could mean they are in a Child in Need, a referral should be made as soon as possible by the DSL to Children's Social Care in the local authority in which the student lives. A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development

is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. It is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge. Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) there should be an inter-agency early-help assessment and procedures will be put in place by children's services to arrange this. The School will coordinate with the local agencies involved.

14.2 If a student is in immediate danger or is at risk of harm, a referral should be made to children's social services and/or the police must be made without delay (and in any event within 24 hours). Further guidance on when to call the police is provided by the NPCC - when to call the police. The School is not required to obtain parental consent prior to a referral being made.

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

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

14.5 Anyone can make a referral, although if a referral is made by someone other than the DSL, the DSL should be informed as soon as possible.

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

14.7 Where relevant, the School will cooperate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is susceptible to being drawn into terrorism. The School will respond to requests for information from the police promptly, and in any event within five to ten working days.

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

## 15. Informing parents

15.1 Parents will usually be informed of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult with the Local Authority Designated Officer (LADO), children's social services, the police and/or the Headteacher before discussing details with parents.

15.2 For Prevent referrals, the DSL will inform the student and their parent/carer and will attempt to seek the consent of the student (or their parent/carer) when determining what

information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

15.3 When the School decides to refer a particular complaint of abuse to local authority social services or the police, the parents/carer and student will be informed in writing of their right to make their own complaint or referral to social services or the police, where appropriate, and will be provided with contact names, addresses and telephone numbers.

15.4 For the avoidance of doubt, referrals do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

## 16. Allegations about members of staff, supply staff, trainee teachers, contractors and volunteers

16.1 Guidance to staff

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

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

To reduce the risk of allegations, staff should be aware of safer working practices and should be familiar with the detailed guidance on acceptable behaviour and actions contained in the Staff Code of Conduct, which is issued to all staff. Particular care should be taken where staff have one-to-one meetings with a student.

16.2 The following procedures will be used where it is alleged that a member of staff, trainee teacher, a supply teacher, contractor or volunteer 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 they would pose a risk of harm to children; or
- behaved or may have behaved in a way (in or outside of School) that indicates they might not be suitable to work with children. The incident may not necessarily involve children but may raise concerns that such behaviour might be replicated against a child (eg domestic violence at home).

16.3 These criteria are often referred to as the allegation or harms threshold. The procedures outlined below aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. The procedures follow Part 4 of KCSIE 2026. Reporting an allegation about staff

If an allegation is made about staff that appears to meet the criteria in paragraph 16.2:

- Where an allegation is made about a member of staff, including the DSL, trainee teacher, temporary staff, support staff, supply staff, trainee teachers, directors, volunteers, contractors, external services, academic, non-academic, and pastoral staff the matter should be reported immediately to the Headteacher, ANNE-MARIE KENNEDY, or in her absence, the Managing Director ALISON RUFFELLE, who will then consider whether an

onward referral to the Local Authority Designated Officer is required (the person designated by the local authority to be involved in the management of allegations against people who work with children). In the event of a situation where there is a potential conflict of interest in reporting the matter to the Managing Director an allegation should be reported directly to the LADO.

- Allegations about the Headteacher should be reported to the Managing Director who will seek advice and work directly with the LADO. Allegations about a Director, other than Alison Ruffelle, should be reported to the Managing Director. If the allegation is against the Managing Director the matter should be reported directly to the LADO to prevent any conflict of interest.

NB In all referral cases, the adult to whom the allegation(s) relate should not be informed of them without the explicit consent of the LADO

- The Headteacher or Director who receives any such allegation is referred to in these procedures as the 'case manager'.

16.4 Action to be taken by the case manager

- Before contacting the LADO, the case manager will conduct basic enquiries in line with the Bi-borough's procedures to establish the facts to help determine whether there is any foundation to the allegation. Nothing must be done at this initial stage that could jeopardise a future police investigation.
- If the case manager is unsure whether the allegation meets the criteria in para 16.2 above, the LADO will be consulted for advice.
- Any allegations meeting the criteria in para 16.2 will be dealt with in accordance with the local authority's arrangements for managing allegations. All such allegations must be dealt with as a priority to avoid any delay.
- The case manager will immediately (and in any event within one working day) discuss the matter with the LADO before further action is taken. The case manager may also consult with the DSL, but no attempt will be made to formally investigate the allegation until the LADO is consulted. The purpose of the initial discussion between the case manager and the LADO is to consider the nature, content and context of the allegation and agree on a course of action. All discussions with the LADO should be recorded in writing.
- The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it will be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom.
- In situations where a person is deemed an immediate risk to children or where there is evidence of a possible criminal offence, the case manager may, in consultation with the LADO, request police involvement from the outset.
- If an adult makes an allegation to the School that they were abused there as a child, the individual will be advised to report the allegation to the police. Non-recent allegations made by a student will be reported to the LADO in line with Bi-borough's procedures for dealing with such allegations. The LADO will then coordinate with the children's social care and the police.

16.5 Disclosure of information

- The case manager will inform the accused person of the allegation as soon as possible after the LADO and, if appropriate, local authority children's social care and the police have been consulted.
- The parents of the student involved will be informed of the allegation as soon as possible if they do not already know of it, although where external agencies are involved, the case manager will not inform the accused or the parents until it has been agreed what information can be disclosed. Parents will be kept informed of the progress of the case, only in relation to their child: no information can be shared regarding the member of staff.
- The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

16.6 Investigation

- Investigations will usually be undertaken by a senior member of School staff, under the guidance of the LADO. However, depending on the nature and complexity of an allegation, the investigation may instead be conducted by external agencies, such as social services or the police. In some cases, the LADO may ask for further enquiries to be made before a formal decision is reached about how to proceed. When this occurs, the LADO will provide specific guidance as to how and by whom the investigation should be conducted.
- Where an external agency is conducting the investigation rather than the School, the School will cooperate fully with external investigators. No internal investigation into possible breaches of the School's disciplinary code will commence until any external investigation or criminal proceedings are complete.
- The case manager will monitor the progress of the case to ensure that it is being dealt with as quickly as possible in a thorough and fair way. Wherever possible, the first review should take place within four weeks of the initial assessment. Subsequent reviews will take place at fortnightly (and no longer than monthly) intervals whilst the investigation is ongoing.
- It is recognised that the School may have to consider an allegation against an individual not directly employed by the School: for example, supply tutors provided by an employment agency or business. SYTS will ensure allegations are dealt with properly. Whilst the school is not the employer of supply teachers, the school is still responsible for ensuring that allegations are dealt with properly. In no circumstances should the school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency whether it is appropriate to suspend the person they have supplied, or redeploy them, whilst the investigation is carried out. SYTS will take the lead in the investigation, to ensure that the allegation is dealt with properly and to recognise the fact that the agency would not have direct access to students or other School staff. They would therefore not be able to collect the facts or liaise with the LADO, police and/or children's social services. Supply staff will be advised to contact their trade union for representation. If there is an allegation meeting, it will address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School. Where concerns or allegations relate to a trainee teacher, the expectations set out above also apply. In addition, teacher training providers are expected to follow the same procedures as set out for supply agencies.
- If SYTS receives an allegation relating to an incident that happened when an individual or organisation was using its premises for the purposes of running activities for the children, the School will follow the procedures set out in this policy.

- The School will not cease its investigations if the person involved leaves, resigns, ceases to provide their services, or refuses to cooperate. Records will be kept of the nature of the allegation and any supporting evidence used to determine whether or not, on the basis of information available, the allegation is substantiated. The person involved will be notified in writing of the outcome of the investigation process.
- In accordance with DfE statutory guidance, the following definitions will be used when determining the outcome of allegation investigations:
    - Substantiated: there is sufficient evidence to prove the allegation
    - Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject to the investigation.
    - False: there is sufficient evidence to disprove the allegation
    - Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
    - Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

16.7 Support

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

16.8 Suspension

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

16.9 Confidentiality and information sharing

- The School will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality, in order to ensure a fair investigation with minimum impact on all parties.
- A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence to publish information that could lead to the identification of a member of staff who is the subject of an allegation before they are charged with an offence. Publication includes any speech, writing, relevant programme or other communication, in whatever form, which is addressed to the public at large or any section of the public.
- The case manager will take advice from the LADO, police and children's services, as appropriate, to agree:
    - Who needs to know about the allegation and what information can be shared
    - How to manage speculation, leaks and gossip, including how to make the parents or carer of the student involved aware of their obligations with respect to confidentiality
    - What, if any, information can be reasonably given to the wider community to reduce speculation
    - How to manage press interest if, or when, it arises
- Where the police are involved, wherever possible the School will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in any subsequent disciplinary process initiated by SYTS.

16.10 Unsubstantiated, unfounded, false or malicious allegations

- If an allegation by a student is determined to be unsubstantiated, unfounded, false or malicious, the case manager should consider the following actions:
    - If the student who made the allegation is in need of help or may have been abused by someone else and, under such circumstances, whether a referral to student's social services is appropriate
    - Whether to take disciplinary action against the student in accordance with the School's Behaviour, Rewards and Sanctions Policy.
- If a parent has made a deliberately invented or malicious allegation the Managing Director will consider whether to require that parent to withdraw their child or children from the School, on the basis that they have treated the School or a member of staff unreasonably.
- Whether or not the person making the allegation is a student or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

16.11 Substantiated allegations

- If an allegation is substantiated and the member of staff, contractor or volunteer is dismissed because they are unsuitable to work with children a report to the Disclosure and Barring Service will be made promptly, and in any event within one month of the person leaving the School.
- Settlement agreements, including a form of words for a reference, will not be used in cases where a member of staff, volunteer or contractor resigns or ceases to provide his or her service, where there are allegations that indicate the person is a risk or poses a risk of harm to children. Resignation or ceasing to provide services will not prevent a referral being made to the Disclosure and Barring Service where appropriate.

- If a tutor has been dismissed, or would have been dismissed had they not resigned, in cases involving unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction for a relevant offence, the School will give separate consideration to whether a referral should be made to Secretary of State, as required by sections 141D and 141E of the Education Act 2002. Employers should continue to have regard to their duties under the PSED. The School will follow the advice set out in the Teaching Regulation Agency documents: and Teacher misconduct: the prohibition of teachers (as updated from time to time) to decide whether a referral should be made.
- At the conclusion of a case in which an allegation is substantiated, the LADO will review the circumstances of the case with the case manager to determine whether any improvements could be made to the School's procedures to prevent the occurrence of similar events in the future. Consideration will also be given to how the investigation process was managed, including, where appropriate, the use of suspension of the accused. The case manager will produce a written report that will be presented to the Board without delay.

