



Safeguarding Children and Child Protection Policy

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Applies to	Whole School
Endorsed by	Head Master
Responsibility	Deputy Head Pastoral
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Safeguarding Children and Child Protection Policy

If you have a safeguarding concern about a pupil at Bedford School, you must pass this on to a designated safeguarding lead (DSL) or a deputy as soon as possible. You can contact them directly or record this on CPOMS if you are a staff member.

If a child is at immediate risk outside of term time or there is a crime committed, please contact the police.

The DSL is Rachel Mellor, contactable on rachelmellor@bedfordschool.org.uk or 01234 362308

The DSL in the Prep school (years 3-8) is Rachel Stratton, contactable on rstratton@bedfordschool.org.uk or 01234 362274

Further useful contacts that may be required to follow up a safeguarding concern are below.

A full list of useful contacts is found at the end of this policy and can be located with the contents page.

<p>Deputy Designated Safeguarding Leads</p> <p>Deputy Assistant Head Pastoral (Prep School)</p> <p>Senior Boarding Housemaster</p> <p>Senior Day Housemaster</p> <p>Head of General Education</p> <p>Vice Master</p> <p>You can also contact the Head Master or Headmaster, who are trained to act as deputy DSLs. They can be contacted on their own or via their PA's email address (it is best to email both addresses listed).</p>	<p>Simon Lincoln slincoln@bedfordschool.org.uk</p> <p>James Marriott jmarriott@bedfordschool.org.uk</p> <p>Simon Everitt severitt@bedfordschool.org.uk</p> <p>Alice Swallow aswallow@bedfordschool.org.uk</p> <p>Sam Baldock sbaldock@bedfordschool.org.uk</p> <p>jhodgson@bedfordschool.org.uk / akirkaldy@bedfordschool.org.uk</p> <p>isilk@bedfordschool.org.uk / dbeveridge@bedfordschool.org.uk</p>
<p>Nominated Safeguarding Governor</p> <p>Chair of Governors</p>	<p>Dr Andrew Edwards Tel: 01234 362241 or 01234 362244 (Contact via Bursary)</p> <p>John Holland-Kaye Tel: 01234 362241 or 01234 362244 (Contact via Bursary)</p>
<p>Bedford Integrated Front Door (BIFD, formerly known as MASH) Bedford Borough Council</p>	<p>Tel: 01234 718700. Out of hours: 0300 300 8123. Multiagency@bedford.gov.uk</p>
<p>Local Authority Designated Officer (LADO)</p>	<p>Sandeep Mohan Tel: 01234 276693 lado@bedford.gov.uk</p>
<p>Bedfordshire Police</p>	<p>Tel: 01234 841212 or dial 101 for non-emergency calls. For emergencies, dial 999, or 112 from a mobile</p>
<p>Prevent Duty</p>	<p>Prevent@beds.police.uk</p> <p>0207 340 7464 Counter.extremism@education.gsi.gov.uk</p> <p>Anti-Terrorism Hotline Tel: 0800 789 321</p>

Children Missing Education Officer	<p>Tel: (01234) 228178, CME@bedford.gov.uk</p> <p>Borough Guidance: https://www.bedford.gov.uk/schools-education-and-childcare/education-welfare-service/children-missing-from-education/</p>
NSPCC whistleblowing helpline	<p>Tel: 0800 028 0285. The line is available from 8:00 AM to 8:00 PM, Monday to Friday. Email: help@nspcc.org.uk</p>
Bedford Borough Local Offer	https://localoffer.bedford.gov.uk

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1 Introduction

This safeguarding children and child protection policy applies to all staff (i.e. all individuals working in or for the school, including part-time staff), volunteers and governors. It applies to all pupils (both day and boarding), in both the Prep School and the Upper School.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy 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.

This policy informs all our other policies and is particularly informed by the following national and local guidance:

[Keeping children safe in education](#)

[Working together to safeguard Children](#)

[What to do if you are worried a child is being abused](#)

[National Minimum Standards for Boarding Schools](#)

[Local Safeguarding Children Board guidance](#)

[DfE Data Protection guidance for schools](#)

Harpur Trust Safeguarding Policy

Furthermore, the Behaviour, Anti-Bullying, and Acceptable Use of IT policies of the school particularly link with this policy and are linked to:

[Behaviour in Schools Guidance](#)

The [ISI inspection report of October 2023](#) records that all safeguarding and child protection requirements were met.

The law with respect to Child Protection covers all children under the age of 18. Pupils who are 18+ may decide themselves whether to report abuse to the police, but they are still supported by the school.

The School Committee of Governors and the Core Management Team accept that they are responsible for ensuring that the school has a Safeguarding Children and Child Protection Policy and procedures in place to deal with incidents. We aim to have a school where pupils' physical and emotional development and wellbeing is promoted throughout our curriculum and co-curriculum.

2 What to do with a safeguarding concern

Pupils

You should tell an adult you trust if you are ever concerned about the welfare or safety of another person. Within school this can be your Tutor, Housemaster or Head of Year, or another trusted adult. You can always tell one of the designated safeguarding leads in the school. You can also report online, with the option of anonymity, using the “Safeguarding Worry” button on the top banner of Pupil Link.

All information for pupils is found on the ‘Who Can You Talk To?’ (Upper School) and ‘Have you got a worry?’ (Prep School) posters around school. This includes information on the independent listener for boarders. You will also receive regular updates via Mrs Mellor, or Mrs Stratton and Mr Lincoln, throughout the school year.

Parents and adult members of the school community

As adults in our community safeguarding children and young people is a responsibility for us all. Please contact a school safeguarding lead with any safeguarding concerns, or follow the guidance on the opening pages of this document. This policy and others that are relevant are held on the [school website](#) to support all in the school community.

Staff

We are a school where staff are aware that safeguarding and promoting the welfare of children is everyone’s responsibility. Staff should consider, at all times, what is in the best interests of the child.

Fuller guidance is below but the most important steps are on page 1 of this policy. Appendix 1 gives a summary outline of what to do. **If in doubt at any time speak to a DSL.**

When deciding how to act, consider your training. All staff are trained on induction, annually at the start of the academic year, and given further updates throughout the academic year. This training includes online safety and responsibilities with regards to filtering and monitoring to understand how our processes work and how to report any concerns. This training also includes the Prevent Duty. This is to help you make effective judgements about how to act. Copies of previous training materials can be shared with you on request.

All staff who deal directly with pupils must read part 1 of *Keeping Children Safe in Education (KCSIE)* and those who don’t must read its Annex A. *KCSIE* contains important guidance on how to safeguard children. All staff must read and adhere to the Staff Code of Conduct in Appendix 2.

You will also be given, and should consult, our behaviour policies which are produced in line with government guidance on behaviour in schools.

3 Aims of this Policy

This policy aims to set out clear procedures for identifying and reporting cases of suspected or actual abuse, neglect or exploitation. We aspire to reduce the risk of abuse, neglect or exploitation through the teaching and pastoral support offered to all pupils in our care, and to provide support for pupils who may have been abused.

Our values of Responsibility, Endeavour, Integrity, Curiosity and Kindness underpin all we do and create an environment in which pupils feel secure and valued and are listened to and taken seriously. These values underpin our safeguarding commitments to have a whole-school, child-centred approach where we maintain a collective and coordinated responsibility for everybody. At all times we expect to maintain openness, transparency and accountability in our approach to ensure we do our best by every child. This underpins a culture of continuous learning and improvement.

These aims are realised with the intention to protect and support pupils by:

- Ensuring we practise safer recruitment in checking the suitability of staff and volunteers to work with children in line with Part 3 of *Keeping Children Safe in Education*. This includes online searches at the shortlisting stage and further checks after an offer of employment has been made. All candidates are made aware that employment is subject to satisfactory checks at the application stage.
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse;
- Supporting pupils who have been abused in accordance with their agreed Child Protection Plan;
- Establishing a safe environment in which pupils can learn and develop, one in which children and young people feel safe, secure, valued and respected; confident to talk openly and sure of being listened to;
- Preventing pupils from gaining access to dangerous or age-inappropriate material by maintaining, reviewing and reporting on the efficacy of online filtering and monitoring systems. Online safety is taught within the curriculum throughout the school, and spirals through our PSHE curriculum.

We recognise that because of the day-to-day contact with children, school staff are well placed to observe the outward signs of abuse. We therefore:

- Ensure pupils know that there are adults in the school whom they can approach if they are worried and that all adults act in way that promotes trust and feeling safe; this is realised by staff behaviour, posters around the school, and assemblies;
- Ensure that children are taught about safeguarding, including safety online, through teaching and learning opportunities throughout the curriculum, as well as in PSHE;
- Include opportunities in the PSHE curriculum for pupils to develop the skills they need to recognise and stay safe from abuse, neglect or exploitation;
- Recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns daily. Opportunities will be provided for staff to contribute to and shape safeguarding arrangements and relevant school policies.

We will follow the procedures set out by the Bedfordshire Safeguarding Children Board and take account of guidance issued by the Department for Education to:

- Develop effective links with relevant agencies and cooperate as required with their enquiries regarding child protection matters, including attendance at case conferences. The school readily communicates with local safeguarding agencies, or those relevant to pupils from other counties, whenever an allegation or disclosure of abuse has been made;
- Keep written records of concerns about children, in accordance with the procedures section of this policy, even where there is no need to refer the matter immediately. These records are maintained on CPOMS, where all safeguarding records are kept securely;
- Follow the correct procedures where an allegation is made against a member of staff (including supply staff, volunteers and out-of-hours hire contracts);
- Notify social services if there is an unexplained absence of more than two days of a pupil who is subject to a Child Protection Plan. Ensure that, where a pupil subject to a Child Protection Plan leaves, their information is transferred to their new school immediately and that the child's social worker is informed;
- Ensure that contractors on site are monitored and checked in accordance with guidance in *KCSIE*.

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school, their behaviour may be challenging and defiant or they may be withdrawn. The school will endeavour to support the pupil through:

- The school values which promote a positive, supportive and secure environment and gives pupils a sense of being valued;
- Ensuring that all pupils have supportive adults taking the lead in their development and know about the adults they can turn to if worried;
- The content of the curriculum. Using the curriculum to provide opportunities for increasing self-awareness, self-esteem, assertiveness and decision-making so that pupils have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others.

3 Management and Responsibilities for safeguarding

i) Fundamental Principles

Bedford School accepts the principles that:

- Abuse, in whatever form, always constitutes serious harm to the child.
- Suspicion, belief or evidence of abuse of a child, currently or in the past, must be passed to a person in authority for them to seek advice and evaluate the information.

It is accepted that child abuse can be a problem for children from all backgrounds and that any child may need protection. Our staff are trained in the principle that the welfare of children is everyone's responsibility. No single professional can have a full picture of a child's needs and circumstances. Everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action. We recognise the principles to follow when working with parents and carers set out in *Working Together To Safeguard Children*.

As a general rule, all safeguarding concerns should be brought to the attention of the Designated Safeguarding Lead, or to one of the Deputy DSLs, immediately.

ii) Governing Body

The School Committee of Governors accepts their responsibility to undertake the following, as part of and alongside maintaining their obligations under the Human Rights Act 1998, the Equality Act 2010, the Public Sector Equality Duty, the Data Protection Act 2018, the UK GDPR and the duties to safeguard children under Charity Commission Guidance.

Members of the School Committee of Governors will do the following alongside following all relevant guidance in *KCSIE*:

- Be safeguarding trained on induction;
- Ensure there is always a nominated governor with responsibility for safeguarding;
- Ensure that there is a senior member of staff responsible for safeguarding;
- Ensure that there are policies and procedures in place for appropriate action to be taken in a timely manner to safeguard and promote children's welfare, including an effective safeguarding and child protection policy, staff code of conduct and a behaviour policy;
- Ensure that all adults who have had a lapse in service of three months will be checked through the Disclosure and Barring Service;
- Review the policies and procedures for Child Protection annually to satisfy themselves that the duties outlined have been appropriately and efficiently discharged and remedy any deficiencies or weaknesses regarding Child Protection arrangements that are brought to its attention without delay;
- Ensure that staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by a local authority, if and when they have such children on roll. This would include ensuring that a designated member of staff has

responsibility for their welfare and progress and has up to date information from the relevant local authority, the most recent care plan and contact arrangements with parents, and delegated authority to carers.

iii) The Designated Safeguarding Lead

The Deputy Head (Pastoral), Mrs Rachel Mellor, is the Designated Safeguarding Lead. She is trained in child protection and inter-agency working and is a member of the senior leadership team, known at Bedford School as the Core Management Team (CMT). She is normally available during school opening times and her contact details are in the 'contacts' section. Where she is not available in person, the deputy DSLs can be contacted, or another appropriate contact made using the contacts section of this policy.

The role of the DSL is outlined in Appendix 6.

4 Procedures within the School

i) Principles and Guidance

The staff summary sheet (Appendix I) issued to staff at the beginning of each academic year provides a quick reference for dealing with a case of abuse. The school policy is available to parents on the website. Pupils are trained and guided throughout the year on safeguarding procedures.

The following points are instructions for staff:

ii) What to do if you are concerned about a pupil's welfare:

At the earliest possible time, pass on a written account taking notes of times, dates, any relevant factual information and, wherever possible, the exact words of the child, and pass to the DSL.

If it is not an emergency, this is best done by recording an incident on CPOMS.

If it is an emergency, phone the DSL using the contacts in this policy. If they cannot be found, ask the Bell Room or prep reception to assist with locating a deputy DSL. **DO NOT use CPOMS or email for an emergency.**

The DSL will make a decision on what happens next and, in some cases, will facilitate a referral to any external agencies themselves.

Remember...

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and Serious Case Reviews have repeatedly shown the dangers of failing to take effective action.

Poor practice includes failing to act on and refer the early signs of abuse, neglect or exploitation, poor record keeping, failing to listen to the views of the child, failing to re-assess concerns when situations do not improve, sharing information too slowly and a lack of challenge to those who appear not to be taking action.

Staff must be aware that pupils 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. For example, pupils may feel embarrassed, humiliated, or threatened – this could be due to their susceptibility, vulnerability, disability, sexual orientation or language barriers.

This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a pupil. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

iii) What to do if a pupil makes a disclosure:

A disclosure may happen at any time. Remember:

- If you talk to a pupil, do so with tact and sympathy. Listen, but do not offer an opinion.
- Do not ask leading questions. When asking questions, always ask open questions using the TED principle of “Tell me, Explain to me, Describe to me”.
- Do not let the pupil take the blame. A child cannot be held responsible for abuse.
- Confidentiality should not be promised; make clear that staff have a responsibility to share relevant information with the DSL or other adults who can help to keep young people safe. It is important to remind the pupil that you will have to pass on their concern.
- Do not panic and think things must happen instantly; it is more important that the right decision is made and therefore immediate referral to the DSL is essential for decision-making.
- Follow the guidance above about referring information to the DSL.
- If possible, ask permission to have another adult present as a support to the child and a witness to the information, especially where the disclosure contains child-on-child abuse.

iv) General Principles of Confidentiality

- All staff should be aware that personal information about a child and their family is confidential and should only be given to an appropriate person.
- If abuse is suspected, accurate information must be given to the DSL immediately.

- Other staff need only know enough to prepare them to act with sensitivity to a distressed child, decision-making on this will generally be through the DSL and appropriate pastoral staff.
- If a child makes a disclosure, the child should be kept informed of who knows and why, where appropriate.
- Promises of confidentiality must not be given as a teacher has a duty to protect a child from abuse; all abuse must be reported.
- Staff should not, in any circumstances, remove a child's clothing. They should only note those marks which they have noticed, or which are brought to their attention by the child. No further examination should be carried out.
- Members of staff should not photograph an injury.
- All staff must be aware that they have a professional responsibility to share information with other agencies to safeguard children.

If staff (teaching or support) hear worrying information about children from parents, neighbours or even other children, this should be passed on to the DSL.

v) [Monitoring and Record Keeping](#)

Confidential pastoral and safeguarding records are maintained through CPOMS where a chronology is created. Actions taken and decisions made are recorded here. Anyone accessing these records is trained by the DSL and records their agreement to access in line with protecting pupil data.

As well as keeping records of concerns, discussions and decisions, DSLs will keep a record of the rationale for any decisions made.

There are safeguarding watchlists for the Prep and Upper Schools that alert staff to pupils for whom they should be most aware, without disclosing details of why. Pupils with SEND profiles are identified where appropriate. Pupils of concern are discussed in weekly welfare meetings that include the DSL, SENDCo, Lead Counsellor and Lead Nurse.

Important pastoral information that is important for all staff to know will be kept on iSAMS or otherwise shared.

Regarding safeguarding issues, it is especially pertinent to pass on any of the following to a pastoral lead for a pupil or DSL:

- Patterns of attendance
- Changes in mood
- Changes in classroom functioning
- Relationships (with peers and adults)
- Behaviour
- Statements made by the child, comments, stories, 'news', drawings
- General demeanour and appearance
- Home/family changes
- Medicals
- Response to PE/Sport

- Injuries/marks – past and present

vi) Referrals to Social Services (through BIFD) and Early Help

When the school makes a referral, we will consider whether the pupil needs urgent protection. If the child is in immediate danger or is at risk of harm, the school will make a referral to children’s social services and/or the police immediately.¹ In Bedford Borough, the school will follow [recommended procedures](#) for contacting the Bedford Integrated Front Door using the contacts in this document.

Where there is concern, but not immediate danger, the school will consider the option of applying for Early Help. Early Help means providing support as soon as a problem emerges at any point in a child’s life. In practice this could mean enrolment of the child or family in services focusing on inclusion, education welfare or positive parenting. Bedford Borough offers wide-ranging [Early Help](#) services. Staff should be alert to the potential need for Early Help for a child who shows any of the characteristics outlined to be aware of in KCSIE part I and *Working Together to Safeguard Children*. The guidance for doing this effectively from Bedford Borough will be followed.

Staff should be alert to the need for Early Help for a child who:

- is frequently missing/goes missing from education, home or care;
- has experienced multiple suspensions and is at risk of being permanently excluded from school;
- has a parent or carer in custody or is affected by parental offending.

Before making any referral, staff should discuss safeguarding concerns about a pupil with the DSL if possible.

The Bedford Borough Safeguarding Children Partnership uses [referral thresholds](#) to determine how they will respond to the referral. They should decide within one working day what actions should be taken.

When referring, anything said by the pupil should be written down as a verbatim report. Information will be recorded in factual, non-emotive, non-judgmental terms, with notes of the time, date and context of the events in question. Any referral to BIFD must be recorded on CPOMS; most online referrals give the option of saving a PDF and this can be uploaded as a record.

vii) Child Protection Records and the Data Protection Act

We recognise the importance of sharing information with local agencies and that the General Data Protection Regulation (GDPR) and Data Protection Act 2018 do not prevent, or limit,

¹ This would include any child whose needs may meet the threshold for statutory intervention under the Children Act 1989 such as those considered to be ‘in need’ for the purposes of the Act, those who may be suffering, or are likely to suffer, significant harm, and/or those who may be in immediate danger and in need of immediate protection.

the sharing of information for the purposes of keeping children and young people safe. Child Protection records can be kept on computer and are exempt from the disclosure provisions of the Data Protection Act.

All staff should understand that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data without consent when there is a good reason to do so. Staff will also consult the [DfE Data Protection guidance for schools](#), as required.

For older manual records, the Education (School Records) Regulations 1989 exempt information relating to child abuse from the requirement of disclosure. However, in cases of alleged child abuse which come to court, the court may require the school to provide its Child Protection records.

viii) Supporting the Pupil

Protecting a pupil by only telling staff what is necessary to keep them safe is a principle we follow. The school will provide appropriate support to a child who has been or may have been abused or neglected, which may include arranging time with the counsellor, Chaplain, or other services and pastoral leads in school; or implementing measures suggested by the Bedford Borough Safeguarding Children Partnership. In nearly every case, the pupil's Tutor and Housemaster/Head of Year will be a key support in school.

ix) Supporting Staff

We accept that staff working in school who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL or Lead Counsellor and to encourage further support, particularly through the Employee Assistance Program available to all Harpur Trust staff. Further information for staff can be found in the Staff Handbook.

x) 'Whistle-blowing'

Whistle-blowing is the mechanism by which staff can voice their concerns, made in good faith, without fear or repercussion. All concerns about adults should be reported, including any 'low-level' concern, so that it can be dealt with promptly and appropriately.

Procedures for whistle blowing are outlined in the staff code of conduct and the Harpur Trust Whistleblowing Policy.

5. Specific Safeguarding Issues and Procedures

xi) Bullying, Child on Child Abuse, Sexual Violence and Sexual Harassment

Our approach to all child-on-child abuse and sexual violence and harassment has been developed in conjunction with the safeguarding leads at other Harpur Trust schools.

All child-on-child abuse is unacceptable, and we take a zero-tolerance approach to this.