16.12 Record keeping and references

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

16.13 Learning lessons

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

## 17. Low-level concerns

17.1 As part of a whole School approach to safeguarding, SYTS seeks to promote a culture in which all concerns about all adults working in or on behalf of the School are dealt with promptly and appropriately. The purpose of the School's low level concerns (see staff code of conduct) is to create and embed a culture of openness, trust and transparency in which our values and expectations of staff behaviour as set out in the Code of Conduct are constantly lived, monitored and reinforced by all staff.

17.2 A "low-level' concern 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 has acted in a way that:

- Is inconsistent with the School's Code of Conduct, including inappropriate conduct outside of work; and
- Does not meet the allegation threshold (see KCSIE 2026 Part Four: Section One) or is otherwise not serious enough to consider a referral to the LADO. If the School is in any doubt as to whether the information shared about a member of staff meets the harms threshold, advice from the LADO will be sought.

NB: The term 'low-level' does not mean that the concern is insignificant; it simply means the behaviour does not meet the allegation threshold as defined in KCSIE.

17.3 Inappropriate behaviour can exist on a wide spectrum, from that which is inadvertent or thoughtless through to that which is ultimately intended to enable abuse. Examples of such behaviour could include but are not limited to: being overly friendly with students; showing favouritism; engaging with a student on a one-to-one basis in secluded area; taking photographs of students on a personal device; or humiliating students.

17.4 Low-level concerns may arise in several ways and from a number of sources: for example, suspicion; complaint; or disclosure made by a student, parent or another adult within or outside the organisation; or as a result of vetting checks undertaken.

17.5 Staff are required to report any concerns about any adult (including a person employed by a supply agency or a contractor) to the Headteacher (or the Managing Director in her absence). In the case of supply staff, and contractors their employers will be notified so any patterns of inappropriate behaviour can be identified. Where the concern relates to the Managing Director, it should be reported directly to the LADO. Such reports should be made without undue delay. Staff do not need to be able to determine whether their concern is a low-level concern or whether it meets the threshold of an allegation. This determination will be made by the Headteacher (with advice from LADO) when the matter has been investigated.

17.6 A member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff, for whatever reason, may have behaved in a manner which, on reflection, falls short of the standard set out in the Staff Code of Conduct. Under such circumstances, the member of staff should make a self-referral to the Headteacher as soon as possible. Doing so demonstrates transparency, facilitates effective management of the issue and can reduce the risks of misunderstandings and false allegations.

17.7 Full details of how the Headteacher (or nominated deputy) will go about investigating low-level concerns are set out in an annex to the Staff Code of Conduct. In brief, they will gather as much evidence as possible by speaking directly to the member of staff raising the concern (unless the concern has been raised anonymously), to the individual involved and to any witnesses. . If the Headteacher is the subject of the concern the Managing Director will act in a similar fashion.

17.8 All low-level concerns, including those determined to be unfounded, will be recorded in writing by the Headteacher. The record will include details of the concern, the context in which the concern arose, and any actions taken and decisions reached (and the rationale for them), and the eventual outcome. The name of the individual sharing their concerns will be noted. If the individual wishes to remain anonymous, then this will be respected as far as reasonably possible. Records of low-level concerns are confidential and securely stored by the DSL in accordance with the Data Protection Act 2018 and the UK General

Data Protection regulation and the Data (Use and Access) Act 2025 until the individual ceases to be employed by the School.

17.9 Low-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in employment references provided by the School. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to.

17.10 Records of low-level concerns will be reviewed at least termly by the DSL, Headteacher and Managing Director to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. Where a pattern of behaviour is identified consideration will be given to whether disciplinary procedures should be invoked, the matter should be escalated to the LADO and, more broadly, whether existing policies need to be revised and/or additional training is required to address wider cultural issues and minimise the risk of recurrence in the future.

## 18. Arrangements for dealing with child-on-child abuse and allegations

18.1 Most instances of students causing harm to each other will be dealt with under the School's Anti-bullying and Behaviour Policies. However, all staff should be aware that safeguarding concerns can arise as a result of conduct by a student towards another (sometimes referred to as child-on-child abuse). This type of abuse can happen both inside and outside of School and online. **All** staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator; **All** staff should recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate; **All** staff should know 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.

Examples of students' conduct towards each other that could raise safeguarding concerns are:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- discriminatory behaviour, including racism and faith-targeted abuse, added to the definition of child-on-child abuse
- abuse in intimate personal relationships between peers;
- physical violence such as hitting, kicking, shaking, biting, choking, hair-pulling or otherwise causing physical harm this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration (for example rape or penetration with an object) and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

- 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;
- upskirting, which typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or to cause humiliation or distress. (Upskirting is now a criminal offence. Anyone of any gender can be a victim.)
- consensual and non-consensual sharing of nude and/or semi-nude images and/or videos including those generated using AI; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

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

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

18.4 A child or young person who is (or is perceived to be) lesbian, gay, bisexual or questioning their gender may mean that they can be targeted by other children and subjected to harm because of this. This risk can be compounded where such students lack a trusted adult with whom they can be open. With this in mind, the school creates a culture where these children can speak out and share their concerns, including one-to-one pastoral meetings, counselling sessions and the Student Council.

18.5 Whilst sexual violence and sexual harassment are forms of child-on-child abuse to which the comments and measures below concerning awareness, education and reporting apply, their particular nature requires extra commentary, which is provided in section 19.

18.6 SYTS has an important role in developing students' understanding of what constitutes child-on-child abuse and instilling behavioural norms that minimise the risk of it taking place. With this in mind, **all** staff should be aware of the importance of:

- not assuming child-on-child abuse is not occurring because known cases are rare when it may in fact be that such abuse is occurring and are simply going unreported by students;
- enforcing the School's rules, which are explicit about the high standards of behaviour and courtesy the School expects;
- implementing in a consistent way its Behaviour, Rewards and Sanctions Policy;
- being clear that sexual violence or sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing any form of child-on-child abuse as 'part of growing up', 'banter', 'just having a laugh' or 'boys being boys' as this can lead to a culture of unacceptable behaviours, misogyny and an unsafe environment for students;
- recognising the escalatory nature of misogyny and the benefits of early identification to support their approach to minimising the risk of HSB, sexual harassment and sexual violence;

- challenging behaviours, potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them;
- taking a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual;
- implementing the School's anti-bullying strategy.

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

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

18.7 If a student discloses that they or another student has been the victim of child-on-child abuse, the guidance for gathering and recording the information provided in Section 12 of this policy should be followed.

18.8 If an allegation of child-on-child abuse has been made the DSL must be informed as soon as possible. Where the DSL considers that the behaviour meets the local authority threshold criteria (i.e. where there is reasonable cause to suspect a student is suffering or is likely to suffer significant harm), the case will be referred to the local authority using the procedures set out in this policy. The School will take advice from children's social services on when and how to inform the student about the allegations and how the investigation of allegations should be conducted. It will also take all appropriate action to ensure the safety and welfare of all students involved, including those accused of abuse. Further details on how cases of child-on-child abuse will be managed is contained in Part 5 of KCSIE (September 2025).

18.9 A student against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the School's policies on behaviour and sanctions will apply.

18.10 If it proves necessary for a student to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of children's social services, parents are informed as soon as possible and that an appropriate adult supports the student during the interview. It will be explained that the law is there to protect (not criminalise) children If a student's parents are abroad, the student's education carer will be asked to support the student and to accommodate him or her if they have been suspended. The School will be part of the discussions with parents.

18.11 Both the victim and the perpetrator will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. The DSL, as part of these procedures, will produce a welfare risk assessment which will consider the needs of all those involved (victim, perpetrator and other students at the School) and the measures

that need to be taken to protect and keep them safe. When compiling the risk assessment, appropriate weight will be given to: the wishes of the victim; the nature of the alleged incident; the ages of those involved; whether the incident was an isolated one or part of a pattern; any power imbalance between the victim and perpetrator; any ongoing risks to the victim and other students; and any relevant contextual factors including potential intrafamilial harms and protection for siblings. Children's social services will independently risk-assess the situation and any report produced by them will be used to inform and update the School's own risk assessment which, in any event, will be reviewed on a regular basis.

## 19. Child-on-child sexual violence and sexual harassment

19.1 Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Behaviour outside the normal range is called harmful sexual behaviour (HSB) because it is harmful to others or the student themselves. HSB can occur online and/or face-to-face. HSB should always be considered within a child protection context. (Advice on stages of typical sexual development and behaviour for different age groups can be found in Sexual behaviour and development in children - NSPCC Learning and for a table that presents key features of the continuum, please see Appendix 8.)

Central to determining whether sexual behaviour between children can be considered harmful is the age and development of those involved. For example, sexual behaviour can be considered harmful if one of the children is much older, particularly if there is more than two years' difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child if they have power over them; for example, if the older child is disabled or smaller in stature. For some there may be a link between viewing online pornography and subsequent HSB.

HSB can escalate over time. Early intervention when inappropriate behaviour is identified can help prevent problematic, abusive and/or violent behaviour in the future. It should be noted that the majority of young people displaying HSB do not become sexual offenders as adults.

19.2 Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 as described below:

**Rape**: A person (A) commits an offence of rape if they intentionally penetrates the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.

**Assault by penetration**: A person (A) commits an offence if: they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual assault**: A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.

**Causing someone to engage in sexual activity without consent**: A person (A) commits an offence they intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents.

**What consent is**: Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if they agree by choice to that penetration and has the freedom and capacity to make that choice:

• a child under the age of 13 can never consent to any sexual activity,

• the age of consent is 16, and

• sexual intercourse without consent is rape.

19.3 Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline and both inside and outside of School. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can take a wide variety of forms:

- Sexual comments, such as making lewd comments or sexualized remarks about a person's clothes or appearance, using sexualised names, sexual jokes or taunting etc
- Physical behaviour, such as deliberately brushing against someone, interfering with clothing (flicking bra straps, lifting up skirts etc), upskirting, displaying pictures, drawings or photos of a sexual nature
- Online sexual harassment, such as non-consensual sharing of images and videos (nudes and semi-nudes) including those generated using AI, sharing unwanted explicit content, sexualised online bullying, unwanted sexualised comments and messages, sexual exploitation and coercing others into sharing images of themselves or performing acts they are not comfortable with online

19.4 Sexual violence and sexual harassment can occur between students of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls, students with SEND, and LGBTQ+ students are more likely to be victims of these types of abuse. Evidence shows that boys are more likely to be perpetrators and girls to be victims. Young people who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

19.5 Students may not find it easy to tell staff about their abuse verbally. They can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of staff may overhear a conversation that suggests a child has been harmed, or a child's own behaviour might indicate that something is wrong.

19.6 All staff will be trained to manage a report of child-on-child sexual violence and sexual harassment. It is essential that all victims are reassured that they are being taken

seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the School must not be downplayed and should always be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report, or their experience minimised.