It is useful to consult the following site if unsure of definitions for types of sexual violence and harassment: <https://www.legislation.gov.uk/ukpga/2003/42/contents>

Abuse between young people is abuse and should never be tolerated or passed off as mere 'banter', 'having a laugh' or 'part of growing up'. Staff should be clear as to the school's policy and procedures regarding child-on-child abuse and act on them.

KCSIE cites Lucy Faithfull Foundation's 'Shore Space'. which offers a confidential chat service supporting young people concerned about their own or someone else's sexual thoughts and behaviours.

Abusive behaviours could indicate that the perpetrator may present an on-going risk to pupils. Any abusive or unkind behaviour (even if it may appear to be relatively innocuous), or harmful sexual behaviour of any kind, should be addressed to help prevent problematic, abusive and/or violent behaviour in the future.

All staff should be aware that children are capable of abusing their peers. Even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and simply not being reported. The school recognises that not acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment, and in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Examples of child-on-child abuse include:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between peers;
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence and sexual harassment;
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos;
- 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;
- Initiation/hazing type violence and rituals.

We believe in adopting a contextual approach to safeguarding, recognising that children are vulnerable to abuse in a range of social contexts, including amongst their peers in school and out of school, and in spaces where their parents or guardians may have little influence.

All staff, but especially the Designated Safeguarding Lead (and deputies), should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. There may also be risk to siblings in such contexts that must be considered and acted on appropriately by the DSL.

Bullying is one form that child-on-child abuse can take. Our policies on anti-bullying and anti-cyberbullying are set out in a separate policy document. We acknowledge that bullying and cyberbullying are serious safeguarding issues and our policy outlines how we deal with allegations of bullying and how victims are supported.

- [Sharing Nudes and Semi-Nudes](#)

Our Anti-Bullying and Anti-Cyberbullying Policy also sets out how sharing nudes and semi-nudes or 'sexting' is dealt with. Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending material of this nature can happen in any relationship and to anyone, whatever their age, gender or sexual orientation. It may be a form of child-on-child abuse. Staff who become aware of sharing of nudes and semi-nudes, or youth-produced sexual imagery, should be aware of [Searching, Screening and Confiscation Advice](#) (July 2022) and [UKCIS guidance](#) (updated in 2024).

'Upskirting', the act of taking a picture underneath someone else's clothing, is a criminal offence under the Voyeurism (Offence) Act 2019. The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable.

Further guidance and toolkits are available through:

[London Grid for Learning-collection of advice](#) – Various information and resources dealing with the sharing of nudes and semi-nudes.

[UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) – Advice for schools and colleges on responding to incidents of non-consensual sharing of nudes and semi-nudes.

- [Sexual Violence and Sexual Harassment](#)

There are many other forms of child-on-child abuse. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence refers to acts of rape, assault by penetration or sexual assault. Sexual harassment refers to unwanted conduct of a sexual nature that can occur online and offline. This may include sexual comments, sexual 'jokes', or physical behaviour. Some children are particularly vulnerable to physical, sexual and emotional abuse by their peers, including pupils with SEN and/or disabilities.

The school recognises the gendered nature of some forms of child-on-child abuse. It is more likely that girls will be victims and boys perpetrators. Although the school is a boys' school, we recognise that our pupils could be the perpetrators or the victims of child-on-child abuse involving pupils outside of the school as well as other pupils at the school. We educate our pupils in how to behave responsibly with all peers of all genders, with particular emphasis in our PSHE programme on issues such as consent, appropriate behaviour and issues particularly faced by women and girls.²

Staff should always be aware, and intervene and challenge inappropriate behaviour to help prevent problematic, abusive and violent behaviour in future. Challenging physical behaviour (potentially criminal in nature), such as grabbing buttocks, breasts and genitalia, pulling down trousers, flicking bras and lifting-up skirts is crucial to ensuring a zero-tolerance approach.

- Procedures to minimize the risk of and from child-on-child abuse:

The school actively seeks to raise awareness of and prevent all forms of child-on-child abuse by training all staff and volunteers on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify, report and respond to it. We educate pupils about the nature and prevalence of child-on-child abuse via PSHE and the wider curriculum. They are regularly informed about the school's approach to such issues, including its zero-tolerance policy towards all forms of child-on-child abuse. All child-on-child abuse issues are fed back to the school's safeguarding lead so that they (with other pastoral leaders) can identify and address any concerning trends, and identify pupils who may need additional support. We aim to challenge the attitudes that underlie such abuse by championing the school's values and applying them to moral situations, including encouraging a culture of respect amongst all members of the school community. Further preventative measures specific to bullying and cyberbullying are outlined in the anti-bullying policy. The Designated Safeguarding Leads of the Harpur Trust Schools meet regularly and work together to review trends and share best practice.

The school takes action to make sure systems to report abuse are well promoted, easily understood and easily accessible so children can confidently report abuse at school, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. Pupils are also educated about anonymous external services, such as Childline, if they feel they cannot share their concern in school. We remind pupils frequently of these procedures in tutor time and assemblies, via posters around the school, and information on the pupil portal of the school website.

- How allegations of child-on-child abuse will be recorded, investigated and dealt with:

If a child discloses that they have been abused, the person taking the disclosure should follow the procedures outlined in Section 4 of this policy. Next steps may be supported by other

² The school follows statutory guidance [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#) (updated 2021) following guidance and using resources available at [Teaching about relationships, sex and health](#) (updated 2021).

agencies, such as children's social care and the police, as required. Where the report includes a digital element, staff should not view or forward illegal images of a child.

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider: the victim, especially their protection and support; the alleged perpetrator; and all the other children (and, if appropriate, adult pupils and staff) at the school. The school will follow the guidance laid out in the DfE's [Sexual violence and sexual harassment between children in schools and colleges](#) (2021) and the guidance section in *KCSIE*.

The response to the incident will take one of four stages, as laid out in *KCSIE* but always emphasizing a zero-tolerance approach and with all concerns, discussions and decisions recorded:

- a) Manage internally, only if none of the below are appropriate, using the behaviour policy and pastoral support in the school.
- b) Referral to Early Help, where a referral to the services below is not required but support for children involved would help alongside school approaches to manage internally.
- c) Referral to local authority children's care, where a child has been harmed, is at risk of harm or is in immediate danger. We will work alongside children's services to support the children involved but will not wait for any outcomes to proceed with protecting a victim and other children.
- d) Call the police, especially if there has been a case of rape, assault by penetration or sexual assault. The guidance on [when to call the police and other support available](#) may be useful if unsure. A discussion will be had with the police about what information can be shared, particularly with perpetrators and their parents or carer. Ongoing discussion should happen about information sharing and best ways to protect and safeguard children in the school. The school will not wait for decisions from the police to begin supporting children involved but will work alongside local safeguarding partners continually to support all children affected.

All staff should reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. 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.

If a child is convicted or receives a caution for a sexual offence, the school will review its assessment of risk to the children involved and the wider school community and will proceed with a disciplinary approach as outlined in the behaviour policy.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should 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 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 as per the

behaviour policy. The school's response will be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions will be recorded.

- How victims, perpetrators and any other child affected by child-on-child abuse will be supported:

In the event of disclosures about child-on-child abuse, all children involved, whether perpetrator or victim, are treated as being at risk. In all cases where a child has been harmed, is at risk of harm, or is in immediate danger, the school should make a referral to local children's social care where advice will be sought regarding further action.

Further information on our policy for dealing with sexual violence and harassment and supporting pupils involved, developed in line with other Harpur Trust schools, can be found in Annexe E.

6. Procedures for acting when concerned about a member of staff

If an allegation is made against a member of teaching or non-teaching staff (including supply staff and volunteers and other adults such as contractors), responding to it appropriately and in the timeliest manner possible must be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, unnecessary delays should be avoided. The school will follow the guidance laid out in *KCSIE*.

KCSIE describes two types of allegation: 1) Allegations that meet the harms threshold, i.e. where the allegation might indicate a person would pose a risk of harm if they continue to work or volunteer in their present position; and, 2) Allegations or concerns that do not meet the harms threshold, called 'low level concerns'.

The school will not undertake their own investigations of allegations that meet the harms threshold without prior consultation with the Local Authority Designated Officer (LADO), or in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, discussions with the LADO can be held informally and without naming the school or individual.

All allegations are to be reported straight away to the Head or the DSL. In their absence, it would be reported to the Chair of Governors who would ensure that the LADO is informed without delay. Note: any member of staff may make a referral to external agencies. Details of the LADO are given in the 'Contacts' Section of this policy. All action must be carefully recorded.

The discussion with the LADO will consider the nature, content and context of the allegation, and a course of action will be agreed, including any involvement of the police. Discussions should be recorded in writing and any communication with the individual and the parents of the child will be agreed. Consideration should be given as to whether the member of staff

should be suspended from their duties while an investigation is carried out. Schools are obliged to make every effort to maintain confidentiality and guard against unwanted publicity up to the point where the accused person is charged with an offence or until the Department of Education and/or Teaching Regulation Agency publish information about an investigation or decision in a disciplinary case.

If a pupil makes an allegation against the DSL with responsibility for Child Protection, the member of staff receiving the allegation must immediately inform the Head Master, who will inform the Chair of Governors, or the Governor with specific responsibility for Child Protection. They will ensure the LADO is informed without delay. In case of serious harm, the police should be notified from the outset.

The Disclosure and Barring Service (DBS) will be notified within one month of any person leaving the school whether employed, contracted, a volunteer or pupil whose services are no longer used because they are considered unsuitable to work with children. The school also has a duty to consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed if they had not resigned) and a prohibition order would be appropriate.

Concerns related to supply staff or contractors will be notified to their employers to look for any patterns of behaviour.

Allegations found to be malicious are removed from personnel records; records are kept of all other allegations, but those not substantiated, unfounded or malicious are not referred to in employer references.

If there has been a substantiated allegation against a member of staff, the school will work with the LADO to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

The school's procedure for dealing with low-level concerns is outlined in the low-level concerns policy. A low-level concern can be brought to the Head Master or the DSL.

In general, the approach will normally be to speak directly to the person who raised the concern, unless it has been made anonymously; and to the individual about whom the concern was raised, and any witnesses. The information collected will help to categorize the type of behaviour and determine what further action may need to be taken. Information collected will be recorded in writing along with the rationale for any decisions or action taken. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

We encourage staff to self-report any issues that arise between them and young people which are, or could be interpreted to be, inappropriate.

xii) [Procedures for acting when abuse by the Head is alleged](#)

Procedures follow those specified in the section above, except that the abuse should be reported to the Chair of Governors without informing the Head or DSL first. The Chair of

Governors or DSL will inform the LADO without delay within 24 hours and any action taken should be by the Chair or other members of the Governing Body.

xiii) Procedures for acting when abuse by a volunteer or other adult is alleged

Procedures follow those specified in sections above for staff members.

xiv) Procedures for acting when there are organisations or individuals using the school premises and out of school activities

When activities out of term time are run by the school as part of our normal education such as training camps and trips, then normal school safeguarding arrangements will apply. When the school runs its own enterprises that bring pupils onto site then our own safeguarding procedures will apply, and a member of staff will be allocated to have lead responsibility for safeguarding and act as a deputy DSL. They will be someone trained to the same level as a DSL. When external groups are hiring the school's facilities there will be checks of their procedures and policies to ensure they are appropriate in their approach to safeguarding children. When a new company hires school facilities their safeguarding policies will be checked as part of the contractual agreement. Two members of the Events team and lead managers for the operation of the estate are DSL trained to enable appropriate lenses for checking contracts and choices of external providers, and to provide a suitable level of training to act if any safeguarding concern is raised as part of the business run by external providers. A procedure for how to act in the event of safeguarding concerns during the holidays and for external providers is documented as an internal training document and reviewed annually. As a principle, the same procedures used internally will be applied for external providers if a concern is raised and not followed up by a provider adequately.

xv) Private Fostering

A private fostering arrangement is essentially one that is made privately (i.e., without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or with parental responsibility or a relative in their own home. Guidance outlined in KCSIE and the Children Act 1989 will be followed with regards to fostering.

The school might sometimes make arrangements for children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to which they are not related. This might happen, for example, as part of a foreign exchange visit or sports tour. Such arrangements could amount to 'private fostering' under the Children Act 1989 or the Safeguarding Vulnerable Groups Act 2006, or both.

If the school makes the arrangement for a pupil with a host in the UK, it will request a DBS enhanced check (which will include barred list information) to help determine the host's suitability for the arrangement. However, where the parents make the arrangements themselves, this will be a private matter between the child's parents and the host parents and

in these circumstances the school will not be acting as the regulated activity provider. The DBS cannot access criminal records held overseas. Host families in other countries, therefore, cannot be checked in the same way by local authorities as schools and colleges in the UK when children stay abroad but due checks to be reassured of safety should be completed, using ISI guidance.

Where the school has not been involved in making a private fostering arrangement but a member of staff or volunteer at a school becomes aware that a pupil may be in a private fostering arrangement, they should raise this in the first instance with the DSL. The school will notify the local authority of the circumstances, and the local authority will check that the arrangement is suitable and safe for the child.

7. Online Safety

The school takes online safety seriously and recognises the risks posed by the internet and digital technologies to children. Areas of risk include:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact:** being subjected to harmful online interaction with other users; 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.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and conduct (personal online behaviour that increases the likelihood of, or causes harm;
- **commerce** (risks such as on-line gambling, inappropriate advertising, phishing and/or financial scams). If there are concerns that someone may be at risk please contact the DSL and report it to the Anti-Phishing Working Group (<https://apwg.org>)

Online safety education is considered whilst devising and implementing policies and procedures, planning the curriculum, considering staff training needs (including the DSL) and parental engagement.

The school has a clear policy on the use of mobile and smart technology. The School Rules state that digital technologies must be used responsibly. This means using them for legitimate reasons at school such as: checking emails, accessing school resources and keeping organised. The rules are posted around the school on posters and reinforced through school and house assemblies. It is not appropriate use to take or share photographs of people without their permission, play games or go on social media and to send or view anything inappropriate or that has the intention to hurt or demean others (cyber-bullying). Boarding houses look after younger pupils' mobile devices overnight and reinforce the acceptable use policy and reminders about the '4 Cs' above regularly.

The school has appropriate filters and monitoring systems in place in its IT system which block users from accessing unsuitable, age-inappropriate or dangerous material. These are reviewed at least annually, and the DSL takes responsibility for oversight of this. We take a whole-school approach to online safety to ensure that pupils in our school are taught about safety online in line with DfE guidance in [Teaching Online Safety In Schools](#) (updated 2023), in the PSHE program and in assemblies. Online safety training for staff, including responsibilities for filtering and monitoring, is integrated into the annual safeguarding training and updates are provided to all school staff, including part-time staff. This includes guidance to enable staff to identify children who may be at risk of harm as a result of their own or others' use of technology or the internet, and how to intervene and escalate such cases appropriately in accordance with the child protection procedures set out in this policy.

The Department for Education has published [Generative AI: product safety expectations](#) to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

Parents and guardians have access to guidance and support to help their children with use of digital technology through the parent partnership program and parent sections of the school website. They are also able to check what is expected of pupils in homework tasks online through the setting of tasks in online platforms. Where pupils may have to access learning online or engage with specific online materials beyond the normal expectations this will be communicated to parents.

Online safety and the effectiveness of the school's systems are reviewed by governors when both safeguarding and IT provision are reviewed. The school will review its approach to online safety annually by assessing the risks children face, which can evolve and change rapidly. The Director of IT manages and reviews our cyber security provision and updates the CMT and governors at least annually on its efficacy.

Where staff are interacting with children online, they will continue to follow our existing Staff Code of Conduct and the Acceptable Use Policy.

Staff must be alert to signs that a child may be at risk of harm online, and act on any concerns immediately. Ongoing training for pupils ensures they know how to report any concerns they have back to school, and signpost them to other sources of support too.

8 Full List of Useful Contacts

Designated Safeguarding Lead	Rachel Mellor 01234 362308 rachelmellor@bedfordschool.org.uk
Deputy Designated Safeguarding Leads	
Assistant Head Pastoral (Prep School)	Rachel Stratton Rstratton@bedfordschool.org.uk
Deputy Assistant Head Pastoral (Prep School)	Simon Lincoln slincoln@bedfordschool.org.uk
Senior Boarding Housemaster	James Marriott jmarriott@bedfordschool.org.uk
Senior Day Housemaster	Simon Everitt severitt@bedfordschool.org.uk
Head of General Education	Alice Swallow Aswallow@bedfordschool.org.uk
Vice Master	Sam Baldock Sbaldock@bedfordschool.org.uk
You can also contact the Head Master or headmaster, who are trained to act as deputy DSLs, they can be contacted on their own or via their PA's email addresses	jhodgson@bedfordschool.org.uk / akirkaldy@bedfordschool.org.uk isilk@bedfordschool.org.uk / dbeveridge@bedfordschool.org.uk
Nominated Safeguarding Governor	Dr Andrew Edwards
Chairman of Governors	John Holland-Kaye Tel: 01234 362241 or 01234 362244 (Contact via Bursary)
Bedford Integrated Front Door (BIFD, formerly known as MASH) Bedford Borough Council	Tel: 01234718700. Out of hours: 0300 300 8123 . Multiagency@bedford.gov.uk
Local Authority Designated Officer (LADO)	Sandeep Mohan Tel: 01234 276693 lado@bedford.gcsx.gov.uk
Bedfordshire Police	Tel: 01234 841212 or dial 101 for non-emergency calls. For emergencies, dial 999, or 112 from a mobile.

Bedfordshire Police Education and Diversion Coordinator	Richard Denton Richard.Denton@beds.police.uk
Bedford Borough Early Help Assessment	https://www.bedford.gov.uk/social-care-and-health/children-and-families/early-help-families/early-help-assessment/early-help
Senior Education Welfare Officer, Bedford Borough Education Support Services	David Blake Tel: 01234 276043 EducationWelfareService@bedford.gov.uk
CAMHS	Tel: 01234 893301 elft.spoebedfordshire@nhs.net Further contact and referral information: https://www.elft.nhs.uk/services/north-bedfordshire-camhs
Prevent Duty Bedfordshire Police Contact	0207 340 7464 Counter.extremism@education.gsi.gov.uk Anti-Terrorism Hotline Tel: 0800 789 321
Children Missing Education Officer	Tel: (01234) 228178, CME@bedford.gov.uk Borough Guidance: https://www.bedford.gov.uk/schools-education-and-childcare/education-welfare-service/children-missing-from-education/
NSPCC whistleblowing helpline	Tel: 0800 028 0285. The line is available from 8:00 AM to 8:00 PM, Monday to Friday. Email: help@nspcc.org.uk

Further information is available from the following websites:

www.dcsf.gov.uk

www.nspcc.org.uk

DBS referrals address:

PO Box 181 Darlington County Durham DL1 9FA

Helpline Tel: 01325 953 795

Appendix 1: Child Protection Actions Summary

This summary is intended to be useful to you if you are dealing with any suspicions or disclosures of abuse, whatever type and whoever has perpetrated it.

If you **suspect** that a pupil is being abused but you don't know for sure, speak to the DSL (Rachel Mellor) who will advise on the best course of action. In the prep school, contacting the prep DSL (Rachel Stratton or Simon Lincoln) is ideal but this can also be referred to the senior school DSL and vice versa.

If the designated safeguarding lead(s) are unavailable, the deputy DSLs outlined in the contacts section can be contacted. If no DSL is available, the Head Master will act for Upper School pupils and the Prep School Headmaster will act for Prep School pupils.

You will need to document your concern in writing. The best way to do this is using CPOMS but not if it stops a referral being made. If the abuse has been perpetrated by another pupil, refer both pupils. You should then continue to monitor the situation and report any developments.

If you **know** that a pupil is being abused, you must speak immediately to a DSL. Do not delay your report.

If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to Bedford Borough children's social care (BIFD) immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration.

If a pupil wants to make a disclosure, receive the account and pass on the details, as above. Reassure the pupil but never probe. Record what happened in writing in detail with dates and times and, as far as possible, the exact words of the pupil, very soon after the disclosure.

Never guarantee confidentiality and never refuse to hear parts of disclosures. Avoid giving physical comfort, especially if you are alone with the pupil. Do not contact parents without being advised to do so, there may be information that you do not know. It is likely that parents will be spoken to before referral, but the DSL will lead on this decision making and advise accordingly. You may be required to be present at interviews with parents if you are part of a pupil's support network. The DSL or other senior staff will liaise with external agencies as appropriate.

Don't overlook the trivial: report all concerns so that we can see patterns when necessary. Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.

Be vigilant and listen well: abuse can and does happen to children in all types of schools. The child's welfare is the single most important factor. Pass on information promptly.

The school's full policy and more detailed information and advice (above) can be found on the school website. Bedford School does not use corporal punishment.