19.7 Section 12 of this policy provides general guidance for listening to students and record-keeping. Effective safeguarding practice in the context of claims of sexual violence or harassment further requires the following:

- If possible, reports should be managed with two members of staff present, (preferably one of them being the Designated Safeguarding Lead or a Deputy).
- Where the report includes an online element, staff should know and follow the searching, screening and confiscation advice (for schools) and UKCIS advice on sharing nudes and semi-nudes. The key consideration is for staff not to view or forward illegal images of a child. The UKCIS advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.
- The recognition that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so students may not be able to recall all details or timeline of abuse.

19.8 The School will respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the School. The DSL/DDSLs are likely to have a complete safeguarding picture and be the most appropriate people to inform the School's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB (harmful sexual behaviour) has been displayed;
- the ages of the children involved; the developmental stages of the children involved;
- any power imbalance between the children (eg whether the alleged perpetrator(s) significantly older, more mature or more confident);
- whether the victim has a disability or learning difficult;
- whether the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- whether there are ongoing risks to the victim, other children, adult students or School or School staff; and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

Note: The victim of sexual harassment or violence may ask the School not to tell anyone but the DSL has to balance the victim's wishes against their duty to protect the victim and other students in the School. The general rule of thumb is that if a student is either at risk of harm, or is in

immediate danger or has been harmed, a referral to local authority social care must be made. Rape, assault by penetration and sexual assaults are crimes and must therefore be reported to the police.

19.9 The DSL will reach a judgement about which of the following four ways is the most appropriate for handling the case:

- Internal management: the school or college may decide that the children involved do not require referral to statutory services but may benefit from other support.
- early help assessment: where the students concerned do not require referral to statutory services but may benefit from assistance from an external agency.
- Children's social care: where a child has been harmed, is at risk of harm, or is in immediate danger.
- Report to the police: in addition to the above, where the seriousness of the concern merits it.

In all but the first circumstance, how the case is managed will be determined in conjunction with the local authority MASH (Multi Agency Safeguarding Hub) team and/or the police. The School will follow the guidance as set out in detail in KSCIE (2025), Part 5. However, community based Early Help and the option to manage a report internally do not need to be mutually exclusive. Whatever the response, the school operates a zero-tolerance approach to sexual harassment and sexual violence, that it is never acceptable, and it will not be tolerated.

19.10 The School will do all that it reasonably can to protect the anonymity of students involved in any report of sexual harassment or sexual violence. Amongst other things, this will mean carefully considering which staff should know about the report and any support that will be put in place for those involved.

19.11 Risk and needs assessments are integral to the management of most cases of sexual harassment and all cases involving sexual violence. These assessments must be formulated on a case-by-case basis and must be conducted immediately once an incident comes to light rather than waiting for the outcome (or even the start) of a local authority children's social care and/or police investigation. Where sexual violence is alleged to have occurred the risk and needs assessment should consider:

- The victim, especially their protection and support
- Whether there may have been other victims
- The alleged perpetrator(s)
- All other children at the School, especially any actions that are appropriate to protect them from the alleged perpetrators
- The time and location of the incident, and any action required to make the location safer

Risk assessments will be recorded in writing and kept under regular review by the DSL to ensure the risk mitigation measures that have been put in place are effective and reflect changing circumstances. It is highly likely that these risk assessments will be informed by assessments made by social workers and/or sexual violence specialists.

19.12 Where a report has been made to the police, the School will seek their advice and agree what information can be disclosed to staff and others, in particular, the alleged perpetrators and their parents. Central to this discussion will be how the victim can best be protected. Thereafter the DSL will continue to work closely with the police (and any

other agencies as required) and keep up to date with how any investigation is progressing. The fact that another body is investigating or has investigated an incident does not necessarily prevent the School from coming to its own conclusion, on the balance of probabilities, and imposing a sanction accordingly.

However, the School will consider if, by taking any action, an external investigation and/or any subsequent prosecution could be compromised. There may also be circumstances in which it would be unreasonable or irrational to reach its own view about what has occurred while an independent investigation is ongoing. The School will be guided by the police and/or local authority children's social care when making this decision.

19.13 Where allegations of sexual harassment or sexual violence are contested there can be lengthy delays before the criminal process is complete. Under such circumstances, a determination will need to be made on a risk assessment basis as to whether it is viable for both the victim and alleged perpetrator to continue their education at the School. Consideration will be given to: stress and trauma to the victim; the potential for the suspected person to intimate the victim or witnesses; and the need to protect the rights of the alleged perpetrator to education, privacy and family life. The decisions taken must be proportionate to the alleged offence and balance the rights of the victim and perpetrator(s) and will be guided by advice provided by children's social services and the police.

19.14 Not all cases reported to the police are progressed and those that are may result in a not guilty verdict. The fact that an allegation was withdrawn or could not be substantiated does not necessarily mean that it was unfounded. Under these circumstances, the School will discuss with the victim how the situation is to be managed and ongoing support will be provided to them and the alleged perpetrator(s).

19.15 Where a criminal investigation into sexual harassment or sexual violence leads to a conviction of caution, the School will, if it has not already done so, consider what sanctions it wishes to impose in line with its Behaviour, Rewards and Sanctions Policy. The sanction imposed will be proportionate to the offence and the circumstances in which it took place. Proven cases of rape and assault will constitute a serious breach of discipline and are highly likely to result in the permanent exclusion of the perpetrator(s). Where an offence justifies a lesser sanction, consideration will also be given to how best to keep the victim and perpetrator(s) a reasonable distance apart on School premises (including during before and after School-based activities) and on transport to and from School. Any arrangements will take account of the wishes of the victim and will be discussed with their parents or carers and those of the perpetrator(s). Support arrangements will be put in place for both the victim and the perpetrator(s).

19.16 Sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Where students have a health need arising from sexual assault or abuse, the School will assist them in gaining access to suitable specialist support services.

19.17 If a report of sexual violence or sexual harassment is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider if disciplinary action should be taken against the Student who made the allegation and/or whether a referral to children's services is appropriate.

## 20. Other safeguarding arrangements

20.1 Mental health

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

**Only** appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise. These could include:

• significant changes in behaviour,

• ongoing difficulty sleeping,

• withdrawing from social situations,

• not wanting to do things they usually like, and

• physical signs of self-harm or neglecting themselves.

Education staff have an important role to play. Specifically, they can support the fulfilment of 4 key roles:

• promoting good mental wellbeing and preventing the onset of mental illness,

• observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one,

• ensuring early targeted support is provided, and

• liaison with/referral to specialist services where needed.

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by raising the issue with the DSL, who may in turn contact an appropriate external agency. The DSL will consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk.

20.2 Teaching students to keep themselves safe

The School is committed to raising awareness of personal safety whenever the opportunity arises. This includes highlighting general health and safety matters in and around the School as well as in the wider world and educating students about specific safeguarding issues, such as staying safe online (including when they are accessing remote learning), radicalisation, grooming, child sexual exploitation, child criminal exploitation, healthy relationships, mental health, substance misuse, bullying and sexting. The framework for educating students about these and other issues pertaining to wellbeing is provided by the statutory guidance Relationships Education, Relationships and Sex Education and Health Education (2026).

These issues are explored in a variety of contexts, including academic and PSHCE lessons, assemblies, and in fortnightly pastoral meetings with all of the pastoral team. Staff are also aware

of the ongoing need to promote fundamental British values as a means of building resilience to the risks of radicalisation. A range of written and online resources are also provided to students when they join the School (Student Handbook, Acceptable use of IT Policy and a booklet on mental health and wellbeing) and these are also available on the shared portal. Students are specifically taught how to identify risks and how to modify behaviour to mitigate these risks.

20.3 Children who are gay, lesbian, bisexual, or gender questioning

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. LGBT inclusion is part of our Relationships Education, Relationship and Sex Education and Health Education curriculum. SYTS celebrates diversity and LGBT history, Pride month, Anti homophobia days and high profile LGBT staff ensures an open and diverse community.

When supporting a gender-questioning child, the school will not initiate any action in this area; the school's policy is focused on circumstances where a child or their parent has raised a request relating to social transition to which the school is responding. Members of staff should not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents or carers have been involved, the school will engage parents/carers as a matter of priority. In cases where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, there is no reason to break any confidence unless there is a related safeguarding risk.

The school has a statutory duty to safeguard and promote the welfare of all children. The school will 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. This means that 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. Maintaining flexibility and keeping children's options open will help to avoid a child feeling they are under pressure to commit to a potentially irrevocable pathway when they are young.

The school is conscious of safeguarding concerns relating to primary aged children. 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. The school is aware 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.

The School will remain aware of the potential wider vulnerabilities of children who are questioning their gender, including having complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying. This will usually involve working in partnership with parents except in rare circumstances where to do so would constitute a significant risk of harm to the student. Where possible, the school will adopt practices across the school that maintain flexibility and avoid rigid rules based on gender stereotypes. The school has a zero tolerance policy to discrimination and bullying, the

school is also conscious of the rights of pupils and staff in relation to their religion or belief. When supporting social transition the school might consider discussing options with pupils and staff such as using names instead of pronouns.

20.4 The use of 'reasonable force'

There are limited circumstances when it is appropriate for staff to use 'reasonable force' to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is necessary for the least amount of time', the application of which will depend on the circumstances. The decision on whether or not to use 'reasonable force' to control or restrain a child is down to the professional judgement of the staff concerned within the context of the law and should always depend on individual circumstances.

When using 'reasonable force' in response to risks presented by incidents involving children with SEND, mental health problems or with medical conditions, the school recognises the additional vulnerability of these groups. By planning positive and proactive behaviour support, for instance through having individual plans of support for more vulnerable children, and agreeing them with parents, schools can reduce the occurrence of challenging behaviour and the need to use 'reasonable force'. Further details on reasonable force can be found in the school's Behaviour, Rewards and Sanctions Policy.

20.5 Online safety

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

1. Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,
2. Contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,
3. Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and
4. Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If the school feels that students or staff are at risk, this will be reported to the Anti-Phishing Working Group (https://apwg.org/).

The School also has a range of filtering systems in place to keep students safe when accessing the internet whilst at the School, and usage is also monitored (see the School's Internet Safety Policy for further details).

The safe use of technology is a focus in all areas of the curriculum and key ICT safety measures are routinely reinforced in lessons and at pastoral events. The School has an Acceptable Use of IT policy. It manages access to the internet via WiFi using filters and monitoring systems to ensure the School's network and IT equipment are being used in a safe and appropriate manner, including when generative AI is being used. However, the School will try and ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

The School recognises, however, that students may use their 3G/4G/5G connection and bypass its filters. This means that some students could, whilst at School, potentially use these devices to bully, control or sexually harass, share nude of semi-nude images including those generated using AI, view and share pornography and other harmful content. SYTS employs a range of strategies to promote an understanding of online risks and to discourage misuse:

- exploring e-safety in detail via the curriculum and pastoral events;
- ensuring systems are in place to facilitate early disclosure of potentially harmful online incidents;
- providing information to parents about how the School uses filters and monitors online use and, more generally, to promote understanding of the varied and evolving nature of online risks;
- informing students (and their parents) of the online activity that will be expected of them as members of the School: the websites they will be expected to access; and how and with whom they will interact online (eg email or Teams meetings); and
- deterrence through the use of robust sanctions against those found to have abused others online.