James Hodgson
Head Master
September 2025

Appendix 2: Specific Safeguarding Issues and Procedures

To guide staff and give clarity, our understanding of the forms of abuse that may be experienced by children and young people are below. This is followed by definitions and guidance for particularly vulnerable students as outlined in *KCSIE* Part I and annexe B. All staff need to know these and to know they can update their understanding in this section and from *KCSIE*.

Abuse is a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm, or by failing to act to prevent harm. A child may be abused by an adult or adults or another child or children. They may be abused in a family or in an institutional setting by those known to them, or more rarely, by others (e.g., via the internet). Harm can include children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects. Abuse can take place wholly online and technology may be used to facilitate off-line abuse. This section provides broad definitions of different categories of abuse, possible signs of abuse and their impact. Although these categories are useful, the types and indicators of abuse often overlap with each other. Staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label.

i) Physical Abuse

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

Possible signs of physical abuse: Bruising (without satisfactory explanation), burns (often recurrent), bite marks, parent/carers frequently alleging illness in a child, body covered in hot weather, reluctance to do PE or shower, self-harm.

Impact of physical abuse: It can lead to neurological damage, physical injuries, disability and occasionally death. Harm may be caused directly by the abuse itself or by the abuse taking place in a wider family context of conflict. Physical abuse has been linked to aggressive behaviour, emotional and behavioural problems and educational difficulties.

In making professional judgements, consider: the frequency of bruising/injury, context of injury, explanation from child and adult, parent response. 'Non-Accidental Injuries' may need to be followed up, too. If injuries keep occurring, issues of neglect and level of supervision need to be discussed with appropriate agencies.

ii) Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including

exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. Neglect may include the parent / carer failing to provide suitable education. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Possible signs of neglect: Constant hunger, poor personal hygiene, poor state of clothing, frequent lateness or non-attendance at school, untreated medical problems.

Impact of neglect: Severe neglect of young children is associated with major impairment of growth and intellectual development. Persistent neglect can lead to serious impairment of health and development, and long-term difficulties with social functioning, relationships and educational progress.

iii) Emotional Abuse

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

Possible signs of emotional abuse: Physical, mental and emotional development lags, over-reaction to mistakes, extremes of passivity or aggression, continual self-deprecation, self-harm, inappropriate emotional response to painful situations. It may be when an adult constantly behaves in an uncaring or hostile way towards a child or young person, perhaps by bullying, rejecting, frightening or criticising them.

Impact of emotional abuse: Emotional abuse has an important impact on a developing child's mental health, behaviour and self-esteem. It can be especially damaging in infancy. Domestic violence, adult mental health problems and parental substance misuse may be features in families where children are exposed to such abuse.

iv) Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual

activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse of children by other children is a form of child-on-child abuse which is considered further in section xi of this policy.

Possible signs of sexual abuse: Children displaying knowledge or interest in sexual acts inappropriate to their age; children using sexual language or having sexual knowledge that you wouldn't expect them to have; children asking others to behave sexually or play sexual games; children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

Impact of sexual abuse: Victims of sexual abuse may self-harm, demonstrate inappropriate sexualised behaviour, suffer with depression, and experience loss of or a poor self-esteem. They may show aggressive behaviour, lack of trust, or run away from home.

v) Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE) and Serious Violence

Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.³

If the child is coerced, manipulated or deceived into criminal activity, it is known as Child Criminal Exploitation (CCE).

CSE and CCE involve exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual or criminal activities. CSE is a form of sexual abuse and consent cannot be given. Child sexual exploitation is never the victim's fault, even if there is some form of exchange. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing

³ Department for Education, [Child Sexual Exploitation](#), February 2017.

education, and consensual or non-consensual sharing of nudes and semi-nude images and/or videos can be signs that children are at risk and should all be reported to the DSL immediately.

Further information and advice can be accessed through UK Council for Internet Safety guidance: [Sharing nudes and semi-nudes advice for education settings](#)

- vi) So-called 'Honour-based abuse' (including Female Genital Mutilation (FGM) and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Staff should always bring concerns to the DSL immediately. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities (including pupils' schools), need to be alert to the possibility of children being at risk of FGM, or already having suffered FGM. For example, if a pupil discloses knowledge or concern about FGM in their family or community, it is important for staff to know how to respond.

There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practice FGM. 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. Where a member of staff discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a statutory duty upon that individual to report it to the police.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. They should also discuss any such case with the school's DSL and involve children's social care as appropriate. In cases relating to girls over the age of 18, or if a member of staff suspects that FGM has been carried out, they should discuss their concerns with the DSL who should involve children's social care as appropriate.

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

pass it on and the school will act in accordance with guidance⁴. 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. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

vii) Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

Section 26 of the Counter-Terrorism and Security Act, places a duty on specified authorities, including local authorities and childcare, education and other children’s services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism (“the [Prevent](#) duty”). Bedford School has regard to government statutory [Prevent duty guidance for England and Wales](#) (updated 2023), and in particular Paragraphs 141-210, which are concerned specifically with Education.⁵

The Act also places a duty on local authorities to ensure Channel and Prevent Multi-Agency Panels are in place. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Following a referral, the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Referral to the Channel programme will be undertaken by the DSL but may also be undertaken directly by a member of staff. The Act requires partners of Channel panels, such as schools, to co-operate with the panel in the carrying out of its functions and with the police in undertaking the initial assessment as to whether a referral is appropriate.

As with managing other safeguarding risks, staff should be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection. Signs that could suggest radicalisation can include a withdrawal of isolation from former friendship groups, use of symbols or insignias, or use of radical or extremist language, or seemingly ‘scripted’ language. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. It should include a discussion with the Designated Safeguarding Lead and may result in making a referral to Prevent (prevent@bedfordshire.pnn.police.uk or 01 582 473080).

The DSLs and deputy DSLs undertake Prevent awareness training and can provide advice and support to other members of staff on protecting children from the risk of radicalisation. The

⁴ The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage](#) - GOV.UK (www.gov.uk) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

⁵ *Prevent* is supplemented by non-statutory advice and a briefing note: [The Prevent duty: Departmental advice for schools and childminders](#) (updated 2023) and [The use of social media for on-line radicalisation](#) (July 2015)

school accepts that effective engagement with parents or the family of the child should also be considered as they are in a key position to spot signs of radicalisation. The school would attempt to discuss any concerns in relation to possible radicalisation with a child's parents in line with Bedford Borough Safeguarding Children Partnership advice, unless they have specific reason to believe that to do so would put the child at risk.

The Prevent duty stipulates that visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised. All staff and pupils inviting speakers into the school should contact the Vice Master or the Assistant Head (Pastoral) in the Prep School, providing the name of the speaker, the purpose of their visit, the time and date of their visit, and supervision arrangements in place.

viii) Child absent or missing from Education

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Absence from education for prolonged periods, unexplainable and/or persistent absences is a potential indicator of abuse, CSE or CCE and neglect or other possible safeguarding concerns. The school works with the local authority to fulfil responsibilities set out in 'Children Missing Education' (updated 2024). All schools must inform the local authority of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more, but may report earlier. Staff must refer all concerns about a pupil's attendance to the DSL. The school's full Children Missing Education Policy is set out below in this policy as an Appendix.

The school also has an Attendance Policy and Missing Child Procedure which staff should refer to and follow in all cases of a child's unauthorised absence.

ix) Serious Violence, County Lines and Gang Involvement

Children are at risk of involvement in, or being victimised by, gun, gang and knife crime. 'County Lines' is when gangs (usually from urban areas) exploit children and use them to transport or sell drugs in smaller towns – often by enticing/paying them (initially) or manipulating/coercing them. They target the most vulnerable young people, and also children who might have access to more affluent clientele. Staff should be aware of the signs that a young person may be at risk and report any concerns to the DSL immediately. Indicators may include increased absence from school, a change in friendship groups, significant decline in performance, signs of self-harm, assault or unexplained injuries, possessing unexplained gifts or money. Other signs may include:

- Changes in emotional well-being, behaviour and attitude
- A person meeting unfamiliar adults
- The use of drugs and alcohol
- Individuals with multiple mobile phones, tablets or 'SIM cards'
- Relationships with controlling or older individuals
- Possession of weapons, drugs or paraphernalia

KCSIE states that being male, frequent absence or exclusion from school, and experience of maltreatment as a child are additional risk factors. Further government guidance for schools can be found in [Criminal Exploitation of Children and Vulnerable Adults: County Lines \(updated 2023\)](#) and [Advice to Schools and Colleges on Gangs and Youth Violence \(2013\)](#).

x) Children with special educational needs and disabilities

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs;
- Communication barriers and difficulties in overcoming these barriers. This can also apply to pupils who speak English as an Additional Language who may not have developed the vocabulary or confidence to make a disclosure.

Staff must consult the school's SEND and EAL registers and be particularly aware of pupils' individual needs, bearing these in mind when carrying out their responsibilities to be attentive to the signs of abuse and neglect; or in responding in the event of a disclosure.

xi) Mental Health

There is a link between mental health and safeguarding. Schools play an important role in detecting possible problems and supporting good mental wellbeing. It is part of our safeguarding responsibility to prevent impairment of children's mental, as well as physical, health and development.

All staff should be aware that mental health problems can, in some cases, be an indication of abuse, neglect or exploitation. Only appropriately trained professionals should diagnose mental health problems. However, school staff are well placed to identify behaviour which may indicate that a child is experiencing mental health problems or is at risk of developing this. Staff should immediately raise any mental health concerns with the Designated Safeguarding Lead (DSL) or deputy. The Deputy Head (Pastoral), Rachel Mellor, and Deputy Assistant Head (Pastoral) in the Prep School, Simon Lincoln, are the school's senior mental health leads.

Staff must be aware of how adverse experiences like abuse and neglect, can have a lasting impact on a child's mental health, behaviour and education. DfE guidance [Mental Health and Behaviour in Schools](#) (2018) sets out best practice in promoting children and young people's emotional health and wellbeing.

All staff should recognise the school's role in supporting pupils' mental health. It is also understood that stress resulting from their experiences during and following the COVID-19

pandemic means that some pupils will find circumstances challenging. Some pupils may experience high or acute anxiety. Some signs to be aware of include preoccupation and excessive worry, emotional and behavioural changes, showing signs of not being able to cope, avoidance of responsibilities or relationships, repetitive thoughts, or chronically thinking about risk and threat, rumination or thinking too deeply about a situation.