20.6 Mobile phones and cameras

Students do not have access to their mobile phones or wearable recording devices (including glasses) throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime. Students are able to access their mobile phone where necessary when raising concerns with teachers about issues which have occurred online.

The School provides mobile phones to staff for trips and ipads and cameras for taking photographs when necessary. Mobile phones should not be used when supervising or teaching students except in cases of emergency or for the completion of electronic class registers. Images of students must not be taken or stored on any personal mobile phone. If a phone is to be used for the School newsletter, social media, whilst on educational visits, permission must be obtained from the Headteacher and reference to their use and subsequent safety of data must be referred to in the trip risk assessment.

Photographs and videos are taken of students by staff for a variety of purposes, including displays of work/activities, personal records of achievement and for the School website and newsletter. Written permission is obtained when a student joins the School and this also indicates the level of consent, including where images may be used (personal records only or personal records and on the School website and in School publications). The DSL will ensure that all staff are aware of the names of students who may not be photographed or where there is limited consent. Images of students on the website will not be named. Images may only be captured on School devices and the images may only be stored on those devices and on the School's password-protected

computers. Once images have been transferred from a camera/device onto a computer the images must be deleted from the device/camera immediately. Additional copies may be stored on flash drives, but these must be stored securely in a locked cupboard. Images must not under any circumstances be transmitted by staff to other individuals over the internet.

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

- all students must be appropriately dressed
- images that only show a single student with no surrounding context should not be created: photographs of three or four students are more likely to include the learning context
- use photographs that represent the diversity of students participating
- do not use images that are likely to cause distress, upset or embarrassment
- do not use images of a student who is considered vulnerable, unless parents or someone with parental responsibility has given specific written permission

Due to the nature of the School there might be times where staff are required to use their own phones to take photos or videos. This should be rare and with the permission of the Headteacher. If this does happen the staff member must move all footage to the google drive the same day and delete the images or videos from their personal device. Staff are advised to use School iPads where possible.

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

20.7 Risk assessment

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

Day to day responsibility for producing risk assessments under this policy is delegated to the DSL who has been trained to carry out this particular type of assessment.

20.8 Staff recruitment

The School is committed to safer recruitment processes. Members of teaching and non-teaching staff at the School, including trainee teachers, part-time staff, temporary and supply staff, and visiting staff are subject to the background checks required under the Education (Independent School Standards) Regulations 2014 and in accordance with the latest version of KCSIE. For most appointments, an enhanced DBS check with 'barred list' information will be required. At least one member of any staff recruitment panel will have had Safer Recruitment training. The School's separate Staff Recruitment Policy contains further details about how the process of staff recruitment is conducted.

Curriculum vitae (CV) will only be accepted alongside a full application form and is not sufficient on its own to support safer recruitment. Schools will now do an online search on short-listed applicants. Applicants will be informed.

20.9 Procedures for Children who are absent or missing from education

All staff are aware that children being absent, as well as missing, from education for prolonged periods and/or on repeat occasions is a potential indicator of a range of safeguarding issues such as neglect, sexual abuse or exploitation, child criminal exploitation, mental health problems, substance abuse, travelling to conflict zones, female genital mutilation or forced marriage. The School has clear procedures in place for following up on unexplained absences and/or persistent absences from education, where necessary, reporting to the Local Authority any student who fails to attend School regularly or is missing from School for more than 10 school days (continuous). The procedure includes the requirement to record any incident, the action taken and the reasons given by the student for being missing. Attendance registers are carefully monitored to identify any trends and action will be taken in accordance with the School's Attendance Policy if any absence of a student gives rise to concern.

In order to protect the child's right to an education, the School will monitor attendance, work to understand barriers to attendance, facilitate support, formalise targeted support with external agencies for persistent and severely absent children and where all other avenues have been exhausted, enforce attendance through statutory intervention.

In accordance with the School Attendance (Pupil Registration) (England) Regulations 2024, the School has a legal duty to inform the Local Authority if a student is to be removed from the roll at a non-standard transition point; ie, where a compulsory school-aged student leaves the School before completing the School's final year. When this notification is made the following information has to be provided by the School: full name of the student; name, address and telephone number of the parent the student lives with; details of any new address for the child and parent; the name of the student's destination School and expected start date; and the reason why the student is leaving the School. The principal grounds for removal are where the student:

- Has been taken out of school by their parents and the school has received written notification from the parent that they are being educated outside the school system
- Has ceased to attend school and no longer lives within reasonable distance of the school
- Has been certified by a physician as unlikely to be in a fit state of health to attend school
- Has been in custody for a period of more than four months due to a final court order and the Headteacher does not reasonably believe they will be returning to the school at the end of that period
- Has been permanently excluded

The School is also legally required to notify the Local Authority within five days of adding a student's name to the admissions register at a non-standard transition point. The notification includes all the details contained in the admissions register for the new student; specifically, their full name; sex; name and address known to be a parent of the student (and an indication of which parent the student normally lives with and which parents hold parental responsibility); address of new or additional places of residence; at least one contact telephone number at which the parent can be contacted in an emergency*; date of birth; and the name and address of the last School attended (if any).

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

20.10 Elective home education

Where a parent expresses their intention to remove a student from the School in order for them to be home educated, we will work with the relevant local authority and other key professionals to coordinate a meeting with parents where possible, ideally before a final decision is made. This is to ensure that parents have considered what is in the best interests of their child. This will be particularly important where a child has SEND, is vulnerable, and/or has a social worker.

20.11 The Prevent Duty

All Schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, to have "due regard" to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. There are five specific elements to SYTS' approach to meeting the statutory requirements imposed by the Prevent duty. In summary these are:

- Risk assessment – working with the Local Authority, who provide contextual information about the area, the School assesses the risk of students being drawn into terrorism, including extremist ideologies.
- Working in partnership – liaising closely with the LSCP to ensure students requiring support are referred at a suitably early stage. It is important to note that individuals need to consent to any support delivered through the Channel programme.
- Staff training – enabling staff to identify students at risk of being drawn into terrorism and to challenge extremist ideas.
- IT policies – to provide guidance to students as to how to stay safe online (see the School's Acceptable Use of ICT Policy) and set out the filtering and monitoring mechanisms in place.
- Curriculum – to develop students' awareness of the ways people can become drawn into extremism and understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

20.12 Visiting speakers

Any student or member of staff who wishes to invite a speaker to address students must provide details of the individual to the SLT in order that they may carry out a vetting procedure. The event organiser or, if the organiser is a student, a member of the SLT, will undertake a search via the internet to research the background of the individual and consider taking up references from other schools at which they have spoken at in the past. The event organiser must also consider carefully whether the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups. In these circumstances the event will not be allowed to proceed.

For visitors who are there in a professional capacity, schools and colleges should check ID and be assured that the visitor has had the appropriate DBS check depending on the activity they are there to carry out (or that the visitor's employers have confirmed that their staff have appropriate checks. Schools and colleges should not ask to see the certificate in these circumstances). It is not necessary to undertake a DBS check on every speaker. In cases where specific vetting checks are not prescribed by KCSIE, the visiting speaker will be accompanied at all times by a member of staff to ensure there is no unsupervised access to students. However, if a DBS check is deemed necessary, the appropriate details will be recorded on the School's SCR.

20.13 Confidentiality and information sharing

The DSL will 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 such as LA children's social care or the Prevent program etc.The School will process personal information fairly and lawfully and to keep the information safe and secure. The school will take measures to safeguard children by protecting personal information and ensuring appropriate cyber security systems are in place The school will keep all child-protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. SYTS is not required in all circumstances to gain consent for such information to be shared. For example, it would be legitimate to share information without consent where: it is not possible to gain consent; it cannot reasonably be expected for the school to gain consent; and, if to gain consent would place a child at risk.

The School will cooperate with police and local authority children's social services to ensure that all relevant information is shared for the purposes of child-protection investigations.

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

When deciding what information to share, schools and colleges should consider:

• the relevancy of the information, including to the current safeguarding risk,

• what is necessary for the receiving setting to know, and

• whether it is clearly presented and appropriately contextualised

Professional judgement should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. But care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk.

Where information indicates a risk to others and/or the individual student, for example where a student has previously carried, threatened with, or used a knife or weapon, it is incumbent on the receiving school to assess risk, and accordingly, put in place a safety and support plan for when the child arrives. A conversation may take place between the designated safeguarding leads at both settings, where there are issues or concerns.

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

Information sharing is essential in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including in relation to their education. The Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025 do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the

welfare and protect the safety of children. Information that is relevant to safeguarding is regarded as 'special category personal data' and as such can be shared securely on a need-to-know basis. Further non-statutory guidance Information Sharing was published by the Government in May 2024. See Appendix 4.

20.14 Whistleblowing

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

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

If the member of staff feels unable to raise their concern with the Headteacher (or a member of SLT) or if they believe any concern raised has not been dealt with, there is a Director with responsibility for Whistleblowing Alison Ruffelle who can be approached regarding concerns. Staff may also use the NSPCC whistleblowing advice line (see section 1 for contact details). Any member of staff can whistleblow without fear of detriment (retribution or disciplinary action), provided the report was made in good faith. Malicious allegations may be considered as a disciplinary offence.

20.15 School premises, security and visitors

- The School will take all practicable steps to ensure that all School buildings are as secure as circumstances permit. The School buildings have CCTV cameras at their main entrances and other locations.

  The school does not allow children into toilets designated for the opposite biological sex. This includes where the school is responding to a request to support any degree of social transition for children who are questioning their gender. In line with the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014 the school provides separate toilets for boys and girls aged 8 and over (apart from where individual toilets are in a room that can be locked from the inside, intended for use by one student at a time). When a gender-questioning child does not wish to use the toilet designated for their biological sex, the school provides suitable alternative facilities without compromising the provision of single sex facilities. The alternative arrangements do not compromise the safety, comfort, privacy or dignity of the child, or of any other children. Communication with children and parents/carers who may be affected by this is appropriate, recorded and reviewed regularly.

  The school does not allow a child, aged 11 years or older at the start of the school year, to undress in front of a child of the opposite biological sex. This is required by the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014. When responding to a request to support any degree of social transition, the school does not allow a child access to changing rooms designated for the opposite sex. When a gender-questioning child does not wish to use the changing rooms and showers designated for their biological sex, the school provides suitable alternative facilities without compromising the provision of single sex facilities. The alternative arrangements do not compromise the safety, comfort, privacy or dignity of the child, or of any other children. Communication with children and parents/carers who may be affected by this is appropriate, recorded and reviewed regularly.