Other signs of poor mental health may be seen in a child's emotional state (fearful, withdrawn, low self-esteem); behaviour (aggressive or oppositional; habitual body rocking); interpersonal behaviours (indiscriminate contact or affection seeking, overfriendliness or excessive clinginess; demonstrating excessively 'good' behaviour to prevent disapproval; failing to seek or accept appropriate comfort or affection from an appropriate person when significantly distressed; coercive controlling behaviour; or lack of ability to understand and recognise emotions).

Whenever staff have concerns about a child's mental health or behaviour, these should be referred to the DSL in the same way as any other potential safeguarding concern, ideally with the pupil's Tutor and Housemaster also informed. When the school identifies that a pupil is having mental health difficulties, it will put support in place, and may seek or recommend specialist support in managing mental health concerns, for example via external agencies or services and/or encouraging pupils to use services available directly to them. These are outlined in the school's guidance to pupils and the medical centre stay up to date with available help.

xii) Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse), all of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. Staff must report any signs that might indicate domestic abuse to the DSL. Operation Encompass operates in every police force in England and can be contacted if concerned about domestic abuse. They also have a useful helpline. <https://www.operationencompass.org/>. The school subscribes to Operation Encompass in our area so we are informed of issues related to domestic violence when they are attended to by police.

xiii) LGBTQ+ Pupils

The school takes its duty to ensure every child is included and celebrated seriously. While a child identifying as LGBTQ+ may not be in itself an inherent risk factor for harm, children

who are can be targeted by others and those who are perceived to be, may also be vulnerable to this as well. Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open.

We have an LGBTQ+ allies group where pupils can discuss ways to support LGBTQ+ pupils and find support themselves from peers and the staff running it. We expect all pupils to be able to identify adults who are safe to talk with and it is vital all staff seek to reduce barriers to communication with pupils. Where a pupil does not trust the usual adults identified to support them, connecting them to another trusted adult is also part of our strategy and these are communicated in the 'Who can I talk to?' poster around the school site and in regular school messaging.

We follow guidance about teaching LGBT inclusion from the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum. We will not tolerate homophobic, biphobic and transphobic bullying and abuse and treat it as we do all abuse related to protected characteristics as described in our behaviour and anti-bullying policies. We recognise that that gender questioning children guidance is currently under consultation.

The DfE is due to publish revised guidance on gender questioning pupils. This policy will be revised once the guidance has been published.

xiv) Boarders

Our boarding community may face further risk as pupils who live away from home. Transitioning to and from home can place pupils under increased stress and provide worry. If there is a worry for a boarder at school or concerns provided by pupils within their house it can feel that they can't 'get away' from this. Some boarders, especially from overseas, may spend extended periods away from home and stay with people who they do not know very well during holidays. Staff in boarding houses check closely how pupils are doing during the holidays and follow all guidance on national minimum boarding standards to protect their welfare.

xv) Cybercrime

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

Cyber-dependent crimes include:

- Unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;

- ‘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;
- Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL will 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.

xvi) 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. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. We advise students on safe travel to and from school, including on trains and buses. We feel it is important that lessons focus on building children’s confidence and abilities rather than simply warning them about all strangers. We also aim to communicate community safety incidents to parents when we feel it is in their interests to be aware and work in conjunction with local policing to discuss strategies for this.

xvii) Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5- to 11-year-olds and 12- to 17-year-olds linked in *KCSIE*. We recognise that the stresses of such events may impact children and use the guidance in *KCSIE* to support them and their families.

xviii) Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. We will follow this to support any pupil for whom this applies.

xix) Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL will maintain awareness of contact details and referral routes into the Local Housing Authority so 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.

Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. In most cases, school 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 also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children and the designated safeguarding lead will ensure appropriate referrals are made based on the child's circumstances.

xx) Modern Slavery

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

Appendix 3: Staff Code of Conduct

All staff and volunteers should read this code of conduct in conjunction with the school's Safeguarding Policy. Although this code of conduct gives advice and instruction on how to deal with specific situations, it should not replace professional common sense and good judgement. Any breaches of the code will be treated in accordance with the school's disciplinary policy. All staff will be expected to sign to confirm that they have read the code of conduct.

1 Underpinning Principles

- The welfare of the child is paramount (Children Act 1989).
- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Staff should work, and be seen to work, in an open and transparent way.
- Staff should discuss and/or take advice promptly from their line manager or another senior member of staff over any incident which may give rise to concern.
- Records should be made of any such incident and of decisions made/further actions agreed, in accordance with school policy for keeping and maintaining records.
- Staff should apply the same professional standards regardless of gender, sexuality, age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation.
- All staff should know the name of their Designated Safeguarding Lead (Rachel Mellor), be familiar with local child protection arrangements and understand their responsibilities to safeguard and protect children and young people.
- Staff should be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

2 Duty of Care

Teachers and other education staff are accountable for the way in which they exercise authority, manage risk, use resources and protect pupils from discrimination and avoidable harm. All staff, whether paid or voluntary, have a duty to keep young people safe and to protect them from physical and emotional harm. This duty is in part exercised through the development of respectful, caring and professional relationships between staff and pupils, and through the behaviour demonstrated by staff which reflects integrity, maturity and good judgement.

Local Authorities (LAs), schools and parents have legitimate expectations about the nature of professional involvement in the lives of pupils. When individuals accept a role that involves working with children and young people, they must understand and acknowledge the responsibilities and trust inherent in that role.

3 Exercise of Professional Judgement

This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. However, it does highlight behaviour that is illegal, inappropriate or inadvisable. There will be occasions and circumstances in which staff have to make decisions or take action in the best interests of the child or young person which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children in their charge and, in so doing, will be seen to be acting reasonably. Ideally individuals should:

- Discuss any proposed action with a senior colleague whenever possible.
- Record the events and any discussions/actions taken with reasons.
- Self-refer low-level concerns.

4 Power and Position of Trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in educational settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

- Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.
- Our approach should be concerned, but professionally detached. Pupils should not be encouraged to develop excessive reliance on individual staff members.
- Where a person aged 18 or over is in a position of trust with a child under 18, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.
- Staff should under no circumstances engage in a romantic or sexual relationship, or any sort of friendship which blurs professional boundaries, with a pupil in this school or a pupil in any other school. Staff should not have unprofessional relations with recently-left former pupils of the school.

5 Confidentiality

Members of staff may have access to confidential information about pupils to undertake their everyday responsibilities. In some circumstances, staff may be given additional highly sensitive or private information.

- They should never use confidential or personal information about a pupil or their family for their own, or others', advantage (including partners, friends, relatives or other organisations).
- Information must never be used to intimidate, humiliate, or embarrass the pupil.
- Confidential information about a child or young person should never be used casually in conversation or shared with any person other than on a need to know

basis. In circumstances where the child's identity does not need to be disclosed the information should be used anonymously.

- There are some circumstances in which a member of staff may be expected to share information about a child, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass on information without delay, but only to those with designated child protection responsibilities.
- If a member of staff is in any doubt about whether to share information or keep it confidential, they should seek guidance from a senior member of staff.
- Any media or legal enquiries should be passed to the Core Management Team.

6 Propriety and Behaviour

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. They should adopt high standards of personal conduct to maintain the confidence and respect of their peers, pupils and the public in general.

An individual's behaviour, either in or out of the workplace, should not compromise their position within the work setting.

Staff should never:

- Make sexual remarks to a pupil or use any sort of sexual innuendo (including in email or any other form of communication).
- Discuss their own sexual relationships with, or in the presence of, pupils.
- Humiliate or demean a pupil, or encourage others to do so.
- Swear or use offensive language, including language which is discriminatory, in front of pupils.

Careful consideration must be given to the use of books or videos of an explicit or sensitive nature, particularly in relation to language or sexual behaviour, and due consideration should be given to the recommended age of films shown in class. There should always be a clear and demonstrable link with the scheme of work.

Staff have a duty to set a responsible example to pupils. They must therefore not consume alcohol in front of pupils unless at an appropriate school event, and in all cases alcohol must be consumed only in moderation, including on school trips. The best decision is always to not consume alcohol when pupils are present. No smoking or vaping is allowed on the school site.

Where a member of staff or volunteer is involved in an incident outside of school which did not involve children, it could still have an impact on their suitability to work with children. The school may consider what triggered the member of staff's actions and whether a child in the school could trigger the same reaction, thereby being put at risk.⁶

7 Dress and Appearance

⁶ See *KCSIE* guidance

Staff should dress in a way that projects a professional image to pupils, parents and other members of our community at all times. This will normally mean that standard business-style attire is worn for most school days, with appropriate kit for games, etc., being worn only at the necessary times.

When on the school site, staff should wear their lanyard and badge so that they are always easily visible.

Staff should consider:

- The manner of dress and appearance appropriate to their professional role which may be different from that adopted in their personal life.
- Staff should ensure that they are dressed decently (not viewed as offensive, revealing or sexually provocative), safely and appropriately for the tasks they undertake.
- Those who dress or appear in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegation.

8 Infatuations

Staff must be aware that it is not uncommon for pupils to be strongly attracted to a member of staff and/or develop an infatuation. All situations should be responded to sensitively to maintain the dignity of all concerned. Staff should also be aware that such circumstances always carry a high risk of words or actions being misinterpreted or for allegations to be made against staff.

A member of staff who becomes aware that a pupil may be infatuated with them, or with a colleague, should discuss this at the earliest opportunity with a senior colleague so that appropriate action can be taken. In this way, steps can be taken to avoid hurt, embarrassment and distress for all concerned.

9 Social Contact

Staff should not establish or seek to establish social contact with pupils for the purpose of securing a friendship or to pursue or strengthen a relationship. This applies online and in person. Even if a young person seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise their professional judgement in making a response and be aware that such social contact could be misconstrued.

Staff should not give their personal details such as home phone number or home email address to pupils unless the need to do so is agreed with the Core Management Team (this would be a rare occurrence). School email should be used for communicating with pupils in accordance with school policy. Personal email addresses should not be used and contact with a pupil via private social media should not take place; if in doubt, speak to the DSL. Chat groups for pupils in houses or on trips should use Microsoft Teams with school logins used.

Staff should usually only write letters or send emails to individual pupils about routine matters of academic study or pastoral care. Staff should avoid contacting pupils at home unless this is strictly necessary – keep a record of any such occasion and inform the DSL. If a member of staff believes it necessary to write a personal note or give a gift to an individual pupil, they

should discuss the purpose and context with the Vice Master or Deputy Head of the Prep School. Staff should not give gifts to an individual pupil outside of the school reward system, although small prizes for competitions, etc., are acceptable.

Staff should not enter boarding houses unless they are members of staff associated with that house, or are expressly invited by the Housemaster, DSL or Vice Master for a specified purpose.