- The Sylvia Young Theatre School receives a range of visitors. These include professionals such as educational psychologists, social workers, and other education-related practitioners, as well as educational visitors like guest speakers or performers. They may also host individuals connected to the site, including contractors working on the building or grounds, children's family members, or others attending school events. The school does not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a school event.

  For visitors who are there in a professional capacity, the school will check ID and be assured that the visitor has had the appropriate DBS check t (or that the visitor's employers have confirmed that their staff have appropriate checks).

  Where a visitor will have no contact with children, it is unlikely that a DBS check will be required.

- Every effort will be made to ensure that contractors who need to enter the building for all purposes relating to the repair and maintenance of the premises, come to the School outside of school hours. If it is necessary for a contractor to come into the school while the students are in school, the amount of time that contractor stays at the School will be minimised and the contractor will always be accompanied by a member of SYTS staff so that they are never left alone with any students.
- All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff. All visitors will be given a name badge with the title 'Visitor', which must be clearly displayed and worn at all times whilst on the School's premises.

20.16 Use of School premises for non-School activities

The School hires and rents out facilities to organisations, both during term time and the holidays. Where activities and courses are provided by another organisation, the School will seek reassurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place in line with DfE Guidance 'Keeping Children Safe during Community activities, after-school clubs and tuition'. The School will follow its own Safeguarding policies and procedures if there is an allegation relating to an incident on the School's premises including informing the LADO. This is regardless of whether the students who make use of these services or activities are on the School roll. This requirement forms part of any lease or hire agreement made with third parties and failure to comply with this will lead to the termination of the contract or agreement.

20.17 Alternative provision

If SYTS places a student with an alternative provider, the School continues to be responsible for the safeguarding of that student and will take all reasonable steps to ensure that the placement meets the student's needs. These will include obtaining written confirmation from the alternative provider that appropriate safeguarding recruitment checks have been carried out on individuals working at their establishment and that they will inform SYTS of any arrangements that may put the child at risk. SYTS will also keep records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. The school should always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. Reviews of provision will be conducted at least on a half-termly basis to ensure the child is attending, the placement continues to be safe and meets the child's needs. Where safeguarding

concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

20.18 Monitoring this Policy

- Any child protection incidents at the School will be followed by a Directors' review of the safeguarding procedures in the School. Where an incident involves a member of staff, the LADO will be asked to assist in this review, to determine whether any improvements can be made to the School's procedures. The DSL will monitor the content and operation of this policy and present an annual report to the Board of Directors.
- The DSL will monitor the operation of this policy and procedures on a day-to-day basis and will provide regular updates at Senior Leadership Team meetings. In addition, the DSL will present regular reports to the Directors. Fortnightly management meetings are attended by Board members and at the termly Director's meeting any safeguarding points that need to be shared with the full Board.
- The SYTS Board will undertake an annual review of the policy and implementation of its procedures including good co-operation with local agencies and of the efficiency with which the related duties have been discharged. The Board will draw on the expertise of staff, including the DSL, when considering amendments to policies and/or arrangements related to safeguarding.
- Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay

## 21. Other relevant policies

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

- Anti-Bullying Policy
- Attendance Policy
- Risk Assessment Policy
- Health and Safety Policy
- Safer Recruitment Policy
- Behaviour, Rewards and Sanctions Policy
- Acceptable Use of ICT Policy
- Whistleblowing Policy
- Prevent Policy
- Relationships and Sex Education Policy

# Appendix 1: Other types of abuse

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

  Other community safety incidents in the vicinity of a college can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.
- **Children who are absent from education for prolonged periods and/or repeated occasions:** All children of compulsory school age, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special needs they may have. A child going missing from education can act as a vital warning sign of a range of safeguarding possibilities. These include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation (FGM), 'honour'-based abuse or risk of child marriage.

  The School will report to the Local Authority instances of prolonged unauthorised absence or a student being removed from the School roll under the circumstances outlined in KCSIE. In cases where a student has a prolonged period of authorised absence for a reason such as long-term illness, the School will be proactive in terms of providing support to both the parents and the student.
- **Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE):** Both CCE and CSE are forms of abuse that occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 (a) in exchange for something the victim needs or wants (for example, food, drugs, alcohol money or affection) and/or (b) for the financial advantage or increased status of the perpetrator or facilitator and/or (c) through violence or threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. An imbalance of power is commonly associated with age difference, it can also be due to a range of other factors including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic and other resources.

  Perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation. CCE and CSE can affect children, both male and female, and can include

children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

More detailed definitions of CCE and CSE are given below:

- **CSE** occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. The victim (male or female) may have been sexually exploited even if the sexual activity appears consensual. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. CSE does not always involve physical contact; it can also occur through the use of technology. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).
- **CCE** is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or being forced or manipulated into threatening/committing serious violence to others.

- **County lines:** "County lines" is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and susceptible adults are exploited to move, store and sell 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 (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. If a child is suspected to be at risk or involved in county lines, a safeguarding referral must be considered (via the National Referral Mechanism) alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.
- **Children and the court system:** Children are sometimes required to give evidence either for crimes committed against them, as witnesses in the criminal courts or as part of family court procedure. This can be stressful and may reflect existing conflict and difficulties in the family. Staff members must be made aware of any child who is involved in the court process as the child may be at risk of a particular safeguarding issue. The Ministry of Justice has produced two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

- **Children with family members in prison:** Children with a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders provides information designed to support professionals working with offenders and their children to help mitigate the negative consequences for those children.
- **Cybercrime**. 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');
    - 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) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

  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 Designated Safeguarding Lead (or a Deputy), must 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.
- **Domestic abuse:** Domestic abuse includes any incident or pattern of incidents involving: physical or sexual abuse; violent or threatening behaviour; controlling or coercive behaviour, economic abuse; psychological, emotional or other abuse. For the definition to apply, both parties must be aged 16 or over and personally connected. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background. Domestic violence can take place inside or outside the home.

  Domestic abuse can be psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

  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 impact on children's health, wellbeing, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

  When young people experience domestic abuse within their own intimate relationships, this 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 must be followed and both young victims and young perpetrators offered support.
- **Serious violence:** Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying,

and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy). The designated safeguarding lead should assess the risk to both the individual student and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict. Staff should be alert to signs that 20 a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. Schools should also try to be alert to when children might be at highest risk around the school day (for example, immediately after school).

- **Homelessness:** Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. The DSL and deputies are aware of contact details and referral routes into the Local Housing Authority so that they can raise /progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour as well as the family being asked to leave a property. In most cases college staff will be considering homelessness in the context of children who live with their families and intervention will be on that basis. However, it should be recognised that some 16 and 17 year olds may be living independently for example, having been excluded from the family home and will require a different level of intervention and support. Children's services will be the lead agency for those young people and the DSL or deputy must ensure appropriate referrals are made based on the student's circumstances.
- **Honour-based abuse (HBA).** So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), child marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse, are illegal in the UK (regardless of the motivation) and must be handled and escalated as such.
    - **FGM:** FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. All staff must be aware of the law requiring tutors to report cases to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl aged under 18. The duty to report resides with the **teacher** who becomes aware of the case, not the DSL, although the DSL should be informed unless the **teacher** has a good reason for not doing so. The report must be made orally by calling 101 within 24 hours of the issue coming to light. Failure to report a case of FGM can result in disciplinary sanctions.
    - **Forced marriage**: Forcing a person into a marriage is a crime in England and Wales, this applies to non-binding, unofficial 'marriages' as well as legal marriages. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent is where a person does not consent or where they cannot consent (if they have learning disabilities, for example). 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 eighteenth birthday, even if violence, threats or another form of coercion are not used.

- **Modern slavery:** Modern slavery encompasses human trafficking and slavery, servitude, forced or compulsory labour. Exploitation can take many forms, including, sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal or organs. The modern slavery statutory guidance provides more information on how to identify and support victims.
- **Radicalisation and extremism: "**Radicalisation" refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. "Terrorism" is defined as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Extremism is the vocal or active opposition to British fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces, whether in this country or overseasThere are various reasons why a young person might become interested in extremism:
    - a search for answers to questions about identity, faith and belonging
    - a desire for 'adventure' and excitement
    - a desire to enhance self-esteem of the individual and promote 'street cred'
    - the discovery of and identification with a charismatic individual and, through them, attraction to a group which can offer identity, social network and support
    - a sense of grievance that can be triggered by personal experiences of racism or discrimination

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

  There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they may be in need of help or protection. Young people at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying young people who might be at risk of radicalisation and discuss their concerns with the DSL.

  On the basis of this information, the DSL may conclude that a referral to the Channel Programme is appropriate. 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 is run in every local authority and addresses all kinds of extremism including the extreme-right and Islamist-related. The support provided could include assistance with education or employment, and ideological mentoring to provide susceptible individuals with skills to protect themselves from being drawn into extremism. An individual's engagement with the programme is entirely voluntary at all stages.

- **Sharing nudes and semi-nudes**. The term 'sharing nudes and semi-nudes' refers to the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18

online. It is also known by the names ‘youth-produced sexual imagery’ or ‘sexting’. While sharing photos and videos online and via smartphones is part of daily life for many people, enabling them to share their experiences, connect with friends and **record** their lives, there are risks associated with the production and distribution of sexual and explicit images both in terms of the law (Protection of Children Act 1978, as amended by the Sexual Offences Act 2003) and in relation to the possible impact on a child’s well-being if images are shared more widely than they originally intended.

Creating and sharing nudes or semi-nude photos and videos of under-18s is illegal. Also, consensual and non-consensual sharing of nude or semi-nude images and/or videos can be an indicator that children are at risk. Images may be taken by the child themselves (sometimes referred to as ‘self-generated imagery’) or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as ‘deepfakes’ or ‘deep nudes’.

Consequently, a member of the DSL team must be notified as soon as possible if an incident comes to light in which a student under the age of 18:

- has created and shared nudes or semi-nudes of themselves with a peer under the age of 18;
- has shared nudes or semi-nudes created by another person under the age of 18 with another person; or
- is in possession of nudes or semi-nudes created by another person under the age of 18.