Staff should not attend private pupil parties and should be aware of their professional standing and responsibilities when attending parties arranged by parents at which pupils are also present. Staff who are parents of pupils, friends with parents of pupils or voluntary workers in youth organisations attended by pupils should use their professional judgement to respect the spirit of this code. If in doubt, seek the advice of the Vice Master or Deputy Head of the Prep School.

10 Physical Contact

A 'no touch' approach is not always practical though it is an important general rule. When physical contact is made with pupils this should be in response to their needs at the time, limited in duration and appropriate given their age, stage of development, gender, ethnicity and background. It is not possible to be specific about the appropriateness of each individual occurrence of physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another, or with a different child. Staff should, therefore, use their professional judgement at all times.

Some staff, for example, those who teach PE and games, or those who offer music tuition, will on occasions have to initiate physical contact with pupils to support a child so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or to assist them with an exercise. This should be done with the pupil's agreement. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

There may be occasions when a distressed pupil needs comfort and reassurance. This may include age-appropriate physical contact though this should be avoided if at all possible. Staff should always remain self-aware in order that their contact is not threatening, intrusive or subject to misinterpretation. Where a member of staff has a particular concern about the need to provide this type of care and reassurance, they should seek further advice from a senior member of staff.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible, and copies given to the DSL.

There are occasions where a member of staff may need to use 'reasonable force', for example to prevent pupils from hurting themselves or others. The school advises staff to read the

government's guidance on [Use of reasonable force](#) (2013). The need to use force with pupils is extremely rare. If force is used, the member of staff should inform the DSL of the full details as soon as possible.

11 Showers and Changing

Young people are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision to safeguard young people, satisfy health and safety considerations and to ensure that bullying or teasing does not occur in spaces hidden from staff view. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.

Staff would therefore need to be vigilant about their own behaviour, ensure they follow agreed guidelines and be mindful of the needs of the pupils. A good guide is to knock and call out and ask for permission to enter any room where a pupil might be getting changed or showering.

12 Behaviour Management

All pupils have a right to be treated with respect and dignity.

Bedford School does not use corporal punishment. Corporal punishment is unlawful in all schools. Staff should also not use any form of degrading treatment to punish a pupil. The use of humour can help to defuse a situation but the use of sarcasm, demeaning or insensitive comments towards pupils is not acceptable in any situation. Approaches to behaviour management for teachers are outlined in training and policy.

13 Sexual Contact with Young People

Any sexual behaviour by a member of staff with or towards a child or young person is both inappropriate and illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether the child or young person consents or not.

There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child, and to manipulate that relationship so sexual abuse can take place. Staff should be aware that conferring special attention and favour upon a child might be construed as being part of a 'grooming' process, which is an offence.

14 One to One Situations

Staff working in one-to-one situations with children and young people may be more vulnerable to allegations. Teachers and others must recognise this possibility and should plan and conduct such meetings accordingly. Every attempt should be made to ensure the safety and security needs of both staff and pupils are met.

- Ensure all meetings whenever possible take place in an open area and not in remote or secluded locations around the school.

- Wherever possible, ensure there is visual access and/or an open door in one-to-one situations. If possible, use a door stop to keep doors open for the duration of the meeting.
- Inform other staff of the meeting beforehand, assessing the need to have them present or close by.
- Always report to a senior colleague any situation where a pupil becomes distressed or angry.
- Pre-arranged meetings with pupils away from the school premises should not be permitted unless approval is obtained from their parent and the Head Master or other senior colleague with delegated authority.
- Staff should not convey a pupil in a private vehicle unless advice has been sought from the DSL, and arrangements made with the parents of the child.

15 Educational Trips and Visits and After School Clubs

Staff should take particular care when supervising pupils in a residential setting or after-school activity.

During school activities that take place off the school site or out of school hours, a more relaxed discipline code or informal dress and language may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship and promotes safety.

Full guidance can be found in the DfE guidance [After-school clubs, community activities and tuition: safeguarding guidance for providers - GOV.UK](#)

Where out of school activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Pupils, staff and parents should be informed of these prior to the start of the trip.

Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in an out of school activity.

Dress on trips must be suitable and appropriate. Although dress will likely be less formal, it should still be in keeping with the advice above about professional standards. Staff members on trips are 'on duty' throughout, unless time 'off duty' i.e. explicitly granted by the trip leader.

Staff should only consume alcohol on trips in moderation when off duty. They should at no stage be considered to have consumed alcohol when in charge of pupils or inebriated when off duty but near pupils. For pupils, the Alcohol Policy applies on trips just as in school.

16 Internet and Device Use

The school has a clear policy for acceptable access and use of the Internet. Under no circumstances should adults in school access inappropriate images. Accessing child pornography or indecent images of children on the internet, and making, storing or disseminating such material, is illegal and, if proven, will invariably lead to the individual being barred from working with children and young people.

Using school equipment to access inappropriate or indecent material, including adult pornography, is a breach of the school's acceptable use policy and is likely to result in disciplinary action being taken. See the 'Social Conduct' guidance above about use of email and social media.

Personal equipment like phones should not be used to store images of pupils. If it is felt a personal device may be used for school business, e.g., social media content for marketing then photos should be put onto a school-based storage means and deleted quickly from personal devices.

17 Whistle-blowing

Bedford School aims to create a culture of safety and sharing concerns, reflective practice and valuing staff. Whistle-blowing is the mechanism by which staff can voice their concerns, made in good faith, without fear or repercussion. Staff should acknowledge their individual responsibilities to bring matters of concern to the attention of the Vice Master, Head Master and/or relevant external agencies as outlined in the Safeguarding and Child Protection Policy. This is particularly important where the welfare of children may be at risk. The Harpur Trust whistleblowing policy is linked in the safeguarding and child protection policy.

If a staff member feels unable to raise a safeguarding issue within the school, or that their genuine concerns are not being addressed, other whistleblowing channels are open to them. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally, staff can call: 0800 028 0285. The line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.

18 Sharing Concerns and Recording Incidents

All staff should be aware of the School's Child Protection procedures, including procedures for dealing with allegations against staff. Staff who are the subject of allegations are advised to contact their professional association. In the event of an incident occurring, which may result in an action being misinterpreted and/or an allegation being made against a member of staff, the relevant information should be clearly and promptly recorded and reported to the DSL or Head Master. Staff must be aware of the low-level concerns policy.

Members of staff should feel able to discuss with their line manager any difficulties or problems that may affect their relationship with pupils so that appropriate support can be provided, or action can be taken.

It is a requirement to report to the Disclosure and Barring Service (DBS) within one month of leaving the school, any person (employed, contracted, a volunteer or pupil) whose services are no longer used because he or she is considered unsuitable to work with children. In this context, ceasing to use a person's services includes dismissal, non-renewal of a contract, no longer using a teacher from a supply agency, terminating a pupil's placement, no longer using staff employed by contractors, no longer using volunteers, resignation or voluntary withdrawal from any of the above. Cases of serious misconduct by a teacher or anyone undertaking teaching work will be reported to TRA according to its [guidance](#).

19 Dignity at Work (Interactions with other members of staff)

Staff must not engage in any behaviour or conduct which may amount to harassment of another person at work. Harassment of any kind is regarded as a disciplinary offence and in serious instances may lead to instant dismissal. The full [Dignity at Work Policy](#) is available on SharePoint. Staff are expected to read and abide by it.

Harassment may take the form of unwanted conduct which is related to a relevant protected characteristic which is perceived as affecting an employee's dignity at work. It may also take the form of unwanted conduct towards someone based on their appearance or other personal characteristics which is perceived as affecting their dignity at work. It is not only unwanted physical contact, assault or propositions; it includes suggestive remarks or gestures, pin-ups, graffiti, offensive comments, jokes and banter. Harassment may include bullying, intimidating behaviour, persistent teasing or constant unfounded criticism of the performance of work tasks, unfair allocation of work and responsibilities, or exclusion from normal workplace conversation. It may be directed towards one individual or a group. A single incident can amount to harassment if sufficiently grave.

20 Other professional obligations for teaching staff

All teaching staff should refer to the Staff Handbook for details of further expectations. Teachers should also be aware of the key features of the regulatory system for teachers introduced on 1st April 2012 and of the type of conduct which could lead to the imposition of a prohibition order by the Secretary of State. Examples of such misconduct include violence, offences related to terrorism, fraud, serious dishonesty, class A drugs (particularly if supplying is involved), serious sexual misconduct, arson and other major criminal damage, serious driving offences (particularly those involving alcohol or drugs), serious offences involving alcohol, serious offences involving gambling and possession of prohibited firearms, knives or other weapons.

James Hodgson
Head Master
September 2025

Appendix 4: Attendance and Children Missing Education Policy

We recognise our duty as a school to promote good attendance at school to ensure the best outcomes for young people. Excellent attendance is an expectation of all pupils at Bedford School. This applies to all parts of the school day, beginning with morning registration and all lessons and games commitments from Monday to Saturday (Monday to Friday for years 3 to 5). We communicate this clearly with parents and train staff on their responsibilities to promote good attendance. Full details are set out in the school's Attendance Policy.

This policy has regard to the DfE statutory guidance [Children Missing Education \(2024\)](#); [Working Together to Improve School Attendance \(2024\)](#), the Education (Independent Schools Standards) Regulation 2014, Part 3, paragraph 15; section 175 of the Education Act 2002; Keeping Children Safe in Education and Working Together to Safeguard Children.

The Deputy Head (Pastoral) is responsible for all matters of attendance, their contacts are in the safeguarding policy and available from the Bellroom.

All procedures for notifying about absence are found on the parent portal, here: <https://www.bedfordschool.org.uk/portals/parents/reporting-absences/>

The school will hold more than one emergency contact number for each pupil wherever reasonably possible. This will be monitored using the school's database and parents or guardians of any pupil with fewer than two contact numbers will be requested to provide an additional number.

The school registers all pupils a minimum of twice each full school day, once at the start of the morning session and once during each afternoon session. Staff should report any concerns about a pupil's extended absence immediately to the DSL. Pupils arriving beyond the end of period 1 in the school day will be considered late and marked as such, though this can be changed if an appropriate reason is later communicated.

Pupil attendance is monitored through the daily Attendance Register by tutors, Housemasters, Heads of Year, Vice Master and Deputy Head (Prep School) and the DSL. Regular reports about pupils missing these periods are analysed by the DSL and communicated with these pastoral leads to ensure no absence patterns are missed and any pattern is quickly responded to. Parents have live access to their son's full attendance record through the secure parent portal.

Where monitoring of attendance identifies a concern about absence patterns a meeting will be held with the pupil and their parents to listen and understand any barriers to attending school. A plan for early intervention will be agreed to facilitate improved attendance that will be reviewed at an agreed time. These plans will take into account the specific needs of a pupil and their family that might provide specific barriers to attendance. This will happen for any pupil where absence meets local thresholds across a term but could also be related to patterns of absence or short prolonged bouts of not attending school.

We will work together with other schools where family members attend them or where they are a feeder or a destination for one of our pupils to promote good attendance.

More targeted support and intervention will be sought if a pupil's absence means they are absent more than they are present at school. In some cases, it might be identified and agreed that the barriers to attending school might be best solved by a part time timetable but this will be short term and will not be as a solution to manage behaviour. In rare circumstances an agreed strategy may be transfer to another school and this will be supported as a strategy in the best interests of a pupil improving attendance in an education setting.

With regard to examinations, we recognise that study leave should not be granted by default and used sparingly. We only permit study leave during external examinations, or during internal examinations for Fifth Form, lower Sixth and Upper Sixth, although provision to study in school remains available for all pupils.

Procedures to identify and respond to children who go missing

The school recognises its duty to act with the Local Authority to identify children missing education (children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school) and shares a belief that all children are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Children go missing from education for a range of reasons and they may be at risk of significant harm.

The school maintains an Admissions Register. If a pupil fails to attend school on the first agreed day of attendance, the school will undertake reasonable enquiries to establish the child's whereabouts and consider notifying the local authority at the earliest opportunity, especially if the child's whereabouts cannot be ascertained.

The school will follow through statutory safeguarding duties to investigate any unexplainable and/or persistent absences.

The school follows Bedford Borough's [guidance](#) on reporting the details of pupils who fail to attend school regularly. The School must report any continuous pupil absences, greater than 10 school days, where no reason is given, but may report sooner. This includes following guidance with regard to fixed penalty notices.

Notifying the Local Authority

The school will inform the Local Authority where a pupil's name is going to be deleted from the admission register in cases:

- when the child has been taken out of school to be electively home educated
- when the family has apparently moved away;
- when the child has been certified as medically unfit to attend;
- when the child is in custody for more than four months;
- when the child has been permanently excluded.

The Local Authority will also be notified when the school removes or adds a pupil's name to the admissions register at non-standard transitions, and will also provide information to the local authority for standard transitions if requested. The school recognises children missing

education as a safeguarding issue, particularly when a child leaves school with no known destination and will therefore also copy in the local authority where the child is normally resident.

Appendix 5: Approaches for dealing with incidents of sexual violence and sexual harassment

In supporting the victim, the pupil's age and the developmental stage, the nature of the allegations and the potential risk of further abuse will all come into consideration. The needs, wishes and feelings of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine and for school to feel a safe space for them. The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report. Support will be tailored on a case-by-case basis.

The support of a victim will however need to be balanced with the school's duty and responsibilities to protect other children. We will take into consideration:

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. For example, is an alleged perpetrator significantly older, more mature or more confident?
- Whether the victim has a disability or learning difficulty.
- If 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)
- Acknowledgment that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- Any ongoing risks to the victim, other children or school staff.
- Other health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC);
- Other support available.

We are also aware that victims may not disclose all information immediately and ongoing dialogue will be kept open and encouraged. The school will offer the child the opportunity to nominate a 'designated trusted adult' on the staff to communicate with if that would be helpful.

A victim of sexual violence or harassment may be traumatised and may struggle in a normal classroom environment. The school will avoid any actions that may serve to isolate the child, especially from supportive peer groups, but if the child wishes to withdraw from some

activities or work in a separate space then the school will make every reasonable effort to meet these wishes, in both the short and, if necessary, longer-term.

The school will do everything it can to protect the child from any bullying or harassment that occurs as a result of the report they have made, as well as safeguarding and supporting the alleged peer abuser and young people who have displayed harmful sexual behaviour.

The age and the developmental stage of the alleged perpetrator will also be considered. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them. The school will carefully consider the proportionality of the response. The level of support and nature of sanctions applied will be considered on a case-by-case basis. As stated in *KCS/E* and in line with the DfE guidance noted above, taking disciplinary action where appropriate and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.

HSB in young children may be (and often is) a symptom of their own abuse or exposure to abusive practices or harmful materials. A child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of the school. The school will seek the support and advice of children's social care, specialist sexual violence services and the Police in assessing how best to support the child concerned. Taking disciplinary action and providing appropriate support can, and should, occur at the same time if necessary;

If the alleged abuser moves to another educational institution, then the DSLs will ensure that the child's educational progress and support, ongoing needs, and potential risk of harm to others are communicated effectively to the new school or education provider.

Consideration will be given to supporting children who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required.

Following any report of sexual violence or sexual harassment, it is likely that some children will take 'sides'. The school will do all we can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed;

The school's main point of reference in the management of all cases of or concerns about peer-on-peer abuse is *Keeping Children Safe in Education* and the DfE guidance document.

Appendix 6: Role of the DSL

Rachel Mellor is the overall DSL of Bedford School, including both the Upper School and the Prep School. She takes lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring processes put in place. The Assistant Head (Pastoral) and their deputy in the Prep School, Rachel Stratton and Simon Lincoln, are also trained as a Designated Safeguarding Lead and concerns about safeguarding in the Prep School should be brought to their attention in the first instance. If the Designated Safeguarding Lead(s) are unavailable, the Head Master or Vice Master will act for Rachel Mellor and the Prep School Headmaster, Ian Silk, will act for Rachel Stratton or Simon Lincoln. If the Heads are also absent, the Senior Boarding Housemaster (James Marriott), Senior Day Housemaster (Simon Everitt), and Head of General Education (Alice Swallow) are also trained as Deputy DSLs and will take responsibility for handling safeguarding concerns in any part of the school.

As stated in Annex C of 'Keeping Children Safe in Education' the Designated Safeguarding Lead is expected to:

- **Manage referrals.**

This includes referring cases of suspected abuse to the local authority children's social care; supporting staff who make referrals to children's social care; referring cases to the Channel programme where there is a radicalisation concern and supporting staff who make referrals to the Channel programme; referring cases where a person is dismissed or left the school due to risk or harm to a child to the Disclosure and Barring Service; referring cases where a crime may have been committed to the Police as required.

- **Work with others.**

Day to day this is as a support for staff to give advice and expertise but also liaising with safeguarding partners. It also means expertise of staff will be sought to support safeguarding concerns linked to SEND, mental health, online and digital issues and for general pastoral awareness of individual pupils.

This also involves working with parents and carers to promote supportive engagement and to assist with challenging circumstances.

This will mean liaising with the Head Master to inform them of issues, especially queries under section 47 of the Children Act 1989 and police investigations. This includes awareness of the requirement for children to have an appropriate adult and is guided by PACE Code C 2019.⁷

Taking lead responsibility, working with the Head Master and other strategic leads where appropriate, for promoting educational outcomes by knowing issues faced by children in need and being aware of the impact of their needs on attendance, engagement and achievement. This will mean ensuring the school knows of children with a social worker and supporting staff to provide additional adjustments and

⁷ <https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible>

support for children who have had a social worker and recognising that even when statutory social care has ended there can still be a lasting impact.

- **Manage information sharing and the child protection file**

The CPOMS database is used in the school to keep files up to date, stored securely and managed confidentially. The DSL ensures that only those who need to can access these records in line with guidance in KCSIE. It includes clear and comprehensive details of concerns, how they are followed up and resolved and notes of actions taken, and decisions reached and their outcomes.

Files will be shared with new schools within five days of the start of a new term, separate from main files and ensuring secure receipt from those who need to be aware, such as DSLs in the new school.

- **Raise awareness**

This includes ensuring that the school's child protection policies are known, understood and used appropriately, especially for new and part-time staff; working with governors and ensuring that this Safeguarding and Child Protection Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly; ensuring the policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made and the role of the school in this; linking with the local LCSB to make sure staff are aware of training opportunities and the latest local policies on safeguarding. It also means helping promote educational outcomes with teachers and school leadership staff by sharing information about children who have or have had a social worker about issues they are experiencing.

- **Develop their training, knowledge and skills**

This includes, as a minimum, relevant training for DSLs every two years for themselves and deputies, including Prevent awareness training, and refreshing knowledge and skills at regular intervals and at least annually by, for example, meeting other DSLs and carrying out reading on safeguarding developments in order to:

- Understand the assessment process for providing early help and intervention. The DSL is familiar with '[Protecting Children: The Bedfordshire and Luton Safeguarding Children Board Procedures](#)';
- Have a working knowledge of how local authorities conduct a child protection case and child protection review conference and so be able to attend and contribute to these effectively when required to do so;
- Understand the importance of the role in providing information and support to local authority children's social care and understanding the impact that adversity and trauma can have and what is needed to respond to this in promoting educational outcomes;
- Be alert to specific changes of children in need, those with special education needs, relevant health conditions and young carers. Where a child has a social worker, the DSL should liaise with them so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes;

- 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;
- Understand the unique risks associated with online safety and maintain confidence in the capability required to keep children safe when online at school. Furthermore, to understand the additional risks that can be faced by pupils with SEND online and confidence in the capability to support them;
- Obtain access to resources and encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in the measures that the school takes to protect them.

- **Provide support to staff**

The DSL's training and skills should allow them to support and advise staff on safeguarding and child protection matters, including specifically supporting them during the referrals process and helping them to consider the links between safeguarding, welfare and educational outcomes to inform their provision of academic and pastoral support.

- **Understand the views of children**

It is important all children feel heard and understood so the DSL and deputies will be supported in developing knowledge and skills to develop a culture of listening to children and taking account of their wishes and feelings amongst all staff and in measures to protect them. They must also understand and help all staff to understand the difficulties that children may have in approaching staff about their circumstances and the need to build trusted relationships to facilitate communication.

- **Hold and Share Information**

This will mean following guidance in KCSIE to ensure they are equipped to understand information sharing, especially in school transfers and with safeguarding partners and other agencies; understand relevant data protection legislation, especially the Data Protection Act 2018 and UK GDPR and being able to keep accurate, secure written records of concerns and referrals and the purpose of this. As well as keeping records of concerns, discussions and decisions, the DSL should keep a record of the rationale for any decisions made.

In addition, the DSL will:

- Monitor the attendance of any pupil currently deemed to be at risk and refer concerns, when appropriate, to the Bedford Borough Council [Education Welfare Service](#) in the first instance.