**Management of an incident**. Any direct disclosure by a student must be taken seriously. Students who make such disclosures are likely to be embarrassed and worried about the consequences. Typically, they will have tried to handle the problem themselves and they will consider notifying a member of staff as a last resort. Given the potential seriousness of the situation, the DSL must be informed as soon as possible. The DSL will conduct an initial review, which will include meeting relevant staff and the students, to consider:

- whether there is an immediate risk to any child or young person;
- if a referral should be made to the police and/or local authority children’s social care;
- If sexual imagery is suspected, **images must NOT be viewed deliberately.** What further information is required to decide on the best response;
- whether the image(s) has been shared widely and via what services and/or platforms;
- whether immediate action should be taken to delete or remove images or videos from devices or online services or to confiscate the device used (if possible); if a crime may have been committed the image should not be deleted without consideration of potential police involvement
- whether to inform the parents or whether involving them would put the young person at risk of harm.

**Viewing the Imagery.** Staff **must not** ask to see the imagery but should confiscate the device on which it is held and pass it on to the DSL. If a device is confiscated, it should be turned off and locked away securely until it is passed on to the DSL or an external agency such as the police. Staff must not intentionally view any nudes and semi-nudes. If the image has been viewed accidentally, for example, as part of standard IT monitoring procedures, has been found on School equipment or a student has shown it directly to a staff member, this must be recorded.

Along with our own Safeguarding and Child Protection procedures, the School will follow the advice given in *Sharing nudes and semi nudes: advice for education settings working with children and young people (December 2020)*.

**Referral.** Once the DSL has sufficient information, a decision will be taken over whether the matter should be dealt with internally or referred to local authority children's social care and/or the police. The DSL will be informed by the need to ensure the welfare and protection of the student. Records will be kept of the information available and the rationale for any decisions taken.

A referral will always be made to children's social care and/or the police immediately if:

- the incident involves an adult.
- there is reason to believe that a 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
- you have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming

**Support.** It is vital that continuing support be given to the student so that they know they are not alone. Students must be advised on how to report nudes or semi-nudes or sexual images or videos, how to get them taken down and how to delete them from their accounts. Students must also be made aware of the importance of not sharing the image further. Most online service providers offer a reporting function for account holders and some offer a public reporting function to enable a third party to make a report on behalf of the child or young person. Students can use the IWF and Childline's Report Remove tool to report images and videos they are worried have been, or might be, shared publicly.

**Deletion of imagery.** If the School decides that other agencies do not need to be involved, then the DSL should request that the student and parents/carers delete nudes and semi-nudes from devices and online services to limit any further sharing. Any decision to request that the police search or inspect a student's device and delete imagery should be based on the professional judgement of the DSL.

**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 been reported out to police or children's social care. Copies of imagery should not be taken.

# Appendix 2: Further information on signs of abuse

**hysical abuse**

| Physical signs | Behavioural signs |
|---|---|
| ● Unexplained bruises and welts on the face, throat, arms, buttocks, thighs or lower back in unusual patterns or shapes which suggests the use of an instrument<br>● Unexplained burns, especially burns found on palms, soles of feet, abdomen or buttocks<br>● Scald marks: immersion burns produce 'stocking' or 'glove' marks on feet and hands or upward splash marks, which may suggest hot water has been thrown over a child<br>● Human bite marks<br>● Broken bones | ● Behavioural extremes (withdrawal, aggression or depression)<br>● Unbelievable or inconsistent explanations of injuries<br>● Fear of parents being contacted<br>● Flinching when approached or touched<br>● Truancy or running away from home |

**motional abuse**

| Physical signs | Behavioural signs |
|---|---|
| ● Eating disorders, including obesity or anorexia<br>● Speech disorders (stammering)<br>● Nervous disorders (rashes, hives, facial tics, stomach aches) | ● Fear of parent being approached<br>● Fear of making mistakes<br>● Developmental delay in terms of emotional progress<br>● Cruel behaviour towards children, adults or animals<br>● Self-harm<br>● Behavioural extremes, such as overly compliant/demanding, withdrawn/aggressive, listless/excitable |

**exual abuse**

| Physical signs | Behavioural signs |
|---|---|
| ● Torn, stained or bloody underclothes<br>● Pain or itching in genital area<br>● Bruises or bleeding near genital area or anus<br>● Sexually transmitted infections<br>● Pregnancy<br>● Discomfort when walking or sitting down | ● Self-harm<br>● Sexual knowledge or behaviour (promiscuity) that is beyond their age/developmental level<br>● Sudden or unexplained changes in behaviour<br>● Avoidance of undressing or wearing extra layers of clothing<br>● Truancy<br>● Regressive behaviours (bed-wetting or fear of dark) |

**eglect**

| Physical signs | Behavioural signs |
|---|---|

| | |
|---|---|
| • Height and weight significantly below age level<br>• Poor hygiene (lice, body odour etc)<br>• Inappropriate clothing for weather conditions<br>• Indicators of prolonged exposure to the elements (sunburn, chapped extremities, insect bites)<br>• Constant hunger, sometimes stealing food from others | • Erratic attendance at School<br>• Chronic hunger or tiredness<br>• Having few friends<br>• Assuming adult responsibilities |

**hild sexual exploitation**

| Physical signs | Behavioural signs |
|---|---|
| • Tiredness or mood swings<br>• Bruising<br>• Sexually transmitted diseases<br>• Pregnancy | • Sudden decline in School performance, punctuality, attendance<br>• In possession of expensive goods<br>• Going to place they cannot afford<br>• Age-inappropriate clothing<br>• Inappropriate sexualised behaviour<br>• Secretive<br>• Deterioration in mental well-being<br>• Mixing with older people<br>• Misuse of drugs and alcohol |

**hild criminal exploitation and county lines**

| Physical signs | Behavioural signs |
|---|---|
| • See sections on physical and sexual abuse<br>• Carrying weapons<br>• Have been the victim or perpetrator of serious violence (eg knife crime)<br>• Exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection<br>• Found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity; owe a 'debt bond' to their exploiters<br>• Have their bank accounts used to facilitate drug dealing<br>• | • Self-harming<br>• Unexplainable and/or Persistent absence from School or home and/or being found out of area<br>• Deterioration in mental well-being<br>• Unexplained acquisition of money, clothes or mobile phones<br>• Excessive receipt of texts/phone calls and/or having multiple handsets<br>• Relationships with controlling older individuals or groups<br>• Significant decline in School performance<br>• Gang association or isolation from peers or social networks<br>• Involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs |

**emale genital mutilation**

| Physical signs | Behavioural signs |
|---|---|
| • Difficulty walking, sitting or standing<br>• Bladder or menstrual problems | • Abroad for a prolonged period<br>• Unusual behaviour after a period of absence |

| | |
|---|---|
| ● Severe pain and bleeding<br>● Infections such as tetanus, HIV and hepatitis B and C | ● May talk of a 'special procedure' or 'special occasion to become a woman'<br>● Spending longer periods in the bathroom<br>● Reluctance to undergo normal medical examinations |

**orced marriage**

| Physical signs | Behavioural signs |
|---|---|
| ● Cut or shaved hair as a form of punishment for being disobedient | ● Absence from School<br>● Failure to return from visit to country of origin<br>● Self-harm or attempted suicide<br>● Running away from home<br>● Early marriage of siblings<br>● Sudden announcement of engagement to a stranger |

**Grooming**

| Physical signs | Behavioural signs |
|---|---|
| ● See section on sexual abuse | ● Spending increasingly prolonged time online<br>● Having older boyfriends or girlfriends<br>● Secretiveness about who they are talking to online and what sites they visit<br>● Possession of electronic devices such as mobile phones or webcams that parents have not provided<br>● Engaging less with their usual friends<br>● Using sexual language that you would not expect them to know<br>● Going to unusual places to meet people<br>● Using drugs and/or alcohol<br>● Going missing from home or School |

**adicalisation**

| Physical signs | Behavioural signs |
|---|---|
| ● out of character changes in dress, behaviour, and peer relationships | ● Beginning to isolate themselves from family and friends<br>● Showing sympathy for extremist causes<br>● Glorifying violence<br>● Legitimising the use of violence to defend ideology for a cause<br>● Evidence of possessing illegal or extremist literature<br>● A sudden disrespectful attitude towards others<br>● Unwilling to engage with or being abusive to students who are different |

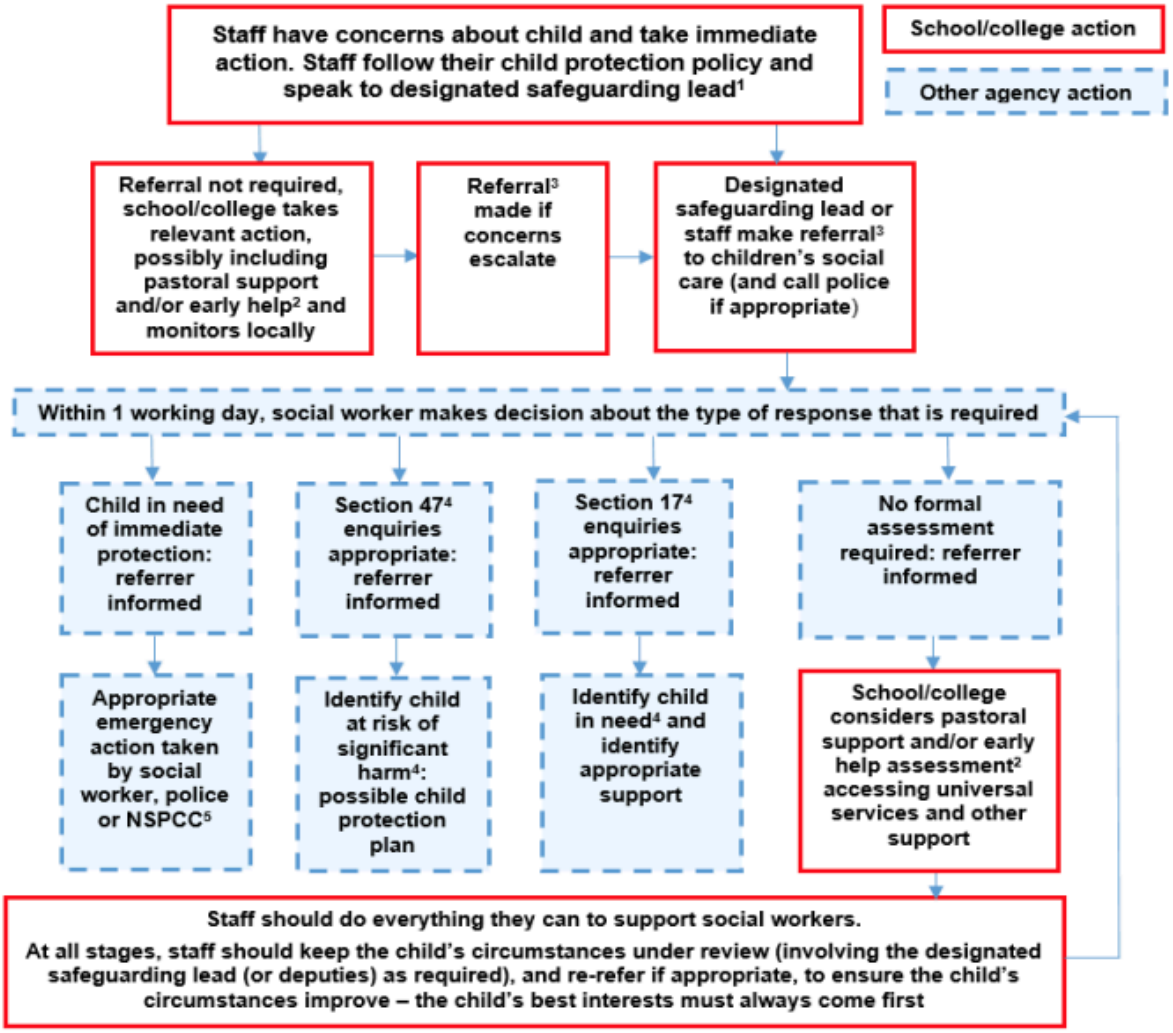
| | |
|---|---|
| | ● Increased secretiveness, especially in relation to internet use<br>● Unwillingness or inability to discuss their views<br>● Increasingly judgemental or argumentative<br>● Feeling persecuted<br>● Embracing conspiracy theories<br>● Advocating messages similar to illegal organisations such as 'Muslims Against Crusades' or other non-proscribed extremist groups such as the English Defence League |

Broad government guidance on the following is also available via the GOV.UK website (see Part one: Keeping Children Safe in Education September 2026)

- bullying, including cyberbullying
- children missing education
- child who run away or go missing from home or care
- child sexual exploitation
- domestic violence
- drugs
- faith abuse
- female genital mutilation (FGM)
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate
- mental health
- missing children and adults
- private fostering
- preventing radicalisation
- relationship abuse
- sexting
- safeguarding children who may have been trafficked
- behaviour in schools guidance
- Safeguarding children with special educational needs and disabilities (SEND)
- Safeguarding Deaf and disabled children and young people

# Appendix 3: Actions where there are concerns about a child (KCSIE, September 2026)

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




[1] In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

[2] Family Help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated Family Help, a family help inter-agency assessment should be arranged. Working Together to Safeguard Children provides detailed guidance on the Family Help process.

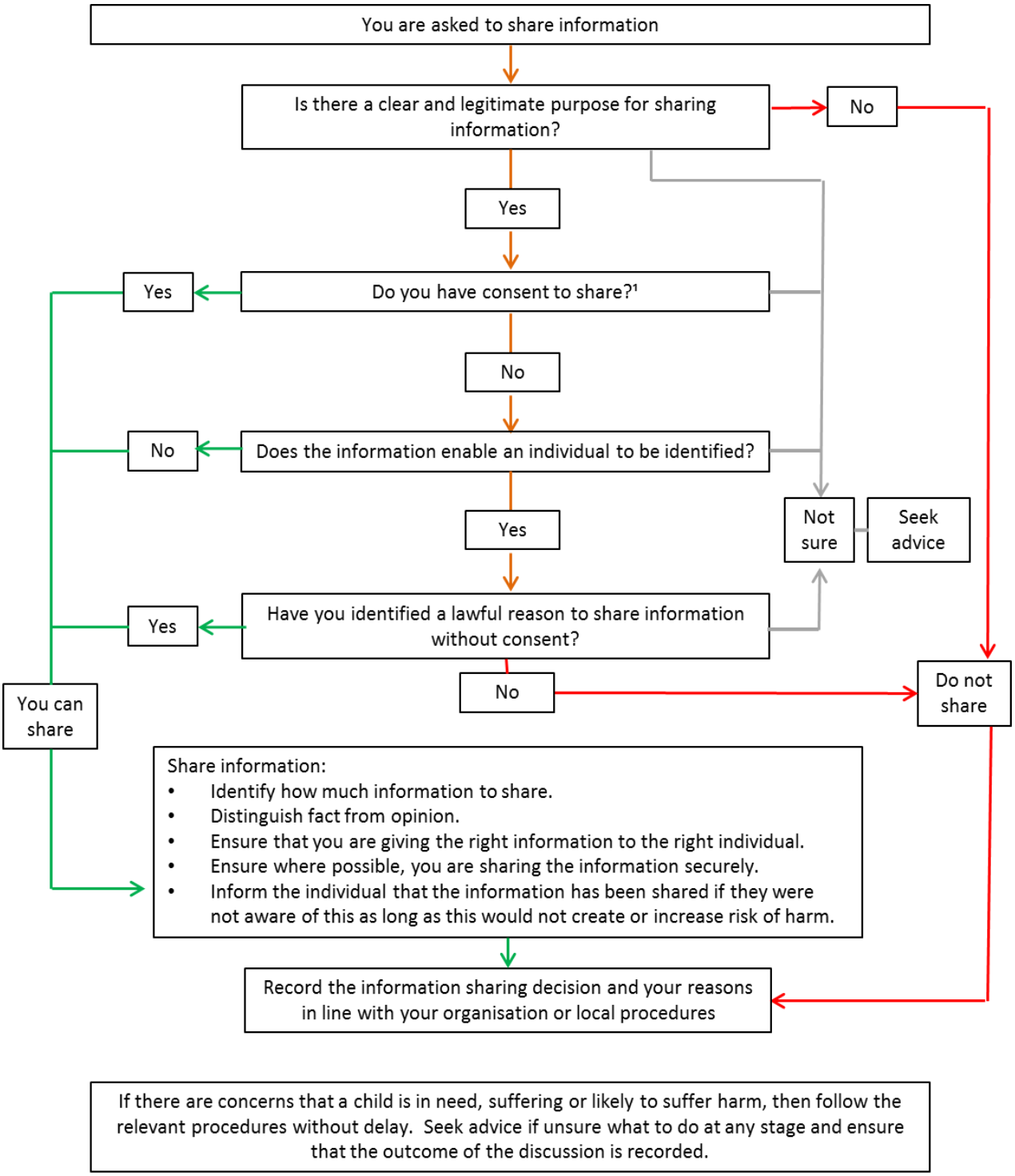
[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. See Working Together to Safeguard Children.

[4] Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Working Together to Safeguard Children.

[5] This could include applying for an Emergency Protection Order (EPO).

Referrals will follow the processes set out in the Bi-borough's threshold guidance.

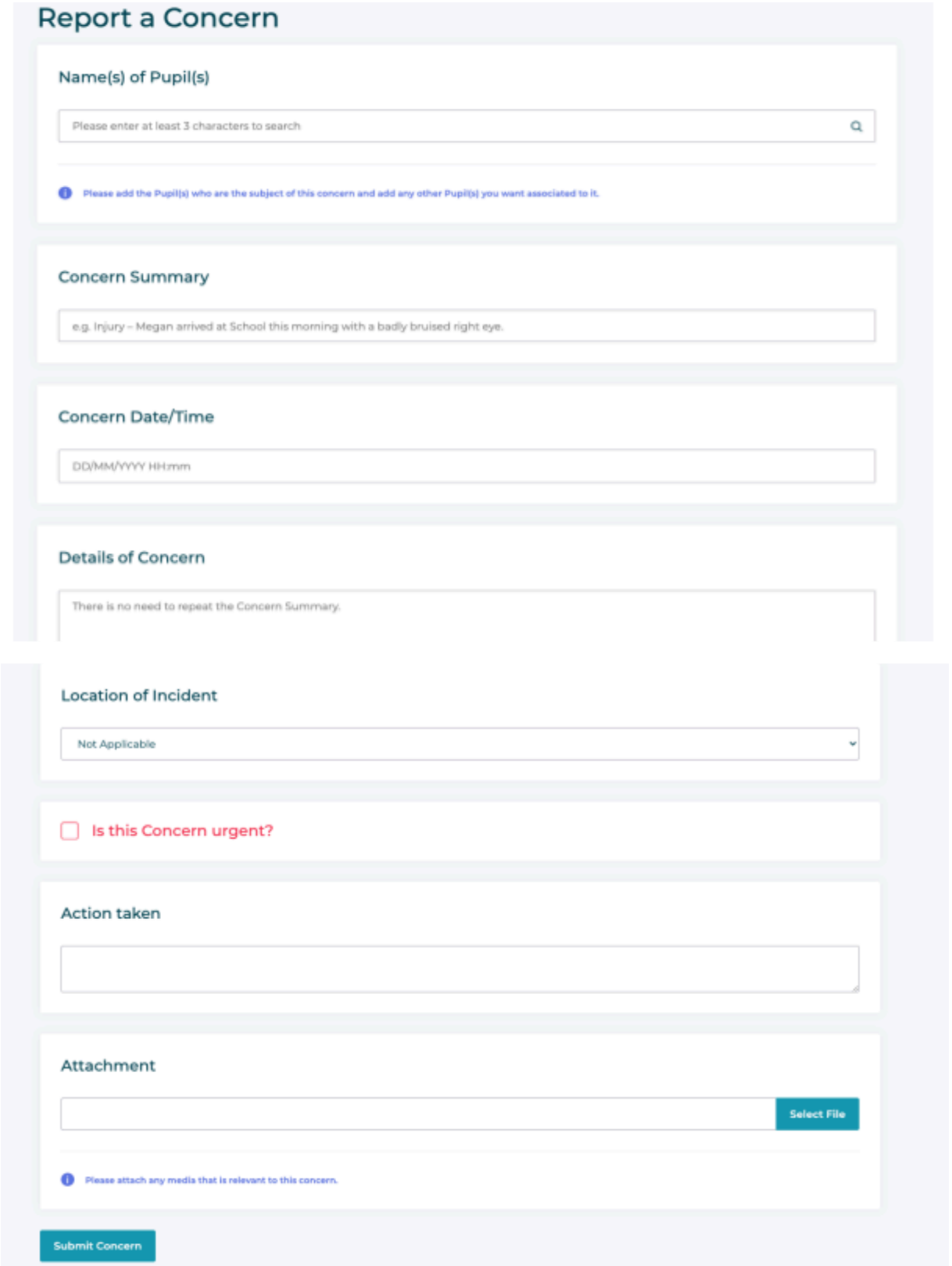
# Appendix 4: Flowchart of when and how to share information




If there are concerns that a child is in need, suffering or likely to suffer harm, then follow the relevant procedures without delay. Seek advice if unsure what to do at any stage and ensure that the outcome of the discussion is recorded.

# Appendix 5 Child Protection Expression of Concern Form

## MYCONCERN SCREENSHOT



# Appendix 6: DSL Job Description

| **Job description for the Designated Safeguarding Lead (DSL and DDSLs)** | |
|---|---|
| **The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment** | |
| **Summary of the role** | ● To take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place) occurring at the School and to support all other staff in dealing with any child welfare and child protection concerns that arise.<br>● To provide advice and support to other staff on matters of child welfare, safeguarding and child protection.<br>● To take part in strategy discussions and inter-agency meetings and to support other staff to do so, and to contribute to the assessment of pupils.<br>● To promote and safeguard the welfare of pupils in the School.<br>● Whilst the activities of DSL can be delegated to appropriately trained deputies (DDSLs), the ultimate lead responsibility for child protection remains with the DSL. This lead responsibility cannot be delegated. |
| **Main duties and responsibilities** | Further specifics: |
| **Availability** | You are expected to:<br>● ensure during term time that you or a Deputy will always be available during School hours (8am – 6pm) to discuss any safeguarding concerns; and<br>● arrange adequate and appropriate cover arrangements for any out of hours/out of term activities. |
| **Managing referrals** | You are expected to refer cases:<br>● of suspected abuse and neglect of any pupil at the School to the local authority children's social care and support staff who make referrals to local authority children's social care; to the Channel programme where there is a radicalisation concern and support staff who make referrals to the Channel programme; where a person is dismissed or left due to risk/harm to a child to Disclosure and Barring Service (**DBS**); andwhere a crime has been committed to the Police. |
| **Working with others** | You are expected to:<br>● act as a source of support, advice and expertise for all staff;<br>● act as a point of contact with the three safeguarding partners: the local authority (Royal Borough of Kensington and Chelsea); Integrated Care Systems; and the police;<br>● liaise with the Managing Director to inform her of issues; especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;<br>● ensure that 'an appropriate adult' is present if a student is being questioned or detained by the police<br>● as required, liaise with the "case manager" (as per Part 4 of KCSIE) and the designated officer (LADO) at the local authority for child-protection concerns in cases which concern a staff member; |

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| | ● liaise with staff (especially tutors, pastoral support staff, IT staff, First Aiders, counsellors and the named persons with oversight for SEND) on matters of safety, safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;<br>● promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances; and<br>● work with the Headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at the School. This includes:<br>○ ensuring that the School knows who its cohort of children are who have or have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,<br>○ supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes. |
| **Information sharing and managing the child protection files** | You are expected to:<br>● ensure that child protection files are kept up to date.<br>● ensure that information is kept confidential and stored securely.<br>● ensure that records include:<br>○ a clear and comprehensive summary of the concern;<br>○ details of how the concern was followed up and resolved; and<br>○ a note of any action taken, decisions reached and the outcome.<br>● ensure that files are only accessed by those who need to see them and that where the file or content within it is shared, this happens in line with information-sharing advice, as set out in Part 1 and Part 2 of KCSIE.<br>● ensure, when a student leaves the School, that:<br>● their child protection file is transferred to the new school or college as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term); and<br>● their child protection file is transferred separately from the student's main file in a secure manner and confirmation of receipt is received from the destination school or college; and<br>● consider whether it is appropriate to share any information with the new school or college in advance of the student leaving particularly where the information would support an assessment of risk to others in the school as well as the individual child; and<br>● for incoming child protection files, ensure that key staff are aware as required and consider what other information should be shared with other relevant staff and when appropriate to do so. |

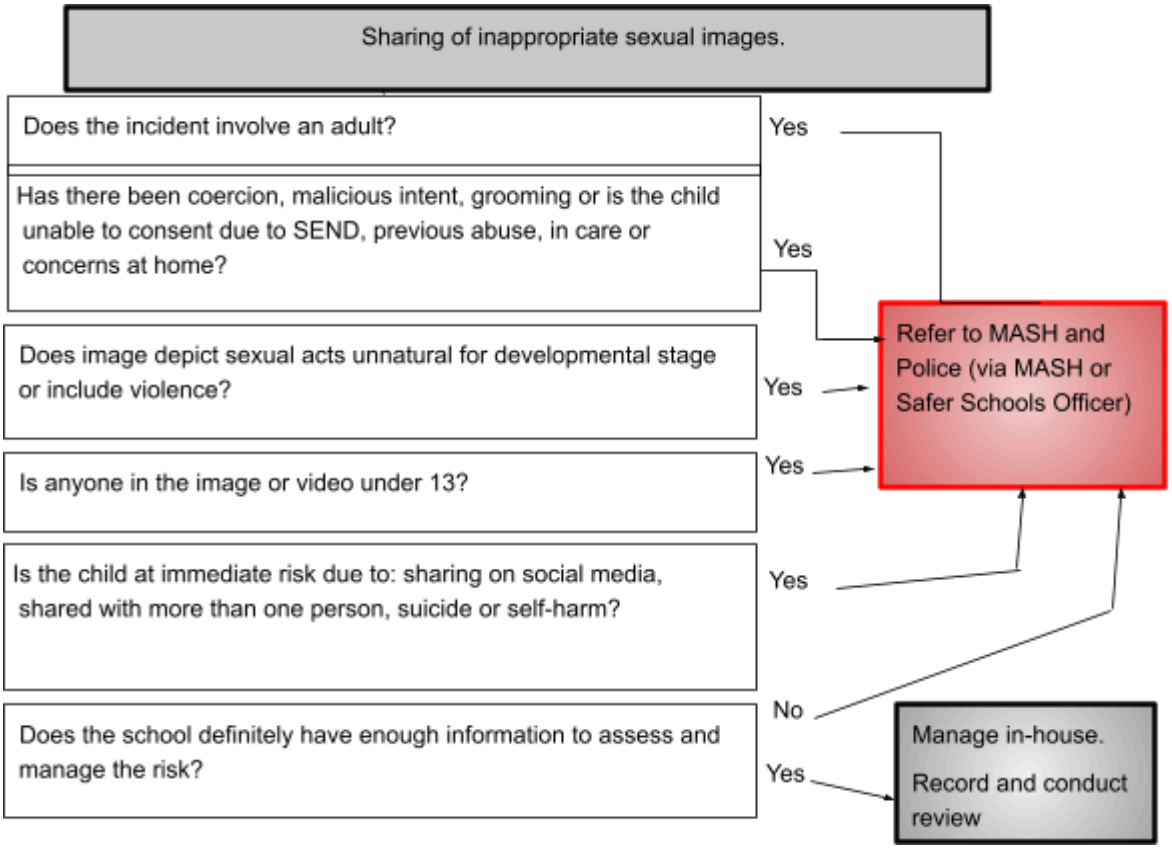
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| **Filtering and Monitoring** | DSL is responsible for ensuring Filtering and Monitoring standards are met. The DSL should take lead responsibility for safeguarding and online safety<br>Duties to include overseeing:<br>● Filtering and monitoring reports<br>● Take the lead responsibility for any safeguarding concerns picked up by filtering or monitoring<br>● Encourage compliance of staff physically monitoring the screens of users and ensure that staff are aware of how to report concerns<br>● Weekly meetings with ICT staff for updates on filtering and monitoring systems and to assess whether the provision continues to meet the needs of the school<br>● Meetings with SLT and ICT staff to identify and ensure a thorough understanding of any current or potential risks<br>● Together with SLT and ICT staff review the Filtering and Monitoring provision annually. This should include the current provision, any gaps, teaching requirements and the specific needs of the students and checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record should be kept of these checks. |
| **Raising awareness** | You are expected to:<br>● Ensure each member of staff has access to, and understands, the college's safeguarding policy and procedures, especially new and part-time staff;<br>● Ensure the School's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Board regarding this,<br>● Ensure the safeguarding 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;<br>● Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and<br>● help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and School leadership staff. |
| **Training, knowledge and skills** | You are expected to ensure your child protection training and that of the DDSLs is sufficient and appropriate to provide the knowledge and skills required to carry out this role. This training must be updated every two years. All members of the DSL team should also undertake Prevent awareness training.<br>In addition to the formal training, the knowledge and skills of members of the DSL team should be supplemented and refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so that they:<br>● understand the assessment process for providing early help assessment and statutory intervention, including local criteria for action and local-authority children's social care referral arrangements;<br>● have a working knowledge of how local authorities conduct a child-protection case conference and a child-protection review conference and be able to attend and contribute to these effectively when required to do so; |

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| | ● understand the importance of the role the Designated Safeguarding Lead has in providing information and support to children social care in order to safeguard and promote the welfare of children;<br>● understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in response to this in promoting educational outcomes;<br>● are alert to the specific needs of children in need, those with Special Educational Needs and Disabilities (SEND), those with relevant health conditions and young carers;<br>● understand the importance of information sharing, both within the School, and with the three safeguarding partners, other agencies, organisations and practitioners;<br>● understand and support the School with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation;<br>● are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School;<br>● can recognise the additional risks that children with SEN and disabilities (SEND) face online (for example, from online bullying, grooming and radicalisation) and are confident they have the capability to support SEND children to stay safe online;<br>● obtain access to resources and attend any relevant or refresher training courses; and<br>● encourage a culture among all staff of listening to students and taking account of their wishes and feelings, in any measures the School may put in place to protect them. |
| **Providing support to staff** | Training should support the Designated Safeguarding Lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child-protection matters. This includes, specifically, to:<br>● ensure that staff are supported during the referrals processes; and<br>● support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support. |
| **Understanding the views of children** | It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:<br>● encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the School may put in place to protect them; and,<br>● understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication. |
| **Holding and sharing information.** | The critical importance of recording, holding, using and sharing information effectively is set out in Parts 1, 2 and 5 of KCSIE, and therefore members of the DSL team should:<br>● understand the importance of information sharing, both within the School, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners; |

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| | ● understand relevant data-protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation; and the Data (Use and Access) Act 2025 and<br>● be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping. |

# Appendix 7: Assessing Sexual Behaviour Thresholds

Sylvia Young Theatre School Referral Process for nudes and semi-nudes



# Appendix 8: Hackett's Continuum of Sexual Behaviours

Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant.

| Normal | Inappropriate | Problematic | Abusive | Violent |
|---|---|---|---|---|
| Developmentally expected | Single instances of inappropriate sexual behaviour | Problematic and concerning behaviours | Victimising intent or outcome | Physically violent sexual abuse |
| Socially acceptable | Socially acceptable behaviour within peer group | Developmentally unusual and socially unexpected | Includes misuse of power | Highly intrusive |
| Consensual, mutual, reciprocal | Context for behaviour may be inappropriate | No overt elements of victimisation | Coercion and force to ensure victim compliance | Instrumental violence which is physiologically and/ or sexually arousing to the perpetrator |
| Shared decision making | Generally consensual and reciprocal | Consent issues may be unclear | Intrusive | Sadism |
| | | May lack reciprocity or equal power | Informed consent lacking, or not able to be freely given by victim | |
| | | May include levels of compulsivity | May include elements of expressive violence | |

Reference: Hackett, S (2010). Children, young people and sexual violence. In Barter, C and Berridge, D (eds) *Children behaving badly? Exploring peer violence between children and young people*. London: Blackwell Wiley.